Appendix 1A: Responses to the Local Plan for Derby, Regulation 19 Consultation

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

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

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

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
1. Introduction						
The Coal Authority	Introduction	N/A	N/A	N/A	The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records do not indicate the presence of any coal mining features at surface or shallow depth, which may pose a risk to surface stability and public safety, within the Derby City area. On this basis the Planning team at the Coal Authority have no specific comments to make on this consultation document.	
George Fletcher*	Introduction	Object			Thank you for your notice about the Regulation 19 (Submission Plan) Consultation.	

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					As far as I'm concerned the regulation 18 "consultation" is null and void because nobody was told of its existence. I only heard through another individual who had found out. I assume this lack of publicity was intentional by the council, since clearly a lot of local objections would be against the council's wishes.	
Community Campaigner David Barton	Paragraph 1.1	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding	Entirety of Document: "Authentic Traditional Architecture Design Codes will be integrated to accord with all key stakeholders' requirements providing practical benefits alongside strong economic, ecological and environmental advantages."

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					biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Marrons on behalf of Ainscough Strategic Land	Paragraph 3	Support		Yes	We raise no objection to the proposed plan period. The period to 2043 provides an appropriate long-term framework for planning and investment decisions and is sufficient to support the strategic delivery of housing, employment and infrastructure. Our representations therefore focus on the extent to which the Plan's strategy can be demonstrated to meet identified needs and be effectively delivered over that period, rather than the duration of the plan period itself.	
2. Spatial Portrait						
Community Campaigner David Barton	Paragraph 4	Object	Yes	No	Authentic Traditional Architecture Design Codes must be so integrated to ensure circular success for all key stakeholders.	Entirety of Document- Authentic Traditional Architecture Design Codes must be so integrated to ensure that residents and businesses can harness this greatest USP of Derby.
Historic England	Paragraph 4	Support			We support the varied references to the historic environment within the first two chapters and consider they are useful to set the scene about the importance of heritage within the City, and its need to be protected and conserved.	
Rob Hoddinott	Paragraph 6	Object	No	No	HA16 is contrary to this. You mention “however spatial Inequalities persist in regards to the accessibility to Green spaces” this proposal makes this even worse, How can a local plan be authorised to exacerbate a problem.	Move to non green spaces location

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Rob Hoddinott	Paragraph 10	Object	No	No	HA 16 is removing the park space that is to fondly mentioned here.	Move to brownfield location.
Roy Woolley*	Paragraph 10	Object	Yes	No	Matter / Policy Reference: Section 2 (Spatial Portrait, Para 10), Section 13 (City Centre, Paras 663, CC4c), and the Infrastructure Delivery Plan (IDP) Soundness Tests Failed: Positively Prepared, Justified, and Consistent with National Policy (NPPF 96(c) – Promoting Healthy and Safe Communities) 'Data Deficits' is the technical background PDF uploaded in response to 485 with file name Data_Deficits_Regulation_19_Draft__Roy_Woolley_FINAL.pdf. Reason the Policy is Unsound: The plan presents an unevidenced and contradictory strategy for sport, leisure, and climate resilience. 1. The Aquatic Infrastructure Deficit: Paragraph 10 cites Moorways Sports Village as providing versatile leisure "for the whole community". In reality, closing Queen Street Baths in the City Centre has centralised aquatic provision into a single facility that is several miles away from the inner-urban core (Data Deficits, Section 8, 12); moreover, this site is already heavily used by multiple schools, swimming groups and employees located at the large Sinfin Rolls-Royce campus directly adjacent to it. Allocating thousands of new dwellings across the city - including the redevelopment of the Queen Street Leisure Centre site itself under CC4(c) and other areas - while simultaneously failing to replace local civic sports infrastructure, has created and will continue to deepen an acute social deficit. 2. Transport and Health Compounding: Section 96(c) of the 2024 NPFF explicitly states planning policies and decisions should "enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities	1. Modify the Infrastructure Delivery Plan (IDP) and developer contribution requirements (CIL / S106 schedules) to ring-fence funding to provide or reinstate an accessible, public indoor sports and aquatic facility within the central/inner-urban area. 2. Extend NO2 and PMx monitoring to the most densely populated/used sections of Osmaston Road. Plan ahead and establish a defined response mechanism should monitored levels approach or exceed relevant limit values. 3. Amend Chapter 10 and City Centre policies to explicitly require public urban cooling infrastructure, accessible green/blue respite spaces, and active health facilities capable of serving high-density residential populations.

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					between the most and least deprived communities". Moorways is located in an area (Osmaston) where poverty and reduced life expectancy have been recorded for decades. It is reasonable to assume that a significant proportion of the thousands of new residents wishing to swim will travel to Moorways by car, further increasing traffic density on an already heavily used stretch of road 3. Failure on Extreme Heat & Climate Respite: Chapter 10 (Climate Change, Paras 556–558) focuses heavily on flood risk but contains a complete policy void regarding urban cooling spaces, public heat respite, and accessible aquatic facilities.	
Community Campaigner David Barton	Paragraph 15	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic	Entirety of Document- Establish authentic Traditional Architecture Design Codes for new construction to bring cohesion amongst all key stakeholders on strong practical grounds.

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					Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Rob Hoddinott	Paragraph 17	Object	No	No	HA16 exacerbates this inequality by introducing a new group of people who are very deprived. HA16 location sits in Derby 024F neighbourhood for deprecation and this is “more deprived that most neighbourhoods within Derby”	Move to less deprived area.
George Fletcher*	Paragraph 18	Object	No	No	No assessment has been made on the adverse mental health effects on approximately 320 households in Wilmorton loosing their park.	The council needs to show that they have assessed the mental health effects on the residents of Wilmorton, and have compared this with the other 46 parks in Derby.
George Fletcher*	Paragraph 19	Object	No	No	Destroying the green space in the deprived area of Wilmorton is totally in opposition to the stated aim of improving wellbeing.	The council needs to demonstrate that it has compared the wellbeing effects of destroying the green space in all 46 parks in Derby. For example, the percentage loss of green space in Darley Park would be infinitely less.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Rob Hoddinott	Paragraph 19	Object	No	No	HA16 sits with Derby 024F neighbourhood for deprivation index and its worst score of all categories is Health and Disability, the policy indicates access to takeaways and the importance of open space to exercise. HA16 proposed area has a very high number of takeaways and the only open space is being removed/limited.	Move proposed location to less deprived area that can absorb these peoples health needs better
Jordan Booth	Paragraph 25	Object	Yes	No	In reference to Policy HA16: These are woodlands with mature trees and a grassy area for recreation. Have you truly evidenced the ecological and arboriculture value of the region? Were alternatives, which wouldn't flatten an ecological area and negate climate control contribution, considered?	The loss of biodiversity which freshens the area around us must be compensated if this plan is to go ahead. First and foremost, Policy HA16 must be reviewed to make sure it abides by the environmental aims of the proposal.
George Fletcher*	Paragraph 25	Object	No	No	As a key part of the structure of the city, green wedges play a pivotal role, so destroying Wilmorton Park is totally at odds with this. No assessment has been made into the proportion of the park will be destroyed by the 17 pitches.	Find an alternative location that isn't destroying a key green space for the approx. 320 Wilmorton households.
George Fletcher*	Paragraph 26	Object	No	No	Derby's 1,126.20 hectares of open green space is also protected due to its plentiful benefits such as health, biodiversity and reducing flood risk. Destroying Wilmorton Park is clearly at odds with this.	An alternative location needs to be found that does not involved destroying a key green space for the approx. 320 households of Wilmorton.
George Fletcher*	Paragraph 29	Object	No	No	A strength is an extensive green wedge and green infrastructure across the city. Destroying Wilmorton Park is completely at odds with this.	An alternative location needs to be found that doesn't involve destroying the key green space for approx. 320 households of Wilmorton.

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Rob Hoddinott	Paragraph 29	Object	No	No	Strength table talks about green spaces. HA16 is contrary to this.	Move to brownfield site
Marsha Ramroop Unheard Voice Consultancy Ltd*	Paragraph 29	Object	Yes	No	This plan says the right things about inclusion, and this Publication draft says more of them than the January draft did; my representations are directed at making sure it also does them, through policy wording that will hold at examination, in viability negotiation and on site. I would be glad to appear at examination in support of these representations if helpful, and to support the Council's work on inclusive engagement, equalities assessment and design review as the plan progresses.	I respond both as a resident of Derby and as Founder and Director of Unheard Voice Consultancy (UVC), an equity, diversity and inclusion consultancy specialising in Cultural Intelligence, inclusive leadership and culture change in the built environment. I am the author of Building Inclusion: A Practical Guide to Equity, Diversity and Inclusion in Architecture and the Built Environment (Routledge), was the inaugural Director of Inclusion and Diversity at the Royal Institute of British Architects, and lead-authored the Formula 1 DEI Charter with the Royal Academy of Engineering. I also serve as a Non- Executive Director at the Joint Nature Conservation Committee and the Marine Management Organisation; this response is made in a personal and UVC capacity and does not represent the views of either

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						body. Recognising that representations at this stage should address the tests of soundness, each representation below states the relevant ground. My overall position is supportive: the plan's brownfield and City Centre first strategy is right, its Spatial Portrait is honest, and this Regulation 19 draft is stronger on inequality than the January draft, now acknowledging at paragraphs 6 and 17 that spatial inequalities and uneven patterns of deprivation persist across the city. My representations are directed at one theme: ensuring that the plan's Inclusive City commitments are carried by policy wording strong enough to be effective at examination, in viability negotiation and in delivery. Where I object, I do so constructively and propose specific modifications.

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3. Vision and Objectives						
Community Campaigner David Barton	Paragraph 30	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	Entirety of Document- Authentic Traditional Architecture has the power to unlock Derby's full potential and so must be fully supported across each part of the Vision.

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Historic England	Paragraph 30	Support			We support the varied references to the historic environment within the first two chapters and consider they are useful to set the scene about the importance of heritage within the City, and its need to be protected and conserved.	
Home Builders Federation*	Paragraph 30	Object		No	HBF welcomes the Council's vision for the City Centre and the wider Derby area and the recognition in the Plan of the challenges facing the City, in particular the clarity around the approach to meeting the full requirement for new market and affordable homes, through development beyond the City boundary . However, we would suggest that the Plan could be doing more to support SME builders through additional small and medium sized allocations. HBF request that the role of all new housing, including new open-market housing, in creating a sustainable Derby and wider-Derby region is more explicitly recognised within the Plan's vision and objectives.	
Rob Hoddinott	Paragraph 30	Object	No	No	HA16 is not consistent with this vibrancy and health claim.	Move to brownfield site.
South Derbyshire District Council	Paragraph 30	Support			SDDC supports the vision of the of Local Plan, in particular (as set out in paragraph 32) that Derby will deliver sufficient homes to meet the needs of a growing popultation, (paragraph 45) that the City Centre will be transformed through residential led regeneration, and that Derby will remain compact and liveable.	

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South Derbyshire District Council	Paragraph 31	Object			the vision in the Local Plan should be focused on development within Derby City's administrative area and/or should be clear that development outside of the City's authoritiative boundary is not within the direct control of Derby City (e.g. pargraph 51).	
George Fletcher*	Paragraph 35	Object	No	No	Destroying Wilmorton Park is completely at odds with the aim of increasing green spaces.	An alternative site needs to be found that does not destroy the key green space for the approx. 320 households of Wilmorton.
Historic England	Paragraph 34	Support			We support paragraph 34 and recognise it as a really clear goal for the City Council to help steer appropriate development within the area.	
Rob Hoddinott	Paragraph 35	Object	No	No	HA16 is totally contrary to this claim.	Move to brownfield site.
Matthew Buchanan*	Paragraph 37	Object	Yes	No	Policy HA16 completely contradicts this paragraph and directly takes vital, accessible landscapes and footpaths away from a community with a lack of personal private recreation space	Policy HA16 is reconsidered and that the Council: publishes or identifies the assessment of a distributed-site alternative; demonstrates why HA16 performs better than reasonable alternatives; undertakes or publishes robust site-specific ecological and arboricultural evidence; demonstrates how existing active-travel routes and accessible public open space will be retained; and clarifies how the environmental effects

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						acknowledged in the Sustainability Appraisal are consistent with the Plan's wider policies on green infrastructure, biodiversity and trees.
Historic England	Paragraph 34	Support			Paragraph 37 would benefit from a reference to heritage.	
Historic England	Paragraph 38	Support			We support paragraphs 38 and 39 in the Plan and again see this as a clear goal for the City Council to help steer appropriate development within the area.	
Historic England	Paragraph 39	Support			We support paragraphs 38 and 39 in the Plan and again see this as a clear goal for the City Council to help steer appropriate development within the area.	
The Woodland Trust	Paragraph 40	Object	Yes	No	As drafted, the policy/supporting text does not clearly demonstrate how growth beyond the city's boundaries will be planned and managed in a manner consistent with the protection afforded to irreplaceable habitats in national policy. The plan is therefore not sound because it is not fully consistent with national policy and has not adequately justified how growth requirements can be accommodated whilst avoiding harm to ancient woodland.	For the plan to be sound, the Woodland Trust believes the Council should include explicit wording confirming that future site allocations and development proposals required to meet housing needs will avoid loss or deterioration of ancient woodland and other irreplaceable habitats, in accordance with national policy.
Councillor Tim Prosser	Paragraph 46	Object		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including:	

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					• New vision-level statements committing to make "sustainable and active travel the natural choice" and describing the cycling and public transport network as having been "strengthened." Para 46 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.	
George Fletcher*	Paragraph 50	Object	No	No	How can a "qualitive improvement" compensate for the destruction of Wilmorton Park?	An alternative location that does not lead to the destruction of a key green space for the approx. 320 households of Wilmorton need to be found.
Councillor Tim Proser	Paragraph 51	Object		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including:	

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					• A new test for “urban extensions,” requiring them to be planned as mixed-use places that “reduce the need for long car-based trips” and support “viable public transport, walking and cycling networks.” Para 51 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It’s been explained to me that these changes were made under delegated powers to **“make minor changes for the purposes of presentation, error correction and clarity”** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.	
George Fletcher*	Paragraph 56 OBJ2	Object	No	No	Destroying the open space at Wilmorton is totally at odds to this.	An alternative location needs to be found that does not involved destroying the key green space used by the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 56 OBJ2	Object	No	No	56. OBJ2 To develop stronger, safer and more cohesive communities through the provision of quality housing, employment opportunities, education, health care, open	Move to brownfield site.

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					space, sport, recreation HA16 is totally contrary to this objective.	
Marrons on behalf of Ainscough Strategic Land	Paragraph 56 OBJ2	Support		Yes	We support the principle of Objective 2 which seeks to develop stronger, safer and more cohesive communities through the provision of quality housing, employment opportunities, education, health care, open space, sport, recreation, leisure and community facilities.	
Councillor J Wright	Paragraph 56 OBJ2	Object		No	Not justified: • The Council at its meeting dated 26th February approved an amendment to the MTFP that: o It was moved by Councillor J Wright and seconded by Councillor Smale that the minute was amended by the addition of the following words: 1. That £0.150m be added to the budget for Communities and Place for the purposes of Regeneration of the City Centre through Housing, to be funded from resource to support additional capacity as defined by the Delivery Board to deliver future savings and efficiencies of £0.250m. 2. To note that a £0.150m one-off external, specialist consultancy report will identify suitable locations in the city centre for homes. The city centre having better/closer public transport, health, education,	

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					employment prospects and leisure facilities than green field sites will provide the infrastructure required for residents that would benefit most: younger residents, older (including those with extra care needs), looked-after children, and temporary accommodation. The report will focus on: • building upon the capacity work already undertaken for the local plan to consider the provision of minimum, maximum and average unit numbers for the strategic city centre sites Riverside, Castleward, Northern Gateway and Station Gateway • the capacity testing should include master-planning/layouts for the major city centre housing led regeneration sites as stated above. Particularly for Riverside • the report could additionally provide some high level evidence around strategic housing requirement, viability testing, market demand/requirement and deliverability of these sites. The report will also aim to identify sufficient locations/numbers to reduce / remove the pressure on our green belt and green wedges. The initiative will lead to increased certainty for developers by providing a	

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					robust demand analysis, increased social housing for the city and protection of 8 our precious green spaces. ○ This motion provided a counter-balance to the previously completed 'Green Belt Review' that examined the city's green belt, wedges and other green spaces to identify sufficient locations to help to meet the city's housing needs requirement. This review focussed only on protected green spaces within the city boundaries and there was no comparative brownfield site review to support the Council's stated ambitions of a) protecting and enhancing the green belt/wedges and utilising a 'brownfield first' approach. The budget amendment, above, was agreed to support a comprehensive review of brownfield/other non-green sites within the city centre and develop 'City centre regeneration through housing' strategy. This report has not yet been produced to provide that balance to the green belt review and so preceding with the emerging plan is not balanced, is inconsistent with national policy, local policy 'brownfield and city centre first (para 81) and fails to comply with Council policy	

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					regarding the budget whilst also frustrating the will of the Council by not waiting for the 'city centre regeneration through housing' review to be completed and integrated into the process.	
Rob Hoddinott	Paragraph 57 OBJ3	Object	No	No	Concreting over a park is contrary to this objective. It adds to climate change not reduces it.	Move to brownfield site where the impact will be reduced.
Derby Climate Coalition	Paragraph 59 OBJ5	Object	Yes	No	We see no reason to mention tall buildings as an objective, especially given the restrictions proposed in policy CC6.	Leave out the phrase "developing tall buildings in appropriate locations"
Rob Hoddinott	Paragraph 59 OBJ5	Object	No	No	I provided a list of numerous sites which could be considered, non of this was mentioned when the local plan post consultation document was issued. We have seen no efforts in securing a site which meets this criteria. It's as if the site was already decided and everything else available has been ignored (one site which has been empty for 10 years and would have been suitable is evidently now being developed for retail.	Plenty of small brownfield sites are available.
South Derbyshire District Council	Paragraph 59 OBJ5	Support			SDDC are also very supportive of objective 5 of the local Plan which aims to make the best use of previously developed land and vacant or under used buildings in urban or other sustainable locations, including bringing empty homes back into use and developing tall buildings in appropriate locations.	

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Rob Hoddinott	Paragraph 60 OBJ6	Object	No	No	This is not balanced with the HA16 proposals. Bringing people in the lowest socioeconomic category into one of the most deprived areas of this city is not balanced, it's the opposite.	Move to less deprived area than can absorb this.
Marrons on behalf of Ainscough Strategic Land	Paragraph 60 OBJ6	Support		Yes	Similarly, it is right to recognise through Objective 6 that there is a continued need to work with neighbouring authorities to make the best provision for unmet need.	
South Derbyshire District Council	Paragraph 60 OBJ6				In addition, the Local Plan should contain a stand-alone housing objective to support the maximum feasible delivery of housing within the City boundary and that it is should not rely solely on a stand-alone housing objective that supports the delivery of Derby's unmet housing need outside of your administrative area	
George Fletcher*	Paragraph 61 OBJ7	Object	No	No	Objective to protect and improve Derby's natural environment by developing a network of green infrastructure based around our parks and other green open spaces is totally at odds with destroying Wilmorton Park.	An alternative location that does not involve the destruction of the key green space for approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 61 OBJ7	Object	No	No	HA16 is contrary to the "Green City" objective.	Move to brownfield site.
Derby Climate Coalition	Paragraph 62 OBJ8	Object	Yes	No	The current plan says "To enhance the role of Derby's Green Wedges by recognising and protecting them in terms of their contribution towards creating a network of Green Infrastructure that improves access to open spaces and the countryside, brings the countryside into the city, defines the character of our neighbourhoods and providing opportunities for supporting education, sport, recreation, healthy lifestyles, biodiversity and adapting to climate change." The S19 draft says "To enhance and strengthen the role of Derby's Green	The plan does not support this objective, so it should be deleted, or preferably, the plan proposals changed to support the objectives as defined in the 2017 plan.

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					Belt, Green Wedges and Green Gaps by reviewing, recognising and protecting them in terms of their contribution ……" However, reviewing appears to mean not strengthening Green Wedges but deleting them or downgrading the remains to "Green Gaps" thereby negating their purpose.	
Derbyshire County Council	Paragraph 62 OBJ8	Support	Yes	Yes	In its comments on the Regulation 18 Draft Local Plan, the County Council considered that there was one important omission from the Plan's objectives relating to Green Belt, noting that although there are limited areas of Green Belt within the City, which are mainly located to the north-west, north-east, east and south-east of the City, these areas of Green Belt have previously been assessed as being of significant strategic importance in previous Green Belt reviews of the Nottingham Derby Green Belt, particularly in meeting a number of key Green Belt purposes set out in the NPPF (see further comments below relating to Green Belt policy). The County Council, therefore, recommended that the importance of the Green Belt should be reflected in the Objectives for the Plan. It is welcomed and supported, therefore, that this issue has now been addressed in the Regulation 19 Plan in Objective OBJ8, which now includes reference to the need 'To enhance and strengthen the role of Derby's Green Belt, Green Wedges and Green Gaps…'	
Derbyshire County Council	Paragraph 62 OBJ8	Support	Yes	Yes	The objective above is fully supported by the County Council, which recognises the importance of the City's Green Wedges. Historically, Derbyshire County Council has been supportive of the City Council's	

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					policy approach to defining Green Wedges dating back to the 1990 and 2001 Derby and Derbyshire Structure Plans, which has previously recognised the importance of Green Wedges in the City in helping to frame the district identity of its different neighbourhoods and provide green lungs extending from within the city to the open countryside and Green Belt beyond the City's urban areas, providing a valuable recreational resources for the City's residents. The County Council has been aware that the City's Green Wedges have experienced significant development pressure in recent years, particularly from new housing developments given the City's limited capacity for additional housing land and so the County Council fully supports the Plan's objective to enhance and strengthen the role of the remaining Green Wedges in the City.	
George Fletcher*	Paragraph 62 OBJ8	Object	No	No	Objective to enhance and strengthen the role of Derby's Green Belt, Green Wedges and Green Gaps by reviewing, recognising and protecting them in terms of their contribution towards creating a network of Green Infrastructure that improves access to open spaces. Destroying Wilmorton Park is totally at odds to this objective.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 62 OBJ8	Object	No	No	HA16 is contrary to everything here.	Use a brownfield site.

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Rob Hoddinott	Paragraph 63 OBJ9	Object	No	No	HA16 is contrary to just about every element of these objectives. Open space and opportunity for play is being reduced.	Move to brownfield site.
Historic England	Paragraph 64 OBJ10	Support			Page 64, we support Objective 10.	
Derby Climate Coalition	Paragraph 66 OBJ12	Object	Yes	Yes	We support the addition of "as well as access to green and blue spaces for all within easy walking distance" to this objective.	
4. Overarching Spatial Strategy						
Pegasus Planning on behalf of Catesby Estates*	Overarching Spatial Strategy	Object	No	No	The draft Plan confirms that the City Council is not able to fully meet the Local Housing Need identified for the City through the Government Standard Method. It is noted at paragraph 77 of the draft Plan that the scale of development that can be met within the city is a minimum of 12,500 homes over the plan period. Paragraphs 75 and 76 of the Submission Draft Plan provide the Council's explanation for the 12,500 homes. Paragraph 75 refers to the work undertaken jointly by the Derby Housing Market Area (HMA) authorities 'Derby Housing Market Area Growth Options Study 2021' whereas paragraph 76 refers to 'Derby City and South Derbyshire Councils Local Housing Needs Assessment'. It should however be noted that the 12,500 capacity is the same as expressed in the Local Plan consulted	The capacity for housing within Derby City should be reassessed in light of updated supply information, and the proposed plan period, and the overarching Spatial Strategy should be modified in light of the up to date capacity position. The SA report section 5.2 should be modified to include clear reasons for the selection and rejection of each reasonable alternative identified.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					upon at Regulation 18 in March 2026, and which our client made representations outlining that the figure was not based upon up to date information. The figure of 12,500 quoted for the March 2026 Regulation 18 consultation was taken from the Derby Housing Land Capacity: Position Paper October 2024 which estimated that their housing capacity supply over the period 2022-2039 (17 years) was 12,500 and set out the components of this potential supply. The plan period now being proposed is 2023-2043, this is a 20 year plan period with an additional three years to that considered in the Position Paper. It is therefore unclear whether the evidence underpinning the capacity figure is up to date and reflects this longer period. It is anticipated that over an additional three years there may be further windfalls for example and there may be larger sites that may not have been completed within the previous plan period where further homes might be delivered. The updated Statement of Common Ground (February 2026) notes that the new plan period '*rolls forward the 2024 Standard Method with May 2025 inputs by 4 years but does not factor in any additional supply for these 4 years as there is no updated evidence of additional capacity beyond the 12,500 already identified*'.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					As presented, the capacity figure of 12,500 dwellings stated in the draft Plan is based on evidence from 2024, does not take account of latest Government Local Housing Need figures and does not take account of up to date monitoring. The Plan is therefore not positively prepared, not justified and inconsistent with the NPPF. *Meeting Unmet Need* There is an acknowledged unmet need for housing in Derby City and as was the case when the last Local Plan was prepared, the City Council is committed to working with the other Derby Housing Market Area authorities, South Derbyshire and Amber Valley, to meet the City's housing needs. The Submission Draft Local Plan sets out that through ongoing, collaborative working with Amber Valley and South Derbyshire a housing growth strategy has been established which will see Derby City's housing and other growth needs met in full across a range of sites in sustainable locations both within and on the edge of the City. The updated Statement of Common Ground (February 2026) however does not fully address the unmet need arising from the City. The calculation in Table B, which appears to show an overprovision across the Housing Market Area, is flawed. It is based on a calculation	

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					which uses a mixture of the 2023 and 2024 standard method figures, and because the lower of the two figures is used for each authority, the figures do not add up to the total need of the Housing Market Area. The Statement of Common Ground (February 2026) starts by setting out that the overall housing need across the Housing Market Area has not significantly changed following the changes to the standard method in December 2024, with just a small increase from **2,102** to **2,152** homes a year. Table A in the Statement highlights this, however it also shows that the distribution of the housing need changes significantly, shifting away from the city to the two districts. Table B in the Statement then goes on to use a mixture of the 2023 and 2024 standard method figures (the lower figure for each authority) to demonstrate an over provision. The third column of the table shows the expected provision, and this is measured against the figures in the fourth column. The fourth column shows the plan requirement for each authority based on the 2023 standard method for the two districts (Amber Valley's 2023 figure is 351 + South Derbyshire's 2023 figure is 507) and the 2024 standard method figure for Derby (Derby's 2024 figure is 917). This means total provision is measured against a total annual need figure of **1,775** (351+507+917). As the table below highlights, this is 327-377 homes short a	

<table>
<tr><th>Respondent Name</th><th>Commenting on</th><th>Support or Object</th><th>Legally Compliant</th><th>Sound</th><th>Reasons</th><th>Suggested Modifications</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td>year of the housing need in the Derby Housing Market Area (based on 2023 standard method total for the Housing Market Area of 2,102 a year or the 2024 standard method total of 2,152 a year). Under the 2026 Standard Method the figure is even higher at 2,226 dwellings per year.

<table>
<tr><th>Local Authority</th><th>2023 Standard Method</th><th>2024 Standard Method</th><th>2026 Standard Method</th><th>Figure used in Table B to measure over or under provision</th></tr>
<tr><td>Amber Valley</td><td>351</td><td>643</td><td>670</td><td>351</td></tr>
<tr><td>Derby</td><td>1,244</td><td>917</td><td>960</td><td>917</td></tr>
<tr><td>South Derbyshire</td><td>507</td><td>592</td><td>596</td><td>507</td></tr>
<tr><td>Derby Housing Market Area Total</td><td>2,102</td><td>2,152</td><td>2,226</td><td>1,775</td></tr>
</table>
The approach taken to identifying whether the housing need of the City has been met is fundamentally flawed and leaves in the region of a need for 4,000-6500 homes not accounted for over the plan period.

The total housing need for Housing Market Area using the 2023 standard method figures is 2,102 homes a year, which over a 19 year plan period is a total of 39,938 homes (Amber Valley is planning for 18 years, South Derbyshire 19 years and Derby City 20 years, so 19 is used as a reasonable proxy). Table B in the Statement of Common Ground identifies that the three Local Plans are planning for 35,714 homes, this is more than 4,200 homes short of the overall market</td><td></td></tr>
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Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					area's need. If the 2026 standard method figure for the Housing Market Area is used (2,226), the total is 42,294 homes, and the provision shortfall is then 6,580 homes. This level of shortfall is a significant concern and does not meet the positively prepared test of soundness. *Spatial Strategy Sustainability Appraisal* The Sustainability Appraisal outlines the spatial options that have been assessed in Section 5 and Appendix C. This identifies six options that have been assessed and identifies Option A as the preferred strategy. Option A focuses development on brownfield, and City Centre sites identified through the allocations process, then the residual need met by sustainable greenfield sites within the Derby administrative boundary and meeting need through HMA contributions. The spatial strategy is supported. It is noted that the Sustainability Appraisal supporting the Regulation 19 Pre-Submission version of the Local Plan in Section 5.2 set out conclusions at the end of the assessment of each set of option, however the SA Report does not set out the clear reason(s) that the preferred option has been selected, and the reasons for not selecting reasonable alternatives. This is a	

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					requirement of the Environmental Assessment of Plans and Programmes Regulations 2004, and so SA Report does not meet these legal requirements.	
Community Campaigner David Barton	Paragraph 70	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can	Entirety of Document- Traditional Architecture will make best possible use of all resources old and new whilst conferring the greatest practical advantages for everyone.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					withstand local, regional, national and international pressures.	
Home Builders Federation*	Paragraph 70	Object		No	Although HBF do not comment on individual sites but would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The Plan should provide for a wide range of deliverable and developable sites across the area, in order to provide competition and choice to ensure that housing needs are met in full. HBF suggest that this policy and/or the supporting text will need to be updated for the Plan to be consistent with, and better reflect, the new NPPF DM policies and the presumption in favour of development within settlement boundaries.	
South Derbyshire District Council	Paragraph 72				SDDC have, and will continue to work in partnership with Derby City Council to ensure that development to the Derby Fringe located within SDDC delivers appropriate infrastructure and connections to the City. SDDC has worked in close collaboration with Derby on these two-housing led Strategic allocations to deliver approximately 4,500 homes in sustainable locations on the Derby urban fringe, and we look forward to continuing this work through the masterplan process with consultants now appointed.	
George Fletcher*	Paragraph 81	Object	No	No	There is no evidence that any assessment has been carried out of other green spaces, including 46 other parks, before	An alternative location needs to be found that does not involve

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					Wilmorton Park was selected for destruction. It is requirement of this process to do this.	destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 81	Object	No	No	This has not been followed with regards HA16. Brownfield land is not being used and nothing the public have been given says anything to the contrary.	Use a suitable brownfield location.
George Fletcher*	Paragraph 85	Object	No	No	Wilmorton Park forms a vital function for the approx. 320 households.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 85	Object	No	No	HA16 is contrary to this.	Use brownfield site.
George Fletcher*	Paragraph 88	Object	No	No	The city's green infrastructure will be protected and enhanced and where possible made accessible to communities. Destroying Wilmorton Park is completely at odds with this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 88	Object	No	No	The city's green infrastructure will be protected and enhanced and where possible made accessible to communities. HA16 does the opposite of this.	Use brownfield land.
5. General Development Principles						
Community Campaigner David Barton	Paragraph 91	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and	Entirety of Document- Authentic Traditional Architecture combined with properly sourced Placemaking will ensure the full

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	success of the City for future generations.
Policy GD1: Placemaking Principles						
Historic England	GD1: Placemaking Principles	Support				

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Home Builders Federation*	GD1: Placemaking Principles	Object		No	*Policy GD1 is not considered to be sound as it is not justified, not effective and not consistent with national policy* By including reference to anothedocuments within a policy seeks to give that document full Local Plan status which is not appropriate. As such the reference to the Council's Design Code should be moved to the supporting text.	
Marsha Ramroop Unheard Voice Consultancy Ltd*	GD1: Placemaking Principles				I strongly support the policy's commitment to resist the dilution of design quality after permission, and the supporting text's honesty at paragraph 102 that value engineering harms the longer-term sustainability of proposals and the character, identity and distinctiveness of Derby, creating a negative perception of new development among residents. I also welcome paragraph 95's recognition that quality depends on development teams with 'adequate skills and the right mindset': outcomes are produced by people and culture, not documents alone. This is one of the most important commitments in the plan, and I want it to survive contact with reality. Resistance needs a mechanism. Dilution is not an aesthetic misfortune; it is a governance and culture risk. Amendments arrive late, framed as technical, when public scrutiny is lowest and delivery pressure is highest, and each individual change seems too small to refuse. 'Carefully appraised' (paragraph 102) is not a defence against that dynamic, and without a defined process the commitment cannot be applied consistently.	• For major schemes, require a schedule of the design, social and environmental commitments on which permission was granted, fixed at consent. • Require that amendments reducing any scheduled commitment be supported by explicit trade-off analysis and signed off at a defined senior or committee level, with a transparent decision log, rather than absorbed through officer-level non-material amendment. • On design review (paragraph 110): panel composition matters as much as panel existence. Panels should reflect the diversity of the city whose

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						character they assess, and include access and community perspectives alongside architectural ones; whose eye reviews design determines what review
George Fletcher*	GD1: Placemaking Principles	Object	No	No	Placemaking Principle: Optimise opportunities to incorporate green infrastructure and biodiversity and protects habitats. Destroying Wilmorton Park is completely at odds with this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
George Fletcher*	Paragraph 94	Object	No	No	In Derby, where a significant gap in healthy life expectancy exists between communities, the design of the built environment is a critical tool in reducing long term inequalities. Destroying the park in the deprived area of Wilmorton is completely at odds with this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
George Fletcher*	Paragraph 100	Object	No	No	Green infrastructure should be considered at the outset of planning for development and fully incorporated into the design of schemes, including all masterplans taking into account the principles of Natural England's Green Infrastructure Planning and Design guide. Destroying Wilmorton Park is completely at odds with this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
George Fletcher*	Paragraph 108	Object	No	No	Harmful and/or irregular intrusion into open countryside, Green Wedges, Green Gap or Green Belt should be avoided, such as destroying Wilmorton Park.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Rob Hoddinott	Paragraph 108	Object	No	No	HA16 is harmful to green space, contrary to this section.	
George Fletcher*	Paragraph 121	Object	No	No	Character and context are also important in the context of creating a defined and meaningful urban boundary and maintaining Green Wedges and Green Gaps. Destroying Wilmorton Park is completely opposed to this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
George Fletcher*	Paragraph 122	Object	No	No	There is no evidence that the council has assessed the affects of replacing Wilmorton Park with a traveller camp on the approx. 320 households. A so-called consultation took place in spring 2026, but none of the 320 household affected by the policy were informed of the consultation's existence. This section 19 consultation is only been extended to the few individuals that did respond to the first consultation.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 122	Object	No	No	HA16 will have a significant effect on the lives of the current neighbourhood. No impact assessment on the effects of increased traffic has been shown to the public.	Move to less congested area.
Policy GD2: Character and Context						
Historic England	Policy GD2: Character and Context	Support			Policy GDP2, we support this policy and the references to heritage. We would recommend that there is additional detail for this policy about what evidence base will be required to be submitted with planning applications to ensure that the policy is effective and enforceable.	

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Policy GD3: Amenity						
Rob Hoddinott	Policy GD3: Amenity	Object	No	No	HA16 will bring more traffic to some of the narrowest and most densely parked streets in Derby. This will affect life adversely for the current residents.	Move to venue with easier access and less congested side roads.
Policy GD4: Accessible Places						
Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy GD4: Accessible Places	Object	No	No	Policy GD4 is the thinnest policy in the General Development Principles chapter, yet it covers the dimension with the strongest statutory underpinning in the Equality Act 2010 and the Public Sector Equality Duty, which the supporting text at paragraph 129 rightly cites. Three short clauses ask applicants to 'demonstrate' inclusive design and 'have regard to current best practice' without naming any standard, threshold or evidence requirement. Compare the granularity of Policy GD1, which specifies densities, design process requirements and detailed placemaking principles. The contrast tells applicants what the Council considers negotiable, and a policy that names no benchmark cannot be applied consistently in decision-making: it is not effective. The plan's own Spatial Portrait records at paragraph 16 that 8.8% of Derby residents identify as disabled and limited in their daily activities, and that the city's population is ageing. I welcome the new paragraph 131 linking accessible places to the natural environment. But inclusive environments are not achieved by 'regard'; they are achieved by requirement, evidence and the involvement of disabled people themselves.	• Name in the policy the standards applicants must design to, including relevant Building Regulations accessibility standards and recognised sector guidance such as the RIBA Inclusive Design Overlay, rather than an unspecified 'current best practice'. • Require an inclusive design statement, proportionate to scale, for all major development, setting out how access needs across age, disability and circumstance have been addressed from concept stage, not retrofitted. • Require evidence of engagement with disabled people and access experts in the design

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						development of major and City Centre schemes. • Commit the Council to including access expertise and lived experience of disability on the design review panels described at paragraph 110. Who reviews design shapes what design review sees.
Rob Hoddinott	Paragraph 129	Object	No	No	HA16 reduces the areas which can bring people together to improve social cohesion.	Use brownfield site so as to not reduce vital green space.
Policy GD6: Health and Wellbeing						
Rob Hoddinott	Policy GD6: Health and Wellbeing	Object	No	No	providing access to the natural environment, including wildlife sites, river corridors, open spaces and leisure, recreation and play facilities to encourage physical activity and mental wellbeing HA16 is contrary to this.	Use a brownfield site.
Rob Hoddinott	Policy GD6: Health and Wellbeing	Object	No	No	providing access to social, community and healthcare facilities, community halls, spiritual buildings and arts and cultural facilities. These will be protected and improved to ensure that they can be accessed by sustainable and/or active transport modes. There is no healthcare at all in the immediate area and what is accessible by bus and car is oversubscribed.	Move to an area with less over subscription to healthcare.
Home Builders Federation*	Policy GD6: Health and Wellbeing	Object		No	*Policy GD6 is not considered to be sound as it is not effective, justified, or consistent with national policy*	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The requirement for HIA assessment on all schemes of more than 10 homes does not seem proportionate or justified.	
Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy GD6: Health and Wellbeing	Support	Yes	No	I strongly support the requirement for Health Impact Assessments on major development and the policy's recognition of the social determinants of health at paragraph 140. The plan's evidence is stark and commendably honest: paragraphs 19 and 138 record that men in Derby's most deprived areas can expect to live 11.1 years less than those in the least deprived, and women 10.9 years less; Table 1 records that 45 of the city's 151 LSOAs are among the 20% most income-deprived in England; and paragraph 16 records that the city's Asian and Black communities are concentrated in four wards at 35 to 54% of the population. Paragraph 17 now acknowledges plainly that patterns of deprivation are uneven and that not all communities experience the city in the same way. The gap is that the policy never requires the HIA to ask who. Health impacts in Derby are not evenly distributed; an assessment that reports aggregate effects will systematically conceal the inequality the policy exists to reduce. Without disaggregation, 'reduce health and well-being inequalities' is an aspiration audited by anecdote, and the plan will be unable to evidence progress against its own Inclusive City objectives, OBJ2 and OBJ11. A policy whose central commitment cannot be measured is not effective.	• Amend Policy GD6 to require that HIAs for major development assess impacts disaggregated by deprivation, ethnicity, age and disability, drawing on the JSNA data the plan already cites at paragraphs 17 and 138, at ward or LSOA level. • Require HIAs to identify explicitly who bears adverse impacts and who receives benefits, and how any inequitable distribution will be mitigated. • Add a monitoring indicator to Appendix 1 tracking health-equity outcomes of development, not only provision of facilities: Policy GD6 is currently marked 'Not applicable' in the monitoring framework, which leaves the plan's flagship health commitment unmonitored.

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NHS Property Services	Policy GD6: Health and Wellbeing	Support	Yes	Yes	Draft Policy GD6 sets out the Council's commitment to making sure that new developments promote healthier lives and help reduce health inequalities through the built and natural environment. NHSPS support the inclusion of a standalone health policy that supports healthy lives. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. <u>Health Impact Assessment (HIA)</u> Draft Policy GD6 also includes a requirement for a HIA to be submitted for major development proposals and recommends a screening assessment to first be undertaken to assess if a full HIA is needed, with the level of detail to be proportionate to the development and agreed with the relevant case officer. Supporting paragraphs 141-142 refer to guidance on HIA published by Public Health England and recommend the use of the NHS Healthy Urban Development Unit (HUDU) Rapid HIA toolkit to quickly assess the impacts of a development plan or proposal and recommend measures. It is recommended for the tool to be used as early as possible in the planning process and established at pre-application stage. NHSPS welcome the inclusion of a HIA requirement within Draft Policy GD6. The use of HIA is a useful tool to ensure planning applicants and the Local Planning Authority have	

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					the right information to make sound planning decisions in promoting healthy and safe communities. NHSPS supports the requirement for Health Impact Assessment to focus on major developments with potential for significant health impacts. We would also encourage future applicants to have regard to the forthcoming NHSPS guidance on HIA, which will build upon existing guidance, including the HUDU Rapid HIA toolkit, once published. Overall, NHSPS considers Draft Policy GD6 to be positive and effective, and therefore sound.	
Rob Hoddinott	Paragraph 135	Object	No	No	HA16 is contrary to this policy regarding open spaces being important to health.	
Rob Hoddinott	Paragraph 139	Object	No	No	HA16 will only make this worse - " This aligns with the downwards trend in physical activity levels"	Move to brownfield site.
Rob Hoddinott	Paragraph 140	Object	No	No	HA16 brings in more people in the lowest socioeconomic group to one of the most deprived areas in the city.	Use less deprived area.
Rob Hoddinott	Paragraph 141	Object	No	No	Has this been completed for HA16, it has never been made public if it has.	
Policy GD7: Comprehensive and Coordinated Development						
Lichfields on behalf of Derbion	Policy GD7: Comprehensive and Coordinated Development	Object		No	*Policy Consideration* Whilst Derbion supports the Council's intention to secure comprehensive and coordinated development through Policy GD7, Derbion does not support the requirement for a	Policy GD7 should retain sufficient flexibility to allow individual sites to come forward in advance of, or independently

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					masterplan or framework where this becomes a barrier to delivery in its own right. In particular, the policy wording that 'no significant development will be permitted' within City Centre allocations until an acceptable masterplan/framework is in place, risks delaying delivery where this is contingent upon agreement with third parties, or where infrastructure or design coordination extends beyond land within an applicant's control or ownership. This risks impeding the delivery of individual allocations, such as Bradshaw Way, Eagle Quarter and Riverside, rather than facilitating regeneration. *Tests of Soundness* 1 Effective – The current policy wording makes no significant development acceptable until a masterplan/framework has been agreed with the Council, with may rely on processes entirely out of an applicant's control. This could introduce delays for the delivery of allocations, where it is reliant on masterplans/frameworks coming forward which involve third-party land. The policy does not allow for the delivery of allocations (or existing permissions) to proceed independently where not all of the triggers in criteria (a) to (d) apply, and in its current wording is therefore ineffective. 2 Consistent with national policy – A lack of flexibility which does not allow for sites to come forward	from, a wider masterplan/framework. *"~~In circumstances where a masterplan/framework~~ Development sites may come forward independently of a masterplan/framework, where an indicative is ~~to be~~ put forward as part of a planning application, to meet the requirements detailed above. In such circumstances, early and effective engagement with the Council, and consultation with the local community and other stakeholders should also take place in advance of the submission of an application."*

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					independently risks the delivery of allocations in a timely manner and is therefore at odds with the NPPF's presumption in favour of sustainable development.	
Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy GD7: Comprehensive and Coordinated Development	Support	Yes	No	The January 2026 Regulation 18 draft helpfully reported consultation numbers throughout its 'You Told Us' sections: 448 respondents on character and context, 470 on care homes, and so on. What was never reported, there or in this Publication draft, is who responded. In a city where paragraph 16 records that more than a quarter of residents are from global majority communities and 8.8% are disabled, and where paragraph 17 acknowledges that communities experience the city unevenly, it is not possible to know whether the plan's priorities were shaped by the whole city or by the sections of it most comfortable with written, portal-based, formal consultation. Those formats are not neutral: they encode the communication norms of the professionals who design them, and they structurally advantage residents who share those norms. The communities most affected by the plan's biggest decisions are frequently those least served by its methods of asking. I ask that the Statement of Consultation accompanying submission address the demographic representativeness of responses and the steps taken to reach underrepresented groups. Policy GD7 carries the same issue into delivery: masterplans and frameworks must involve 'proper consultation of the local community' (paragraph 146), with no standard for what that consultation must involve, who it must reach, or how communities learn what changed as a result. Without standards, the requirement cannot be applied consistently and is not	• Amend Policy GD7 to require, for masterplans and frameworks, a statement of community involvement covering: co-design methods rather than presentation of near-final options; accessible and multilingual formats; engagement taken to where communities already gather; a community role in designing the engagement process itself; and published feedback showing how input changed the scheme. • Recognise resourcing: meaningful participation has a cost, and unresourced participation is extraction. Developer contributions under Policy GD9 can legitimately support it on major schemes. • In the Statement of Consultation, publish demographic monitoring of

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					effective.	consultation responses against the city's Census profile, with the outreach undertaken to close gaps.
Rob Hoddinott	Paragraph 146	Object	No	No	HA16 is not complaint with this. Open spaces are being reduced.	Use brownfield site.
Historic England	Paragraph 147	Object			Paragraph 147, clause f, amend to 'harm'.	
Policy GD9: Infrastructure and Developer Contributions						
Home Builders Federation*	Policy GD9: Infrastructure and Developer Contributions	Object		No	*Policy GD6 is not considered to be sound as it is not effective, justified, or consistent with national policy* By including reference to another documents within a policy seeks to give that document full Local Plan status which is not appropriate. As such the reference to the Planning Obligations SPD should be moved to the supporting text. In order for the Plan to be justified and in compliance with national policy, it will be important for any s106 contributions to be assessed against the CIL tests at the time that a planning application is being determined. The policy should therefore include explicit reference to this fact. HBF also would draw attention to the High Court Decision on R (on the application of the University Hospitals of Leicester	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					NHS Trust) versus Harborough District Council. This has drawn into question the legitimacy of asking for develop contributions for acute healthcare that is funded through general taxation.	
Johnson Mowat on behalf of Harworth Group*	Policy GD9: Infrastructure and Developer Contributions	Object		No	Policy GD9 states that proposals for major new development will only be permitted where a comprehensive and co-ordinated approach to both phasing and infrastructure can be demonstrated. It also states that Section 106 agreements, the Community Infrastructure Levy (CIL) or successor regulations/ guidance will be used to secure developer contributions and, where appropriate, these contributions will be pooled to allow the provision of strategic infrastructure that individual schemes cannot justify on their own. Harworth Group is supportive of the principle of this policy and recognises the importance of delivering infrastructure to mitigate the impacts of development. The approach set out is considered to be appropriate. However, if CIL is to be adopted it is essential to ensure that this and Section 106 requirements are compatible and do not duplicate or double contributions for infrastructure.	Harworth Group request that this is clarified in the supporting text to Policy GD9 and suggest the following text addition: *S106 agreements and CIL or other successor regulations will operate in parallel to help deliver the necessary and appropriate infrastructure, facilities and amenities to mitigate the impact of development. There will be no "double counting" (developers paying twice towards the same item of infrastructure) between S106 and CIL contributions.*
National Highways	Policy GD9: Infrastructure and				Policy GD9 continues to require infrastructure contributions from all allocations, and it remains essential that these allocations are supported by a	

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	Developer Contributions				robust and proportionate transport evidence base.	
The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy GD9: Infrastructure and Developer Contributions	Object		No	We note that policy GD9 says 'Where a developer can provide robust evidence to demonstrate that it is not viable to deliver the policy requirement, the Council may require developers to enter a 'clawback' agreement which will allow contributions to be increased in the future should higher levels of viability become achievable during the lifetime of a development. In these circumstances, the Council will prioritise the infrastructure types a to e above. The exact priority order will be determined on a site-by-site basis.' This is similar to the wording in policy H4. Para 5 of policy H4 also requires a clawback mechanism or review mechanism when a developer can provide robust evidence that it is not viable to provide the maximum policy requirement. Paragraph: 010 Reference ID: 10-010-20251216-of the government guidance on Viability states the following: 'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy	*Possible proposed wording:* • **Single-phased development schemes will not be subject to a review mechanism.** • **Where sites have a construction programme which is proposed to extend beyond 2 years, the planning obligation will provide for the affordable housing component of later phases to be reviewed based on updated viability evidence which may result in an increase of the affordable housing requirement**.

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					compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509. A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism and detail within it that sits within a planning obligation needs to be considered and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. The Local Plan does not achieve this and therefore the requirement at point 5 of the plan is contrary to national policy. In addition, for a large or multi-phase development which will be delivered over a long period it makes sense to check whether the scheme's viability has changed with market movements. However, for a small single phased site, such as an older persons housing scheme that is built in one phase , the Inspectorate have repeatedly noted that review mechanisms are unnecessary. For example, under Appeal decision reference	

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					APP/C4235/W/120/3256972 dated 1st April 2021, the Inspector noted in paragraph 17 that 'as the development would almost certainly be completed in a single phase with an estimated build time of 12-18 months, it is not the sort of large multi-phased scheme where stronger arguments for a review/clawback mechanism may otherwise exist'. This is also becoming the case in local Plans and for example the Local Plan Inspectors report for the East Riding of Yorkshire Local Plan notes the following: 170. The final section of the policy addresses the use of review mechanisms for Section 106 agreements. To provide certainty, and thus the effectiveness of the policy, it is necessary for MM55 to amend the wording so that it clarifies that this relates to larger sites that will come forward over a longer period of time, and not all proposals. This is also the case in for example Amber Valley and Cannock Chase. Therefore, if a review mechanism is to be introduced the detail within any review mechanism needs be published so it can be fully assessed through the Local Plan process, this must also include an exemption for single phased schemes as repeatedly noted by the planning inspectorate.	

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Ann Mason	Policy GD9: Infrastructure and Developer Contributions	Objects		No	I have read a lot of this policy. I do not believe that the correct infrastructures will be put on place by developers. A prime example of this is the new estates off Chellaston Lane. There are absolutely no footpaths from the island on Shardlow Road to those estates or the old peoples home. This means that no-one can safely walk or cycle to Chellaston or Shardlow Road from those new developments. It is not safe to get to Elvaston Castle either. The airport bus is also inaccessible from those estates. This is very restrictive to those residents and contributes to the short journeys by car that you are wanting to reduce. There are no Doctors, Dentists or Shops within walking distance, the lack of pavements does not help with that either, so everyone has to get the car out. Anyone in a wheelchair has no chance of getting anywhere. I haven't even read all of it as most of it is word salad and heavy going. If I get around to reading it in full I'm sure I will just get more frustrated than I already am.	
NHS Property Services	Policy GD9: Infrastructure and Developer Contributions	Support	Yes	Yes	Draft Policy GD9 states that all new development will be supported by necessary and appropriate infrastructure, facilities and amenities to mitigate the impact of development. Where it is not appropriate for this to be dealt with through planning conditions or Section 278, developer contributions towards infrastructure will be sought, including health and community facilities (part (i)). All new development will be required to provide for the necessary on-site or off-site infrastructure requirements arising from the proposal, or by making financial contributions towards its provision and/or maintenance.	

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					The policy states that where full policy compliance is demonstrably unviable, the Council may require a clawback agreement, allowing contributions to increase if viability improves over the lifetime of the development. In these circumstances, the Council will prioritise the infrastructure types (a) to (e) in the Draft Policy GD9, with the exact priority order to be determined on a site-by-site basis. Contributions will be made in accordance with the saved Planning Obligations Supplementary Planning Document (SPD) except where indicated otherwise. NHSPS welcomes the recognition of health infrastructure as infrastructure for which development proposals are expected to make provision to meet the cost of additional infrastructure for, where the need arises from the development, also in line with Policy IC1. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller housing growth and the need for mitigation must also be considered by the Plan. Noting healthcare infrastructure's strategic importance, the Council should include health and community facilities in infrastructure priorities to ensure that the impact on healthcare service provision is appropriately mitigated. The Draft Infrastructure Delivery Plan (IDP) includes a dedicated health chapter (chapter 8) which demonstrates clear engagement with NHS Derby and Derbyshire Integrated	

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					Care Board (ICB), as the local health commissioners. NHSPS supports the Council's engagement with the ICB in drafting the IDP to identify the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. We request that the Council continue its engagement with the NHS to further refine the identified healthcare needs and proposed solutions to support the level of growth proposed by the Local Plan, as identified in the draft IDP. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures. Overall we consider Draft Policy GD9 to be positive and effective, and therefore sound.	
Policy GD10: Advertisements						
Historic England	Policy GD10: Advertisements	Support			Policy GD10, we welcome the references to heritage within this policy.	

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Lichfields on behalf of Derbion	Policy GD10: Advertisements	Object		No	As currently drafted, the Policy is not sound. Derbion considers the restrictions set out in GD10 limiting the use of poster display boards and vinyl stickers to be overly restrictive. Vinyl can provide a useful method for operators to screen back-of-house areas and is often an operational necessity that assists in maintaining tidy frontages. Digital screens are set to play an increasingly central role in how retailers and operators animate frontages and attract footfall within competitive city centre environments. Digital formats are an important tool for enhancing vibrancy and visual interest. Digital screens are set to play an increasingly central role in how retailers and operators animate frontages and attract footfall within competitive city centre environments. Digital formats are an important tool for enhancing vibrancy and visual interest and these should be more actively supported in the Policy. *Test of Soundness* 1 Positively Prepared – The discouragement of vinyl is not necessary and should be removed from the policy to allow for their use, where serving a clear functional or visual purpose. The Policy should also acknowledge the shift towards digital screens and ensure that policies remain proportionate, enabling well-designed	The Policy amendments set out below should be applied to ensure that the Policy can be found sound: *"Applications for internally illuminated digital display advertising screens will ~~only~~ be permitted where they demonstrate reasonable measures to safeguard public safety and visual amenity. The installation of vinyl stickers or similar coverings on shop windows, particularly those that obscure at least more than a quarter of the glazing, will generally be discouraged unless it can be demonstrated that active frontages can be safeguarded and visibility into shop interiors can be preserved, where this contributes towards the frontage. Proposals for vinyl or window graphics that exceed the thresholds permitted under*

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					digital displays in appropriate locations rather than inadvertently deterring major occupiers through overly restrictive controls.	*deemed consent will require formal advertisements consent prior to installation."*
Policy GD11: Shopfronts						
Historic England	Policy GD11: Shopfronts	Support			Policy GD10, we welcome the references to heritage within this policy.	
6. Housing						
Community Campaigner David Barton	Paragraph 176	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate	Entirety of Document- Authentic Traditional Architecture will provide the greatest boost to everyone across the City reinvigorating the appeal for the area whilst providing purpose.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Historic England	Paragraph 176	Support			Housing allocations, we note that where site allocations have already received planning permission, we have not raised the need for heritage assessment, as this will have been considered as part of the wider planning application process. We note currently that the housing allocations are not supported by a heritage impact assessment, though we are aware that there is a draft now available and that we are currently commenting on this draft, outside of the Regulation 19 process. We will make comments formally through the HIA process and then request that where comments relate to the housing sites, and where avoidance and mitigation measures are required, that these can be incorporated into the specific policy wording if needed. We would aim to work with the local authority through a Statement of Common Ground to address any concerns in relation to the housing sites once we have commented on the evidence base documents.	
South Derbyshire District Council	Paragraph 177				The spatial portrait (paragraph 20) sets out the existing mix of housing within the City and this is dominated by semi detached and detached housing, within the context of falling home ownership, SDDC consider that Derby City Council	

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					could focus on delivering smaller (more affordable) dwellings at higher density, predominantly in the form of flats. High density development, such as flatted accomodation, is more suited to urban areas within a City, particualrly around transport hubs such as the railway station. A focus on supporting high denisty development through both policy and allocations would assist Derby significantly with meeting their housing target. Information from the recently approved Friar Gate and Cathedral Quarter developments show that flatted development within the city centre is in high demand. With this in mind, references to Derby's limited abilty to meet its own housing need (e.g. paragraph 20, 70) and limited availability of re-developable land is questioned. The SHLAA also includes a number of potential sites within the City Centre that are identified as suitable for residential development but delivery is uncertain, regeneration of these sites may be assisted through a Local Plan allocation as this provides certainty for developers / investors and can assit with delivery.	
Policy H1: Housing Delivery						
Amber Valley Borough Council	Policy H1: Housing Delivery	Objects		No	The draft Local Plan sets out that the Derby Urban Area comprises the urban area of Derby and planned extensions to it in the administrative boundaries of Derby City, South Derbyshire and Amber Valley. There is history of positive collaborative working between the Derby Housing Market Area (HMA) authorities, which has included the Derby HMA Joint Advisory Board playing	It would be helpful in Appendix 2 to detail the sources of supply for each monitoring year, to show which sites with permission, which sites which are allocated are delivering as well as assumptions on windfall.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					an important role in overseeing the co-ordination of evidence and strategy development between the three local authorities. We support the ongoing cooperation between our authorities to allow for appropriate delivery of housing across the Derby HMA. This is increasingly important given the changing context within which the HMA authorities are working. There are challenges due to different plan periods, changes to the local plan making system including transition arrangements, changes to how local housing need is calculated, a new version of the NPPF, and Local Government Reorganisation. Despite the obvious challenges, the HMA authorities are still proactively to working together. With respect to collaborative working, the HMA authorities have previously produced a Statement of Common Ground to document the joined up approach to working across the HMA area. The Statement of Common Ground is currently being updated to reflect the latest position of each of the Local Authorities and combined HMA needs. <u>Housing need and delivery</u> Policy H1: Housing Delivery This policy now states:	

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					Over the Plan period (2023 to 2043) Derby's housing needs will be met through the delivery of high-quality new homes in sustainable locations. New homes will be provided to meet a range of housing needs including market and affordable homes, and across a variety of types and sizes, and which are capable of meeting specialist needs which are identified in the Local Housing Needs Assessment. In particular, the Council will: a) facilitate the delivery of a minimum of 12,500 new, high quality mixed tenure homes within the city between 2023 and 2043; b) work with neighbouring local authorities to co-ordinate and plan urban extensions to the city to ensure comprehensive development, connectivity and integration with established areas and communities and ensure that infrastructure needs are met; ... It is noted that the supporting text to this policy that it has been updated to include a new standard method housing need figure of 953 net new dwellings per annum	

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					(previously 917 net dwellings per annum), with an overall 20-year housing need figure of 19,060 net new homes. However, the most recent standard method annual housing need figure of 960 net new dwellings per annum, as of June 2026, is not reflected in the plan. We consider that the plan should use 960dpa to calculate its housing needs but should only be applied from 2026. This would give a need of 16,320 over the period 2026 to 2043. Paragraph 74 of the Reg 19 submission draft Local Plan for Derby highlights that Derby City's ongoing housing needs determined through the standard method are unable to be wholly met within the city's boundaries given spatial constraints. It indicates that 'later work' has identified that the city would be able to provide a minimum of 12,500 homes during the plan period. However, this later work does not appear within the published evidence base. Derby City Council previously indicated that based on work updated in 2024 and covering the period to 2039, the City would have capacity to provide approximately 12,500 homes to 2039 (16 years). The figure of 12,500 is now being used in relation to the time frame of 2023 – 2043 as the plan period has been extended. It is unclear if any further work has	

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					been undertaken to review the earlier work which led to the 12,500 dwellings figure to see if further capacity can be identified for the additional years of 2039 – 2043. It is also unclear if the supply that was previously identified to make up the 12,500 dwellings is the same supply being relied upon in the Reg 19 Local Plan. For example, the windfall allowance (120 dwellings pa) has been extended for a further 4 years and there are allocations delivering 1,150 homes in the same period. We consider that these should be additional to the 12,500 figure. Therefore the plan should state that the supply is 14,130. This made up of the 12,500 supply for the period 2023-2039, plus 480 homes windfall for the period 2039-2043, plus the 1,150 homes being delivered on proposed allocated sites. Accordingly, it is concluded that this policy is unsound as is it is not justified by the evidence. However, this could be rectified through modifications as detailed above. <u>Accommodating HMA unmet need</u> In terms of where HMA unmet need can be accommodated, the draft local plan at paragraph 77 and 180 implies that all of Derby's unmet housing needs will be accommodated within South Derbyshire and Amber Valley.	

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					In this regard: • Paragraph 77 states: 'Taking these studies together with the statement of common ground between the HMA authorities and the progress on the Amber Valley and South Derbyshire Local Plans, the HMA's housing needs can be most sustainably met with the delivery of a minimum of 12,500 homes through this plan, and the remaining requirements being delivered through the Amber Valley and South Derbyshire Local Plan.' • Paragraph 180 States: 'A strategic approach to meeting the housing needs of the Derby HMA has been agreed by the three HMA authorities which means that Derby City's unmet needs will be accommodated in sustainable locations within South Derbyshire and Amber Valley.' For clarity, the agreed position between the authorities as detailed in the signed Statement of Common Ground is that the local housing need calculated using the previous version of the Government standard methodology for the time period to 2040 could be met within the HMA based on the plans being developed at that time. As noted above there is a changing context that will require the HMA to	

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					consider needs arising beyond 2040 in future plans. The current standard method figure for Amber Valley of 670 homes is a substantial increase from the Adopted Local Plan requirement of 434 dwellings, which used the standard method calculation figure at the time of 350 dwellings per annum and incorporated unmet HMA need of 1320 dwellings. It is noted that as the Amber Valley housing requirement will be substantially higher under the new standard method this could result in a situation where Amber Valley may add to the HMA unmet need, subject to analysis of the housing need during the plan period 2026 – 2044 which has yet to be undertaken and work to assess future potential supply. Amber Valley Borough Council is currently undertaking a Housing and Economic Needs Assessment (HEDNA) to establish housing and economic need in the Borough, a green belt review and undertaking a Strategic Housing land Availability Assessment This work is not expected to be completed until summer of 2027. However, at this point in time Amber Valley Borough Council is unable to determine a position with respect to accommodating HMA unmet need beyond that it has committed to, and therefore it cannot say that HMA unmet need can be met in appropriate sustainable locations.	

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					As previously advised, relevant references in the plan should refer to HMA unmet need rather than Derby unmet need.to accord with the changes set out by the Planning Inspectorate to the Amber Valley Local Plan.	
Caddick Land*	Policy H1: Housing Delivery	Objects		No	The draft Derby Local Plan correctly identifies unmet needs will be addressed in the South Derbyshire and Amber Valley local plans. However, the draft Derby Local Plan then specifically identifies sites within these authorities to meet those unmet needs (specifically sites in South Derbyshire on the edge of the Derby urban area). The approach of specifically identifying sites in other authority areas is unsound as the sites in South Derbyshire are not allocated sites, there are no current planning applications, and the draft plans which identify these sites have not been submitted for examination. The sites in question (South Derbyshire Draft Local Plan Part 1 Review sites STRA1 Infinity Garden Village and STRA2 Land South of Mickleover) have significant unresolved objections. This has direct implications for the Derby Local Plan as draft allocations within the plan (namely draft allocation HA5) are reliant on those sites within South Derbyshire. For example, if STRA2 on land South of Mickleover in South Derbyshire is not found sound then HA5 would not be deliverable.	

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Caddick Land*	Policy H1: Housing Delivery	Objects		No	Caddick welcomes that emerging policy H1 has been updated to remove specific references to sustainable urban extensions in South Derbyshire being the means of meeting Derby's unmet need. This is a sensible and logical change which recognises the Derby Local Plan cannot lawfully allocate or direct development to particular locations in other authority areas. However, we remain concerned that through emerging plan paragraphs 181 and 182 there remains an implication that South Derbyshire sites at Mickleover and Infinity Garden Village are the intended or preferred locations. The emerging plan remains **unsound** in this regard, and references to sites in other authorities should be removed from the plan policies and supporting text.	
Derbyshire County Council	Policy H1: Housing Delivery	Support	Yes	Yes	Derbyshire[DB3.1] County Council supports the approach set out in Policy H1. Derbyshire County Council has been working jointly with Derby City Council, Amber Valley 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	

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					Board, Derby HMA Officer Coordination Group and Derby HMA Growth Strategy Officer Working Group. These Member and Officer Groups have also considered the likely potential strategic infrastructure requirements that are likely to be required to support housing and employment growth across the HMA. To this end, a Derby HMA Transport Strategy Group has recently been established to consider the highways and transport implications of planned growth across the HMA, which recently commissioned Systa Consultants to carry out transport modelling works of all the strategic and housing allocations that are being proposed in the three respective Local Plans (see further comments below). Under the requirements of the Duty to Cooperate, the four HMA authorities have also engaged with Erewash Borough Council on a regular basis over the last three or four years through these Member and Officer Groups to consider cross boundary strategic housing matters and future housing needs arising in Erewash Borough and the Derby HMA. The joint working arrangements within the Derby HMA have underpinned the preparation of separate but aligned local plans for each local authority areas, over a common timeframe as far as possible. This joint working has included: • 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	

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					period and for future development to be supported by appropriate services and infrastructure. On the basis of the above, it is welcomed and supported that the Regulation 19 Local Plan has been prepared and drafted to reflect the considerable and extensive joint working that has taken place between the four HMA authorities and the key strategic issues that have been identified and joint approaches that have been agreed on key strategic cross boundary planning matters. This joint working is fully reflected in Chapter 4: The City's Spatial Strategy and Policy H1. Housing Provision and Meeting Derby City's Unmet Need It is noted that the supporting text to Policy H1 of the Plan, indicates the following: 179. Derby's housing needs are set through the Government's 'Standard Method' calculation which identifies a need of 953 net new dwellings per annum. Over the 20-year plan period that equates to a need for a minimum of 19,060 net new homes. 183. Derby's capacity to provide new homes has been evidenced and agreed across the HMA as a minimum of 12,500 net new dwellings. The Derby HMA Joint Advisory Board has played an important role in overseeing the co-ordination of evidence and strategy development between the three local authorities. In this context, Policy HO1 of the new NPPF requires that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the	

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					extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. It is considered that this requirement in the NPPF has been appropriately reflected in the Regulation 19 Local Plan. As noted above, Derbyshire County Council has been working jointly and collaboratively for some time with Derby City Council, Amber Valley Borough Council and South Derbyshire District Council that comprise the Derby HMA, to consider cross boundary housing matters and particularly the future housing requirements of both the Derby HMA as a whole, and the individual local authority areas that will be set out in the three councils' local plan reviews. This collaborative working has been carried out in the context that each of the three authorities are preparing their Local Plan Reviews to aligned timescales but slightly differing plan periods, with the Amber Valley Local Plan being the most advanced of the three plans, which has recently been adopted in March 2026. The implications of this are considered further below. Derby City Council has recently carried out extensive work to assess the City's capacity for accommodating future housing needs in the City, which has been assisted by the other HMA authorities including the County Council. The City Council's capacity work has been concluded and peer reviewed for robustness by consultants AECOM. This capacity work has concluded that the City can only accommodate around 12,500 new homes over the City Council's Local Plan Review period against the new standard methodology housing need of around 19,000 new homes.	

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					In the context of the above, three HMA authorities supported by the County Council commissioned consultants (Clearlead) to undertake a Sustainability Appraisal (SA) of a range of options of how Derby City's unmet need could be accommodated within Amber Valley Borough and South Derbyshire District. The HMA authorities identified three alternative scale options to be tested through the SA which included: • Scale 1: Standard method in full (including 35%); 36,584 dwellings; • Scale 2: Standard method (no 35% uplift); 31,008 dwellings; and • Scale 3: Standard method (no 35% uplift) + 10%; 34,109 dwellings. Within each of these scale options, the SA considers different apportionment options between the three local authority areas, including distribution between sites adjoining Derby (the Derby Urban Area, or 'DUA'), towns and key villages. The assessment was informed by the HMA Growth Options Study. Within the SA, the Broad Areas of Search identified in the GOS have been compared to the sites submitted to the Strategic Housing and Economic Land Availability Assessment (SHELAA) for Amber Valley and South Derbyshire in order to provide an indication of site capacity for residential development. The overall conclusion of the SA is that meeting the unmet need arising from Derby as close as possible to the City amounts to the most sustainable development option.	

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					Given the above, Derbyshire County Council considers that the City Council's approach to assessing the City's future housing needs and its proposed approach in the Pre-Submission Plan that makes provision for a minimum of 12,500 dwellings over the plan period with the City's unmet need being met as large sustainable urban extensions on the edge of the City in Amber valley and South Derbyshire, is robust and well justified and is supported by a range of up-to-date evidence and takes appropriate account of the Government's new standard methodology for assessing housing need. In seeking to help meet part of Derby City's unmet need, the Regulation 19 Pre-Submission South Derbyshire Local Plan proposes to allocate two large strategic sites that form sustainable urban extensions to the City on land at Infinity Garden Village (IGV) for 2000 homes and on land south of Mickleover for 2,500 dwellings. The location of these sites fully reflects the conclusion of the SA work above, which indicated that the most sustainable location to meet Derby's unmet need was for sites located as close to the City boundary as possible. In principle, therefore, the allocation of these two strategic sites has been supported by the County Council in its response to the South Derbyshire Local Plan Regulation 19 consultation, in which the County Council has also committed its support to work with the District Council to ensure that the key necessary strategic infrastructure required to	

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					support the delivery of the urban extensions, is delivered in a timely manner, which includes the provision of a new A50 junction and link road and new secondary school at IGV allocation and a new primary school on the Mickleover allocation. Statement of Common Ground Given the context above, an updated Statement of Common Ground has recently been agreed and finalised by the three HMA local planning authorities, to which Derbyshire County Council is also a signatory as strategic infrastructure provider. The SoCG sets out an agreed approach of how the authorities will work together to seek to ensure that the unmet needs of Derby City are met in full through the Local Plans of Amber Valley Borough Council and South Derbyshire District Council. The SoCG has been tested through the Examination of the recently adopted Amber Valey Local Plan, through which the Inspector deemed the joint working approach between the HMA authorities to be robust and legally compliant.	
Fisher German on behalf of Bloor Homes Ltd	Policy H1: Housing Delivery	Object	Yes	No	The NPPF states at Paragraph 8a that in securing the social objective of sustainable development, “sufficient number and range of homes can be provided to meet the needs of present and future generations”. Paragraph 11a affirms that Plans should “promote a sustainable pattern of development that seeks to: meet the development needs of their area”. Part B of paragraph 11 states “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:	

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					i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area ; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole." Paragraph 20 of the Framework states "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for: a) homes (including affordable housing)". Paragraph 61 states "to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed". Paragraph 62 continues "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance". Derby City Position The applicable Local Housing Need (LHN) has been updated since the Regulation 18 consultation in January 2026, increasing from 917 dwellings per annum to 953 dwellings per annum to reflect the latest affordability adjustment (2026). This updated position is supported. Over the 20-year Plan period, the Council acknowledges that this equates to a requirement for 19,160 net additional homes. However,	

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					despite recognising this level of need, the City Council concludes that it is unable to accommodate the full requirement within its administrative area. Paragraph 183 of the consultation document confirms that the requirement of 12,500 dwellings (which equates to the maximum capacity of the City over the Plan period) is agreed over the HMA through the Derby HMA Joint Advisory Board, with the remainder of LHN unable to be accommodated in the City. A Statement of Common Ground (SoCG) has been prepared (states written Autumn 2025 though labelled 2026 – 2026 used for the purposes of referencing within this document), albeit does not set out a clear strategy as to the distribution of unmet needs. BHL made clear representations at the Regulation 18 consultation stage that evidence of HMA agreement to the capacity of Derby City and a willingness for unmet needs to be met in the form of a SoCG was required. This is a fundamental matter of soundness to ensure both agreement as to the quantum of unmet needs, and to provide certainty that any unmet needs being exported from the City will be delivered within the HMA. The last tested SoCG within the HMA was produced to support the Amber Valley Local Plan Examination. This was published on 6 December 2024, thus pre-dates the most recent changes to NPPF and PPG, and was undertaken to predominantly support the pre-NPPF 2024 compliant plan being advanced in Amber Valley, but is also relevant for the emerging Plan in South Derbyshire, both of which could	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					proceed under transitional arrangements under previous versions of the NPPF (2023). That SoCG agreed that Derby City is constrained and will have unmet need. Derby City Council committed to delivering a minimum of 12,500 homes over the period 2022-2039 (735 per annum). This left a shortfall of over 8,500 units to be delivered in the neighbouring authorities. The 2026 SoCG remains untested and lacks clear detail as to how any unmet need arising from the 2024 Standard Method will be met in the Derby HMA. It again accepts a supply of 12,500 dwellings in Derby City, this time over the period 2023-2043, and highlights a shortfall of 5,840 dwellings utilising the 2025 standard method calculation for the city (Derby's LHN updated in 2026 through this R19 document results in a higher shortfall). The application of Policy H1 as drafted, utilising a 2026 assessment of Derby City's LHN, results in a shortfall of 6,560 dwellings (19,160 (Plan period LHN) minus 12,500 (plan period supply)). Despite the Plan's assertion that this position is agreed, it is only agreed in the context of Amber Valley and South Derbyshire's emerging Plans where their own Local Housing Need was significantly lower than now applicable. There is no agreed position in respect of the exporting of Derby City's needs against the 2024 standard method. Regardless, prior to exporting any unmet needs, {DCC must demonstrate clearly that it has exhausted all its own supply. Paragraph 11b does allow for needs not to be met where	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Footnote 7 areas provide 'strong reason' for restricting development. As discussed later within these representations, in relation to BHL land interests, the Council's evidence base does not show that the exclusion of this site provides a strong reason for restricting development. Therefore, BHL interests at Locko Road should be allocated, to reduce the quantum of unmet needs. The adopted Amber Valley Local Plan, provides only 1,320 homes towards meeting Derby City's unmet needs up to 2040, equating to 73 dwellings per year, over their 17-year Plan period. This contribution however must be read in the context that Amber Valley's own needs at that time was only 351 dwellings per annum versus the 666 dwellings now applicable. Turning to the current Local Housing Need of 958 dwellings (2026-2036 base and having regard for the March 2026 affordability ratio as assumed in the draft Plan), and looking over the proposed Plan Period of 2023-43, Derby City are still maintaining a deliverable supply of 12,500 homes - though now over a 20-year Plan period. Having regard for a need of 19,160 dwellings, that results in unmet needs of 6,660 dwellings. This is an increase of 820 dwellings from the 2025 SoCG, due to the increased LHN now applicable in Derby City. HMA Position Amber Valley's updated Local Housing Need is 666 dwellings per annum. This is in contrast to an adopted requirement of 424 dwellings per annum (to meet a Local Housing Need of 351 dwellings per annum and to provide the 1,320	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					commitment to Derby City's unmet needs). This means, against the adopted strategy, there could be argued to be no contribution to unmet needs currently. On the contrary, Amber Valley would need to increase their housing requirement by some 242 dwellings per annum simply to meet their own current needs, let alone meet any of Derby City's unmet needs. There is no agreement in the most recent Statement of Common Ground that Amber Valley would seek to increase its needs in its Plan review both to meet its own LHN and a similar level of contribution as per the adopted Plan. Turning to South Derbyshire, their updated Local Housing Need (2026) amounts to 592 dwellings per annum. The proposed requirement in the Regulation 19 and addendum document is 763 dwellings per annum, or 15,263 dwellings per annum. The Local Plan, despite a 2026 update, still uses 2024 LHN of 507, not the 592 now applicable. For consistency, using a 2026 base date, this representation considers the 592 now applicable. It is noted that South Derbyshire's Regulation 19 Local Plan Part 1 consultation draft is clear that overprovision in South Derbyshire is not solely to meet Derby City's unmet needs. Policy S1 of the Regulation 19 document states "Over the plan period (2022 – 2041) at least 14500 dwellings updated to 15,263 in the SDDC Regulation 19 addendum] will be built within South Derbyshire. This comprises 9633 homes to meet South Derbyshire's own needs and the remainder to help meet Derby City's unmet need to reflect the high level of housing delivery experienced in South Derbyshire in recent	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					years; to provide flexibility in regard to site delivery and to help match affordable housing need with delivery as closely as possible". It is clear therefore that not all oversupply in SDDC is intended to meet unmet needs. For simplicity and given the Plan is not explicit on a split, which will no doubt need to be considered at SDDC's examination, these representations will assume all oversupply in SDDC can be used to offset Derby City unmet needs, but the reality is this likely overestimates any contribution SDDC can make. This means against the proposed strategy, South Derbyshire could be argued to being capable of contributing 171 dwellings per annum, or 3,420 dwellings over Derby City's unmet needs over a 20-year Plan period. Using 2026 LHN unmet need of 6,660 dwellings, assuming no agreed and tested contribution from Amber Valley, and a contribution of 3,420 dwellings from South Derbyshire, that leaves a shortfall of 3,240 dwellings over the Plan period unmet need over the Plan period. Even if Amber Valley could contribute a further 1,320 dwellings, which is not explicit within the SoCG, it would still leave a shortfall of around 2,000 dwellings in the HMA. The 2026 SoCG (Page 5) sets out there is sufficient supply across the HMA to meet Housing Needs in full, however, unmet need cannot be arbitrarily met by oversupply in other locations. It must be formally declared and formally met in Plans, which is not the case currently as identified above. Moreover, the additional supply proposed in South Derbyshire is explicitly not just for meeting Derby City's	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					unmet need, it is also to provide contingency for delivery of South Derbyshire's own housing requirement, and to align affordable housing delivery. Similarly, any oversupply above Amber Valley's requirement is contingency only to meet Amber Valley's unmet need. Moreover, this SoCG is now out of date in respect of Derby City's unmet needs having regard for the updated Derby City LHN, which is larger than previously identified. It also results in South Derbyshire potentially meeting Amber Valley unmet need, which is a position not agreed or tested politically or at examination. An updated LHN is required as a matter of urgency to clearly state how, against a 2026 compliant LHN, unmet needs will be distributed and the justification for any remaining unmet need. Conclusions on Housing Requirement There is no agreed SoCG which clearly distributes Derby City's unmet need against the 2026 LHN. Both the adopted Amber Valley Local Plan and emerging South Derbyshire Local Plan make some commitment to meeting Derby City's unmet needs, however this is in the context of the pre-2024 Standard Method. A clear and updated SoCG is required as a matter of urgency to establish an agreed 2024-method compliant position (using 2026 as a base date). Before exporting unmet needs, Derby City must demonstrate without any doubt that it has exhausted all options to meet its needs in full, with any residual need be met by the HMA neighbouring authorities, as agreed through a SoCG. As discussed later in these representations, Derby City has sites it should - and in fact is obligated to - allocate to ensure as	

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					much of the City's needs are met as possible, prior to exporting to neighbours. Turning to the tests of soundness, the Plan fails: • Positively prepared – The Plan does not provide a strategy which meets the areas objectively assessed needs, both within Derby City and the wider HMA. • Effective – No agreed evidence that any quantum of unmet needs can be met by HMA neighbours utilising the 2024 Standard Method (2026 base date of calculation). SoCG provided is vague and provides no certainty that SDDC and Amber Valley will increase their housing requirement sufficiently above their own higher LHN. • Consistent with national policy – Inconsistent with Paragraphs 8, 11, 20, 61 and 62 as set out above. Fails to utilise sites in accordance with paragraph 148, as discussed below. Plan Period This Regulation 19 Plan updates the date of the Standard Method calculation from 2025 to 2026. The Standard Method is inherently forward looking. The standard methodology is based on both stock growth and affordability ratios which can be impacted by delivery in previous years. Such delivery is already intrinsically counted as part of calculation through affordability adjustment. Thus, the housing delivered prior to the calculation will have informed the onward projection. It is clear that the role of the Standard Method is to be forward looking, as demonstrated below. Therefore, delivery in years preceding the calculation of Local Housing Need have already	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					been included in the Standard Method Calculation and therefore should be excluded as years of the Plan period. As such, the Plan period should have a base date of 2026 to reflect the calculation of Local Housing Need. A number of recent Local Plan examinations have grappled with the issue of the relationship between the date on which the Local Housing Need is calculated and the base date of the Plan. Note these reflect examinations both pre and post the 2024 Standard Method, but ultimately all remain relevant. In North Norfolk the Inspector's Report1 (October 2025) at Page 29 states "the base date of the plan should correspond to the date from which the housing needs of the district have been quantified, and as explained below, this exercise was undertaken using up to date statistics as at April 2024. In order to be consistent with national policy the plan period should therefore be amended to 2024-40". The Isle of Wight Post Hearings Letter2 (April 2025) states at paragraph 25 "in already accepting the standard method figure as the basis for the housing need, the Council has indicated that the plan period would need to be modified to be forward looking. As such the base date of the plan should move from 1 April 2022 to 1 April 2024 to reflect the latest local housing need figure prior to the point of plan submission. As submitted the end date of the plan is 31 March 2037". In the Amber Valley Inspectors Report3 (January 2026) the Inspector concluded "it has been put to us that to do so	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					should also require the base date of the Plan to be altered to align with the date of the new SM figure as to do otherwise would "double count" dwellings in the Plan's housing supply which will also have been counted as existing housing stock for the purposes of the SM. Although the PPG is silent on this matter, having regard to the responses made to the MM consultation we consider that the Plan should use the most up to date SM figure. In doing so, to avoid "double counting" a recalibration of the base date for the purposes of housing supply is necessary". Also of relevance is nearby Greater Nottingham, where the Inspectors Post Hearing Note4 (August 2026) Paragraph 13 states "since the calculation of local housing need is a forward-looking assessment, it runs from the date it was calculated to the end of the plan period. Any under or over supply of housing prior to the date of calculation is irrelevant for the purposes of the Plan. To that end the housing trajectories and five year housing land supplies need updating by deletion of housing supplies prior to the latest calculation of local housing need. We will comment further on how that might affect the housing requirement(s) of the Plan in any subsequent post hearing note" [our emphasis]. It is clear therefore that the base date of the Plan should be updated to reflect the date of calculation of the Standard Method, which in this case should reflect 2026/27 as the base year. Five-Year Housing Land Supply	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Paragraph 72 of the Framework states that "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for five years following the intended date of adoption; b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period." Whilst the Council has not provided a full trajectory of anticipated housing supply, it does identify housing projections over the Plan period, enabling consideration of whether the Plan can comply with Paragraph 72 of the NPPF, notwithstanding that it proposes a housing requirement of 625 dwellings per annum, below the identified Local Housing Need. Having regard for a base date of 2026, which is clearly applicable in Derby given the update to Local Housing Need figure now proposed, it is possible to calculate a position. Delivery for the 5-years from 26/27-30/31 (according to the Council's trajectory) amounts to 3,722 dwellings. The requirement over that period is 3,125 dwellings (625x5). Derby City has failed the Housing Delivery Test (2025), achieving only 71% of the required level of growth. As such, it	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					is necessary to apply a 20% buffer to any 5-year housing land supply calculation (20% of 3,125 = 625). This means a 5-year requirement of 3,750 dwellings, against an anticipated supply of 3,722 dwellings, or 4.96 years, meaning Derby City cannot demonstrate a housing land supply currently, prior to any critical examination of the Council's supply, windfall allowance or applying a lapse rate. Considering the assumptions on Local Plan Allocations, the Council has estimated delivery of 417 dwellings across 10 sites in the year 28/29. Of those, eight are yet to have a permission granted, and many do not have an application even submitted. For example, Brook Farm (Policy HA2), delivery anticipated in 2-years, with 100 dwellings in the 5-year supply, without an application submitted. Likewise for Stoney Lane Spondon (Policy HA7), where 120 dwellings are assumed, including 60 dwellings in two years, where again no planning application has yet to be submitted. Whilst a shortfall can be demonstrated without consideration of supply, it is clear from even a cursory review that the position is likely to be overoptimistic regardless. Again, this points to a clear need for additional supply to be found within the city boundary for compliance with Paragraph 72 of the Framework. BHL's site at Locko Road can make a valuable contribution to this requirement. Windfall It is noted that Table 2 confirms the Council assume a windfall contribution of 120 dwellings per annum. Paragraph 188 states that between "2016 to 2026 over 100 windfall	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					dwellings were delivered on average each year on small sites alone (1-9 dwellings). This figure does not include any housing delivered within the city centre". However, the Council do not state what level of delivery was delivered within the city centre. As such, it is not clear there is compelling evidence for a windfall delivery rate of 120 dwellings. More evidence is required to justify the windfall allowance of 120 dwellings. Such evidence should be provided to the examination so it can be properly scrutinised and comment made in detail. Without such evidence, the windfall allowance should be reduced to 100 dwellings per annum.	
Home Builders Federation*	Policy H1: Housing Delivery	Object		No	*Policy H1 is not considered to be sound as it is not effective, justified, or consistent with national policy* HBF recognise the long history of joint working between the three Derby HMA local authorities, Derby City, Amber Valley and South Derbyshire and the conclusion that Derby cannot meet all of its housing needs within the city. However the Plan needs to set out in policy that this has been acknowledged by both Amber Valley and South Derbyshire and that a strategic approach to meeting the housing needs of the Derby HMA has been agreed. It will be important for monitoring of housing delivery to be undertaken across the three HMA authorities to ensure that housing which is meeting Derby City's unmet needs but being accommodated in sustainable locations within South Derbyshire and Amber Valley is being delivered. The policy should clearly set out the total housing requirement for Derby, how much of this is being	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					met within the City and how much is remaining unmet need that will be met elsewhere. In order to be effective and justified the Plan's policies and evidence base should set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by paragraph 69 of the NPPF. Indeed, HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%. The Government has a long-standing desire to diversify the house building sector and has actively looked to see what more can be done support for SME builders. One of these actions is the requirement in the new NPPF (Aug 2026) for small and medium sites to be allocated in Local Plan. HBF has long called for allocations, rather than windfalls, to be the way that the small-site requirement is delivered, as this provides greater certainty needed for SME developers. As such we would request additional small and medium allocations are made in the Derby City Local Plan to ensure the Plan is effective and	

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					deliverable. Although small sites may come forward as windfall, HBF believe that in order for the Plan to be effective and justified the small sites requirements should be met through allocations	
Johnson Mowat on behalf of Harworth Group*	Policy H1: Housing Delivery	Support		Yes	Policy H1 of the draft Local Plan for Derby seeks to ensure Derby's housing needs are met over the Plan period (2023 to 2043) through the delivery of high-quality new homes in sustainable locations. The draft policy wording states that the Council will facilitate the delivery of a minimum of 12,500 new, high quality mixed tenure homes within the city between 2023 and 2043. Harworth Group is supportive of Policy H1 and consider that the overall strategy has been positively prepared to meet Derby's objectively assessed needs. It is considered critical that sites in sustainable locations are allocated for housing development, such as 'Land at Stoney Lane, Spondon' which is subject of allocation reference HA7 in the Regulation 19 Submission Draft Plan. The site is located in a highly sustainable location and has the capacity to deliver around 450 high quality, new homes to meet a range of housing needs across a range of sizes and tenures.	
Marrons on behalf of Ainscough Strategic Land	Policy H1: Housing Delivery	Object		No	The Housing Requirement Paragraph 179 (previously Paragraph 183) of the Emerging LDP states that "Derby's housing needs are set through the	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Government's 'Standard Method' calculation which currently identifies a need of 953 net new dwellings per annum. Over the 20-year plan period that equates to a need for a minimum of 19,060 net new homes." Policy H1 sets out Derby's overarching approach to housing delivery over the Local Plan period from 2023 to 2043. The policy confirms that the city will deliver a minimum of 12,500 new homes during this time, reflecting what the Council considers to be the city's practical capacity for growth within its constrained urban boundary. Patently, planned delivery is lower than the housing need by at least 6,560 homes. Because Derby cannot meet its objectively assessed housing need within the city, the policy makes clear that additional housing to meet the city's unmet need will be provided in sustainable urban extensions to the city located in South Derbyshire and Amber Valley. Acknowledging Unmet Need In light of the above, our first concern in respect of Policy H1 is that it does not clearly declare the extent of unmet need to be accommodated in neighbouring authorities. For clarity, Policy H1 should clearly identify the consequent shortfall of 6,560 and state expressly that this needs to be accommodated within the wider HMA. Meeting Unmet Need over the Plan Period The Regulation 19 Plan continues to rely heavily upon	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					strategic cooperation between Derby City Council, Amber Valley Borough Council and South Derbyshire District Council. Paragraphs 180-183 explain that Derby's unmet need will be addressed within Amber Valley and South Derbyshire and that this approach has been developed through ongoing HMA cooperation and Statements of Common Ground. In principle, the Housing Market Area approach is supported. However, whilst the headline figures suggest that neighbouring authorities may collectively be providing sufficient housing to offset Derby's unmet need, the Plan still fails to demonstrate that Derby's needs will be met throughout the entirety of the Plan period. The critical issue is not simply the overall amount of housing being provided across the Housing Market Area, but whether that provision aligns with the Derby Local Plan period. Derby's Local Plan extends to 2043, whereas the adopted Amber Valley Local Plan extends only to 2040 and the emerging South Derbyshire Local Plan extends only to 2041. Whilst both authorities are making provision towards Derby's unmet housing needs, the Derby City Regulation 19 Plan does not explain how housing needs arising during 2042 and 2043 will be met. This concern is compounded by Derby's own evidence, which indicates that the City's identified housing capacity of 12,500 dwellings is expected to be largely exhausted before the end	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					of the plan period. As a result, Derby becomes increasingly reliant upon neighbouring authorities during the latter years of the Plan period, precisely at the point where those authorities plans no longer provide for unmet need arising from the City. Although Amber Valley's adopted Local Plan includes provision intended to contribute towards Derby's unmet housing needs, it remains unclear how needs arising beyond 2040 will be addressed. Similarly, whilst South Derbyshire's emerging Local Plan proposes to accommodate a substantial proportion of Derby's unmet requirement, there remains very limited flexibility within the strategy. Any delay or under-delivery within Derby would place additional pressure on neighbouring authorities, yet no meaningful contingency appears to have been identified elsewhere within the Housing Market Area. Taken together, these factors raise doubt as to whether Derby's housing needs will be met throughout the full plan period. Whilst it is recognised that Derby City Council cannot dictate the content of neighbouring Local Plans, it remains incumbent upon the Council to demonstrate that its housing strategy is effective. In the absence of clear evidence explaining how housing needs arising between 2041 and 2043 will be accommodated, the Plan does not currently demonstrate that cross-boundary	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					housing needs have been fully resolved. Accordingly, further evidence should be provided to demonstrate how housing needs arising across the entirety of the period to 2043 will be met. Until such evidence is provided, serious concerns remain as to whether the housing strategy satisfies the effectiveness test of soundness set out in paragraph 36 of the NPPF. Viability The Council's Residential Viability Assessment1 forms an important component of the evidence base supporting the Regulation 19 LDP and is intended to demonstrate that the proposed housing strategy is capable of being delivered over the Plan period. Whilst the viability evidence is welcomed, the conclusions of the assessment raise important questions regarding the deliverability of the housing strategy proposed through Policy H1. The Viability Assessment concludes that significant viability challenges exist across large parts of Derby, particularly within the City Centre, low value housing markets and parts of the medium value market. It further identifies that affordable housing requirements, accessibility standards, planning obligations, the Future Homes Standard and the Building Safety Levy collectively place considerable pressure on development viability. Significantly, the report recommends that the Council maintain flexibility in the application of policy requirements and continue to allow site-specific viability considerations where justified.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					These findings are directly relevant to the housing strategy set out within the Regulation 19 Plan. Policy H1 seeks delivery of a minimum of 12,500 dwellings within Derby between 2023 and 2043, with a substantial proportion of that supply expected to come from city centre regeneration opportunities and previously developed land. The Plan is therefore heavily reliant upon development typologies that the viability evidence itself identifies as facing the greatest delivery challenges. Whilst the Assessment ultimately concludes that the Plan can proceed on the basis of flexible policy application, this nevertheless calls into question the extent to which the housing trajectory is dependent upon development coming forward in circumstances where policy requirements may need to be reduced or negotiated. Accordingly, further evidence should be provided demonstrating that the housing trajectory remains realistic and achievable in circumstances where significant parts of the strategy are reliant upon development forms that the viability evidence identifies as financially challenging. In the absence of such evidence, concerns remain regarding whether the housing strategy is sufficiently justified and effective to satisfy the soundness requirements of paragraph 36 of the NPPF. Sources of Supply	

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					Sources of supply are set out in Table 2 of the Plan. The key areas of concern for us related to the "City Centre Allocations" and windfalls. Urban Capacity: We remain concerned by the absence of proportionate and objective evidence underpinning Derby City Council's assumed housing capacity of 12,500 dwellings. An understanding of this evidence will be necessary to satisfy the tests of soundness and we suggest the Council provide such clarity ahead of a future Examination. Whilst the Regulation 19 Plan contains minor clarification regarding City Centre regeneration opportunities within the supporting text of Policy H1 when compared to the Regulation 18 draft, there has been little additional evidence produced to demonstrate that the assumptions underpinning the 12,500 dwelling capacity figure are realistic and achievable. Rather than providing additional deliverability evidence, the Regulation 19 Plan simply retains the focus on city centre allocations with only minor variation2 presumed to reflect the updated position on applications. Table 2 identifies 2,574 dwellings arising from City Centre allocations alone, whilst Policy CC3 seeks delivery of at least 5,600 homes within the defined City Centre through a combination of permissions, mixed-use redevelopment opportunities, strategic	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					regeneration areas and upper floor conversions. This is significant when compared to the 12,641 dwellings identified within the Plan. As such, this further reinforces the need for clear evidence to support such an approach, without which concerns in respect of viability, timescales, delivery risk and implementation remain largely unanswered. In addition, there remains a notable absence of contingency planning within the housing strategy. Table 2 indicates a total housing supply of 12,641 dwellings against a target of 12,500 dwellings, representing a buffer of just 1.1%. This provides no meaningful allowance for delays or non-delivery of the city-centre or other allocations. Even a minor delay in projected trajectories could result in the failure to deliver the 12,500 homes required. Therefore, the need for supporting evidence to demonstrate delivery must remain a clear focus for the Council. Windfall Allowance: Paragraph 188 of the Draft LDP seeks to justify the continued inclusion of a windfall allowance of 120 dwellings per annum from 2029 onwards. In doing so, the Council has sought to address concerns raised through the Regulation 18 consultation by providing additional supporting text regarding historic rates of delivery. Specifically, the Council notes that more than 100 windfall dwellings per annum have	

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					been delivered on average from small sites between 2016 and 2026 and states that the allowance of 120 dwellings per annum (dpa) is considered to be conservative. Paragraph 75 of the NPPF is clear that where a windfall allowance is relied upon as part of anticipated housing supply, there should be "compelling evidence" that such sites will continue to provide a reliable source of supply. Any allowance must be realistic having regard to historic delivery rates, expected future trends and evidence from housing land assessments. The difficulty with the Council's position is that the evidence relied upon is principally retrospective rather than forward looking and only indicates that more than 100 windfall dpa have been delivered historically, rather than 120 dpa or higher. The fact that windfall development has occurred historically does not necessarily demonstrate that it will continue to occur at similar levels throughout the remainder of the Plan period. This concern is particularly acute given that paragraph 186 of the Regulation 19 Plan acknowledges that there is a "scarcity of suitable sustainable development land for housing in the city". If opportunities for development land are increasingly constrained, it is not immediately apparent why unidentified development opportunities would continue to emerge at a rate capable of consistently delivering 120 dwellings per annum until 2043.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Consequently, whilst the justification provided at Regulation 19 is stronger than that available at Regulation 18, it remains unclear whether the evidence reaches the threshold of "compelling evidence" required by national policy. In our view, further evidence should be provided to demonstrate that the assumed rate of windfall delivery is realistic and capable of being sustained throughout the remainder of the Plan period. Without this additional evidence, there remains a risk that the windfall allowance is not adequately justified. Given the reliance placed upon windfall development within the overall housing trajectory, this raises concerns regarding whether the housing supply strategy is sufficiently robust to satisfy the justified and effective tests of soundness set out at paragraph 36 of the NPPF.	
National Highways	Policy H1: Housing Delivery				Our Regulation 18 representation identified National Highways' interest in a number of the Plan's site allocations by reference to their likely impact on specific parts of the SRN, namely: • HA1 (Rykneld Road, Littleover) and HA3 (East of Moorway Lane, Littleover), both likely to impact the A38 / Rykneld Road Findern Interchange, with HA3 also likely to affect the A50 to the south); • HA7 (Stoney Lane, Spondon), likely to impact	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					the A52 / Derby Road Spondon Roundabout, and the A52 to the south; and • the City Centre allocations at Derby Riverside, Railway Station Quarter and North Castleward, which together with other CC4 allocations require assessment of impacts on the A52, A61 and A38.	
Planning Limited on behalf of National Grid	Policy H1: Housing Delivery				The draft Local Plan does not propose any residential allocations on land affected by 132kV overhead lines.	
Rob Hoddinott	Policy H1: Housing Delivery	Object	No	No	“encourage the regeneration of brownfield land” - multiple brownfield sites were submitted for consideration for HA16, the public have seen no evidence of how this was considered and /or discounted.	Consider brownfield sites submitted.
Little Ships Housing CIC	Policy H1: Housing Delivery	Object	Yes	No	Policy H1 and paragraphs 74 to 77 set the housing requirement at a minimum of 12,500 homes over the plan period and explain that the balance of the housing market area's need will be met through the Amber Valley and South Derbyshire Local Plans. We accept that the requirement is a minimum, not a ceiling, and we support the brownfield and City Centre first approach in paragraph 81 and Objective 5. Our representation concerns how the city's capacity was established, and what the Plan does about the part of the city's land that was not assessed. The Council has described 12,500 homes as the limit of the city's capacity (Council statement,	Modification 1: Policy H1 supporting text (new paragraph after paragraph 77) and Policy MH1. "The Council will assess the capacity of land and buildings in the ownership of the Council and other public bodies within the city, including surface car parks, depots and the airspace above existing and replacement public buildings and car parks,

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					November 2025). The evidence for that limit is the call for sites and the Strategic Housing Land Availability Assessment. Both assess land that owners choose to promote. Land in public ownership is different. The Council and other public bodies own a substantial estate in the city: surface car parks, depots, and the airspace above low-rise civic, health and education buildings and car parks. Whether such land is offered for housing is a landowner decision, taken on grounds wider than planning. The Council's Planning Policy team confirmed to us on 4 September 2026 that Council land has been assessed where it came forward through the call for sites, and that the one estate-wide review of Council-owned sites was carried out for gypsy and traveller provision. There has been no estate-wide assessment of the public estate's capacity for housing. The Plan therefore exports part of the city's need without having tested a source of supply that sits within the city, in single public ownership, on previously developed land, in the most sustainable locations, and which can be developed without displacing the existing use where homes are built above it. In our view this engages three of the tests of soundness: Positively prepared. The strategy should seek to meet the area's needs as a minimum. Capacity	to accommodate new homes without displacing existing uses. The assessment will be completed within 12 months of adoption, reported through the Authority Monitoring Report, reflected in the Brownfield Land Register and the housing land supply, and used to inform any review of the Plan." Add a corresponding indicator to Appendix 1: homes permitted on or above land in public ownership.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					within the city was not fully established before part of the need was passed to neighbouring authorities. Justified. The reasonable alternative of intensifying the public estate does not appear to have been assessed among the spatial options in the Sustainability Appraisal (we have not found it in Appendix C). Effective. Land in public ownership is among the most deliverable in the city: single ownership, no land assembly and no purchase price. The City Centre figure of around 5,500 homes rests largely on sites outside the Council's control. National policy points the same way. The NPPF asks plans to promote the effective use of land, to support the development of under-utilised land and buildings, especially where land supply is constrained, and to support the use of the airspace above existing premises for new homes (NPPF paragraphs 124 and 125, December 2024 edition). The Plan describes Derby as a constrained authority (paragraph 20).	
Pegasus Planning on behalf of Catesby Estates*	Policy H1: Housing Delivery	Object	No	No	*'Housing Requirement' Terminology* Policy H1 states that: *"Over the Plan period (2023 to 2043) Derby's*	In order that Policy H1 aligns with The Planning Data (England) Regulations 2026, it should modified so it provides a clear housing

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					housing <u>needs</u> will be met through the delivery of high-quality new homes …" *"In particular, the Council will:* *<u>facilitate the delivery</u> of a minimum of 12,500 new, high quality mixed tenure homes within the city between 2023 and 2043"* The Planning Data (England) Regulations 2026 mandate that local planning authorities publish plan timetables and housing requirements in standardised formats. The regulations states that the housing requirement is the minimum number of homes that a local plan expects to be provided during the period of the plan. It is also vital that housing requirement is expressed as an annual figure so that monitoring, including housing delivery and housing land supply can be calculated as required by NPPF paragraph 78. Policy H1 does not clearly set out an annual housing requirement and so it is inconsistent with national planning policy and with The Planning Data (England) Regulations 2026. *Justification for 12,500 'Housing Requirement'* The figure of 12,500 homes in Policy H1 is based upon the Council's estimated capacity of Derby City. As set	requirement, this should also be expressed an annual figure as required by the NPPF paragraph 78. The capacity for housing within Derby City should be reassessed in light of updated supply information, and the proposed plan period, and Policy H1 should be modified in light of the up to date capacity position.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					out above this is based on out of date information and on the basis of a different plan period and therefore needs to be revisited. As presented, the capacity figure of 12,500 dwellings stated in the draft Plan is based on evidence from 2024, does not take account of up to date monitoring. The Plan is therefore not positively prepared, not justified and inconsistent with the NPPF.	
George Fletcher*	Paragraph 178	Object	No	No	Destroying Wilmorton Park is the opposite of protecting important open land, green infrastructure and recreational facilities.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 178	Object	No	No	HA16 is totally contrary to this claim.	Use brownfield sites.
South Derbyshire District Council	Paragraph 183				SDDC consider that Derby City could plan more positively for housing growth particularly in the later years of the Local Plan. Paragraph 74 of the Local Plan, and the Derby Housing Land Capacity: Position Paper October 2024 provide a summary of capacity work undertaken by Derby City to date. SDDC are not aware of further updates to this work since 2024 and consider it would be good planning and consistent with the ongoing effective cooperation between our Councils for Derby to update its capacity study, including site specific information and realistic estimates of housing delivery for the later years of the plan (2039 to 2043). It would also be helpful if this update is published to inform the Local Plan Examination.	

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Councillor Tim Prosser	Paragraph 185 & Table 2	Object		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including: • A new "dwelling losses" allowance incorporated into the Housing Trajectory methodology, stating that the housing supply table now factors in an allowance for losses, without setting out the evidence for the rate used. Para 189 and table 2 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.	
Derby Climate Coalition	Paragraph 187	Object	Yes	No	This para starts "A number of new greenfield sites are allocated to be developed for housing across the city, but the main focus for the development of new homes is within the City Centre...", whereas the equivalent in the S18 draft (para 191) says "A number of new greenfield sites will be allocated to be developed for housing…. This will include further incursions of housing into some of Derby's Green Wedges".	Revert to the wording in the S18 version of the plan.

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					This alteration seems to be an attempt to hide an undesirable change in policy.	
Rob Hoddinott	Paragraph 187	Object	No	No	This policy of using previously developed city centre land is not being applied. City centre previously developed land exists and is not being used for HA16.	Use areas in city centre that remain empty, ie Duckworth Square.
George Fletcher*	Paragraph 190	Object	No	No	he city's green infrastructure becomes more crucial as the needs of the population increase and the environmental sustainability of the city becomes increasingly important. Destroying Wilmorton Park is totally opposed to this aim.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 190	Object	No	No	"Derby still needs open spaces, playing pitches, school playing fields, wildlife areas and other green infrastructure to support the existing and increasing population." HA16 is contrary to this claim.	Use brownfield locations.
Policy H2: Residential Development – General Criteria						
Fisher German on behalf of Bloor Homes Ltd	Policy H2: Residential Development – General Criteria	Object	Yes	No	BHL broadly support elements of Policy H2, particularly the ambition to achieve suitable densities on development sites. Paragraph 130 of the Framework states "where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site". Concern is however raised with other criteria within the Policy, with regards to whether they are justified or consistent with national policy, thus sound.	

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					Part E of Policy H2 states "It is demonstrated that the Government's Nationally Described Technical Space Standards are met where applicable". The PPG (Paragraph: 002 Reference ID: 56-002-20160519) states: "What optional technical housing standards can local planning authorities set? Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans." [our emphasis] The Plan does not point to any such evidence of need. Paragraph 196 of the Regulation 19 document states that "The NDTSS are what the Government has set out as the minimum satisfactory living environment internal spaces which should be provided in new dwellings. As such they provide guidance which the Government feels must be met in order to provide an acceptable living environment, and the standards will be required through this policy as part of the Council's drive for health and wellbeing outcomes and part of the qualitative housing requirements of the local plan". This is not evidence and this statement alone does not satisfy the clear requirements of the PPG. Should the Government felt it necessary to blanket impose NDSS, then they would have	

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					done so. It remains a standard which can be introduced, where local evidence points for a need, for example where there is a high incidence of conversion of non-domestic buildings into residential units in urban areas. The term 'where applicable' is considered overly vague in conflict with Paragraph 16 of the Framework, which requires Plans to "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Whilst the Reasoned Justification gives some examples where NDSS would not be required, this is not considered adequately clear and the policy should be clear when the policy is expected to be in force so it is clear to applicants and decision makers. As there is no evidence of need in accordance with the PPG, this criteria should be deleted to ensure the Plan is justified and consistent with national policy. Similarly, when looking at Parts F and G of Policy H2, which place a requirement for 100% of all buildings to meet Part M4(2) and on sites of 25 dwellings or more a requirement for 5% of market houses to be M4(3)a and 10% of affordable housing to meet Part M4(3)a. The PPG (Paragraph: 007 Reference ID: 56-007-20150327) states: "What evidence should local planning authorities use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards?	

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					Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including. • the likely future need for housing for older and disabled people (including wheelchair user dwellings). • size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes). • the accessibility and adaptability of existing housing stock. • how needs vary across different housing tenures. • the overall impact on viability." Paragraph 200 of the Regulation 19 document states that "evidence in the Council's Local Housing Needs Assessment (LHNA) indicates that a significant proportion of the current and future population will have mobility impairments or frailty", which sets out broadly the Council's justification for this policy intervention. Derby City's Local Housing Needs Assessment Final Report (2023) confirms at Paragraph 8.17 that "the projected change shown in the number of people with disabilities provides clear evidence justifying delivering 'accessible and adaptable'	

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					homes as defined in Part M4(2) of Building Regulations, subject to viability and site suitability". Paragraph 8.75 continues "given the evidence, the Councils could consider (as a starting point) requiring all dwellings (in all tenures) to meet the M4(2) standards". It is clear therefore that the LHNA envisaged the Council providing suitable justification given it is not a clear recommendation of the evidence itself, simply a suggestion. Regardless, the evidence of a growing population of those with mobile impairments or frailty, cannot point to a 100% need for such standards, any more than a growing affordable housing need cannot justify 100% affordable housing delivery. BHL accept a proportion of new housing should meet M4(2) standards, but justification for 100% provision has not been justified in evidence as required by the PPG. There is reference at paragraph 8.67 of the LHNA to future changes to the building regulations, but planning policies cannot be justified in that building regulations may change in the future. They need to be specifically justified to be sound in accordance with NPPF Paragraph 36b. Should the amendment to building regulations be made, then there is no requirement for a policy in accordance with NPPF Paragraph 16f. Whilst this Plan is not being examined against the 2026 Framework, it is relevant to note that nationally through that document (specifically H05: Meeting the needs of different groups) the Government considers a minimum of 40% to be acceptable. This gives a far better indication of a suitable minimal threshold, and one for which there would be no	

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					conflict post adoption. Given the lack of local justification, a requirement above 40% is not considered justified.	
Home Builders Federation*	Policy H2: Residential Development – General Criteria	Object		No	*Policy H2 is not considered to be sound as it is not effective, justified, or consistent with national policy* For site specific reasons and/or viability there may be occasions where flexibility is needed in relation to compliance with Nationally Described Technical Space Standards, all new buildings complying with Part M4(2) of Building Regulations, and the requirement for 5% of all newly erected market homes and 10% of all newly erected affordable homes should be constructed to Building Regulations Part M4(3)a 'Wheelchair adaptable' dwellings on sites of over 25 dwellings. The policy should allow for flexibility on a case-by-case basis when supported with evidence of the non-deliverability or non-viability of complying with these policy requirements, for example the conversion of a historic building.	
Lichfields on behalf of Derby Station Quarter	Policy H2: Residential Development – General Criteria	Object		No	The Derby Station Quarter Board supports the objectives of Policy H2 in seeking to secure high-quality, well-designed residential development, including homes that are accessible and adaptable to the needs of current and future residents. We recognise the evidenced need for wheelchair-adaptable homes identified through the Council's Local Housing Needs Assessment, and we do not dispute the principle of Criterion g).	We therefore suggest that Policy H2 Criterion b) and g) are amended to make clear that the stated proportions of M4(2) and M4(3)(a) homes should be provided unless it can be demonstrated, on a case-by-case basis, that this is not feasible having regard to site-specific constraints, including

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					However, the Board seeks to highlight the cumulative effect of Policy H2 when read as a whole, and in particular the interaction between the City Centre density requirement of at least 80 dwellings per hectare (Criterion b), the requirement to meet the Nationally Described Space Standards (Criterion e), and the requirement for 5% of market homes and 10% of affordable homes on qualifying sites to be constructed to Building Regulations Part M4(3)(a) wheelchair-adaptable standard (Criterion g). Each of these requirements appears reasonable when considered individually. However, M4(3)(a) compliant dwellings require materially more floorspace and circulation space than standard space-standard-compliant apartments, including turning circles, wider corridors and doorways, and adaptable bathroom layouts. We are concerned that the combined effect of these requirements has not been fully tested for deliverability on smaller, tightly constrained, apartment-led sites within the City Centre such as the Railway Station Quarter, where achieving the required density and the full quantum of wheelchair-adaptable homes together may be difficult to achieve. We note that this type of flexibility is not unusual in adopted policy. Policy DP28 of the Mid Sussex District Plan provides an exception to its accessibility requirements where site-specific factors make full compliance impracticable or unviable. More recently, Policy LP30 of the West Norfolk Local Plan (2021–2040), adopted in March 2025 following examination, provides an explicit exemption from its M4(3) wheelchair-adaptable homes requirement on practicality or viability	density, plot size and configuration. We consider this modification is necessary to ensure that Policy H2 is effective and deliverable across the full range of site typologies anticipated within the City Centre, without undermining the Council's broader and well-evidenced objective of securing accessible and adaptable homes.

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					grounds. We consider a similar approach would ensure Policy H2 remains effective and deliverable in the specific circumstances outlined above.	
Little Ships Housing CIC	Policy H2: Residential Development – General Criteria	Object	Yes	No	Policy H1 and paragraphs 74 to 77 set the housing requirement at a minimum of 12,500 homes over the plan period and explain that the balance of the housing market area's need will be met through the Amber Valley and South Derbyshire Local Plans. We accept that the requirement is a minimum, not a ceiling, and we support the brownfield and City Centre first approach in paragraph 81 and Objective 5. Our representation concerns how the city's capacity was established, and what the Plan does about the part of the city's land that was not assessed. The Council has described 12,500 homes as the limit of the city's capacity (Council statement, November 2025). The evidence for that limit is the call for sites and the Strategic Housing Land Availability Assessment. Both assess land that owners choose to promote. Land in public ownership is different. The Council and other public bodies own a substantial estate in the city: surface car parks, depots, and the airspace above low-rise civic, health and education buildings and car parks. Whether such land is offered for housing is a landowner decision, taken on grounds wider than planning. The Council's Planning Policy team confirmed to us on 4	Modification 2: Policy H2, new criterion. "Proposals for new homes on or above existing or replacement buildings and car parks, including those in the ownership of the Council and other public bodies, will be supported where the existing use is retained or re-provided, and the proposal accords with the design, amenity and heritage policies of this Plan and, where relevant, Policy CC6."

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					September 2026 that Council land has been assessed where it came forward through the call for sites, and that the one estate-wide review of Council-owned sites was carried out for gypsy and traveller provision. There has been no estate-wide assessment of the public estate's capacity for housing. The Plan therefore exports part of the city's need without having tested a source of supply that sits within the city, in single public ownership, on previously developed land, in the most sustainable locations, and which can be developed without displacing the existing use where homes are built above it. In our view this engages three of the tests of soundness: Positively prepared. The strategy should seek to meet the area's needs as a minimum. Capacity within the city was not fully established before part of the need was passed to neighbouring authorities. Justified. The reasonable alternative of intensifying the public estate does not appear to have been assessed among the spatial options in the Sustainability Appraisal (we have not found it in Appendix C). Effective. Land in public ownership is among the most deliverable in the city: single ownership, no	

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					land assembly and no purchase price. The City Centre figure of around 5,500 homes rests largely on sites outside the Council's control. National policy points the same way. The NPPF asks plans to promote the effective use of land, to support the development of under-utilised land and buildings, especially where land supply is constrained, and to support the use of the airspace above existing premises for new homes (NPPF paragraphs 124 and 125, December 2024 edition). The Plan describes Derby as a constrained authority (paragraph 20).	
Pegasus Planning on behalf of Catesby Estates*	Policy H2: Residential Development – General Criteria	Object	Yes	No	Policy H2: Residential Development – General Criteria (f) and (g) state: • All new build dwellings should be constructed to comply with Part M4(2) 'Accessible and Adaptable dwellings' of the Building Regulations; • On sites of over 25 dwellings, 5% of all newly erected market homes and 10% of all newly erected affordable homes should be constructed to Building Regulations Part M4(3)a 'Wheelchair adaptable' dwellings; The requirements for M4(3) standards are not supported. If the Council wishes to adopt these local standards for M4(3) homes, sufficient robust	Policy H2: Residential Development – General Criteria (g) should be deleted as there is insufficient evidence in terms of need, and the requirement is not justified.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					evidence needs to be presented to justify this approach in accordance with the Planning Practice Guidance which outlines the evidence necessary to justify a policy requirement for optional standards. Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors. There is an extra cost in delivering M4(3) which may vary between affordable and open market dwellings. National standards help ensure these costs are minimised through economies of scale. The government, through the new NPPF, has very recently set out their expectations for accessible homes with a national policy for 40% of homes to be M4(2). There is no evidence that this national requirement is not appropriate for Derby City.	
Policy H4: Affordable Housing						
Derby Climate Coalition	Policy H4: Affordable Housing	Object	Yes	No	This policy is unsound as the supporting text indicates that it is both inadequate and not achievable. The policy for the city centre appears to be to only provide expensive flats for young professionals, which is not the greatest need.	Aim for an increase in the percentage of affordable homes, particularly in the city centre.
Fisher German on behalf of Bloor Homes Ltd	Policy H4: Affordable Housing	Support	Yes	Yes	BHL support the approach in relation to affordable housing, particularly a Golden Rules compliant approach to affordable housing in the Green Belt, particularly with regard to Paragraph 67 of the Framework. It is noted that the	

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					Residential Viability Scoping Report concludes that 40% affordable housing is appropriate. Noted the Stoney Lane allocation (HA7) allows for viability considerations as the Plan has been updated since Regulation 18 to include "subject to demonstrating that this is achievable". If Locko Road was considered necessary for allocation, a similar caveat should be applied for consistency.	
Home Builders Federation*	Policy H4: Affordable Housing	Object		No	*Policy H4 is not considered to be sound as it is not effective, justified, or consistent with national policy* With viability is becoming increasingly difficult we have some concerns about the viability of this Plan. Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724) assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. However, it does require the assumptions used within the whole plan viability testing to be reasonable and for the viability implications of the full range of policies to be considered. National policy already recognises that some sites will be on the very margins of viability and other sites may already be unviable even without a change of circumstances and as such site specific viability considerations may need to be taken into account. National policy therefore allows for the opportunity for negotiation around policy requirements for site specific	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					reasons. The new NPPF allows for greater debate at the development management stage on viability and HBF believes this needs to be properly reflected in the wording of the Derby Local Plan. It is important for the Council to work with developers to understand the viability challenges that developers face and we endorse the conclusion that the viability and deliverability of this Plan has yet to be proven. Although HBF do not comment on individual sites we would encourage the Council to work directly with site promoters and house builders to understand any seek solutions to site specific viability issues. It is no appropriate for the wording of the policy to refer or defer to separate document to the Local Plan which can be updated as necessary within the policy itself. Any such reference should be in the supporting text.	
Lichfields on behalf of Derby Station Quarter	Policy H4: Affordable Housing	Support		Yes	The Derby Station Quarter Board continues to support Policy H4, including the city centre-specific affordable housing threshold of up to 5%, and the provision for negotiation, including clawback arrangements, where the full percentage cannot be viably achieved. We consider Policy H4 to be sound and have no further comments to raise. Platform 4 supports the principle of Policy H4 in seeking to deliver affordable housing across the city, recognising the importance of meeting identified needs while maintaining overall housing delivery.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					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.	
Johnson Mowat on behalf of Harworth Group*	Policy H4: Affordable Housing	Object		No	The wording of Policy H4 sets a requirement of up to 40% affordable housing for major residential sites on sites proposed to be removed from the Green Belt, up to 5% on City Centre sites and up to 25% on sites outside of the City Centre/ Green Belt. This approach is consistent with Paragraph 67 of the National Planning Policy Framework (2024), which this plan is being	It is suggested that this part of the policy wording is amended as follows: 'Affordable housing should be provided on-site ~~and~~ with up to 80% of these dwellings (capped at 20% of total dwellings) ~~should be~~ made available for social rent

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					produced in accordance with. Part (a) of this paragraph requires affordable housing requirement(s) for 'major development involving the provision of housing on land which is proposed to be released from the Green Belt' to be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt. While Harworth Group is supportive of the draft policy wording and the proposed affordable housing requirement for Green Belt land, it is noted that there is a discrepancy between the wording of Policy H4 and Draft Allocation HA7 with regard to affordable housing requirements. As noted above, Policy H4 sets a requirement of 'up to 40% affordable housing' for major development involving sites proposed to be removed from the Green Belt, whereas Draft Allocation HA7 requires that Land at Stoney Lane, Spondon delivers a 'minimum of 40% affordable housing'. We address this point in our comments on Allocation HA7. Harworth Group expresses concern about the policy requirement for 80% of affordable dwellings to be available for social rent (unless it can be justified that this is not achievable) given that in the case of a Green Belt release site this will be 80% of up to 40%, equating to 32% of the total dwellings, which is disproportionately high relative to the contribution required from other sites e.g. 80% of 25% equates to 20%. Land at Stoney Lane, Spondon has the	unless it can be justified that this is not achievable.'

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					capacity to deliver circa 450 no. new homes, which means 144 no. dwellings would be required to be available for social rent. In the context and setting of Green Belt release sites the adherence to this policy risks failing to achieve the positive potential of the development in terms of community balance and economic growth. It is therefore suggested that this 80% is applied to affordable housing provision up to 25% only. This would maintain the social rent provision consistent at 20% of total dwellings for all sites meeting the policy requirement outside of the city centre.	
The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy H4: Affordable Housing	Object		No	Policy H4 requires proposals for housing development to deliver a variable amount of affordable housing based on location, with 40% affordable housing being asked for on Green Belt, 5% being asked for on city centre sites and 25% being asked for in all other locations. This includes specialist housing for older people as confirmed via policy H7 Accommodation for Older People and People with Disabilities that states that 'Planning obligations for C3 developments for older persons accommodation, including extra care schemes, will be subject to the planning obligations required as set out in Policy GD9'. GD9 lists a number of infrastructure requirements that includes affordable housing. We note that the consultation has been supported with a number of Viability Assessments and Addendums produced by Avison Young, however, these do not test specialist housing for older people. Because of this, it is difficult to	

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					ascertain if any of the options put forward are realistic or deliverable. We responded to the council's early engagement consultation and noted that an up to date viability assessment must be undertaken and that this 'must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing'. This has not been done. We provided a link to the Retirement Housing Consortium paper entitled 'A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 ('RHG Briefing Note') available from https://retirementhousinggroup.com/rhg/wp-content/uploads/2017/01/CIL-viabiilty-appraisal-issues-RHG-February-2016.pdf. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. We noted in this consultation response that older persons' housing cannot simply be regarded as standard housing as schemes for older people tend to be based around communal	

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					facilities and community living and delivered on smaller site as highlighted in the PPG (Paragraph: 010 Reference ID: 63-010-20190626). The PPG confirms that older person's housing generally has additional facilities such as extensive communal areas, such as space to socialise, a wellbeing centre as well as a care service with 24 hour access to support services and staff, meals are also often available. This enables residents to live much more independently than they would otherwise. However, the facilities do take up floorspace which make the viability of such schemes much more finely balanced. The council will be aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). Undertaking viability of older person's housing schemes separately accords with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period". If housing for older people is not assessed separately to market	

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					housing, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need. The Council should therefore re-run the viability study to ensure that it includes more typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing. We advise that by limiting scrutiny of the Local Plan Viability Assessment to exclude older person's deviates away from national guidance and the plan is therefore not considered be positively prepared, justified, effective and crucially is not consistent with national policy. Review / Clawback mechanism. Para 5 of policy H4 also requires a clawback mechanism or review mechanism when a developer can provide robust evidence that it is not viable to provide the maximum policy requirement. This is a particularly onerous requirement for older persons housing developments given that the council	

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					has failed to determine if the affordable housing target is justified for this typology in the first instance. Paragraph: 010 Reference ID: 10-010-20251216-of the government guidance on Viability states the following: 'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509. A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism and detail within it that sits within a planning obligation needs to be considered and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. The Local Plan does not achieve this and therefore the requirement at point 5 of the plan is contrary to national policy.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					In addition, for a large or multi-phase development which will be delivered over a long period it makes sense to check whether the scheme's viability has changed with market movements. However, for a small single phased site, such as an older persons housing scheme that is built in one phase , the Inspectorate have repeatedly noted that review mechanisms are unnecessary. For example, under Appeal decision reference APP/C4235/W/120/3256972 dated 1st April 2021, the Inspector noted in paragraph 17 that 'as the development would almost certainly be completed in a single phase with an estimated build time of 12-18 months, it is not the sort of large multi-phased scheme where stronger arguments for a review/clawback mechanism may otherwise exist'. This is also becoming the case in local Plans and for example the Local Plan Inspectors report for the East Riding of Yorkshire Local Plan notes the following: 170. The final section of the policy addresses the use of review mechanisms for Section 106 agreements. To provide certainty, and thus the effectiveness of the policy, it is necessary for MM55 to amend the wording so that it clarifies that this relates to larger sites that will come forward over a longer period of time, and not all proposals. This is also the case in for example Amber Valley and Cannock Chase.	

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					Therefore, if a review mechanism is to be introduced the detail within any review mechanism needs be published so it can be fully assessed through the Local Plan process, this must also include an exemption for single phased schemes as repeatedly noted by the planning inspectorate. Possible proposed wording: • Single-phased development schemes will not be subject to a review mechanism. • Where sites have a construction programme which is proposed to extend beyond 2 years, the planning obligation will provide for the affordable housing component of later phases to be reviewed based on updated viability evidence which may result in an increase of the affordable housing requirement.	
Policy H5: Looked After Children						
Homes2Inspire Ltd	Policy H5: Looked After Children	Object	Yes	No	The National Planning Policy Framework ('NPPF') is clear that within the context of establishing housing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups are listed under NPPF Policy HO1 and explicitly includes looked after children. As per NPPF Policy HO1 (Part 2f) evidence of need for looked after children can be found in the relevant local authority's Children Social Care Sufficiency Strategy. For DCC, the 'Children in care placements commissioning and	Policy H5: Looked After Children The Council will support the change of use of dwellings in residential areas to provide for the care of small groups of looked after children subject to the following:

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					sufficiency strategy 2025-2028'[1] ("the Strategy"), sets out how the Council plans to meet it's 'Sufficiency Duty', ensuring that every child and young person in the care of DCC has access to the right support, in the right place and at the right time. As at 31 March 2024, the Strategy confirms that DCC had 598 children in its care and of these, 382 were placed locally (60.4%) (i.e. within 20 miles of the child's home address). Additionally, the Strategy identifies that 57 children had experienced three or more placement moves. The Strategy identifies the key challenges for DCC including the <u>increasing number of children</u> and young people requiring placements - during the 2023-24 period alone, DCC had 226 new placements - and that <u>there are insufficient residential placements</u> (<u>our underlining emphasis</u>). The Strategy therefore seeks to achieve better outcomes for children in their care through the commissioning intensions listed on p.7, which include, amongst others: • *"Reduce high-cost placements through increased local sufficiency by <u>developing a wider range of placements.</u>* • *<u>Place a minimum of 75% of all children within 20-mile radius of the city centre.</u> Ensure equality of service offers for those outside.* • *Secure the best possible placement for every child and young person, considering their needs and wishes."* <u>(our underlining emphasis).</u>	a) The design ~~and scale~~ of the property ~~is not materially changed or increased and~~ remains within character of the surroundings; b) The proliferation of any such uses does not adversely affect the character of the area; c) The number of residents living within the proposed dwelling is proportionate to the size and facilities of the accommodation; d) A clear Management Plan is provided to support the proposals, explaining how the use will operate.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					On the above basis, H2I therefore welcome that the emerging Local Plan for Derby includes draft Policy H5 to ensure that the accommodation needs of looked after children in the district can be met by the planning system. Whilst H2I agree that in principle support is given for the change of use of dwellings in residential areas to provide for the care of small groups of looked after children, they are concerned that the policy tests and supporting text to draft Policy H5 are unsound and risk undermining the commissioning objectives of DCC's Strategy (as outlined above). Specifically: • Draft criteria a) requires the design and scale of the property to not materially be changed or increased. The policy objective should be underpinned by policy tests that relate to land use considerations only, particularly given that matters related to design and ensuring well designed and high-quality development is controlled by draft Policy GD1 (Placemaking Principles). External changes requiring planning permission may be necessary to ensure that operational matters of a home can be adequately facilitated. For example, the Council recently approved a change of use at 7 Field Lane from a dwelling house to a small-scale children's home, alongside demolition	~~These types of specialist accommodation should be provided in detached housing wherever possible and will not be permitted in terraced housing.~~ <u>Supporting Text</u> 217. Where existing dwellings are proposed to be changed to provide accommodation for small groups of looked after children, the Council will take care to ensure that any adverse impacts of the proposals are minimised. 218. It is expected that the use of dwelling houses in existing

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					of the lean-to-garage so that sufficient off-street car parking for staff could be accommodated (ref. 26/00436/FUL). The policy constraint to prevent external alterations therefore risks undermining the policy purpose to support accommodation for looked after children. Draft criteria c) requires the number of residents living within the proposed dwelling to be proportionate to the size and facilities of the accommodation. The supporting text suggests that this should be restricted for the care of up to three children (paragraph 220). We do not consider a proposed cap on the number of children is necessary given draft criteria d requires that a management plan to support the proposal is submitted to protect the amenity of neighbours. It is also not clear from the Council's own evidence base why they consider three children is an appropriate number. To this end, DCC's Strategy explains that demand on placements for looked after children is growing and better outcomes are achieved for children and young people when they are placed in smaller numbers however the Strategy does not define the smaller quantum. On this basis, we therefore do not consider that it is the responsibility of planning policy to cap the number of children at a home and that management plans are an appropriate control to manage the impacts from development in-lieu of	communities would only be changed to such uses to accommodate small groups of people who may require professional support or management on site. 219. These developments should generally fit within and be compatible with the existing character and community, meaning that the building is not materially changed such

<table>
<tr><th>Respondent Name</th><th>Commenting on</th><th>Support or Object</th><th>Legally Compliant</th><th>Sound</th><th>Reasons</th><th>Suggested Modifications</th></tr>
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<td>limiting the number of children in occupation of a home. This approach would also be consistent with the following decisions approved by the Council where three or more children were in occupation, and a management plan was required:
<table>
<tr><th>Application Reference</th><th>Description of Development</th><th>Number of Children</th><th>Management Plan</th><th>Decision</th></tr>
<tr><td>26/00448/FUL</td><td>Change of use of the building from hostel (Use Class Sui Generis) to a residential children's home for the care of a maximum of four children (Use Class C2)</td><td>4</td><td>Yes</td><td>Approved 24 Jun 26</td></tr>
<tr><td>26/00439/FUL</td><td>Change of use from dwelling (Use Class C3) to children's home (Use Class C2) for a maximum of four children</td><td>4</td><td>Yes</td><td>Approved 12 Jun 26</td></tr>
<tr><td>25/01728/FUL</td><td>Change of use from a dwelling house (Use Class C3) to a residential children's care home for a maximum of four children (Use Class C2)</td><td>4</td><td>Yes</td><td>Approved 15 Jan 26</td></tr>
<tr><td>24/00579/FUL</td><td>Change of use from a bed and breakfast (Use Class C1) to a children's care home for a maximum of four children (Use Class C2)</td><td>4</td><td>Yes</td><td>Approved 18 Jul 24</td></tr>
</table>

Draft Policy H5 directs accommodation for looked after children to detached housing and will not permit children's homes in terraced or semi-detached dwellings. Given the Council's Strategy identifies an increasing number of children entering care, there is insufficient residential placements and that the Council cannot currently accommodate all of its children locally (shortfall of -14.6%), H2I do not consider it necessary to constrain supply by omitting these dwelling types - particularly as the character of terraced or semi-detached

</td>
<td>that it becomes out of character with surrounding dwellings.

220. ~~Uses should be restricted to detached dwellings for the care of up to three children wherever possible and resisted in semi-detached or terraced dwellings in order to fully protect the amenity of neighbouring residents.~~</td>
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Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					dwellings in use as children's home will still look residential in appearance and the policy requirement for a management plan will ensure no adverse impact upon residential amenity. By limiting the policy unnecessarily to detached dwellings only this clearly risks undermining the commissioning intentions (above) and addressing the key challenges identified in the Strategy. The appropriateness of a dwelling should be considered on a case-by-case basis, ensuring fundamentally it meets the needs of children in the care of the local authority and that any potential impacts to neighbour are appropriately mitigated. *Concluding Remarks* The NPPF requires development plans to account for the accommodation needs of different groups – including looked after children. H2I therefore welcome that draft Policy H5 of the Emerging Local Plan for Derby seeks to meet the needs of looked after children and supports the principle of the change of use of dwellings in residential areas to provide for their care. This notwithstanding, the Council's own 'Children in care placements commissioning and sufficiency strategy 2025-2028' recognises there is an increasing number of children in care, there are insufficient residential places for these children and they are unable to place all children locally. We suggest a number of considerations in this letter	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					to ensure that draft Policy H5 is sound and does not undermine the Council's Strategy. We trust that our representation to DCC's Regulation 19 consultation will be considered carefully by the Council. Should you have any queries on our representation, we would be pleased to discuss any points raised. Please do contact me (Joe Thompson) or Jon Kirby in that regard.	
Policy H7: Accommodation for Older People and People with Disabilities						
Anchor	Policy H7: Accommodation for Older People and People with Disabilities	Object	Yes	No	Anchor Hanover, England's largest provider of specialist housing and care for older people, supports the inclusion of a specific policy on older persons' housing, given the significant and growing need.	The policy should also include a clear numerical delivery target for older persons' housing to ensure identified needs are met over the plan period. We are concerned that the draft policy prioritises Care Homes and Extra Care housing for older people. All specialist housing types should be supported, to accord with national planning policy. We recommend making specific site allocations for older persons' housing, rather than relying on 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

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						Anchor's experience, this is at least 65 units per development. We recommend that a more flexible approach to housing mix is taken for older persons' housing. Anchor's developments typically comprise single apartment buildings with around 70 high-quality social rent homes for older people, mainly one-bedroom apartments. Mixed tenure buildings (e.g. combining social rent with affordable rent or sale) can create market challenges and affect viability. Two-bedroom homes are also difficult to let due to under-occupancy charges and the prevalence of single-person households. Flexibility in tenure and housing mix is therefore essential to ensure the viability and successful delivery of older persons' housing developments to meet needs. The policy should therefore be amended accordingly.
George Fletcher*	Policy H7: Accommodation for Older People and	Object	No	No	Specialist housing for older people should be located within walking distance of shops, services, healthcare facilities and accessible green space to reduce isolation and support	An alternative location needs to be found that does not involve destroying the key green space

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
	People with Disabilities				independent living. Destroying Wilmorton Park is detrimental to the needs of elderly people in the neighbourhood.	of the approx. 320 households of Wilmorton.
Home Builders Federation*	Policy H7: Accommodation for Older People and People with Disabilities	Object		No	*Policy H7 is not considered to be sound as it is not effective, justified, or consistent with national policy* HBF have concerns about policies on affordable housing applying to specialist accommodation, including homes for older people. The economics and viability of these kinds of development differ for many reasons including the need to provide shared spaces and onsite management and how units are sold and occupied. We therefore have significant concerns about the impact of this policy on both the viability and deliverability of older person's housing.	
The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy H7: Accommodation for Older People and People with Disabilities	Object		No	Please see our response to H4 Affordable Housing with respect to the requirement in policy H7 for specialist housing for older people to 'be subject to the planning obligations required as set out in Policy GD9''. Given that the viability of older persons housing is more challenging and that the viability assessment has not tested the typology for affordable housing our view is that the Council should therefore re-run the viability study to ensure that it includes more typologies that includes older persons housing and if older persons housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing	

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					provision and delaying the provision of much needed older persons housing. We advise that by limiting scrutiny of the Local Plan Viability Assessment to exclude older person's deviates away from national guidance and the plan is therefore not considered to not be positively prepared, justified, effective and crucially is not consistent with national policy.	
Policy H8: Proposals Which Would Create a New House in Multiple Occupation						
Councillor Kirk Kus	Policy H8: Proposals Which Would Create a New House in Multiple Occupation	Object		No	I consider this element of the policy to be unsound because it has not been demonstrated to be justified by proportionate evidence. The specific wording I object to is the restriction of the 10% concentration threshold to properties being used as **"licensed HMOs"**, rather than properties being used as **HMOs**. The distinction is material. Not every property which is an HMO is required to hold an HMO licence. Restricting the calculation to licensed HMOs therefore excludes properties which are genuinely in HMO use but are not subject to mandatory licensing. It may also exclude licensable HMOs which are operating unlawfully without a licence. This differs from the Council's existing published planning approach. The current HMO planning guidance provides that the 10% threshold relates to properties **"being used as HMOs"**. It also explains that the Council's GIS HMO layer identifies HMOs from a range of sources, including HMO licensing data, planning records and Council Tax data, and	I request that the word **"licensed"** is deleted so that the relevant criterion refers to: **"…more than 10% of the properties within a 50m radius of the development site being used as HMOs."** This would restore the approach contained within the Council's existing published HMO planning guidance and would allow the Council to continue identifying HMO use using the range of information already available to it, including licensing data, planning records, Council Tax data and, where necessary, further investigation.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					expressly provides for further investigation where new or updated information regarding HMO use becomes available. There also appears to be an existing evidential history supporting that wider approach. When the Council considered the HMO Article 4 Direction in 2024, the Cabinet report expressly stated that an Article 4 Direction must be based upon robust evidence. The same report then proposed planning guidance containing the 10% within 50 metres concentration test, expressed in terms of properties **"being used as HMOs"**, without restricting this to licensed HMOs. The Article 4 Direction subsequently came into effect on 3 May 2025 and the Council's published planning guidance continues to use this broader approach. I raised the proposed removal of the word "licensed" during the Regulation 18 consultation and subsequently sought to amend the wording at Full Council on 15 July 2026. At Full Council, Members were advised by Legal that: "Planning as a regulatory process is evidence-led" …. "there's no evidence currently that supports it [the amendment]." Followed by (if the amendment passed); "Therefore there's a fundamental flaw in the draft plan." I subsequently asked the Council to identify the evidence supporting the decision to include and retain the word "licensed". The response I received explains the Council's reasoning; however, it appears to provide an administrative rationale for the change rather than an evidential basis. However, **no evidence, study, assessment or comparative analysis** has been identified demonstrating why excluding known but unlicensed HMOs is the appropriate planning approach, or	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					demonstrating that the existing approach of using multiple data sources is incapable of producing sufficiently robust planning decisions. Nor has any evidence been identified demonstrating that the reasonable alternative of continuing to count **all known HMOs** was assessed against the proposed licensed-HMO approach. This distinction is particularly important because the objective of the concentration threshold is to address the planning effects arising from concentrations of HMOs, including impacts upon residential amenity, neighbourhood character and balanced communities. Those effects arise from the **use of a property as an HMO**; they do not depend upon whether that property happens to hold a licence. Indeed, restricting the calculation to licensed HMOs could produce a situation where more than 10% of properties within the relevant radius are actually being used as HMOs, while the policy nevertheless concludes that the 10% HMO concentration threshold has not been reached. I therefore do not consider that the Council's explanation that licensed HMOs are easier to identify is sufficient, by itself, to demonstrate that the narrower policy approach is **justified**. Paragraph 32 of the applicable National Planning Policy Framework requires policies to be underpinned by relevant and up-to-date evidence which is adequate and proportionate and focused on supporting and justifying the policies concerned. Paragraph 36 provides that a plan is sound only where, amongst other requirements, it is:	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					"Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence." While the Council has stated that the change assists the **effectiveness** of the policy, effectiveness and justification are separate elements of the soundness test. An administrative benefit arising from the availability of licensing data does not, in my view, remove the requirement to demonstrate that the substantive policy choice is justified by proportionate evidence and that reasonable alternatives have been properly considered. Other local planning authorities operate HMO concentration policies based on known HMO use rather than solely on licensed HMOs. I have also sought information concerning the consideration of this issue through the relevant planning working group. I have been informed that there are no minutes recording the discussion, and following discussions with a Councillor who attended the working group, I have not been made aware of any evidence being presented to Members supporting the change to "licensed HMOs". I understand that removal of the word was raised but was not accepted by officers. The Council has subsequently been given a further opportunity to identify the evidential basis for the change through my written correspondence. No specific supporting evidence or assessment has been identified. For these reasons, I consider that the restriction of the 10% threshold to **licensed HMOs has not been demonstrated to be justified by proportionate evidence** and therefore this element of the policy does not presently satisfy the test of soundness.	

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Policy H11: Self-Build, Custom Build and Community Build Homes						
Fisher German of behalf of Bloor Homes	Policy H11: Self-Build, Custom Build and Community Build Homes	Support	Yes	Yes	BHL support the approach to self-build, creating a positive policy environment for suitable applications, rather than enforcing the provision of plots on sites over a specified size threshold which is an approach regularly adopted elsewhere, despite limited evidence it is effective.	
Policy H12: Gypsies, Travellers and Travelling Showpeople						
Derbyshire County Council	Policy H12: Gypsies, Travellers and Travelling Showpeople	Support	Yes	Yes	Firstly, Derbyshire County Council welcomes and supports the fact that the Submission Draft Local Plan's policy approach to the provision of sites to accommodate Gypsies and Travellers, has been informed by the recently completed Derby, Derbyshire, Peak District National Park and East Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA). In 2019, Derbyshire County Council commissioned an update to the 2015 GTAA on behalf of all the local authority partners, which included Derby City, the eight district and borough councils in Derbyshire, the Peak District National Park Authority and East Staffordshire District Council. Severe delays to progressing the GTAA by RRR Consultancy Ltd were subsequently experienced due to the on-set of Covid 19 and restrictions on public engagement for the best part of two years. However, the final GTAA was completed in July 2023 and was published in September 2024 and sets out updated pitch requirements for all the local authority areas between 2020 and 2040. It is welcomed and supported that the Reg 19 Local Plan has used the findings of the GTAA to inform the proposed pitch	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					requirements for the City over the period 2020 to 2040, which is appropriately referenced in the supporting text to Policy H12, that there is a need for some 14 plots for permanent Gypsy and Traveller accommodation within the city. The methodology and approach used in the GTAA is based on policy and recommendations for carrying out accommodation needs assessments set out in national policy in Planning Policy for Traveller Sites and other best practice. This is considered to provide for a sound and robust basis on which to plan for Traveller pitch provision in the Reg 19 Local Plan. A number of recommendations in the GTAA will also have implications for Derby City, particularly the need to consider the provision of negotiated stopping places for Travellers across the Study area. This issue will be taken forward for further consideration by the Derbyshire Traveller Issues Working Group. It is noted that the policy approach in the Reg 19 Plan includes assessment criteria related to this type of use in the event that a planning application for such use may be submitted. This is considered to be a justified approach and the criteria included in Policy H12 to assess the suitability of any new sites, appear to reflect the recommendations of the GTAA. It is noted that in order to seek to meet the identified need identified in the GTAA, Policy HA17: Gypsy and Traveller Site Allocation Land west of Pride Parkway in Wilmorton is	

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					allocated as a Gypsy and Traveller site to provide a minimum of 17 permanent caravan pitches and that planning applications for the development of the site should be consistent with the policy (Policy H12). Whilst not wishing to comment on the specific detail of the proposed site, it does appear to be well located to meet many of the location requirements of Policy H10 and those set out in the GTAA.	
George Fletcher*	Policy H12: Gypsies, Travellers and Travelling Showpeople	Object	No	No	minimising the impact on the amenity of nearby residents and the character of the local area, particularly where mixed-use sites are proposed; there is no evidence that the impact on the existing residence of Wilmorton of loosing their park has been assessed at all. Additionally, a so-called consultation was carried out in spring 2026 without their knowledge.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Policy H12: Gypsies, Travellers and Travelling Showpeople	Object	No	No	“located, designed and landscaped to provide a good level of residential amenity and quality of life for proposed occupiers, whilst minimising the impact on the amenity of nearby residents and the character of the local area, particularly where mixed-use sites are proposed” HA16 is being proposed for the most densely populated area of Derby and will have significant detriment to the local neighbourhood.	Move to a less densely packed location.
Marsha Ramroop Unheard Voice Consultancy Ltd	Policy H12: Gypsies, Travellers and Travelling Showpeople	Support	Yes	No	I write specifically to support these policies, knowing the consultation arithmetic recorded in the January 2026 Regulation 18 draft (paragraph 171): 226 respondents opposed provision for Gypsy and Traveller sites, 156 supported it. That arithmetic is precisely why this representation matters. The need assessed through the GTAA (paragraph 255) is not subject to majority approval; a plan that meets an objectively assessed need in the face of opposition is the definition of positively prepared, and the	• Retain Policies H12 and HA16 unamended in substance; reconcile the H10/H11/H12 numbering inconsistency across paragraph 311, Appendix 1 and Appendix 3; and add supporting text referencing the Public Sector Equality

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					measure of an Inclusive City is how it plans for the residents with the least voice, not the loudest. Gypsy, Roma and Traveller communities experience some of the poorest health, education and accommodation outcomes of any group in England; the plan's promise at paragraph 48 that everyone will have 'equal life opportunities no matter their background' is tested here first. I commend the transparent approach: allocating a Council-owned site to guarantee deliverability where no private sites came forward, and providing 17 pitches against an assessed need of 14 with headroom to the end of the plan period (paragraph 255). I urge the Council to hold this allocation through examination and adoption, and to resist pressure to trade it away. One editorial correction to assist the Council: the plan is internally inconsistent in how it numbers this policy. Paragraph 311 cross-refers to 'Policy H10', Appendix 3's table of policies lists it as H11, and the Appendix 1 monitoring framework lists it as H12. This should be reconciled before submission so the policy is unambiguous at examination. Relatedly, I ask that the plan's Equalities Impact Assessment specifically examine Policies H8 and H9 on Houses in Multiple Occupation. HMO restriction policies are often popular, but the people who live in HMOs, disproportionately migrants, students, young people and residents on low incomes, rarely feature in the consultation responses that shape them. Restricting supply without assessing displacement effects risks harming the very residents with fewest housing options.	Duty as part of the justification, strengthening the policies' position at examination. • Ensure the Equalities Impact Assessment addresses the distributional effects of Policies H8 and H9 on HMO residents, not only on settled neighbours.
George Fletcher*	Paragraph 255	Object	No	No	There is no evidence that the council assessed all the green spaces including 46 other parks before decided that Wilmorton Park was to be sacrificed. Many larger parks are available where the impact of 17 pitches would be less.	An alternative location needs to be found that does not involve destroying the key green space

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					However, these tend to be in the affluent areas e.g. Darley Park, where obviously a traveller park would be completely unacceptable to the affluent residents.	of the approx. 320 households of Wilmorton.
George Fletcher*	Paragraph 258	Object	No	No	considering the amenity of existing local residents, there is no evidence that the amenities of the residents of Wilmorton have been considered at all.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Paragraph 258	Object	No	No	HA16 does the opposite of considering amenity for local residents. The proposal significantly reduces amenity for the current population.	
Housing Allocations Outside of the City Centre						
Derbyshire County Council	Paragraph 259	Support	Yes	Yes	It is noted that the Reg 19 Plan proposes the allocation of fifteen housing site allocations (HA1 to HA15) to help meet the City's future housing 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:	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Rykneld Road is allocated for a minimum of 800 high quality new homes. This site will form part of a larger cross boundary growth area including the Highfields Farm housing site in South Derbyshire which is now built out; and 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 HA1: Rykneld Road, Littleover						
South Derbyshire District Council	Policy HA1: Rykneld Road, Littleover	Support			SDDC support the allocation of Policy HA1… part of which lies immediately to the south of the proposed allocation on the western side of Rykneld Road.	consider for HA1 that this should also include a requirement to create walking and cycling connections to the STRA2 allocation in SDDC
Policy HA2: Brook Farm, Chaddesden						
Councillor J Wright	Policy HA2: Brook Farm, Chaddesden	Object		No	The Council has wrongly stated that this policy on land, designated as 'Green wedge', will not fundamentally alter the	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					character of the land and its neighbouring green belt. Chaddesden is a highly dense residential suburb and the need for 'green wedges' to stop distinct communities coalescing has been part of the city's planning policy since these policies were first introduced and remains part of the Council's planning policy to date. This policy contravenes the green wedge policy and fails to recognise the individual characteristics of Chaddesden regarding distinctive communities and protection of the green belt owing to this policy's proximity to other distinctive communities and the small but crucial green belt within the city's boundaries. This policy is not consistent with the Council's 'brownfield and city centre fist policy' , it too fails to take into account the Council's budget amendment for a balancing review of the city' s brownfield sites.	
Policy HA3: East of Moorway Lane, Littleover						
Marrons on behalf of Ainscough Strategic Land	Policy HA3: East of Moorway Lane, Littleover	Object		No	The Land East of Moorway Lane, Derby, of which our client has an interest, is identified as an emerging housing allocation within the Draft Local Plan under Policy HA3 and a revision to the currently adopted Green Wedge boundary. The allocation policy sets out that the site will deliver a minimum of 335 new, high quality homes and is supported by a number of required criteria (a-k), these include the provision of a children's play area (criterion c), buffer planting to the north of the site (criterion d), improvements to Moorway Lane (criterion f) and the provision of a local centre on site to meet day to day needs of the local area (criterion h).	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The site is highly sustainable and within walking and cycling distance of several educational facilities, benefits from nearby public transport connections to the city centre and access to local amenities, including convenience stores and supermarkets, alongside the provision of the Local Centre on-site. The Green Wedge Review (2025) is clear that due to the width of the Green Wedge in this location, partial development of this site may be feasible, provided that Green Wedge principles are embedded into the layout, through the provision of linked undeveloped areas, and enhancing access to remaining undeveloped areas in the south of the Green Wedge. As such, it recognises that the Green Wedge would continue to make a valuable contribution in terms of well-being, recreation and biodiversity benefits which have been a focus of the submitted application and the draft Policy criteria. Our client is supportive of the proposed allocation and Policy HA3. However, the amendments previously requested through the Regulation 18 consultation have only been partially incorporated into the Regulation 19 version of Policy HA3. Therefore, we remain to suggest the following modification is made: • Though the wording included in criterion (e) has been generalised, however we request the following amendment is made:	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					"e) improved walking, wheeling and public transport connections. In particular strong walking and cycling connections should be made to the surrounding communities to the east and west of the site, where achievable". An outline planning application for this site was submitted on Friday 10th October 2025 (reference: 25/01544/OUT). The description of the development is as follows: "Erection of up to 350 dwellings (Use Class C3) with a local centre (Use Classes E, F1 and F2) with associated landscaping, open space, drainage infrastructure and associated works (all matters reserved except access from Moorway Lane)." The planning application has progressed positively since its submission and is now approaching determination. Throughout the application process, a constructive and collaborative working relationship has been established with Derby City Council. The positive progress made to date demonstrates that the site is both deliverable and capable of coming forward within the early years of the Plan period. The trajectory for the allocation, contained at Appendix 2 of the Draft Local plan, indicates completions on site from 2028/29. This is considered realistic given the advanced nature of the application The application proposals represent a sustainable form of development in an accessible location and will deliver a significant contribution towards Derby's housing needs, together with supporting infrastructure, open space and a local centre. As such, the site is well positioned to support the	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					objectives of the emerging Local Plan and the Council's strategy for housing growth.	
National Highways	Policy HA3: East of Moorway Lane, Littleover	Object		No	We note that Policy HA3, as submitted, does not reference the Findern Interchange, the A50, or the SRN; its only highways requirement is for improvements to Moorway Lane and associated access, a local road. Given this site was identified at Regulation 18 as likely to affect the SRN, we would welcome clarification of how this impact is proposed to be assessed.	
Policy HA5: The Hollow, Mickleover						

Caddick Land*	Policy HA5: The Hollow, Mickleover	Object	Yes	No	This allocation lies on the south western edge of the Derby Urban Area and to the south of Mickleover and is stated to deliver a minimum of 150 dwellings in the Derby City Council area as an urban extension to Mickleover adjoining the Draft site STRA2 Land South of Mickleover in the South Derbyshire Plan as confirmed by the below policy wording: The development in this area will form part of a wider cross-boundary strategic housing extension South of Mickleover including a significant amount of mixed-use development within South Derbyshire. Other requirements set out in the policy include open space provision, planting, green links, landscape buffers, pedestrian and cycling connections, appropriate highways access arrangements and contributions to local infrastructure. The supporting text for the allocation states: It is expected that the South Derbyshire element of the location will provide infrastructure in the form a number of facilities to support the wider cross-boundary development, including a business park, schools, a local centre and parkland (paragraph 288). The spatial approach in Policy H1 infects the location and types of proposed sites in the emerging plan. The plan identifies sites on the edge of Derby for development however these sites are predicated on the delivery of sites in South Derbyshire. Draft Derby Local Plan site HA5 is one such site which is reliant on a wider allocation in South Derbyshire being found sound and delivered. However, the parts of the site in Derby are only deliverable if the corresponding allocation in South Derbyshire is delivered. There would be no infrastructure to support the	

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					allocation within Derby if the emerging allocation within South Derbyshire was not allocated and brought forward. Undue strain on the schools, closest local centre, roads and local employment opportunities would arise if the Derby part of the allocation were brought forward in isolation. Allocating a site on the Derby Local Plan, which is predicated on a site not yet allocated in South Derbyshire, is a premature and unsound approach. The uncertainty of delivery of the site within South Derbyshire seems to be already accepted by the Council as they label it as a 'potential housing allocation'. There are questions over whether this allocation is deliverable and so it should be deleted and housing numbers added to the unmet need to be picked up by neighbouring authorities. Policy HA5 and the associated allocation is unsound.	
Fisher German of behalf of Bloor Homes	Policy HA5: The Hollow, Mickleover	Support	Yes	Yes	BHL raise no objection to this proposed allocation, but would draw Inspectors attention to the Council's conclusions raised in relation to the Locko Road proposals and connectivity of the settlement, which are in our view inconsistent. The HA5 site is wholly disconnected from the main urban area of Derby by both the A38 and A516, which are significant physical barriers in this location. Whilst regard is had for the 'potential' allocation in SDDC, there are clear risks in relying on a neighbouring authority's allocation to justify this site, particularly where that allocation may not come forward, as occurred at Brun Lane in Amber Valley. Moreover, it is not clear that that allocation will be developed in a manner which supports immediately adjacent residential development.	

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Pegasus Planning on behalf of Catesby Estates*	Policy HA5: The Hollow, Mickleover	Object	Yes	No	*Overall Policy Support* The proposed allocation of the land on the western edge of Derby, south of Mickleover at The Hollow is supported as a logical proposal, particularly in response to the emerging South Derbyshire Local Plan. The three parcels of land currently form the Mickleover / Littleover Green Wedge, however the decision by South Derbyshire to allocate the land to the west, south of Mickleover has fundamentally changed the context of this land. The proposed allocations are located between the transport routes of the A38 and A516, the land between these two routes is currently primarily agricultural land with housing on the Old Hospital Site at Merlin Way in South Derbyshire and housing fronting The Hollow in Derby City. The proposed strategic allocation in South Derbyshire will sever the link between the land in Derby City with the wider countryside, a key function of the Green Wedge, compromising the overall integrity and purpose of the Green Wedge. An updated Derby Green Wedge Review, prepared by LUC and published in September 2025, has informed the Draft Local Plan. This found that the majority of the 13 Green Wedges in Derby remain highly effective in fulfilling their primary purpose of shaping urban	Policy HA5 should be modified to remove the land which is now a commitment following planning permission for 96 homes east of The Hollow and identify the remaining two parcels as separate allocations. Policy HA5 should be modified to state the allocation has a minimum capacity of 200 dwellings to ensure the policy is consistent with paragraph 124 of the NPPF, making effective use of land in meeting the need for homes and other uses.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					structure, separating neighbourhoods, and maintaining visual and physical links with the countryside. Three of the Green Wedges scored less well including Littleover/Mickleover Green Wedge which was found to make a relatively weak contribution, performing weakly due to high levels of private land, structural pinch points, and restricted countryside links. The report concludes that the future of the Green Wedge is significantly influenced by the proposed development beyond the city boundary, within South Derbyshire, which would effectively curtail the Green Wedge by severing its connection to the wider countryside and preventing it from fulfilling its primary function. The assessment highlights that the proposed development in South Derbyshire means the Green Wedge designation would no longer remain justified as the land around the Hollow will become a series of isolated pockets of open space lacking a clear purpose or functional contribution. The decision to allocate this land for housing development, in the context of this assessment and the lack of available land for homes, is fully justified and ensures the plan is positively prepared and in line with national policy. *Development Parcels* The supporting text sets out that this is a strategic	

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					growth area which forms part of the South Derbyshire strategic allocation South of Mickleover and which is split into three distinct parcels. This includes our client's land interests west of The Hollow, north of Staker Lane along with the land east of The Hollow and south of Staker Lane. These three sites have different landowners and are being promoted separately. Only two of the parcels, north and south of Staker Lane, have formed part of the wider masterplan for the South Mickleover strategic allocation. Whilst these sites collectively create a strategic growth area, the draft policy should also recognise that these three sites will be delivered individually, on different timelines, by different housebuilders, as part of the wider whole. It would give the Council more certainty and control if these sites were individually allocated. The need to separate out these parcels is highlighted by the recent full planning permission granted for land to the east of the The Hollow to Wheeldon Brothers Limited. On 27th January 2026 this parcel was approved for 96 dwellings, habitat creation, open green space, public children's playground and landscape enhancements to the existing public right of way. The land east of The Hollow is now a commitment which has the potential to deliver sooner within the Local Plan period, it therefore lies within a different part	

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					of the Housing Trajectory to the other two parcels and could be shown as a commitment on the Policies Map. Our client is preparing a cross boundary application for the land to the north of Staker Lane to submit in support of the Local Plan. It would help the Council with the determination of this application, and that for the land south of Staker Lane, if the policy is clear these parcels will be delivered individually as part of the wider strategic picture. *Comprehensive Development* This will not prevent the development being comprehensively planned to ensure development is delivered in a coordinated and cohesive manner with the wider South Mickleover strategic allocation. The concept masterplan for our client's site shown in **Appendix C** has been developed taking into account the constraints on site and the relationship with the wider strategic allocation within South Derbyshire. It is considered to represent a deliverable form of development which will form a coherent part of the wider development and meet the proposed policy requirements of Draft HA5. Our client is in regular contact with the promoters of the majority of the remainder of the South Derbyshire STRA2 draft allocation and the concept masterplan has been developed as part of a comprehensive	

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					approach to green links and vehicular, pedestrian and cycling connectivity. *Scale of Development* Policy HA5 states that Land at The Hollow, Mickleover will deliver a minimum of 150 new homes. The scale of development anticipated significantly underestimates what can be achieved in this location. Planning permission has granted recently east of The Hollow for 96 homes and so this leaves only 54 homes to meet this minimum. Our client's site is capable of delivering a further 85 homes. This capacity figure is based on initial technical work which informed the concept masterplan shown in Appendix C. The reference to 150 dwellings within policy HA5 is not considered to be consistent with paragraph 124 of the NPPF as it does not make effective use of land in meeting the need for homes and other sues.	
South Derbyshire District Council	Policy HA5: The Hollow, Mickleover	Support			SDDC support the allocation of Policy HA5.	
Policy HA7: Stoney Lane, Spondon						
Anne-Marie Adams	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a local resident to formally object to the proposed allocation of land at Stoney Lane, Spondon for 400 homes under Policy HA7 of the Derby Local Plan.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					I believe Policy HA7 is unsound, specifically because I do not believe the allocation is justified or consistent with national planning policy. My main concern is that this is active agricultural land which currently forms part of the Green Belt. I do not believe that land of this nature should be reclassified as “Grey Belt” and released for development when there are significant opportunities to provide new housing on previously developed and brownfield sites within Derby. The Local Plan itself identifies substantial capacity at sites including Derby Riverside, Railway Station Quarter, North Castleward and other city-centre locations. I believe these opportunities should be fully prioritised and optimised before active Green Belt farmland on the edge of Spondon is allocated for such a large development. I am also concerned about the cumulative impact that 400 additional homes would have on Spondon. This is not simply a question of providing housing; those homes create additional demand on local roads, drainage, schools, healthcare and other services. Any decision to allocate a development of this scale should demonstrate convincingly that the surrounding infrastructure can accommodate that additional pressure. Development of this site would also extend the built-up area further into currently open agricultural land and contribute to urban sprawl. Once this land is developed, its character and its function as part of the separation between developed areas cannot realistically be restored.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					For these reasons, I believe Policy HA7 fails the tests of soundness and should be removed from the Local Plan. I ask the Council to deallocate the Stoney Lane site and prioritise the brownfield and regeneration opportunities already identified within the Plan before releasing Green Belt farmland for development.	
Janet Allen	Policy HA7: Stoney Lane, Spondon	Objects		No	I should like to make you aware of my serious concerns and objections to the above plan. I believe that the policy is unsound, in that it is not justified and not consistent with national policy. You are classing this land as "grey belt" when it is in fact active agricultural land, and therefore "green belt". Spondon does not have the infrastructure to cope with a further 400 dwelllings. Our village roads are already heavily congested and our schools, doctors and dentists are over subscribed. I believe the Council has other brown field sites and city centre sites that could more easily accommodate these dwellings. I believe that Plan HA7 is unsound as it fails the Justified and Consistent with National Policy tests as it wrongly classifies green belt land as grey belt. The Council should, instead allocate these 400 dwellings to brown field and city centre sites.	

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National Highways	Policy HA7: Stoney Lane, Spondon	Objects		No	We note that Policy HA7 requires financial contributions for off-site transport improvements, and that supporting paragraph 307 acknowledges the proposed access to the site "is very close to the A52 strategic road and the impact on the strategic road will need to be carefully considered and mitigated." However, the Policy does not set out the mechanism by which this will be assessed, nor does it require this to be agreed with National Highways or resolved prior to the determination of any planning application on the site. It should be noted that National Highways cannot accept financial contributions, and therefore alternative funding and delivery mechanisms may be necessary if mitigation on the SRN is required. We would therefore welcome that reference to financial contributions be expanded to include other delivery mechanisms (such as Section 278 agreements).	
Steve Allen	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to strongly oppose and object to the inclusion of the Stoney Lane site within the Local Plan document. As a local resident, I feel the proposal for 400 homes on this land is wholly inappropriate for a number of reasons: 1. The categorisation of the land as "Grey Belt" is unjustified. My understanding is that national planning policy defines Grey Belt as "previously developed, poor-quality or underperforming Green Belt land". This land is none of those. It has not been previously developed, and it is neither poor-quality nor underperforming given that it is currently being actively farmed and has been for many years. There is	Based on the above reasons, I request that the council reconsider and deallocate Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. In particular, the allocation should be considered unsuitable as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' and without demonstrating

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					numerous photographic and video evidence of crops being farmed and harvested on the land. The Green Belt land also performs a vital role in preventing urban sprawl. 2. It feels like there has yet to be sufficient consideration and review given to building on existing brownfield sites within the city boundaries before any consideration should be given to targeting any Green Belt land. 3. Derby City Council has repeatedly and vehemently challenged Erewash Borough Council on its selection and approval of the Spondon Wood housing development to the north of Spondon. It challenged the suitability of the location and EBC's own reclassification of the land as Grey Belt. Having objected so strongly to that development, how can DCC justify now including the Stoney Lane site within their own Local Plan when it seems, to me and many others, a very similar proposal. 4. The proposed sole access point earmarked to the new development area on Stoney Lane is very close to a busy junction off the A52. Many vehicles exiting the A52 at this point do so at speed coming off the dual carriageway and then enter a sharp, blind bend onto Stoney Lane. Any small amount of congestion building up at the junction as cars wait to turn off Stoney Lane into the new development site is highly likely to lead to collisions as cars exiting the A52 are presented unexpectedly with a queue of stationary cars in front of them	that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81).

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					5. As there is no specific mention of new infrastructure in the Local Plan, it would seem that the expectation is that residents in the new homes would generally be expected to use existing facilities in Spondon. There is no mention of any provision of additional secondary school places (West Park School is already oversubscribed). There is no explanation as to how these additional residents would access GP services when many existing residents already struggle to get an appointment at either of our two local surgeries. There is also no suggestion that anything would be done to mitigate the already heavily congested roads of Spondon, particularly at peak times. I look forward to receiving acknowledgement of my objection and further feedback in due course.	
Brian Anderson	Policy HA7: Stoney Lane, Spondon	Objects		No	It has come to my attention that Derby City Council are proposing to grant permission to build 400 homes off Stoney Lane, Spondon. I oppose this application on the following grounds that Policy HA7 is UNSOUND: 1. The proposed agricultural land has been redesignated as Grey Belt where it was originally a Green Belt land. This has been redesignated without the council demonstrating that all reasonable brownfield alternatives have been fully considered. 2. Allocating this active agricultural farmland for house building conflicts and is not in alignment with the principles of the national planning policy. It also appears that this directly	

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					contradicts the City Council's own commitment to a 'brownfield and City Centre first' strategy, set out in Paragraph 8.1 of the plan. 3. There are numerous brownfield sites currently available such as: i) Derby Riverside (Policy- C11) - 600 homes ii) Railway Station Quarter (Policy CC13) - 500 homes iii) North Castleward (Policy CC14) - 400 homes iv) City Centre Mixed-Use Sites (Policy CC4) - Over 1400 homes 4. The plan has an absence of detail on the impact on the current infrastructure of Spondon itself. Spondon is a small community on the outskirts of Derby city, As such the routes in and out of Spondon towards the city are extremely limited.There is only one road out of Spondon towards the city, namely Willowcroft Road. This road is frequently congested from Sitwell Street to the traffic lights at the junction of Willowcroft road and Nottingham road. The proposed 400 homes will add an estimated (my estimate) 400 additional vehicles (1 per home and possibly more) to the road system. Currently, side roads are used to avoid travelling through the village centre via (mainly) South Avenue. This traffic comes from Stoney Lane and Sandringham Drive area	

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					residents (I am one of them). South Avenue is already a 'rat run' and would no doubt become much worse. I have noted that during the morning rush hour that many children cross over South Avenue on their route to school through Spondon village centre. Currently there is no safe crossing point on South Avenue such as a zebra crossing. Increasing the quantity of homes on this side of Spondon will inevitably encourage many of the home owners to use the same South Avenue 'rat run' as a means of trying to exit Spondon more quickly. 5. I see that no consideration or indeed a thorough investigation / report has been made available investigating the negative impact on Spondon as a community, the impact on the road systems within Spondon village centre and on the few roads exiting the village. 6. There is no report on the reduced safety of pedestrians due to the higher volume of traffic on different roads, particularly during peak time. I note that there is no information given on current traffic flows and the proposed increased traffic flow expected due to the 400 new homes. 7. There is no report estimating the negative impact on air quality and noise that would both increase substantially both within a small area of residential properties. .	

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					I want it noted that a fully reject and oppose the current proposal, Policy HA7 - Stoney Lane, Spondon - 400 homes	
Jean Anderson	Policy HA7: Stoney Lane, Spondon	Objects		No	I firmly believe that to use Stoney Lane site is extremely unsafe and totally unjustified. It is not at all consistent with National policy. The site is an active agricultural piece of land and not poor quality or described as grey belt. Spondon known once as a village is being spoilt by all this building of houses. We need the farm. Our infrastructure is now being totally pressured. Schools, doctors, dentists etc will just not cope with all the extra pressure put on them. Spondon roads are now so heavily used by Lorry's and extra cars it's a nightmare at times. I feel Brownfield and Grey Belt land should be thoughly used before Green belt land even considered. I feel the allocation and use of Stoney Lane site is UNSOUND as it fails the Justified and Consistent with National Policy tests have misclassifying Green belt as Grey belt. To end my email I have lived in Spondon for 62 years and have gradually seen our once thriving village really go downhill in so many ways. No more building especially Stoney Lane.	
Jacqueline Annable	Policy HA7: Stoney Lane, Spondon	Objects		No	With regard to the above I would submit that this policy is Unsound because it is Not Justified, Not consistent with National Policy and there are brownfield alternatives already available to Derby City Council already allocated for housing.	I wish to request this modification: Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes)

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The land is active agricultural farmland and development would extend urban sprawl and existing infrastructure pressures, including roads, drainage and school and health capacity.	from the Local Plan. The allocation is UNSOUND as it fails the 'justified' and 'consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward) in accordance with the Plans stated 'brownfield and City Centre first' strategy (Paragraph 81).
Stepanie and Dean Asher	Policy HA7: Stoney Lane, Spondon	Objects		No	Having previously submitted our objection to the draft plans in relation to your policy HA7: Stoney Lane Spondon, and the update to the draft plan for Derby issued recently we wish to register our strong **OBJECTION** to the unsound proposal to build 400 houses on this land. The eleven points outlined in our response dated 6th March 2026 have not been addressed upon review of the latest update issued via email on 27th July 2026. **In addition**, we	

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					now add the following based on our review of the July update: 1. Your update points 302/3 notes the Council has redefined this land from green belt to grey belt, in an attempt to enable the land to be allocated for housing to the east of Spondon. Grey belt land is defined as green belt that is previously developed (brownfield), poor quality or fails to contribute to core green belt purposes. All of these definitions do not apply to the land in policy HA7 and therefore the definition of this as grey belt land is INCORRECT and UNSOUND and should remain as green belt based on: i. The classification of this land as grey belt is inconsistent with the national policy. The land is not of poor quality, it is agricultural land that is being actively farmed and has been so this year and for a number of years previously, providing cereal crops to contribute to the UK's food security; ii. It prevents the urban sprawl distinguishing Derby City from the neighbouring Erewash Council area, and is the most easterly part of Derby City thereby performing a core green belt purpose; iii. It has never been developed and therefore is not brownfield either. I do not see any evidence that Derby City Council have considered all other suitable brownfield sites already existing in the city (in addition to policies CC11, CC13, CC14 and CC4) that can be designated for housing, given the council's commitment to a city centre/brownfield	

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					sites first policy (as per local plan point 81). All brownfield sites should be given priority ahead of any plans on green belt. 2. There remains no solution to the access/egress to the site. Access from the A52 as suggested on the plan is dangerous and totally unsuitable for the additional vehicular demands that 400 houses brings, both in terms of private vehicles and public transport requirements. Having also considered other potential access points via the existing infrastructure in the area, there is no satisfactory access point opportunities that would be considered wide enough to accommodate this amount of additional traffic. How many accidents, injuries or fatalities would need to occur before the Council deemed this development unsafe? 3. A financial contribution towards improving education is noted with no plans in terms of an increase in educational capacity / new schools, and likewise no mention of other contributions in terms of additional doctors or dentists in an area where doctors' appointments or NHS dental services are currently difficult to obtain without the impact of an expanding population. There is no mention of additional leisure facilities in the Spondon area either. The social infrastructure for an additional c.1000 people needs to be planned and documented first before agreeing the plan for policy HA7. It is insufficient to ask for a financial contribution that is	

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					neither quantified nor applied to increasing Spondon's current facilities. Given the Spondon Wood development has already increased the population in this area, the additional population increase of policy HA7 is to the detriment of all those currently living in the area. Given our previous points, and the additional ones listed above, HA7: Stoney Lane Spondon **<u>needs to be taken out</u>** of the local plan. In summary; • The use of this green belt land is unjustified and inconsistent with the national policy given it is actively in use as farmland for the production of a food crop. • The use of brownfield sites elsewhere in the city have not been considered first. The impact on the current infrastructure of Spondon from further expansion will be hard felt by the current residents, and the vehicular impact and access is unsafe both on the existing roads and from the A52 perspective.	
Anthony Atkins	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the proposed development on Stoney Lane spondon of 400 new homes this is ACTIVE FARMLAND not brown land or grey belt land, not only would you destroy active farm land which would be lost for ever it would have a huge detrimental effect for the local wildlife which I am sure you will agree we cannot afford, as you know this move is not Consistent with National Policy and it even contradicts the Councils very own commitment how can you explain that and justify this move I am sure you are aware there are other	

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					areas within derby city that are appropriate for redevelopment if you allow this Development to go ahead then you are putting children`s lives at risk! is that hay you wish do do and all ways be known for and the reason I am saying this is because entrance to this development is on the part of Stoney Lane where you have traffic building up to enter the A52! of course this still a 30 mile zone and I drive on that part of stoney lane quite frequently so I do understand the traffic there so on this entrance you will have traffic entering and leaving this site as well as traffic leaving and entering the A52! guaranteed to have accidents and you will be deliberately be the cause of this, and that is just the start the local schools would be put under huge pressures which is not acceptable to the school and more importantly to the pupils attending the schools if this goes ahead you will be responsible for the accidents and possibly the deaths of children as that part of the road at school times is very busy, with respect I ask you to stop and think and visualise the road the traffic and more importantly the children and all adults who will have to put there lives at risk because of you decision	
Lynda Aubin	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to object most strenuously about the proposed development for 400 houses on Stoney Lane in Spondon. This is for a multitude of reasons, any one of which could impact the legality of the building. HA7 is **unsound** for the following reasons, which must be ac 1. The proposed site is not "Grey" belt, a new term introduced to circumnavigate the laws pertaining to Green Belt. It is active agricultural land. I have been walking the	

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					pathways through the lands over the last 5 years and have seen the crops rotate from active use to fallow fields. This is as recent as this year. Other Brown sites and city regenerating **must** be considered before this short-term and **unjustified** classification is enforced.. Enforced being the term I believe, is most accurate. Allocating active farmland for development conflicts with the **National Policy** principles and even moreso, the **council's own commitment** to a "brownfield and City Centre first strategy set out in Paragraph 81 of the plan. With a current Government's disdain for the trust of the public, this would not serve the council well. The council already has at least 4 other brownfield alternatives, at Derby Riverside, Railway Station Quarter, North Castleward, and mixed used sites in the city centre. 2. Spondon has already incorporated a current development of new housing in the woods, and adding further buildingwork, and on such a large scale, is going to contribute enormously to the urban development and sprawl towards other villages and towns. Where will this end? With all localities connected as one huge urbanisation? Again, this is not inline with the **brownfield and city centre strategy** already promised. 3. Already, there is an enormous burden on local infrastructure. Schools bearing more and more burdens, roads becoming congested as a matter of course, adding to the issue with CO2 emissions, and drainage and other utility capacities at full stretch. The congestion approaching and entering th A52 will be enormous and whenever	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					traffic cannot travel through Spondon village and is sent via Stoney Lane it will be untenable. 4. The previously mentioned alternatives should be fully utilised before agricultural land that **IS** being used is taken away for ever and therefore unable to ever be used again. 5. Surely in a day and age of the public suffering u-turn after u-turn from a sitting government that has the lowest public approval after taking office, local councils need to set the bar straight at street level, and show the public and voters, the people who pay their wages, it can be trusted by following the **"brownfield and City Centre first"** strategy it promised. There are several legal reasons for this proposed development to be moved to other more prominent, available and less intrusive sites. These must be considered before any high-handed developments leave our country irretrievable and one huge urban sprawl.	
Tony Aubin	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to request that Site HA7 (Stoney Lane Spondon - 400 homes) is deallocated from the local plan. By misclassifying Green Belt Farmland as Grey Belt, without demonstrating that all reasonable brownfield alternatives have been fully optimised, the plan fails the 'Justified' and 'Consistent with National Policy' tests. Policy HA7 is therefore UNSOUND. The Stoney Lane site has not been previously developed and is not of poor Quality or underperforming as Green Belt. The farmer has actually begun growing crops on the site over the last three years, it is actually active agricultural land with a	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					busy public footpath, NOT Grey Belt. This misclassification as Grey Belt simply cannot be justified. Furthermore it is inconsistent with Council's own commitment to a 'brownfield and City Centre first' strategy. In addition, Spondon is already going through an extensive phase of building on Dale Road, which will further increase the load on the already busy roads and infrastructure. With only 4 roads exiting Spondon north of A52 it is already a difficult commute for all residents. Spondon is simply not capable of supporting the burden of an additional 400 homes, proposed under Policy HA7. The placement of HA7 would also result in a significant increase in the flow of traffic onto the A52, using the SHORT entry slip road. This would require a large flow of slow traffic onto the A52, causing traffic congestion, which seems incredibly counterintuitive considering the recent investments into improving A52 traffic flow. At worst, is represents an increased risk to road safety. With that in mind it is reasonable that the Council should reallocate these 400 dwellings to existing brownfield and city centre regeneration allocations, prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield' and City Centre first' strategy (paragraph 81).	
Emma Banks	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to submit a **formal objection** to Policy HA7 (Stoney Lane, Spondon) as part of the Regulation 19 consultation on the Derby Local Plan 2023–2043.	For these reasons, I respectfully request that Site HA7 (Stoney

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					I believe this allocation is **unsound** because it is **not justified** and **not consistent with national planning policy**. As a resident of Spondon, a parent, and someone who works within wellbeing and special educational needs, I care deeply about creating communities where people can thrive. This proposal is about far more than simply building houses. It is about the irreversible loss of valuable green space, the erosion of the character of our village, and the cumulative impact on the health, wellbeing and quality of life of the people who already live here. The land at Stoney Lane is not derelict or previously developed. It is actively farmed agricultural land. I have personally seen combine harvesters in these fields very recently (see attached image), demonstrating that this is productive farmland that continues to serve an agricultural purpose. It should not be reclassified as "Grey Belt" when it clearly performs an important Green Belt function by preventing urban sprawl and maintaining the separation between neighbouring communities. The Council has stated within its own Local Plan (Paragraph 81) that it will prioritise a "brownfield and City Centre first" strategy. However, this allocation appears to absurdly release actively farmed Green Belt land before existing brownfield opportunities have been fully utilised. This is difficult to reconcile with both the Council's stated strategy and national planning policy. There are already significant brownfield allocations capable of delivering substantial numbers of homes, including Derby Riverside, Railway Station Quarter, North Castleward and other city centre regeneration sites. These should be	Lane, Spondon) be **removed** from the Local Plan. I ask that the Council instead reallocates these proposed dwellings to existing brownfield and city centre regeneration sites, in line with it's very own Local Plan which clearly states "brownfield and City Centre first" strategy as well as in line with the national planning policy. Please don't take our beautiful green spaces away - the world is burning and we need more trees not tarmac! We also have an aging population and declining birth rate, empty houses everywhere soon! Thank you for considering my representation.

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					prioritised before productive Green Belt farmland is considered for development. I am also deeply concerned about the cumulative impact on local infrastructure. Spondon has already absorbed substantial housing growth recently, particularly through the large Bloor Homes development at the top of our village. Residents continue to experience increased traffic congestion, delays and disruption associated with that development. Construction has brought prolonged dust and noise, affecting nearby residents' enjoyment of their own homes, while alterations to infrastructure, including changes to the sites elevated levels, have caused significant local concern and actually invade privacy for existing residents - these changes were not approved prior to commencement either! These experiences inevitably raise questions about whether the full impact of further large-scale development has been properly considered. Our village roads are already under considerable pressure. Congestion is commonplace (have you seen Willowcroft road in a morning?!?), and further development will inevitably increase traffic movements, placing additional strain on roads, drainage, and local services. Not to mention that the only entrance way would be right off a 70mile per hour road - it's an accident waiting to happen! It is difficult to see how existing infrastructure can sustainably accommodate another 400 homes without significantly reducing residents' quality of life.	

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					Beyond infrastructure, there is also a wider environmental responsibility. As a mother, I feel a profound responsibility to the next generation. Climate change is no longer a distant concern but an everyday reality, and protecting green spaces has never been more important. Accessible natural environments support physical health, mental wellbeing, biodiversity, flood resilience and climate adaptation. Once these spaces are lost to development, they cannot be replaced. Green spaces are not "empty land waiting to be built on". They are living landscapes that support wildlife, agriculture, recreation and the wellbeing of local communities. Spondon is a village with its own identity, and the gradual erosion of the green spaces separating neighbouring villages risks creating continuous urban sprawl and permanently changing the character of our community.	
Beverley Bardill.	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe that Policy HA7 – Stoney Lane, Spondon is unsound. The Stoney Lane site has been classified as Grey Belt. This is clearly ridiculous as the site is actively farmed agricultural land and is Green Belt. The site is an important Green Belt area as it prevents urban sprawl beyond the existing boundary of housing between Spondon and Ockbrook. Grey Belt designation is not justified without the council demonstrating that all reasonable brownfield sites have been explored and utilised. Further the designation is not consistent with national policy and contradicts the council's own policy of "brownfield and city centre first".	I request that you deallocate Site HA7 (Stoney Lane Spondon – 400 homes) from the Local Plan.

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					The plan for additional housing in Spondon is not sustainable. The roads are already overloaded, local services such schools, doctors, dentists are already struggling to cope. There is minimal sustainable transport infrastructure to support additional housing in this location.	
Michael Bardill	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe that Policy HA7 – Stoney Lane, Spondon is unsound. The Stoney Lane site has been classified as Grey Belt. This is clearly ridiculous as the site is actively farmed agricultural land and is Green Belt. The site is an important Green Belt area as it prevents urban sprawl beyond the existing boundary of housing between Spondon and Ockbrook. Grey Belt designation is not justified without the council demonstrating that all reasonable brownfield sites have been explored and utilised. Further the designation is not consistent with national policy and contradicts the council's own policy of "brownfield and city centre first". The plan for additional housing in Spondon is not sustainable. The roads are already overloaded, local services such schools, doctors, dentists are already struggling to cope. There is minimal sustainable transport infrastructure to support additional housing in this location.	I request that you deallocate Site HA7 (Stoney Lane Spondon – 400 homes) from the Local Plan.
Nathan Bates	Policy HA7: Stoney Lane, Spondon	Objects		No	FORMAL REPRESENTATION – POLICY HA7, STONEY LANE, SPONDON – PROPOSED 400 HOMES I am writing to formally object to the proposed allocation of approximately 400 homes at Stoney Lane, Spondon.	The Council should first make proper use of suitable brownfield and regeneration opportunities before sacrificing

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					I consider Policy HA7 to be unsound and believe it should not be included in the Local Plan in its current form. My objection is based on the following grounds: 1. The site is Green Belt and active agricultural land The Stoney Lane site is Green Belt land and is currently active agricultural farmland. It is not previously developed land, nor is it simply unused or poor-quality land awaiting redevelopment. I strongly object to the principle of removing this land from the Green Belt and permanently developing productive farmland when there are other potential locations for housing within Derby. Allowing a development of 400 homes in this location would represent a significant expansion of the built-up area of Spondon and would cause a permanent loss of open agricultural land. 2. The allocation is NOT JUSTIFIED I do not believe the Council has provided adequate justification for selecting this site. In particular, I object to the apparent categorisation of the land as “Grey Belt” when it is active agricultural land within the Green Belt. A Grey Belt designation should not be treated as an automatic justification for releasing land for	Green Belt agricultural land at Stoney Lane. I respectfully request that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon – 400 homes and provided to the Planning Inspector as part of the Regulation 19 consultation.

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					development. The Council should be required to demonstrate clearly why this specific site is necessary and why reasonable alternatives have not been fully utilised first. There are already significant housing opportunities identified on brownfield, regeneration and city-centre sites elsewhere in Derby, including Derby Riverside, the Railway Station Quarter, North Castleward and other city-centre locations. It is difficult to justify sacrificing active agricultural land at Spondon while substantial opportunities for development on previously developed land remain available. 3. The allocation is NOT CONSISTENT WITH NATIONAL PLANNING POLICY I also consider Policy HA7 to be inconsistent with national planning policy. National planning policy places importance on protecting Green Belt land, preventing unnecessary urban sprawl and making effective use of suitable previously developed land. The Council should therefore demonstrate that the release of this Green Belt agricultural land is genuinely necessary and that reasonable alternatives have been properly considered before proceeding with such a significant development. Simply classifying the site as Grey Belt does not, in my view, remove the need for that justification.	

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					4. Serious concerns regarding the impact on Spondon. A development of 400 additional homes would have a substantial impact on the local area. There are already pressures on local roads and infrastructure, and I have serious concerns about the additional demand this development would place on traffic, drainage, schools, healthcare, utilities and other local services. These are not minor considerations. A development of this scale would have a lasting effect on Spondon and its surrounding area. I therefore strongly urge the Council to reconsider this allocation rather than treating the development of this site as an acceptable solution simply because housing is required. My position is clear: Policy HA7 is not justified, is not consistent with national planning policy, and should not proceed in its current form.	
Lisa Battelle	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to **Policy HA7 – Stoney Lane, Spondon – proposed allocation of 400 homes**, and consider the policy to be **unsound**, particularly on the grounds that it is **not justified** and **not consistent with national policy**. I fully recognise that Derby, like the rest of the country, needs more housing, and I don't believe that Green Belt land should automatically be considered completely untouchable where there is a genuine need and no reasonable alternative.	I would therefore ask that **Policy HA7 is removed from the Local Plan and the proposed 400 homes are accommodated through suitable brownfield, previously developed and regeneration sites before active Green Belt farmland is considered for release.**

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					However, I find the proposed development of Stoney Lane very difficult to justify when the site is **active agricultural farmland** and there are significant opportunities for housing on brownfield and previously developed land elsewhere in Derby. My particular concern is the continued outward expansion of Spondon. A development of 400 homes on this site would contribute significantly to urban sprawl and further erode the distinction and identity of Spondon as a village. Once active farmland at the edge of the village is developed, that change is permanent, and it inevitably creates further pressure for development beyond it in future. I am also concerned by the classification of this site as “Grey Belt”. This is active farmland which currently provides a clear physical break from further urban expansion. I do not believe a convincing case has been made for why this land should be released before reasonable brownfield and regeneration alternatives have been fully explored and prioritised. The Local Plan itself identifies substantial housing opportunities at Derby Riverside, Railway Station Quarter, North Castleward and other city-centre mixed-use sites. In that context, allocating active farmland at Stoney Lane appears particularly difficult to reconcile with a stated “brownfield and city centre first” approach. This isn't an objection to new housing simply because I don't want houses built near where I live. Derby needs homes and those homes have to go somewhere. My objection is to the	

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					choice of **this particular land** when there appear to be numerous alternatives which would provide much-needed housing without contributing to the outward sprawl of Spondon or permanently removing productive agricultural land.	
Katherine Bembridge	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to specifically comment on the plan (HA7 Stoney Lane) in relation to proposed downgrading of the land adjacent to Stoney Lane in Spondon which is currently Greenbelt and which under the local plan will be redesignated as Greybelt. This land is currently actively farmed land which provides a clear buffer between housing areas. It provides a valuable wildlife corridor beside the very busy A52 corridor between Derby, the M1, and Nottingham. If developed this land would further increase the already congested roads of Spondon, and provide increased pressure on local services such as schools, doctors etc. The access to this development could only be on the current slip road to the A52 which is already very busy. In my view this would be both dangerous and cause considerable congestion on the surrounding roads. Spondon is already providing new housing through the developments at Royal Hill Road (also on Greenbelt) and the Erewash development at Spondon Wood. This proposal would make a third and considerably larger development to be absorbed into infrastructure already under strain.	
George and Tina Bennett	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a local resident to make a formal representation regarding Policy HA7 of the emerging Derby	

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					Local Plan 2023-2043 and the proposed allocation of land at Stoney Lane, Spondon for a minimum of 400 homes. I strongly object to the inclusion of this site in the Local Plan and consider the proposed allocation to be unsound. In particular, I do not consider that the allocation has been sufficiently justified by the evidence currently available, and I have concerns regarding its consistency with national planning policy and the Council's stated approach to brownfield and city-centre development. 1. The justification for releasing this Green Belt land requires further evidence The proposed development would result in the loss of open agricultural land on the eastern edge of Spondon and would represent a significant expansion of the built-up area. The Council's classification of the site as "Grey Belt" should be supported by clear and robust evidence demonstrating that the land meets the relevant national definition and that its contribution to the purposes of the Green Belt has been properly assessed. The fact that land is capable of being developed should not, in itself, be sufficient justification for its release. The Council should clearly demonstrate why this particular site is suitable and necessary for development and why its release represents an appropriate planning strategy for Derby.	

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					I therefore consider that the Council has not yet demonstrated sufficiently that the allocation is justified. 2. Reasonable brownfield and regeneration alternatives should be properly demonstrated The Local Plan identifies substantial opportunities for housing on previously developed and regeneration sites elsewhere in Derby, including major city-centre and brownfield locations. The Council should demonstrate clearly why these opportunities cannot make a greater contribution towards meeting the housing requirement before releasing additional open agricultural land around Spondon. I am not suggesting that every brownfield site must be developed before any Green Belt land can ever be considered. However, national policy places significant emphasis on making effective use of suitable previously developed land and other appropriate opportunities. The evidence base should therefore explain why allocating HA7 is necessary when substantial regeneration opportunities remain available. This is particularly important given the Council's stated commitment to a "brownfield and City Centre first" approach. 3. Cumulative highway and transport impacts on Spondon	

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					I have serious concerns about the cumulative effect that this development would have on the local highway network. The issue should not be considered simply as the traffic generated by 400 houses in isolation. The Council should assess the cumulative impact of HA7 alongside other existing, committed and proposed development in and around Spondon and the surrounding area. Particular consideration should be given to the capacity and operation of the A52 and its junctions, Stoney Lane, Dale Road, Derby Road, Lacko Road and the wider surrounding highway network. 1 The Council should also demonstrate that safe and attractive pedestrian and cycle connections, public transport provision and emergency access can be delivered alongside the development. I would ask that the Local Plan Inspector requires the Council to provide clear evidence that the cumulative transport impacts can be satisfactorily mitigated rather than relying solely on measures which may be secured at a later planning application stage. 4. Pressure on local infrastructure and services , A development of at least 400 additional homes would inevitably place additional demand on local services and infrastructure.	

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					I am concerned about the capacity of local primary and secondary schools, GP and healthcare services, dental provision, drainage and sewerage infrastructure, public transport, roads, footpaths, recreational facilities and other community infrastructure. The draft policy itself recognises the need for contributions and improvements relating to education, transport and drainage. The Council should therefore demonstrate that the required infrastructure can be delivered at the appropriate time and will be sufficient to accommodate the additional population. It is not enough for infrastructure requirements to be identified in principle. There should be clear evidence that the necessary infrastructure is deliverable, properly funded and capable of being provided. in step with the occupation of new homes. 5. Impact on the character and setting of Spondon I The proposed allocation would represent a substantial change to the eastern edge of Spondon. i The site currently forms part of the open agricultural landscape surrounding the settlement. Developing a minimum of 400 homes would urbanise this area and materially alter the relationship between Spondon and the surrounding countryside.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The assessment should properly consider landscape character, visual impact, views towards and from the site, the rural setting of Spondon, recreational routes and the cumulative effect of further development on the identity and character of the settlement. I am concerned that continued expansion around Spondon risks gradually changing the character of the area from a distinct established settlement with a countryside setting into a much larger continuous urbanised area. 6. Loss of productive agricultural land The proposed development would result in the permanent loss of agricultural land. The Council should clearly identify the agricultural land classification of the site and explain how the loss of productive agricultural land has been considered in the planning balance. Whilst I recognise that agricultural land is not automatically protected from development, the loss of productive farmland should be properly justified where alternative development opportunities exist elsewhere within the City. 7. Overall soundness of Policy HA?	

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					Taking these matters together, I do not consider that the allocation of HA? has been sufficiently justified. The Council should demonstrate, with robust and transparent evidence: • why the site is appropriately classified for release from the Green Belt; • why the site is necessary when reasonable brownfield and regeneration opportunities remain; • how the cumulative transport impacts on Spondon and the surrounding highway network will be addressed; • how education, healthcare, drainage, sewerage, public transport and other infrastructure capacity will be provided; • how the landscape and character of Spondon will be protected; and • why this location represents a more appropriate and sustainable solution than alternative locations. 8. Requested modification For the reasons set out above, I request that Policy HA? - Stoney Lane, Spondon is deleted from the Local Plan. . iIfthe Council considers that the allocation should remain, I request that the evidence supporting the allocation is substantially strengthened before the plan is submitted for examination, including clear evidence addressing the Grey Belt assessment, reasonable alternatives, cumulative transport impacts, infrastructure capacity, landscape and settlement character, and agricultural land.	

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					In my view, the current allocation does not provide sufficient justification for the loss of this open agricultural land and the further expansion of Spondon. Conclusion I fully recognise the need for Derby to provide new housing and support the principle of sustainable development in appropriate locations. My objection is not to housing in principle; it is to the selection of , this particular site and whether the evidence demonstrates that it is the right location when the wider needs and opportunities of Derby are considered. I respectfully ask Derby City Council and, if necessary, the appointed Planning Inspector to give careful consideration to the issues raised in this representation and to conclude that Policy HA7 should not form part of the adopted Local Plan.	
Michael Bennett	Policy HA7: Stoney Lane, Spondon	Objects		No	1 this is UNSOUND as it is unjustified 2 it will put pressure on local infrastructure school roads drainage 3 the allocation of 400 homes is UNSOUND	
Aaron Betesta	Policy HA7: Stoney Lane, Spondon	Objects		No	HA7 (Stoney Lane) is an unsound housing project. All reasonable brownfield alternative sites have not been optimised.	

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					It is currently active farmland, being used for agriculture, and the use of the term 'grey belt' is being used incorrectly. I believe the council should relocate these 400 houses into brownfield and city centre projects, like Policy CC4, CC11, CC13, CC14, following the brownfield and city centre first policy.	
Beth Betesta	Policy HA7: Stoney Lane, Spondon	Objects		No	HA7 (Stoney Lane) is, in my view, an inappropriate and unsustainable housing site. There are reasonable brownfield alternatives available that have not yet been fully explored or optimised. The site is currently active agricultural land and is in productive use for farming. I therefore believe that describing it as part of the “grey belt” is inappropriate and does not accurately reflect its existing use. The council should instead seek to accommodate the proposed 400 homes through suitable brownfield and city-centre development opportunities, including sites identified under Policies CC4, CC11, CC13 and CC14. This would be more consistent with the principle of a brownfield-first and city-centre-first approach to housing delivery. I therefore believe that the allocation of HA7 (Stoney Lane) should be reconsidered, with greater priority given to the optimisation and delivery of suitable brownfield and city-	

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					centre sites before productive agricultural land is released for development.	
Wayne Birch	Policy HA7: Stoney Lane, Spondon	Objects		No	Afternoon I have just received a letter advising of the above plans I part own a house at [redacted] spondon . Im totally against this idea as I fell there is enough houses in the local ares which are stretch to the limit with local services plus I can have a excellent guess who these properties are being bult for and who will be housed there so would like to register a massive no if favour of this project .	
Nicole Birtwhistle	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of land off [redacted], Spondon, under Policy HA7 of the emerging Derby Local Plan for approximately 400 new homes. I am a resident of Spondon, on Stoney Lane and I believe this allocation is unsound and should be removed from the Plan before it is submitted to the Secretary of State for independent examination. My objection relates specifically to Policy HA7 - Stoney Lane, Spondon - 400 homes, and is made on the following grounds. 1. THE POLICY IS NOT JUSTIFIED The Stoney Lane site is a large area of active, productive agricultural land. It has been classified in the Plan as "Green Belt" in name only, on the basis that it is previously developed or poor-quality land. This is not an accurate description of the site. In reality the land is actively farmed, contributes to food production, and performs an important Green Belt function by checking the unrestricted sprawl of Derby and preventing the merging of Spondon with neighbouring settlements. Removing this land from the Green Belt for housing is not justified when the Plan itself identifies substantial alternative	I request that the Local Plan be modified to remove Site HA7 (Stoney Lane, Spondon - 400 homes) from the housing allocations. I consider that this allocation is not justified and is not consistent with national policy, given that reasonable brownfield and city-centre alternatives are available under Policies CC4, CC11, CC13 and CC14, in accordance with the Plan's own stated "brownfield and city centre first" strategy. I further consider that the Plan does not demonstrate that local infrastructure, including GP surgeries, school places, and the road network, has the capacity

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					capacity on previously developed, brownfield land elsewhere in the city, including: - Derby Riverside (Policy CC11) - around 600 homes - Railway Station Quarter (Policy CC13) - around 500 homes - North Castleward (Policy CC14) - around 400 homes - City Centre Mixed-Use Sites (Policy CC4) - over 1,400 homes Given this level of brownfield capacity already identified within the Plan, releasing active Green Belt farmland at Stoney Lane cannot be considered the most appropriate option when tested against reasonable alternatives, and the evidence base does not demonstrate why greenfield release is necessary ahead of these sites. 2. THE POLICY IS NOT CONSISTENT WITH NATIONAL POLICY National planning policy is clear that Green Belt boundaries should only be altered in exceptional circumstances, and that authorities should give first priority to brownfield and previously developed land, followed by under-used or under-utilised land, before greenfield and Green Belt sites are considered. Allocating active agricultural land for development ahead of the brownfield sites listed above conflicts with this "brownfield and city centre first" approach, which the Plan itself states as an objective (I note this is discussed at Paragraph 81 of the Plan). Allocating Site HA7 therefore appears internally inconsistent with the Council's own stated strategy, as well as with national policy. 3. IMPACT ON LOCAL INFRASTRUCTURE AND SERVICES Beyond the Green Belt and brownfield-first arguments, I am also very concerned about the impact of 400 additional	to support this level of additional development. I would be grateful if this representation could be formally recorded against Policy HA7 as part of the Regulation 19 consultation, and I look forward to confirmation that it has been received.

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					homes on infrastructure and services in Spondon, which are already under significant pressure: - GP and healthcare capacity: Spondon's GP surgeries are already operating at, or beyond, capacity, with long waits for routine appointments. The Plan does not demonstrate that local primary care provision has the capacity to absorb the additional population this development would bring, nor is there a clear, funded commitment to expand GP capacity in step with new housing. - School places: Local primary and secondary schools serving Spondon are already under pressure for places. An additional 400 homes could reasonably be expected to generate a significant number of school-age children, and I have seen no robust evidence in the Plan that sufficient school capacity exists, or is funded and deliverable, to accommodate this. - Roads, traffic and drainage: Stoney Lane and the surrounding local road network are not designed for the volume of additional traffic this development would generate. There are already existing pressures on local roads, drainage and wider infrastructure. The route onto and from the A52 at the bottom of Stoney Lane are already poorly managed and a high-risk trap. Furthermore, the development that has begun on Dale road leading out of Spondon is underway and similar considerations have not been given for the impact of this development on the local area. This would be significantly impacted and the Plan does not adequately evidence how these would be mitigated.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					- Cumulative impact: These infrastructure pressures should be considered cumulatively alongside other housing growth already planned for Spondon and the surrounding area, rather than assessed in isolation for this site alone. For these reasons, I do not consider the Plan to be "sound" in respect of Site HA7, as it fails the tests of soundness relating to being justified, effective, and consistent with national policy.	
Claire Blackmore	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe the policy HA7 I'd unsound as the land is green belt not grey belt. It is not justified-The council has incorrectly categorised active agricultural farm land as grey belt, without demonstrating that all reasonable brownfield alternatives have been fully considered. Not constant with national policy - Allocating active agricultural farmland for development conflicts with the principles of national planning policy. It also appears to directly contradict the councils own commitment to a 'brownfield and city centre first' strategy. Set out in paragraph 81 of the plan. There are alternative brownfield sites: These have been identified as: Derby Riverside- CC11 Railway station quarter- CC13 North Castleward - CC14 City centre mixed-use sites - CC4	I request this specific modification. Relocate site HA7 Stoney Lane, Spondon -400 homes from the local plan. It is unsound as it fails the 'justified' and 'consistent with national policy' tests by misclassifiying active farmland, from greenbelt to greybelt without demonstrating that alternative brownfield have been fully explored. The council should relocate These 400 homes to one of the identified brownfield sites listed above in accordance with councils strategy- paragraph 81.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					These allocations demonstrate that there are substantial opportunities for housing on previously developed sites rather than developing active greenbelt land in Spondon. I woukd also like to highlight the following points. This is active farmland. I have been walking there with my dogs for over 3 years and ut has always been used to grow crops. The development will contribute to urban sprawl. There are already significant pressures on local infrastructure. I have to wait weeks for a gp appointment. I have been on the waiting list for an NHS dentist in Spondon for over 3 years! The council has substantial brownfield sites which should be developed before considering active farmland. The land supports a wealth if wildlife and insects...which are in decline due to loss of habitat. There is already significant development just a little further up on Dale Road. The main road is already very busy and dangerous to cross, without adding more cars!	
Mr Brian & Mrs Julia Bonner	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to Policy HA7 and the proposal to build approximately 400 additional homes on land which was previously designated as Green Belt and is now being considered as “grey belt” land.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					I believe that Policy HA7 is unsound and should be reconsidered, particularly when the cumulative number of homes already planned or under construction across the local area is taken into account. I fully understand the need for appropriate housing provision. However, there must also be consideration of whether the local area has the roads, infrastructure, schools, healthcare services and other facilities necessary to support such a significant increase in population. In my view, the cumulative level of development being proposed is simply too much for the area to absorb. Highway Safety and HGV Traffic The existing roads through our village are already narrow and unsuitable for the level of heavy traffic they are currently experiencing. HGVs are already regularly travelling through our narrow village streets, creating a significant concern for residents, pedestrians and other road users. A particularly serious incident occurred only around two years ago, when an HGV travelling through the village suffered a tyre blowout. The force of the incident was so severe that two shop windows were blown out. Fortunately, nobody happened to be walking directly in front of the shops at the time. Had there been pedestrians outside	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					the shops, the consequences could have been extremely serious. This incident demonstrates the very real safety issues that already exist on our roads. Adding approximately 400 more homes would inevitably increase vehicle movements and put even greater pressure on an already inadequate road network. It is not reasonable to assume that the existing roads can simply absorb this additional traffic without significant consequences for road safety, congestion and the quality of life of local residents. The Cumulative Impact of Housing Development The proposed 400 homes under Policy HA7 cannot be considered in isolation. There are already substantial housing developments either being constructed, planned or allocated within the surrounding area. These include: ● Approximately 400 homes at Deer Park, Spondon, which are already being built. ● Approximately 600 homes under Policy CC11. ● A further approximately 500 homes associated with the railway station under Policy CC13.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					● Approximately 400 homes at North Castleward under Policy CC14. ● More than 1,400 homes through city-centre mixed-use sites under Policy CC4. ● A further approximately 400 homes proposed under Policy HA7. Taken together, these developments represent thousands of additional homes and therefore thousands of additional residents and vehicle movements. The impact of this cumulative development must be properly considered. It is not sufficient to assess Policy HA7 as though it were the only development taking place in the area. We do not need more housing at the expense of the ability of the existing community to function safely and effectively. There must be a point at which the cumulative impact on infrastructure and local services is recognised. Schools Local schools are already under pressure, and there are serious concerns about whether they have the capacity to accommodate the children who would come from these additional developments. The proposed housing numbers cannot be looked at simply as figures on a planning document. Approximately 400	

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					additional homes could mean a substantial number of additional children requiring school places. Where will these children go? If existing schools are already struggling to accommodate demand, the Council must provide clear evidence of where the additional school places will be created and how they will be funded and delivered. GP and Dental Services Healthcare services are also already under considerable pressure. Residents can already struggle to obtain GP appointments, and accessing NHS dental services is becoming increasingly difficult. Adding hundreds, and potentially thousands, of additional households across the various developments will inevitably increase demand for these services. Where is the additional capacity going to come from? It is not acceptable to continue adding housing without ensuring that the essential services required by those residents are capable of meeting the increased demand. Infrastructure	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The same concerns apply to the wider infrastructure of the area. There must be sufficient capacity for: ● Roads and highways ● Drainage and sewage ● Water supply ● Electricity ● Waste collection ● Public transport ● Schools ● GP and dental services ● Emergency services The existing infrastructure is already under pressure. Adding thousands of additional homes across the area will only intensify these problems. Grey Belt Does Not Automatically Mean Suitable for Development	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The fact that land has now been classified as “grey belt” should not be treated as an automatic justification for development. The question must also be whether the land is actually suitable and sustainable for the level of development being proposed. A site may technically meet a particular land classification while still being unsuitable because of inadequate roads, insufficient school capacity, pressure on healthcare services and a lack of supporting infrastructure. Enough Is Enough There has to be proper consideration of the cumulative impact of all these developments on existing residents. Residents should not have to accept increasingly congested and unsafe roads, inadequate infrastructure, overcrowded schools and already overstretched healthcare services simply because additional land has been identified for housing. With approximately 400 homes already being built at Deer Park, Spondon, alongside the significant number of homes identified under Policies CC11, CC13, CC14 and CC4, adding another 400 homes under Policy HA7 would place an unreasonable additional burden on the area.	

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					The figures speak for themselves. We already have substantial housing provision planned and under construction. We do not need more development simply for the sake of meeting further housing numbers when the existing infrastructure is already struggling to cope. Conclusion For all of these reasons, I strongly object to Policy HA7 and believe that it is unsound in its current form. The Council should take a step back and consider the cumulative impact of the thousands of homes already planned across the area before allocating yet more land for development. In particular, I ask that the Council properly investigate and address: 1. The existing highway safety problems caused by HGVs using narrow village roads. 2. The serious incident involving an HGV tyre blowout and the resulting damage to two shop windows. 3. The additional traffic that would be generated by another 400 homes.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					4. The cumulative impact of the 400 homes proposed under HA7 alongside the approximately 400 homes already being built at Deer Park, Spondon. 5. The additional housing proposed under Policies CC11, CC13, CC14 and CC4. 6. The lack of capacity within local schools. 7. The existing difficulties accessing GP and dental appointments. 8. Whether existing utilities, drainage, sewage and other infrastructure can cope with the cumulative level of development. 9. Whether the proposed development is genuinely sustainable in practical terms, rather than simply being considered suitable because the land has been classified as “grey belt”. Our village and surrounding communities already have to cope with significant pressures on roads and services. Adding another 400 homes on top of the extensive development already planned is unreasonable and disproportionate. For these reasons, I respectfully request that Policy HA7 is removed, rejected or substantially reconsidered, and that no further housing allocation is made until the existing	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					infrastructure and cumulative development pressures have been properly addressed. We do not need more. We need the infrastructure and services we already have to be able to cope with the development that has already been approved or planned	
Freya Bradley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to make an individual representation objecting to the proposed allocation of land off Stoney Lane, Spondon, identified as Policy HA7 - Stoney Lane - 400 homes in the emerging Derby Local Plan. I consider Policy HA7 to be unsound and request that the allocation is reconsidered and removed from the Local Plan. 1. **The allocation is not justified** The proposed development would involve the loss of active agricultural land on the edge of Spondon. I do not consider it adequately demonstrated that the exceptional circumstances necessary to justify the development of this land have been established. The proposed site is not simply an area of previously developed or poor quality land. Its current agricultural use provides an important open space function and contributes to maintaining the separation and character of Spondon. The building of 400 homes would blur the boundary lines between Spondon and Ockbrook and ruin Spondon's individual character and community. The Council should clearly demonstrate why this particular site is required and why reasonable alternatives cannot meet the housing requirement before allocating this land for 400 homes. 2. **The Green Belt issue** The Green Belt issues requires proper consideration, the consultation material describes the site as "Grey Belt", however, I am concerned that this designation should not	I therefore request that Policy HA7 is removed from the emerging Local Plan and that the Council reallocates this into existing brownfield and city centre regeneration allocations.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					automatically be treated as sufficient justification for allocating the site for development. The fact that land may fall within a particular Green Belt category does not remove the need for the Council to properly consider its actual characteristics, its existing agricultural use, its contribution to preventing urban sprawl and the consequences of releasing it for development. The Council should provide clear evidence to demonstrate why this site is suitable and necessary for housing rather than relying on its categorisation. 3. **Loss of agricultural land is a significant concern** The development of 400 homes would permanently remove agricultural land from productive use. At a time when there are substantial pressures on land, food production and the environment then the Council should consider whether allowing active farmland to be developed is in the best interests of residents and the environment. 4. **Brownfield and regeneration alternatives should be prioritised** I am concerned that the allocation of HA7 is unnecessary given the other housing opportunities identified within the emerging Local Plan. The consultation material itself identifies substantial capacity on previously developed and regeneration sites including: Derby Riverside (Policy CC11) - 600 Homes, Railway Station Quarter (Policy CC13) - 500 homes, North Castleward (Policy CC14) - 400 homes and City Centre mixed use sites (Policy CC4) - 1,400 homes. This represents a substantial amount of potential housing capacity without having to release active agricultural land on the edge of Spondon. The Council should demonstrate why these brownfield and regeneration opportunities cannot reasonably be brought forward or accelerated before	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					allocating additional greenfield agricultural land. It appears that there is conflict with the Council's principle of brownfield development first and it is difficult to justify the permanent loss of active farmland unless the Council can demonstrate a clear and compelling need for this allocation. 5. **Impact on Spondon** The development of 400 homes would have a significant and detrimental impact on the character and setting of Spondon. The Council should fully assess the cumulative consequences for local roads and traffic, schools and community facilities, GPs and healthcare, drainage and flood risk, landscape character, biodiversity and wildlife and the existing relationship between Spondon and the surrounding countryside. Spondon already has a shortage of significant infrastructure - roads to get in/out of Spondon are highly trafficked, drainage and flooding is an issue (so removing agricultural land would add to this problem), there is a shortage of GPs and schools already and an additional 400 homes with no plans for further local infrastructure would be disastrous and ruin the community. The proposed main access to the site is also from a high speed road and would be dangerous. The agricultural land is home to a high level of wildlife and used by the community to walk their dogs, cross between Spondon and Ockbrook and the Council must justify the impacts on the environment before committing through the Local Plan. For the reasons above, I consider Policy HA7 - Stoney Lane, Spondon to be unsound. In particular, the allocation is not justified because the Council has not demonstrated that the release of active agricultural land is necessary when substantial brownfield and regeneration opportunities are	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					available and is not consistent with national planning policy because the Council should properly demonstrate the need for releasing this land and give appropriate consideration to previously developed and alternative sites before allocating productive agricultural land for development.	
Anne and George Brownhill	Policy HA7: Stoney Lane, Spondon	Objects		No	My husband and I have become aware of plans to build 400 homes on the Green Belt land which has mysteriously become Grey Belt land. How can this happen? This land is agricultural land. Does the council have the power to decide changes to land status? It seems that building companies can put in an application to build and “hay presto” the land has gone from one status to another over-night. National policy is being ignored. Council commitment to build on Brownfield alternatives are available. For example, city mixed sites Policy CC4 over 1400 homes, Railway Station Quarter Policy CC13 500 homes, North Castle Ward Policy CC14 400 homes, Derby Riverside Policy CC11 600 homes. What aren’t these being used? Spondon already has problems with schools, dentists, doctors etc. without adding to it unnecessarily. Please reconsider your decision. The village is already exceedingly more busy with the new development on Dale Road and Spondon is under a lot of strain. PLEASE KEEP OUR GREEN BELT SAFE!!	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Matt Buchanan	Policy HA7: Stoney Lane, Spondon	Objects		No	I object to Policy HA16 because I do not consider that the evidence currently demonstrates that this particular allocation is adequately justified when its environmental, recreational and active-travel impacts are weighed against reasonable alternatives. The need for additional Gypsy and Traveller accommodation is not disputed. Policy H12 itself recognises that need and provides for future accommodation through "site(s)" and planning permissions. However, the Regulation 19 evidence appears to proceed on the basis that accommodating all 17 pitches on one site is the Council's preferred option, rather than demonstrating why a distributed solution across more than one suitable location would not be reasonable. This matters because the Plan contains major strategic housing allocations where entirely new residential neighbourhoods, infrastructure and services are already being planned. HA1 Rykneld Road is allocated for at least 800 homes with a new primary school, expanded local-centre provision, improved bus services, new walking and cycling routes, highway works, flood mitigation, green infrastructure and public open space. HA3 East of Moorway Lane is allocated for at least 335 homes and includes new highway access, public open space, biodiversity improvements, walking and cycling connections and a local centre. I have been unable to identify in the published evidence an assessment of the reasonable alternative of incorporating smaller numbers of permanent Traveller pitches within one or more of these large strategic residential allocations, rather	I therefore request that Policy HA16 is reconsidered and that the Council: • publishes or identifies the assessment of a distributed-site alternative; • demonstrates why HA16 performs better than reasonable alternatives; • undertakes or publishes robust site-specific ecological and arboricultural evidence; • demonstrates how existing active-travel routes and accessible public open space will be retained; and • clarifies how the environmental effects acknowledged in the Sustainability Appraisal are consistent with the Plan's wider policies on green infrastructure, biodiversity and trees.

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					than concentrating all provision at HA16. Appendix F records that residents previously raised concern about the adequacy of the alternatives assessment, and the Council responded that the Regulation 19 Sustainability Appraisal now contains the rationale for site selection. I therefore ask the Council to identify where a distributed-site option was assessed and, if it was not, to explain why it was not treated as a reasonable alternative. There are also significant site-specific concerns at HA16. The Local Plan itself acknowledges that the site contains **active travel links and mature trees**, while Policy HA16 states that the remainder of the site beyond the fenced Traveller accommodation should remain accessible public open space. The Sustainability Appraisal further acknowledges that development would result in the loss of existing public open space and records a negative leisure and recreation effect.The biodiversity assessment also requires closer scrutiny. The Sustainability Appraisal expressly asks whether development will maintain or enhance woodland and tree cover, prevent habitat fragmentation and support the city's natural capital. On the ground, the site contains mature trees, naturally regenerating woodland, dense understory vegetation and connected habitat structure. The assessment nevertheless records a positive biodiversity effect. I do not consider that the published evidence clearly demonstrates how the existing ecological value of the site has been established before reaching that conclusion. There is a similar unresolved issue with access and public use. If part of the site is to be enclosed and fenced, the	

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					Council should demonstrate now — at allocation stage — how existing active-travel routes and meaningful accessible public open space will be retained. Policy HA16 states that the exact siting and access arrangements will be considered later, at planning-application stage. In my view, that leaves an important question unanswered: whether the allocation can in fact accommodate 17 pitches while satisfactorily retaining mature trees, ecological connectivity, public open space and active-travel links. I support the provision of suitable Gypsy and Traveller accommodation. My objection concerns the evidence supporting the selection of **this particular site** and whether the allocation has been shown to be justified and sound.	
Daniel Burgess	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to raise an objection to Policy HA7 - building 400 houses near Stoney Lane, Spondon and believe that the site should be deallocated from the Local Plan. Policy HA7 is unsound as it misclassifies the green belt farmland as grey belt. It will also add significant pressures to local infrastructure such as roads and school capacity. The council has substantial brownfield and city centre housing opportunities (such as policies CC4, CC11, CC13 and CC14) which should be prioritised before releasing green belt farmland for development.	
Joanne Carr	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes.	I therefore respectfully request that the Council deallocate Site

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					I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an "eastern urban extension to the suburb of Spondon." This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be	HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development;

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					supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as “Grey Belt” I am particularly concerned by the Council’s treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council’s own Local Plan strategy places significant emphasis on directing development towards previously	5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times.	

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					This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely	

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					GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives.	

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					I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.	
Callan Camp	Policy HA7: Stoney Lane, Spondon	Objects		No	I am emailing you in protest of the proposal of a 400 home development earmarked off Stoney Lane in Spondon, Derby. This is Farm land, crucial and integral to the community of Spondon and in the local biome for the area. You have stated	

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					it is Grey Belt land, which is total nonsense! It is a active farm and includes natural corridors for wildlife. To remove this would be an absolute tragedy. Not to mention the carbon capture this area gives in an already high traffic area! Why can this site not be included in the City Centre first strategy for Derby City? There are multiple brownfield sites across the city that are yet to be utilised, why remove what little natural space we have. Can I remind you that Spondon has already had its fair share of development with The Dial site on Nottingham Road and the site under construction at the top of Dale Road leading to Kirk Hallam. Leave our village alone now!	
Mr Christopher Clarke & Mrs Dorothy Clarke	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to state that Policy HA7-Stoney Lane Spondon -400 Homes is **unsound** The site is active agricultural farmland and cannot be therefore be classed as Grey Belt. There are other brownfield sites which should be considered before releasing actively farmed land to further the expansion of urban sprawl. eg Derby Riverside(Policy CC11) 600 homes Railway Station Quarter (Policy CC13) 500 homes North Castleward (Policy CC14) 400 homes City Centre Mixed-Use Sites (policy CC4) over 1400 homes The provision of an additional 400 homes in Spondon will increase pressures on an infrastructure that is stretched to	Therefore I wish to request the Council to Deallocate Site HA7 (Stoney Lane, Spondon -400 Homes) from the Local Plan as stated in the plan's objective of brown field and City Centre first strategy (para 81)

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					capacity including roads, schools, parking within the village drainage and medical facilities. The policy is **not justified** because the Council has named actively farmed land as Grey Belt when there are other Brown field sites available The policy is **not consistant with National Policy** because the use of active farmland for building purposes is against the aims of the policy The Council has the capacity to remove these 400 homes from the Local Plan and reallocate them to the existing brownfield and city centre site that have previously been identified as suitable for regeneration and therefore to avoid the use of farmland to put even more pressure on the already stretched resources available to Spondon residents	
Miss Joanne Clay	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to express my concern and disappointment in the proposed housing at Stoney Lane. I have been a resident in Spondon all my life. I believe that the policy HA7 is unsound. It is trying to pigeon hole the land as grey belt when it is clearly green belt and has been for many years. There has been no adequate investigation into alternative sites and this decision is not consistent with national policy on Green Belt. Further there are plenty of other suitable brownfield sites which I understand you have marked for housing so why not exhaust those first? Surely we should be keeping our green	

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					belt land for future generations not making derby another concrete city. Please kindly mark my objection to this proposal. Obviously such a housing venture would impact on schools and care facilities and health places such as doctors. Also the roads are already in poor condition so I wonder how they would cope . I do hope you will consider the residents of Spondon unlike with the royal hill road and Dale Road developments.	
Martin Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	I object to the allocation of Site HA7 for approximately 400 dwellings and consider that the allocation should be removed from the Plan. In my view, the proposed allocation has not been adequately justified and is not consistent with national planning policy. In particular, the Council has not demonstrated a sufficiently robust planning case for releasing this site from the Green Belt when considered against the availability of other, more sustainable and appropriate opportunities for housing delivery. The fundamental issue is that HA7 is **active agricultural land**. It should not be treated as an appropriate location for Green Belt release simply by applying a broad "Grey Belt" designation without first demonstrating, transparently and convincingly, that the Plan has exhausted or properly optimised the reasonable alternatives available within the existing urban area. That distinction matters. The question is not simply whether the site can accommodate housing, but whether its release is necessary and justified in the context of the Plan's overall	Requested modification: Deallocate Site HA7 (Stoney Lane, Spondon) from the Local Plan and redistribute the proposed 400 dwellings to suitable brownfield and city-centre regeneration opportunities.

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					spatial strategy, its stated development priorities and the availability of alternative sites. **1. The allocation has not been sufficiently justified** The evidence supporting HA7's allocation should demonstrate why the release of this particular area of Green Belt is necessary when there remain significant brownfield and regeneration opportunities elsewhere in the Plan area. If the Council's stated approach is genuinely to pursue a **"brownfield and City Centre first"** strategy, it needs to demonstrate that this strategy has been meaningfully applied before relying upon the release of Green Belt agricultural land. In the absence of that demonstration, the allocation appears premature and insufficiently justified. **2. HA7 is productive agricultural land, not previously developed land** HA7 is active agricultural land and is materially different from previously developed or genuinely poor-quality land. The fact that land may fall within a wider category of land considered capable of being treated as "Grey Belt" should not, in itself, be regarded as establishing that its development is the appropriate planning outcome. The Plan still needs to demonstrate that the proposed release represents the most appropriate strategy when reasonable alternatives are taken into account. The Council should therefore explain, with evidence, why this agricultural site has been selected ahead of available brownfield and regeneration opportunities.	

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					3. The allocation would extend the urban area and increase pressure arising from urban expansion Development at Stoney Lane would represent a further outward expansion of the built-up area. This raises a legitimate concern about the cumulative effect of continued peripheral development, including the incremental erosion of the separation between existing settlements and the loss of open agricultural land. The justification for accepting that expansion should therefore be particularly compelling. At present, I do not consider that the Plan has demonstrated that need. **4. Infrastructure capacity requires proper consideration** There are also material infrastructure considerations associated with development at HA7, including pressure on: • the local highway network and associated transport infrastructure; • drainage and surface-water management; • local education and school capacity; and • other services and infrastructure required to support an additional 400 dwellings. These matters should not be treated as secondary considerations capable of being resolved simply through later planning obligations. The Plan's allocation process should establish that the necessary infrastructure can be delivered in a timely and effective manner and that the development would represent an appropriate and sustainable location for growth.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					5. There are more appropriate opportunities within the existing urban area The Council has identified substantial opportunities for housing delivery through brownfield development and city-centre regeneration. In particular, the Plan itself identifies opportunities associated with **Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward)**. Those locations should be properly prioritised before resorting to the release of Green Belt agricultural land. This is not an objection to housing growth as such. It is an objection to the **location and sequencing of that growth**. If the Plan can accommodate the required housing through existing brownfield and regeneration opportunities, there is a strong planning reason to pursue those opportunities before releasing an agricultural Green Belt site on the edge of the urban area. **6. The allocation appears internally inconsistent with the Plan's own spatial strategy** There is an apparent tension between the allocation of HA7 and the Plan's stated commitment to a **"brownfield and City Centre first"** approach, including the strategy referred to at Paragraph 81. The Council should be able to demonstrate how the allocation of HA7 accords with that strategy and why the brownfield and city-centre opportunities identified elsewhere in the Plan	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					cannot reasonably accommodate the housing proposed at HA7. Without that evidence, the allocation risks undermining the Plan's own stated spatial priorities. **Conclusion** For these reasons, I consider that Site HA7 should be **deleted from the housing allocations in the Local Plan**. The approximately 400 dwellings attributed to HA7 should instead be redistributed, where deliverable and appropriate, across existing brownfield and city-centre regeneration allocations, with particular consideration given to the opportunities identified under **Policies CC4, CC11, CC13 and CC14**. This approach would better reflect the Plan's stated brownfield and City Centre first strategy, avoid the unnecessary release of active agricultural Green Belt land, reduce the pressure associated with outward urban expansion, and ensure that housing growth is directed towards locations where the Plan has already identified opportunities for regeneration and development. Accordingly, I consider the HA7 allocation to be **unsound unless the Council can provide compelling evidence demonstrating both the necessity of releasing this Green Belt agricultural land and why reasonable brownfield and regeneration alternatives cannot accommodate the proposed housing requirement.**	
Chris Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy HA7 states: “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.”	**Modification sought:** Policy HA7 should be deleted from the Local Plan. The land east of Stoney Lane should not be

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					My family and I have lived in Spondon for more than 30 years. During that time, we have seen substantial development and increasing pressure on the area. Based on this long-standing local experience, I do not believe that Spondon or its existing infrastructure can sustainably accommodate another development of this scale. I consider Policy HA7 to be **unsound because it is not justified**. The National Planning Policy Framework states that a justified plan must represent an appropriate strategy, take account of reasonable alternatives and be supported by proportionate evidence. The Council has not adequately demonstrated that allocating this agricultural Green Belt site is necessary when substantial brownfield and city-centre housing opportunities remain available. The land east of Stoney Lane is active agricultural land, not derelict, unused or previously developed land. It should not be dismissed as simply "poor-quality" land. Indeed, the Council's own Regulation 19 Sustainability Appraisal identifies the site as greenfield land currently used for agriculture and classifies it as Agricultural Land Classification grades 3 and 4. It concludes that development would result in the loss of agricultural land and records a **significant negative effect** in relation to geology and soils. Once agricultural land has been built upon, that loss is effectively permanent and irreversible. Its present agricultural use, landscape value and role in maintaining separation between Spondon and the countryside should be given proper weight.	allocated for 400 homes and should remain protected from urban development, with housing need addressed by prioritising and maximising brownfield and city-centre opportunities.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The policy expressly describes the proposal as an “eastern urban extension.” This confirms that it would contribute to the further outward expansion of Derby into the countryside. Such expansion would fundamentally change the established edge of Spondon and could encourage further development beyond the existing urban boundary in future. A development of at least 400 homes would also place significant additional pressure on local infrastructure, including roads, public transport, schools, GP and healthcare services, drainage and other community facilities. Financial contributions from a developer would not necessarily provide the capacity needed, nor would they prevent existing residents from experiencing increased congestion and greater pressure on essential services. The Council’s own Sustainability Appraisal also identifies flood-risk concerns, noting that the site is partly within Flood Zone 3 and that development would increase impermeable surfaces and surface-water runoff. These concerns further undermine the suitability and justification for allocating this site. The Council already has substantial housing opportunities on brownfield and city-centre sites. The emerging plan itself makes provision for at least 5,000 homes in the city centre. These opportunities should be prioritised, maximised and delivered before active agricultural and Green Belt land is released. A brownfield-first approach would support regeneration, make better use of existing infrastructure and reduce unnecessary urban expansion into the countryside.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					For these reasons, Policy HA7 is not an appropriate or adequately justified strategy. Its environmental and infrastructure consequences have not been outweighed by a demonstrated need to develop this particular site.	
Lois Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	I strongly object to Policy HA7 and the proposed allocation of land east of Stoney Lane, Spondon, for 400 homes. I consider Policy HA7 to be **unsound and not justified**. The site is active agricultural greenfield land, not derelict or poor-quality land. The Council's own assessment confirms that it is currently used for agriculture and that development would cause a significant, permanent loss of agricultural land. The proposal would create further urban expansion into the countryside and place substantial additional pressure on Spondon's roads, schools, healthcare, drainage, public transport and other local services. Derby already has significant brownfield and city-centre housing opportunities. These should be prioritised and fully developed before productive agricultural land is permanently lost.	I therefore ask the Council to remove Policy HA7 from the Local Plan and retain the land east of Stoney Lane for agricultural use.
Martin Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	I am hereby resubmitting this objection to the allocation of Site HA7 for approximately 400 dwellings with the addition of my address because I have just read that "Planning departments often discard representations that do not	Requested modification: Deallocate Site HA7 (Stoney Lane, Spondon) from the Local Plan and redistribute the proposed 400 dwellings to

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					include a physical address as they cannot verify you are a real person". In my view, the proposed allocation has not been adequately justified and is not consistent with national planning policy. In particular, the Council has not demonstrated a sufficiently robust planning case for releasing this site from the Green Belt when considered against the availability of other, more sustainable and appropriate opportunities for housing delivery. The fundamental issue is that HA7 is **active agricultural land**. It should not be treated as an appropriate location for Green Belt release simply by applying a broad "Grey Belt" designation without first demonstrating, transparently and convincingly, that the Plan has exhausted or properly optimised the reasonable alternatives available within the existing urban area. That distinction matters. The question is not simply whether the site can accommodate housing, but whether its release is necessary and justified in the context of the Plan's overall spatial strategy, its stated development priorities and the availability of alternative sites. **1. The allocation has not been sufficiently justified** The evidence supporting HA7's allocation should demonstrate why the release of this particular area of Green Belt is necessary when there remain significant brownfield and regeneration opportunities elsewhere in the Plan area. If the Council's stated approach is genuinely to pursue a **"brownfield and City Centre first"** strategy, it needs to demonstrate that this strategy has been meaningfully applied before relying upon the release of Green Belt agricultural land.	suitable brownfield and city-centre regeneration opportunities.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					In the absence of that demonstration, the allocation appears premature and insufficiently justified. **2. HA7 is productive agricultural land, not previously developed land** HA7 is active agricultural land and is materially different from previously developed or genuinely poor-quality land. The fact that land may fall within a wider category of land considered capable of being treated as "Grey Belt" should not, in itself, be regarded as establishing that its development is the appropriate planning outcome. The Plan still needs to demonstrate that the proposed release represents the most appropriate strategy when reasonable alternatives are taken into account. The Council should therefore explain, with evidence, why this agricultural site has been selected ahead of available brownfield and regeneration opportunities. **3. The allocation would extend the urban area and increase pressure arising from urban expansion** Development at Stoney Lane would represent a further outward expansion of the built-up area. This raises a legitimate concern about the cumulative effect of continued peripheral development, including the incremental erosion of the separation between existing settlements and the loss of open agricultural land. The justification for accepting that expansion should therefore be particularly compelling. At present, I do not consider that the Plan has demonstrated that need. **4. Infrastructure capacity requires proper consideration** There are also material infrastructure considerations associated with development at HA7, including pressure on:	

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					• the local highway network and associated transport infrastructure; • drainage and surface-water management; • local education and school capacity; and • other services and infrastructure required to support an additional 400 dwellings. These matters should not be treated as secondary considerations capable of being resolved simply through later planning obligations. The Plan's allocation process should establish that the necessary infrastructure can be delivered in a timely and effective manner and that the development would represent an appropriate and sustainable location for growth. **5. There are more appropriate opportunities within the existing urban area** The Council has identified substantial opportunities for housing delivery through brownfield development and city-centre regeneration. In particular, the Plan itself identifies opportunities associated with **Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward)**. Those locations should be properly prioritised before resorting to the release of Green Belt agricultural land. This is not an objection to housing growth as such. It is an objection to the **location and sequencing of that growth**. If the Plan can accommodate the required housing through existing brownfield and regeneration opportunities, there is a strong planning reason to pursue those opportunities before releasing an agricultural Green Belt site on the edge of the urban area.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					6. The allocation appears internally inconsistent with the Plan's own spatial strategy There is an apparent tension between the allocation of HA7 and the Plan's stated commitment to a **"brownfield and City Centre first"** approach, including the strategy referred to at Paragraph 81. The Council should be able to demonstrate how the allocation of HA7 accords with that strategy and why the brownfield and city-centre opportunities identified elsewhere in the Plan cannot reasonably accommodate the housing proposed at HA7. Without that evidence, the allocation risks undermining the Plan's own stated spatial priorities. **Conclusion** For these reasons, I consider that Site HA7 should be **deleted from the housing allocations in the Local Plan**. The approximately 400 dwellings attributed to HA7 should instead be redistributed, where deliverable and appropriate, across existing brownfield and city-centre regeneration allocations, with particular consideration given to the opportunities identified under **Policies CC4, CC11, CC13 and CC14**. This approach would better reflect the Plan's stated brownfield and City Centre first strategy, avoid the unnecessary release of active agricultural Green Belt land, reduce the pressure associated with outward urban expansion, and ensure that housing growth is directed towards locations where the Plan has already identified opportunities for regeneration and development. Accordingly, I consider the HA7 allocation to be **unsound unless the Council can provide compelling evidence**	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					demonstrating both the necessity of releasing this Green Belt agricultural land and why reasonable brownfield and regeneration alternatives cannot accommodate the proposed housing requirement.	
Tracy Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of land at Stoney Lane, Spondon for approximately 400 homes under Policy HA7 of the Local Plan. I consider Policy HA7 to be unsound, in particular because I do not believe the allocation has been adequately justified and I do not believe it is consistent with the stated approach of prioritising brownfield and regeneration sites. My main concern is that the Stoney Lane site is active agricultural land within the Green Belt. I do not believe land of this nature should be released for a major housing development unless it has been clearly demonstrated that reasonable alternatives, particularly previously developed and brownfield sites, cannot meet the identified housing need. The Local Plan itself identifies substantial housing opportunities at locations including Derby Riverside, Railway Station Quarter, North Castleward and other city-centre mixed-use sites. I would therefore like the Council to demonstrate clearly why development of Stoney Lane is necessary before these brownfield and regeneration opportunities have been fully utilised.	I respectfully request that Policy HA7, Stoney Lane, Spondon, be removed from the Local Plan and that the Council instead prioritises appropriate brownfield and city-centre regeneration sites for meeting Derby's housing requirements. Please accept this email as my formal representation in respect of the Local Plan consultation and confirm that it has been received and recorded.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					I am also concerned about the cumulative effect that a development of around 400 additional homes would have on Spondon. This includes increased traffic on local roads, pressure on schools and other local services, drainage and infrastructure, as well as the permanent loss of agricultural and Green Belt land. Spondon has already experienced considerable development, and I do not believe further expansion onto Green Belt farmland should be treated as the preferred solution where substantial brownfield opportunities remain elsewhere within Derby. For these reasons, I consider Policy HA7 to be Not Justified and Not Consistent with National Policy.	
Julie and Kevin Connolly	Policy HA7: Stoney Lane, Spondon	Objects		No	This planning policy is unsound. It is not justified Not consistent with National Policy. Evidence : The site is active agricultural land, rather than poor quality or previously developed 'Grey Belt' Development would contribute to the further expansion of urban development and urban sprawl. There are significant pressures on local infrastructures, including roads, drainage and school capacity. We have lived in Spondon for over 40 years and have seen a significant	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					difficulty in obtaining appointments at our local doctors surgery. We have had to go to the walk in centre many times, and wait for hours due to lack of appointments at our GP. I have currently been waiting 4 months for an annual review of my medical needs. Parents with young children have to drive to the walk in centre 5 miles away also with sick children. Not acceptable. There are already more homes being built in Spondon, which will have an impact on all these local necessities. The Council has substantial brownfield and city centre housing opportunities. This should be prioritise for use of new homes. The proposed allocation appears inconsistent with the Plans stated 'Brownfield and City Centre first' strategy. Many people in Spondon are fed up of poor local necessary services (GP unavailability, congested roads, MOOR HOUSES ALREADY BEING BUILT , which will impact all the services required for every day living. The local residents of Spondon have had enough. This proposal is unwanted and Unjustified.	
Sharon Cooper	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to make an individual **Regulation 19 representation** regarding **Policy HA7 – Stoney Lane, Spondon**, which proposes a minimum of 400 new homes on land off Stoney Lane. I am a long-standing resident of [redacted].	**I request that Policy HA7 – Stoney Lane, Spondon is deleted/deallocated from the Local Plan.** If the Council considers that the 400 homes remain necessary within the overall housing strategy, I ask that it

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					Having considered the proposed allocation and the requirements of the Regulation 19 consultation, **I consider Policy HA7 to be unsound**. In particular, I consider the policy to be: • **Not Justified** • **Not Effective** • **Not Consistent with National Planning Policy** I recognise that Derby needs to provide additional housing and I am **not opposed to housing development in principle**. My objection is specifically to the allocation of this particular site and whether the Council has demonstrated that its release from the Green Belt is necessary, justified and deliverable. **1. Grey Belt classification** I ask the Planning Inspector to scrutinise the evidence supporting the Council's classification of HA7 as Grey Belt. I have attached recent photographs of the Stoney Lane land being harvested on August 5th 2026, proving the land is rich agricultural land and has been farmed actively for many years, performing an important Green Belt function. Also the livestock that has been housed there for many years which produce offspring, contributing furthermore to the cycle of farming. I recognise that agricultural land is not automatically excluded from the current NPPF definition of Grey Belt. However, the Council should demonstrate through a **robust, transparent and site-specific assessment** why this particular parcel meets	demonstrates through the examination evidence whether those homes can appropriately be accommodated through the optimisation of suitable brownfield, city-centre and regeneration sites, including the opportunities identified under Policies CC4, CC11, CC13 and CC14. I respectfully ask the Planning Inspector to give particular consideration to the **Grey Belt classification, reasonable alternatives, the justification for Green Belt release and the deliverability of 400 homes given the site's highway, A52, drainage, power infrastructure and other constraints.** I have attached at the top of the page my **full detailed representation and Appendix 1 – Highway and Access Concerns**, which provide further evidence and detail supporting my objections.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					the definition and how it performs against the relevant Green Belt purposes. The Council should not simply rely upon the designation itself. The evidence supporting the conclusion that HA7 qualifies as Grey Belt should be capable of proper examination. **2. Reasonable alternatives and brownfield land** I am particularly concerned that the Council has not adequately demonstrated that **all reasonable alternatives have been fully examined and optimised before releasing this Green Belt land**. The NPPF requires authorities considering Green Belt release to examine reasonable alternatives, including making as much use as possible of suitable brownfield and underutilised land. The Council's own emerging Local Plan contains substantial opportunities for housing within city-centre and regeneration locations, including: • **Policy CC4 – City Centre Mixed-Use Sites** • **Policy CC11 – Derby Riverside** • **Policy CC13 – Railway Station Quarter** • **Policy CC14 – North Castleward** I therefore ask the Inspector to establish whether these and other brownfield and regeneration opportunities have genuinely been optimised before concluding that HA7 is required. If the Council considers that the 400 homes cannot be accommodated elsewhere, I ask that it provides clear evidence demonstrating:	I would be grateful if you could confirm receipt of this Regulation 19 representation and ensure that it is formally recorded in relation to **Policy HA7 – Stoney Lane, Spondon**.

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					• what reasonable alternatives were considered; • their realistic housing capacity; • whether densities could be optimised; • their anticipated delivery timescales; and • why they cannot accommodate some or all of the 400 homes proposed at HA7. **3. Effectiveness and deliverability** I also question whether a minimum of 400 homes at HA7 is genuinely deliverable given the constraints affecting the site. Policy HA7 itself identifies the need for: • a single vehicular access onto Stoney Lane; • transport improvements; • education infrastructure; • comprehensive surface-water drainage; • public open space; • green infrastructure buffers; • A52 noise attenuation; • pedestrian and rights-of-way connections; and • restrictions associated with overhead power lines. I have significant concerns regarding the proposed single access onto Stoney Lane, particularly given its relationship with the A52, existing traffic conditions and the potential increase in traffic generated by at least 400 homes. I also question whether sufficient space remains to accommodate 400 homes once the required highway arrangements, drainage, landscaping, open space, power-line constraints, A52 buffer and other mitigation measures have been properly taken into account.	

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					The Council should therefore demonstrate that the stated capacity of **400 homes is genuinely deliverable**, rather than simply an assumed capacity. **4. A52, environmental and residential impacts** The proximity of the A52 is another significant concern. The fact that Policy HA7 itself requires noise attenuation and a buffer to mitigate the effects of the A52 demonstrates that this is a material constraint. I ask the Inspector to consider whether the evidence base adequately demonstrates that both future residents and existing residents can be adequately protected from: • road traffic noise; • air-quality impacts; • increased traffic; • visual impact; • loss of openness; • drainage impacts; and • loss of residential amenity. The proposed western green infrastructure buffer behind existing Stoney Lane properties also needs to be properly defined in terms of its width, purpose, long-term protection and ability to provide meaningful mitigation. **5. Green Belt release** The NPPF requires Green Belt boundary changes to be fully evidenced and justified. I therefore ask the Inspector to examine whether the Council has demonstrated:	

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					1. why HA7 needs to be released; 2. whether reasonable alternatives have genuinely been exhausted; 3. whether suitable brownfield and underutilised land has been fully considered and optimised; 4. whether the Grey Belt assessment is robust; 5. whether the proposed 400-home capacity is genuinely deliverable; and 6. whether the resulting Green Belt boundary is appropriate and capable of enduring in the long term.	
Georgie cox	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposal to allocate the Green Belt land off Stoney Lane for the construction of 400 homes. In my view, this policy is unsound, as it is neither justified under the relevant tests nor consistent with national planning policy. The land in question is Green Belt and should not be described as grey belt. It remains actively used for agricultural purposes. I have attached a photograph taken approximately one month ago, which shows the fields behind the houses being actively farmed by a tractor. Building 400 homes on this site would lead to further urban expansion and contribute to urban sprawl. Local infrastructure is already under considerable pressure, particularly the road network, drainage systems and local school capacity. Adding a development of this scale would inevitably increase those pressures.	I respectfully ask that the HA7 Stoney Lane site is removed from the Local Plan. The proposal appears unsound and wrongly categorises actively farmed Green Belt land as grey belt, without demonstrating that existing brownfield opportunities have been fully utilised. This is contrary to the Plan's own stated strategy and inconsistent with national policy. The proposed 400 homes should instead be directed towards suitable brownfield opportunities in the city centre, including sites covered by policies CC4, CC11, CC13 and

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					There are substantial brownfield sites available within the city that could provide opportunities for housing development and these should be prioritised before Green Belt land is considered. The use of Green Belt farmland should be a last resort. Allocating this site therefore appears to conflict with the Local Plan's stated approach of prioritising a "brownfield and city centre first" strategy.	CC14, in line with the Plan's "brownfield and city centre first" approach.
Emma Davis	Policy HA7: Stoney Lane, Spondon	Objects		No	I submitted my objections to the Local Plan for 400 homes being built off Stoney Lane Spondon earlier this year. I have now been informed that the Local Plan for Derby (2023-2043) has now reached its final pre-submission consultation stage (Regulation 19). I would like to submit my representation to the proposed plan which allocates 400 new homes on active farmland off Stoney Lane, Spondon (Policy HA7). I strongly object to the Green Belt land being built on. I own a property on [Redacted] in Spondon and have done since 2010. The fields behind my house are used by farmers every year. The farmers have been collecting their crop earlier this month. I attach evidence of this. Those fields are clearly Green Belt not Grey Belt. Policy HA7 is Unsound, Not Justified and Not consistent with National Policy. Policy HA7 is UNSOUND because: It is Not Justified • The Council has wrongly categorised active agricultural farmland as Grey Belt,	I would like to request the following modification: Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations-prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield

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					• It has not demonstrated that all reasonable brownfield alternatives have been fully considered. Policy HA7 is Not Consistent with National Policy Allocating working farmland as Grey Belt conflicts with national planning policy. The land behind Sundew Close is definitely Green Belt and working farmland. It should remain this way. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (Paragraph 81). yet this allocation releases Green Belt farmland before fully utlising brownfield sites. The Council already has major sites allocated for housing, including: . Derby Riverside (Policy CC11) -600 homes. . Railway Station Quarter (Policy CC13) - 500 homes. North Castleward (Policy CC14)- 400 homes. . City Centre Mixed-Use Sites (Policy CC4)- Over 1,400 homes. Spondon does not have the infrastructure to cope with another 400 homes. Where are those people going to get access to NHS services, where are their children going to go to school? The residents of Spondon are already struggling to get access to NHS services and school places are limited. The roads in Spondon are already struggling with the amount of traffic that passes through and at peak times getting in and out of Spondon is a nightmare. Those homes will bring with them more vehicles on the roads.	and City Centre first' strategy (Paragraph 81)."

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					400 hundred homes brings with it more people and vehicles that Spondon simply does not have the infrastructure to cope with.	
Derbyshire County Council	Policy HA7: Stoney Lane, Spondon	Supports	Yes	Yes	As noted above, the proposed allocation of land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an eastern urban extension to the suburb of Spondon. As noted in the supporting text, however, the site is identified as Green Belt land within the current local plan. A number of Green Belt Reviews / Assessments have previously been carried out of the Nottingham-Derby Green Belt, within which the proposed allocation is located. These are: The Nottingham – Derby Green Belt Review was undertaken in 2006/2007 as part of the preparation of the East Midlands Regional Plan, to provide the evidence base to inform the growth strategy in the Plan for the Three Cities Sub-Area, comprising Derby, Nottingham and Leicester. The Derby Principal Urban Area Green Belt Review (DPUAGBR), was undertaken jointly by Derbyshire County Council, Amber Valley Borough Council, Derby City Council, Erewash Borough Council and South Derbyshire District Council in 2012 to inform the preparation of each local planning authorities' Core Strategy / Local Plans at that time. The study built on previous work undertaken in the Nottingham – Derby Green Belt Review. The important conclusions of both of these Green Belt Reviews, was that the area of the Nottingham – Derby Green	

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					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. In the context of the above, Policy GB3 of the new NPPF sets out policies for the Green Belt as below: GB3: Altering existing Green Belt boundaries 1. Green Belt boundaries should only be altered through the preparation and updating of local plans and where exceptional circumstances are fully evidenced and justified. 2. Exceptional circumstances in this context include a local planning authority being unable to meet its identified need for development in full, having examined all other reasonable options for doing so. In this regard, it is noted in paragraph 302 and 303 of the Plan state: 302. Land to the east of Stoney Lane was previously in the Green Belt, but analysis carried out in preparing the Plan identified the site as 'grey belt' land and as such it provided	

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					an opportunity to extend the edge of the built area of Spondon to the east. 303. As the site was removed from Green Belt to be allocated for housing, it is treated differently to other non-green belt land. The NPPF 'Golden Rules' apply to land removed from the green belt and include that affordable housing should be provided at a minimum of 50% unless this would make development unviable. High level viability indicates that 40% affordable housing should be generally viable in this location. If further detailed viability of site-specific development indicates otherwise, when a specific scheme has been designed, the 40% affordable housing requirement will be revisited based on site specific viability appraisal. In principle, therefore, there appears to be a well justified and robust case set out in the Submission Draft Plan to release land from the Green Belt at Stoney Lane, Spondon to accommodate up to 400 new homes, particularly if the land can be re-classified as 'Grey Belt' land that would be subject to the 'golden rules', which would require 40% of the homes on the site to be provided as affordable homes. Importantly, as noted in the comments above, the City's housing land supply is very constrained and is capacity capped at around 12,500 homes, leaving a significant shortfall against the City's standard methodology housing requirement. Accordingly, it is considered that release of the site from the Green Belt, could be justified in the context of Policy GB3 of the new NPPF, as an exceptional circumstance	

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					'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.	
Alan Drayton	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to you regarding the proposed development of 400 new homes on the working farmland near Stoney Lane Spondon. This land currently provides a green wedge between Ockbrook and Spondon thus helping to prevent urban sprawl, and the footpaths are very well used by the general public. Policy HA7 IS UNSOUND as it has designated the site as Grey Belt yet the farmland is active and therefore this conflicts with the principles of the National Planning Policy. This development would also contradict the Council's own aim of a Brownfield and City Centre First Strategy as laid out in Paragraph 81 of the Plan. The land should remain in the Green Belt as active farmland. The Council could keep the Brownfield strategy intact by considering available alternatives including The Railway Station Area - Policy CC13 Castleward North) Area - Policy CC14. Derby Riverside Policy - Policy CC11 All three of these sites are in close proximity to the city centre and would dovetail nicely with other proposels for the Riverside and the new Railways Headquarters. Being close to the town centre this should improve footfall in the city centre	

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					and also help minimise the need to use cars to get into the centre of the city. Consider the same situation at Stoney Lane ie :- The local roads particularly through the centre of Spondon are very busy and this is before the housing near Spondon Wood is built and occupied. The schools are already near capacity, additionally increasing the number of children crossing the A52 footbridge is putting temptation in the way for a shortcut dash across the carriage way. Finally the problems of sewer drains backing up in the centre of the village are well known this project will only make things worse. The sensible solution is to remove the HA7 Stoney Lane Site from the Local Plan and use the alternative Brownfield sites.	
Noel and Beverley Eaglesfield	Policy HA7: Stoney Lane, Spondon	Objects		No	The site is and always has been active agricultural land. Development would contribute to the further expansion of urban development in an area where there are already significant pressures on local infrastructure including roads, drainage, medical and dental services and schools. The Council has significant brown field and city centre housing opportunities which should be considered before using Green Belt farm land.	Reallocate site HA7 400 homes from the local plan.

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					The allocation is UNSOUND as it classifies Green Belt farm land as Grey Belt. The Council should reallocate these 400 homes into existing Brown field and City centre regeneration allocations prioritised under Policy CC4, Policy CC11 and Policy CC13/14. As lifelong residents of Spondon we are concerned about the loss of this farmland and the impact on the infrastructure of Spondon.	
Andrew Elliott	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to raise my objections to the proposed development of land of Stoney lane. Why this policy is unsound and not justified. The council has identified this land as Grey belt removing it from green belt. Grey belt land is land that been previously developed or under performing green belt land. Stoney land is active agricultural land it's has been planted and harvested for as long as I have lived in Spondon, people that have lived here for the last 60 years have said its always been farmland and used to have cows in the fields, it has already been and ploughed ready for planting again. It is still green belt land and performs an important function, it gives green space to local residents, it is a habitat for wildlife and defines Spondon from Ockbrook. With this development there will be a total loss of privacy to the houses that back on to this land as most have very small gardens. The disruption to local residents just with noise and	

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					dust will go on for a long time, you can hear noise from the Spondon wood development and I'm no where near it. There is no demonstration that all other options of grey field sites have been explored or fully considered, the old Asterdale club site that has been developed is still green belt in local plans how can this be right when it's already developed. This development is not consistent with national policy as it is working farmland, and classifying as grey belt conflicts with national planning policy. The council currently has earmarked for development Royal Hill road, and Locko road near Bluebellsfarm, Spondon wood already under construction and you want to add another 400 homes to Stoney lane. I ask that the council reallocate these 400 homes into an existing brownfield and city centre regeneration allocation under policy CC4 CC11 CC13or CC144. I have other concerns about the impact on the local environment the increase in traffic through Spondon. Traffic already backs up through the village at peak times from Willowcroft road to past Stoney lane, this is without the addition of houses at Spondon wood development. The access to the development of Stoney lane just off the turn of from the A52 this is a blind corner as you pull of A52.	

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					Cars stopping to turn in to new housing development put drivers at risk as they pull of A52. Parked cars on Stoney lane cause driver's to be on wrong side road to pass the parked cars and increased traffic would cause significantly more congestion in this area. The impact on the local facilities in Spondon school places doctors dentist ect. These are near to full to capacity at this present time. Have other local resources been looked at for the increased population of Derby A&E generally running at 130% capacity, are there plans to increase capacity or for more urgent care facilities. Is the current sewage system able to deal with increased demand Stoney lane fields provided a natural resource to prevent flooding to local housing as water is able to drain into land. If Derby continues to spread and all green areas are developed it will lose its local identity and eventually be joined up to other areas. Policy HA7 renders the local draft plan unsound under paragraph 36 of the National planning policy framework. 1. There is no robust evidence base or justifiable spatial strategy when reasonable alternatives exist.	

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					2. The release of active green belt farmland to grey belt directly contradicts the council's own stated spatial principles. The national definition of grey belt is, land that has previously been developed (brownfield) or demonstrates weak or limited contribution to the core green belt purpose, and Stoney Lane does not fall into any of the above under the National definition of grey belt.	
Lynne Elliott	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to raise my objections to the proposed development of land of stoney lane. Why this policy is unsound and not justified The council has identified this land as Grey belt removing it from green belt. Grey belt land is land that been previously developed or under performing green belt land. Stoney land is active agricultural land it's has been planted and harvest this year and plouhged ready for planting again. Is still green belt land and performs an important function,it gives green space to local residents, it is a habitat for wildlife and defines Spondon from Ockbrook. With this development there will be a total loss of privacy to the houses that back on to this land as most have very small gardens. The distribution to local residents with noise and dust you can hear the Spondon wood development. There is no demonstration that all other options of grey field sites have been explored or fully consider the old Asterdale	

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					club site that has been developed is still green belt in local plans how ! This developed is not consistent with national policy as Allocated working farmland as grey belt conflicts with national planning policy I ask that the council reallocate these 400 homes into an existing brownfield and city centre regeneration allocation under policy CC4 CC11 CC13or CC144 I have other concerns about the impact on the local environment the increase in traffic through Spondon. Traffic already backs up through the village at peak times from Willocroft road to past Stoney lane, this is without the addition of houses at Spondon wood development. The access to the development of Stoney lane just off the turn of from the A52 this is a blind corner as you pull of A52. Cars stopping to turn in to new housing development put drives at risk as pull of A52. Parked cars on Stoney lane cause drives to be on wrong side road to pass parked cars increased traffic would cause significant congestion in this area. The impact on the local facilities in Spondon school places doctors dentist ect. These are near full to capacity at present time. Have other local resources been looked at for the increased population of Derby A&E generally running at 130% capacity	

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					are there plans to increase capacity or for more urgent care facilities. Is the current sewage system able to deal with increased demand Stoney lane fields provided a natural resource to prevent flooding to local housing as water is able to drain into land If Derby continues to spread and all green areas are developed it will lose its local identity be called Nottingham soon.	
George Fayers	Policy HA7: Stoney Lane, Spondon	Objects		No	Please accept this email as my formal representation regarding the Derby Local Plan (2023–2043) Regulation 19 pre-submission consultation. My representation relates specifically to Policy HA7 – Stoney Lane, Spondon (400 homes). I wish to state that Policy HA7 is UNSOUND as it is not justified, given that the Council has incorrectly classified active, high-performing agricultural farmland as "Grey Belt" without providing a robust, evidence-based assessment or demonstrating that all reasonable brownfield and urban alternatives have been fully optimised. Furthermore, it is not consistent with national policy because allocating active farmland for development contradicts national planning principles regarding Green Belt protection and the sequential approach to land release, as well as the Council's own commitment to a "brownfield and City Centre first" strategy outlined in Paragraph 81 of the Plan. My objection is heavily supported by the fact that the Stoney Lane site is working agricultural land that actively performs	I request the following modification: Deallocate Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the "Justified" and "Consistent with National Policy" tests by misclassifying active Green Belt farmland as "Grey Belt" without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside),

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					vital Green Belt functions—such as preventing urban sprawl and stopping the coalescence of settlements—rather than meeting the definition of underperforming or previously developed "Grey Belt". Additionally, local infrastructure including highways capacity, local drainage systems, and school places is already under severe strain and cannot sustainably absorb a development of this magnitude. The Council has already identified substantial, deliverable brownfield and regeneration opportunities that must be prioritised before releasing Green Belt land, including Derby Riverside (Policy CC11) for 600 homes, Railway Station Quarter (Policy CC13) for 500 homes, North Castleward (Policy CC14) for 400 homes, and City Centre Mixed-Use Sites (Policy CC4) for over 1,400 homes.	Policy CC13 (Railway Station Quarter), or Policy CC14 (North Castleward), in accordance with the Plan's stated "brownfield and City Centre first" strategy (Paragraph 81). Furthermore, the Council should conduct a transparent reassessment of urban capacity to prove that exceptional circumstances exist before considering any release of protected Green Belt land.
Jane Fearn	Policy HA7: Stoney Lane, Spondon	Objects		No	Re Policy HA7 - Stoney Lane, Spondon I am writing to object to the proposal of 400 homes being built on the above application. This application is UNSOUND, it's not justified and not consistent with national policy, you can't just change what a site is. This land has been misclassified, it is active Green Belt land not Grey Belt. This site is active agricultural land. It has also not been demonstrated that all reasonable Brownfield alternatives have been fully optimised. There are quite a few exiting Brownfield and city centre policies these 400 homes could be built. The other impacts are that Spondon is growing so fast, another big development is already underway. it is getting harder for traffic to move and causing a lot more traffic and pollution, especially as cars queue through the village and	

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					out of Locker Road. I am sure you will say from Stoney Lane people will go down the A52 but not if they want to head to Derby. Then there are the doctors where you can't get appointments now and schools (can't comment on primary as do not know) West Park secondary school is over subscribed, they can't take more. This is going to affect the education children in Spondon get. And what about wildlife, we can't keep taking their homes. This is Green Belt land not Grey Belt land please do not allow homes to be built here. Thank you for you time in reading this objection.	
Caroline Ferguson	Policy HA7: Stoney Lane, Spondon	Objects		No	Good morning. I am sending this email asa resident of Spondon Village. I have lived in the village all my life and am objecting to the proposal of the planned building of 400.homes on Stoney Lane in Spondon. The site proposed is active agricultural land but the bigger concern is the impact the houses will have on already congested roads in Spondon to get out of the village, the local schools(some of which are already oversubscribed) especially our only Secondary School.in the area, our GP surgeries that are already massively stretched and the impact the houses will have on street parking close to local primary schools. There are already pressures on road maintenance and drainage in Spondon. The housing development will only add to these pressures. I am really concerned about this loss of farmland ,the massive impact on Spondon's infrastructure and the further expansion of development around our community. I do hope you will consider all of these points.	
Fisher German on behalf of Bloor Homes	Policy HA7: Stoney Lane, Spondon	Objects	Yes	No	It is noted the Stoney Lane allocation (HA7) has a 40% affordable housing requirement (which is uplifted in accordance with Paragraph 67 of the NPPF). However, the	

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					Policy now allows for viability considerations as the Plan has been updated since Regulation 18 to include that the delivery of the uplift is "subject to demonstrating that this is achievable". If Locko Road was considered necessary for allocation, a similar caveat should be applied for consistency. Whilst no objection to the Stoney Lane allocation is provided, evidence will need to be provided confirming that the scheme's access and relationship with the adjoining A52 slip lane (which is substandard) is acceptable ensure the scheme and any mitigation is deliverable and will not receive National Highways objection.	
Mark Flint	Policy HA7: Stoney Lane, Spondon	Objects		No	The policy to build 400 homes off Stoney Lane, Spondon is UNSOUND. There is no justification for building in this area. 1. The site will place undue pressure on local infrastructure (schools, roads etc). 2. It is agricultural not brownfield, which contravenes the brownfield first policy, as the council already has plenty of sites to utilise within the city without adding to urban sprawl. 3. The site, as stated is active agricultural land not grey belt. 4. There are major concerns on the effect this will have on the Stoney Lane/A52 Junction with site traffic and as the only entry/exit point for 400 houses!	

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					The plan should be modernised to remove site HA7 from the plan. This allocation of land for housing is UNSOUND and is inconsistent with national policy as all alternatives of brownfield sites have not, as yet, been fully optimised. The council should adhere to its city centre first policy and relocate these houses into policy CC4, CC11 and CC13 areas.	
Mark Forester	Policy HA7: Stoney Lane, Spondon	Object		No	I am writing to formally object to the proposed allocation of **400 homes on Stoney Lane, Spondon (Policy HA7)** and to ask Derby City Council to remove this site from the Local Plan. Having considered the proposal and the reasons given for allocating this land, I believe that **Policy HA7 is UNSOUND**, particularly because it is **not justified** and is **not consistent with national planning policy**. My objection is not simply to the principle of new housing. I recognise that Derby needs additional homes. My concern is that the Council should be putting its housing requirement in the **right locations**, particularly where previously developed land, brownfield sites and city-centre regeneration opportunities are available, rather than sacrificing productive agricultural land on the edge of Spondon. **1. This is active agricultural land** The Stoney Lane site is active agricultural land. I strongly question the decision to classify it as "Grey Belt" in circumstances where the land is not previously developed and is not simply an area of poor-quality or underperforming land.	I therefore respectfully but strongly request that Derby City Council: **Deallocate Policy HA7 – Stoney Lane, Spondon – from the Local Plan and remove the proposed allocation of 400 homes from this site.** If the Council considers that these 400 homes are still required within the Plan, I believe the housing should instead be directed towards suitable **brownfield, previously developed and city-centre regeneration opportunities**, including those already identified under Policies CC4, CC11, CC13 and CC14, subject of course to their individual

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					This land currently forms part of the countryside around Spondon and contributes to preventing the further outward expansion of the built-up area. Allowing 400 houses to be constructed here would represent a significant and permanent change to the character of the area and would result in the further loss of agricultural land. Once this land is developed, it is lost permanently. **2. The development would contribute to urban sprawl** The proposed development would push the built-up area further into the surrounding countryside. I am particularly concerned about the cumulative effect of development around Spondon. A decision to allocate another 400 homes on the edge of the community should not be considered in isolation. It risks creating further pressure for development in surrounding areas and gradually eroding the separation between existing communities and the countryside. The purpose of Green Belt and countryside protections should not simply be overridden because housing numbers need to be found. **3. Brownfield and regeneration opportunities should be prioritised** The Council's own Local Plan identifies substantial opportunities for housing on previously developed and regeneration sites.	planning and deliverability considerations. I ask that this representation is formally recorded against **Policy HA7 – Stoney Lane, Spondon – 400 homes** and taken into account as part of the Regulation 19 consultation and subsequent independent examination of the Local Plan.

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					These include: • **Derby Riverside – Policy CC11 – approximately 600 homes** • **Railway Station Quarter – Policy CC13 – approximately 500 homes** • **North Castleward – Policy CC14 – approximately 400 homes** • **City Centre Mixed-Use Sites – Policy CC4 – over 1,400 homes** These allocations demonstrate that there are significant opportunities for housing within existing developed areas. It therefore seems fundamentally difficult to justify the release of active agricultural land for another 400 homes when substantial brownfield and city-centre opportunities already exist. The Council should demonstrate clearly why these opportunities cannot accommodate the housing proposed for HA7 before sacrificing farmland. **4. The proposal appears inconsistent with the Council's own strategy** The Local Plan refers to a **"brownfield and City Centre first"** approach. If that is genuinely the Council's strategy, I believe it should be followed consistently. It appears contradictory to promote substantial housing opportunities on brownfield and regeneration sites while	

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					simultaneously allocating active agricultural land at Stoney Lane for 400 homes. Before Green Belt farmland is released, the Council should demonstrate that all reasonable previously developed and regeneration opportunities have been fully considered and optimised. **5. Infrastructure concerns** I am also extremely concerned about the additional pressure that 400 new homes would place on existing infrastructure in and around Spondon. This includes: • Road capacity and traffic congestion; • Junction capacity and highway safety; • Drainage and surface-water management; • Sewerage infrastructure; • Local schools and school places; • GP and other local services; • Public transport; • Pedestrian and cycling infrastructure; and • The general capacity of existing community infrastructure to absorb a development of this scale. The impact should not be assessed simply by looking at the proposed development in isolation. The cumulative impact of existing and proposed development in the wider Spondon area needs to be properly understood. I would expect the Council to have robust, site-specific evidence demonstrating that the necessary infrastructure can	

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					accommodate this development without placing unacceptable additional pressure on existing residents and services. **6. Loss of agricultural land and countryside** There is also a wider principle at stake. Agricultural land is a finite resource. Once 400 houses, roads, gardens, parking areas and associated infrastructure are constructed, the agricultural function and open character of the site cannot simply be restored. At a time when there is increasing recognition of the importance of food security, protecting agricultural land and preventing unnecessary urban expansion, I do not believe this site should be selected when other housing opportunities are available. **7. The allocation is not justified** For the reasons above, I do not believe that Policy HA7 has been adequately justified. In particular, I believe the Council needs to demonstrate why this active agricultural site is required when substantial brownfield and city-centre housing opportunities are already identified within the Local Plan. Simply identifying a site capable of accommodating 400 houses does not, in my view, demonstrate that it is the most appropriate or sustainable location for those homes.	

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					8. The allocation is not consistent with national planning policy I also consider the allocation to be **not consistent with national planning policy**, particularly in relation to the protection of Green Belt land, the appropriate use of previously developed land and the need to make effective use of suitable brownfield and regeneration opportunities before unnecessarily releasing protected countryside. The Council should not rely upon a Grey Belt designation as a justification for development without properly demonstrating that the land meets the relevant criteria and that reasonable alternatives have been properly considered.	
Peter Fox	Policy HA7: Stoney Lane, Spondon	Objects	No	No	I consider this specific allocation to be UNSOUND on the following grounds under paragraph 35 of the National Planning Policy Framework (NPPF): Not Justified: The site selection is not backed by proportionate, robust evidence regarding local transport capacity, environmental impacts, or Green Belt/Green Wedge boundary release. Not Effective: Serious highway capacity, noise, and infrastructure constraints jeopardize the delivery and viability of the site. Not Consistent with National Policy: The allocation conflicts with national policy regarding Green Belt protection, air quality, noise pollution, and sustainable transport integration. 2. Detailed Grounds of Unsoundness A. Transport & Highways Impact (Unsound: Unjustified & Ineffective) A52 / Brian Clough Way Congestion: The site directly borders the A52, an	To make the Local Plan sound, I request the Planning Inspector to consider the following modifications: Delete the allocation for Land East of Stoney Lane, Spondon, from the Local Plan and Policies Map. Reallocate the housing target to alternative, genuinely sustainable brownfield opportunities within the city centre boundary or through existing cross-boundary agreements with neighbouring authorities. If retained (subject

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					already severely congested strategic trunk road. Adding vehicle trips from 400+ homes, combined with existing traffic from recent developments, will significantly worsen congestion at key junctions (e.g., Spondon roundabout / Raynesway interchange). Local Road Network Constraints: Local access roads around Stoney Lane are narrow and ill-equipped to safely absorb substantial additional residential traffic, raising severe highway safety concerns for pedestrians and cyclists. B. Air Quality, Environmental Health & Liveability (Unsound: Consistent with National Policy) A52 Noise and Air Pollution: Positioning 400 homes immediately adjacent to the high-speed A52 introduces significant air and noise pollution risks. While the plan mentions acoustic buffering, relying heavily on artificial buffers raises doubts about whether acceptable living conditions (NPPF Section 15) can be achieved across the site. Viability Constraints: The cost of extensive mitigation measures (e.g., sound barriers, acoustic glazing, enhanced ventilation systems) undermines site viability, making the high target of 40% affordable housing unrealistic or deliverable (Effective). C. Loss of Green Belt / Green Gap & Ecological Harm (Unsound: Unjustified) Exceptional Circumstances Not Demonstrated: Releasing Green Belt/Green Wedge land at Stoney Lane lacks sufficient justification, particularly when brownfield-first site capacity in the city centre has not been fully optimized. Urban Sprawl: Developing this site weakens the open green boundary of Spondon, reducing the vital	to examination): Amend policy requirements to strictly limit unit numbers, mandate full upfront highways/junction upgrades before phase 1 delivery, and require comprehensive noise/air quality impact assessments demonstrating full compliance with NPPF standards prior to site allocation.

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					buffer separating the suburb from neighbouring settlements and harming local biodiversity. D. Infrastructure & Community Capacity (Unsound: Ineffective) Cumulative Strain: Spondon has absorbed significant residential growth over recent years. The Infrastructure Delivery Plan (IDP) fails to demonstrate how local GP surgeries, primary/secondary school places, and surface water drainage systems will cope with an additional 400 households.	
Joe Frost	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to formally object to **Policy HA7 – Land East of Stoney Lane, Spondon**, which proposes a minimum of 400 new homes. My objection is not to the need for housing in Derby, but to the **location, scale and justification of this particular allocation**. In my view, Policy HA7 is **unsound** and should be removed from the submitted Local Plan. **1. HA7 is not sufficiently justified** The Council must demonstrate that HA7 is the most appropriate strategy when reasonable alternatives are considered. The Council's own planning strategy places emphasis on a **"brownfield and city centre first"** approach. Derby has significant opportunities for housing through city-centre regeneration, brownfield redevelopment and the reuse of previously developed land.	Remove Policy HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is **UNSOUND**, as it fails the **"Justified"** and **"Consistent with National Policy"** tests. The Council has not demonstrated that the release of this active agricultural Green Belt site as "Grey Belt" is necessary, or that reasonable brownfield and urban regeneration alternatives have been fully optimised first. The proposed 400 homes should instead be accommodated through existing **brownfield and city-centre regeneration** opportunities, including those identified under **Policy CC4, Policy C11 (Derby Riverside),**

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					It is therefore difficult to understand why open agricultural land at Spondon should be released for housing before those opportunities have been fully prioritised and utilised. If HA7 is genuinely necessary to meet housing requirements, the Council should clearly demonstrate why the available brownfield and city-centre opportunities cannot accommodate the required housing. Without that evidence, the allocation is **insufficiently justified and therefore unsound**. **2. This is active agricultural land, not brownfield** The site is **open agricultural land with existing farmland and hedgerows**, rather than previously developed or derelict land. Although the Council has identified the site as grey belt, grey-belt status should not be treated as automatically making development appropriate. There is a fundamental difference between releasing genuinely poor-quality, previously developed or heavily degraded land and building 400 homes on functioning agricultural land at the edge of Spondon. The Council should give proper weight to the loss of agricultural land and should demonstrate why this land needs to be released when substantial urban and brownfield opportunities remain. **3. HA7 would contribute to urban sprawl**	**Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward).** This would be consistent with the Local Plan's stated **"brownfield and city-centre first**" strategy in **paragraph 81**, while avoiding the unnecessary loss of open agricultural land and further outward expansion of Spondon. The Council should therefore **deallocate HA7 and prioritise existing urban regeneration and brownfield capacity before releasing Green Belt/grey-belt land for development.** If Derby has substantial opportunities to provide housing through regeneration and previously developed land, releasing open agricultural Green Belt/grey-belt land should be a later option, not a convenient alternative. The Council should not promote a brownfield-first strategy while simultaneously allocating significant areas of open countryside without first demonstrating that the urban

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					The Council itself describes HA7 as an **"eastern urban extension"** to Spondon. That is effectively an outward expansion of the settlement into open countryside. A development of at least 400 homes, together with roads, lighting, parking, drainage and associated infrastructure, would permanently extend the urban footprint of Spondon and fundamentally alter the character of the area. Landscaping and green buffers may reduce visual impact, but they cannot change the fact that open agricultural land would be replaced by a substantial new residential development. The proposal therefore risks contributing to **urban sprawl rather than sustainable urban regeneration**. **4. Significant pressure on local infrastructure** A development of 400 or more homes would place substantial additional pressure on existing infrastructure. Particular concerns include: • traffic and highway capacity; • the A52 and surrounding junctions; • schools and education provision; • GP and healthcare services; • public transport; • drainage and surface-water management; • pedestrian and cycling infrastructure; and • recreational and community facilities.	opportunities have been properly exhausted.

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					These pressures must also be considered **cumulatively with other existing and proposed development in and around Spondon**. The proposed HA7 allocation must also be considered in the context of (as well as other proposed developments) the ongoing **Spondon Wood housing development**, where concerns have been raised regarding compliance with planning requirements and the effectiveness of planning oversight and enforcement. It is particularly concerning that development pressure generated by decisions made by **Erewash Borough Council** is already placing additional demands on Spondon and Derby's roads, schools, healthcare and other infrastructure, despite the development being outside Derby City Council's administrative boundary. The subsequent abandonment of Erewash's Core Strategy, following serious concerns from the Planning Inspectorate regarding the soundness of its housing strategy, further highlights the need for Derby to exercise caution before committing to another major development on the edge of Spondon. Financial contributions from a developer do not, by themselves, demonstrate that infrastructure will be adequate or delivered at the necessary time. The Council should provide clear evidence that the cumulative infrastructure impacts can realistically be addressed. For these reasons, I believe **Policy HA7 is unsound**. The allocation would: • result in the loss of active agricultural land;	

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					• extend Spondon into open countryside; • contribute to urban sprawl; • place significant pressure on local infrastructure; • create cumulative impacts for an already pressured community; and • appear inconsistent with the Council's stated **brownfield and city-centre first** strategy. Most importantly, the Council has not adequately demonstrated why this open agricultural site should be preferred over reasonable brownfield, regeneration and city-centre alternatives. I therefore respectfully ask Derby City Council to **delete Policy HA7 from the submitted Local Plan**. If the Council is minded to retain the allocation, I ask that it provides compelling evidence demonstrating why the brownfield and city-centre alternatives cannot meet the housing requirement, why this agricultural land is genuinely required, and how the significant cumulative infrastructure impacts will be addressed. In the absence of such evidence, I consider **Policy HA7 to be unjustified, ineffective and unsound**.	
Lynne Fryer	Policy HA7: Stoney Lane, Spondon	Objects		No	I'm going to get straight and to the point this policy is UNSOUND, The Stoney Lane site is agricultural farmland. It currently contributes to preventing urban sprawl and performs an important Green Belt function, NOT JUSTIFIED the council has incorrectly categorised active agricultural	

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					farmland as Grey Belt without demonstration that all reasonable brownfield alternatives have been considered. The council has substantial brownfield and city centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. There are significant pressures on local infrastructure, including roads, drainage, doctors and school capacity. The Council should reallocate these 400 dwelling into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81).	
Mervyn Giles	Policy HA7: Stoney Lane, Spondon	Objects		No	The proposal to build 400 new homes on active Green Belt farmland on Stoney Lane Spondon is UNSOUND. It is NOT justified and is NOT consistent with National Policy. This proposed site is active agricultural land and is NOT classed as Grey Belt. The infrastructure that we have for all the homes we have at present in Spondon is under significant pressure including Dental Practices, Doctors surgeries, even significant queues at local supermarkets.400 more homes would increase these pressures substantially. The Council already has Brownfield Alternatives available with bigger opportunities for development such as Railway Station Quarter CC13 for 500 homes or Derby Riverside CC11 for 600	

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					homes, just to mention two, and sites for new homes should be looked at firstly in accordance with the plan's stated brownfield and City Centre first strategy. Active land that is farmed regularly and properly, as this land is, provides much needed crops for now and hopefully for the future, and also provides safe haven for wildlife, and therefore should never be turned into yet more concrete.	
Pralad Ghundoo	Policy HA7: Stoney Lane, Spondon	Objects		No	This policy HA7 is unsound, The council has classified the stoney lane site as grey belt in order to justify its removal from green belt area. National planning policy defines grey belt as land within green belt that is previously developed of poor quality and under performing against the purposes of green belt. The stoney lane site is active agricultural land . It Contributes to preventing urban sprawl and performs an important green belt function. The council has not justified correctly active agricultural farming land as grey belt with out demonstrating that all reasonable brownfields alternative sites have been fully considered. The council is not consistent with national policy, by allocating active agricultural farming land conflicts with the principals of national planning policy .	

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					It directly contradicts the councils own commitment to a brownfield and city centre first strategy, set out in Paragraph 81 of the plan. Brownfield alternative areas are available, The council already has significant brownfields and city centre regeneration opportunities identified as housing including, Derby Riverside (policy CC11)-600 homes. Railway station quarter (policy cc13)-500 homes. North castle ward (policy cc14)-400 homes. City centre mixed use site(cc4)- over 1400 homes. These allocation demonstrate that there are substantial opportunities for housing to be delivered on previously developed and regeneration sites rather than developing active green belt farm land on edge of spondon. Having presented the facts and evidence the council should deallocate site HA7 (Stoney Lane, spondon 400 homes) from the local plan. The allocation is unsound as it fails to justified and consistent with national policy tests by misclassifying active green farmland as grey belt without demonstrating that all reasonable brownfield alternatives have been fully optimised. The impact of increased population and traffic will have a significant negative impact on already congested road and services in the vicinity of this development.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					There will have to be extensive traffics management specially on Stoney Lane where speed humps would be necessary for slowing down traffic. The slip road junction to A52 would become busier and dangerous. An alternative would be to build a by pass road around spondon.	
Isaac Goddard	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a local resident to object to the proposed development of 400 homes on Stoney Lane in Spondon. I believe Policy HA7 is unsound, as I do not think the development is justified and I am concerned that it is not consistent with national planning policy. The site is currently agricultural Green Belt land and I don't think land like this should be built on when there are brownfield and previously developed sites within Derby that could be used for new housing instead. I am also concerned about what another 400 homes would mean for Spondon. It would bring significantly more traffic and put additional pressure on local roads, schools, doctors and other services that existing residents already rely on. As a younger resident, I also think it is important that decisions about development consider what Spondon will be like to live in in the future. Once green space and agricultural land has been built on, we cannot simply get it back.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					For these reasons, I believe Policy HA7 should be removed from the Local Plan and brownfield and regeneration sites should be prioritised for new housing instead.	
Tony Gorbert	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village.	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council’s existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing;

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised	3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available. I ask that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning.	for consideration as part of the Regulation 19 examination.

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					Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate	

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					that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.	
Richard and Sandra Green	Policy HA7: Stoney Lane, Spondon	Objects		No	I am concerned about the proposed building of 400 homes on Stoney lane.	

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					I always thought this farming land was supposed to be greenbelt, I think we should be giving more encouragement to farmers to grow more and use their land for the benefit of the country to grow more crops to stop importing so much. It is also has popular footpath that many use for recreation and enjoying the county side walk. I would also be concerned about the traffic there is already a problem with getting out of Spondon at rush our, the Schools could not cope with the extra pupils it would bring and with the change it would bring to the village. I also understand there are several brownsites in the city where these 400 houses could be reallocated. Please reconsider the building of these houses, I know a lot of money is made by developers who make promises to councils but consider our country side,	
Mr C R Hawke	Policy HA7: Stoney Lane, Spondon	Objects		No	I am a local Spondon resident and wish to lodge my formal complaint for the proposed development on farmland off Stoney Lane , Spondon Specifically Policy HA7- Stoney Lane, Spondon - 400 homes The Policy for choosing this site is unsound and not justified ,the site is active agricultural land and not poor-quality or previously developed or grey belt as the council has designated it The development of this land would contribute to further expansion of urban sprawl	I am asking for the deallocation for Site HA7 (stoney Lane-400 homes) from the local plan because this plan is unsound because it fails the justified and consistent with the national policy tests by misclassifying active green belt farmland as grey belt without demonstrating that all brownfield alternatives have been fully investigated or optimised The council should be

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					There are already significant pressures on the local infrastructure,including roads,drainage and school capacity ,plus the impact that would it would have on the medical services that are already stretched and suffering The council has substantial opportunities to develop brownfield and city-centre housing opportunities which should be prioritised before releasing green belt farmland for development The proposed plan is inconsistent with the plans stated "brownfield and city centre first " strategy	reallocating these 400 homes into existing city centre projects in accordance with the plans stated ' brownfield and citycentre first ' strategy
Shaun Hayes	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of site HA7 at Stoney Lane, Spondon, for approximately 400 homes. In my view, the allocation is **unsound** and does not satisfy the requirements for the plan to be considered **justified or consistent with national planning policy**. My main concerns are as follows: **1. Active agricultural land** The site is currently active agricultural land and should not be treated in the same way as previously developed land or genuinely poor-quality land. Releasing productive green belt farmland for housing should only be considered where there is a clear and compelling justification and where reasonable alternatives have been properly exhausted. **2. Further urban expansion and sprawl**	I therefore ask the Council to: **Deallocate site HA7 (Stoney Lane, Spondon) from the Local Plan and reconsider the proposed 400-dwelling allocation.** If additional housing capacity is required, I believe these dwellings should instead be directed towards existing brownfield and city-centre regeneration opportunities, including the allocations identified under **Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Cattleward)**, where appropriate.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Development of approximately 400 homes at Stoney Lane would contribute to the continued outward expansion of the urban area and would further encroach upon the surrounding green belt. This risks creating additional urban sprawl and permanently changing the character of the area. **3. Pressure on existing infrastructure** There are already significant pressures on local infrastructure. A development of this scale would place additional demand on: • The local road network and traffic capacity • Drainage and surface-water infrastructure • Local schools and education provision • Other community services and facilities I believe these cumulative impacts need to be properly demonstrated and addressed before such a significant allocation is taken forward. **4. Brownfield and city-centre opportunities** Derby has substantial opportunities for housing delivery through brownfield land, regeneration schemes and city-centre development. These opportunities should be prioritised before releasing green belt agricultural land for development. The proposed allocation therefore appears difficult to reconcile with the Plan's stated **"brownfield and city centre first"**approach. **5. Failure to demonstrate that reasonable alternatives have been fully optimised** Before allocating HA7, the Council should demonstrate clearly that existing brownfield and regeneration opportunities have	This would be more consistent with the Plan's stated brownfield and city-centre-first strategy and would avoid the unnecessary loss of active agricultural and green belt land. I respectfully ask that this representation is formally recorded and given full consideration as part of the examination and preparation of the Local Plan.

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					been fully assessed and optimised for housing delivery, and that the proposed 400 homes cannot reasonably be accommodated through those opportunities.	
Emma Healy	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to state these objections to Policy HA7 on Stoney Lane in Spondon for the development of 400 homes. This policy is unsound for two main reasons. The first reason is that the classification of the land as grey belt is not justified as the land is active agricultural land and therefore has been incorrectly classified by the council without them demonstrating that other brownfield sites have been considered. The second reason is that the allocation of this land as grey belt is not consistent with national planning policy. In addition, it contradicts the council's own commitment to "brownfield and City Centre first" (paragraph 81 of the Plan) approach to development. Furthermore, there are other significant brownfield and City Centre sites that could be used for housing development such as Policy CC11, Policy CC13, Policy CC14 and Policy CC14 before using active Green Belt farmland in Spondon. Developing on the site proposed in Policy HA7 would contribute to urban sprawl and will add significant pressure to local infrastructure for example school capacity and drainage as well increasing busy roads	Therefore, the site HA7 Stoney Lane, Spondon - 400 homes should be deallocated. This allocation is unsound as it fails the justified and consistent with national policy tests. This is because it is on land that has been incorrectly classified as grey belt land without showing other brownfield sites can't be used. The Council should reallocate these 400 dwellings to existing brownfield or City Centre sites as listed above.

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Mr & Mrs Henley	Policy HA7: Stoney Lane, Spondon	Objects		No	To who it may concern regarding proposed Planning Policy HA7 which is a proposal to build 400 new homes on Stoney Lane Spondon. On what is , and what has, always been Agricultural land . My objections are firstly this has never been, as described in the planning application GREY LAND. This is and has to my knowledge of 70 years been Agricultural Green land . Secondly this application is in Contradiction with National Policy, of not allocating Agricultural Land for building purposes . There other sites which Council had identified which is Brownfield and would be better suited. For example, Railway Station Quarter Policy CC13 which would accommodate 500 homes, Derby Riverside Policy CC1 which would accommodate 600 homes. These sites show that previously developed land would be beneficial . Spondon at this time is inundated with Building House projects. Spondon as a village just cannot sustain any more homes, the infrastructure ie Doctors, Dentists ,Schools are now at capacity which prevents locals now either getting appointments ,or having the right to obtain School	

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					placements. Myself like many locals , consider this land a green wedge between Ockbrook and Borrowash. The congestion with Traffic within Spondon which is essentially a Village ,is now at its worst and further traffic will only make the environment detrimental to residents.	
Ann Hiley	Policy HA7: Stoney Lane, Spondon	Objects		No	There are immense existing pressures on the local infrastructure including traffic through the village /drainage/school GP and dentist limitations as it currently stands. This is to be further impacted due to the current approved planning by Erewash Borough Council for over 250 houses that are currently being built in Spondon (Locko Park) Interestingly , the proposed planning (policy HA7) is on ACTIVE agricultural land rather than "Grey Belt". The proposal is UNSOUND as it goes against the NATIONAL POLICY by misclassifying this active green belt land as grey belt. There are other current substantial brownfield alternatives which need to be considered in line with the plans BROWNFIELD & CITY CENTRE FIRST strategy (paragraph 81). Policy CC13 Railway Station Quarter Policy CC14 North Castleward Policy CC11 Derby Riverside If this planning were to go ahead it would have a significant negative impact on the village of Spondon, on what is already a village being put under pressure in respect of GP/Dentist/Schools capacities (not to mention, the current vehicles parking outside the local schools is already a safety issue for our children)	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The roads are already a genuine concern to residents due to the current volume of traffic, inlcuding HGVs who use it as a thoroughfare to Ilkeston. The new development underway at Locko Park will further exacerbate this. Some 30+ yrs ago the issue of traffic and heavy goods vehicles through Spondon was raised and for some reason did not progress further. The burden of traffic in the village has risen significanty since then. The planning must not obtain approval due to the above concerns. Moreover, this is GREEN BELT land now being missclassified as grey belt.	
Lauren Hiley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the above planning. There are already substantial existing pressures on the local infrastructure including traffic through the village /drainage/school GP and dentist limitations as it currently is . This is to be further impacted due to the current recently approved planning by Erewash Borough Council for over 250 houses that are currently being built in Spondon (Locko Park) Bizarrely , the proposed planning (policy HA7) is on ACTIVE agricultural land rather than "Grey Belt". The proposal is UNSOUND as it goes against the NATIONAL POLICY by misclassifying this active green belt land as grey belt. There are other current substantial brownfield alternatives which must take priority in line with the plans "BROWNFIELD & CITY CENTRE FIRST" strategy (paragraph 81). These include:-	

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					Policy CC13 Railway Station Quarter Policy CC14 North Castleward Policy CC11 Derby Riverside If this planning were to go ahead it would have a significant negative impact on the village of Spondon, on what is already a village being put under pressure in respect of GP/Dentist/Schools capacities (not to mention, the current amount of vehicles parking outside the local schools which is already a safety issue for our children) The roads are already a genuine concern to local residents due to the current volume of traffic, inlcuding HGVs who use it as a thoroughfare to Ilkeston. The new development underway at Locko Park will further exacerbate this. Some 30+ yrs ago the issue of traffic and heavy goods vehicles through Spondon was raised and for some reason did not progress further. The burden of traffic in the village has risen significantly since then. The planning proposal must not obtain approval due to the above concerns. Moreover, this is GREEN BELT land now being misclassified as grey belt.	
Patricia Hiley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the proposed above planning. There are significant pressures on the local infrastructure including traffic through the village /drainage/school GP and dentist limitations as it currently stands. This is to be further impacted due to the current approved planning by Erewash Borough Council for 250+ houses that are currently being built in Spondon (Locko Park)	

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					Interestingly , the proposed planning (policy HA7) is on ACTIVE agricultural land rather than "Grey Belt". The proposal is UNSOUND as it goes against the NATIONAL POLICY by misclassifying this active green belt land as grey belt. There are other current substantial brownfield alternatives which need to be considered in line with the plans BROWNFIELD & CITY CENTRE FIRST strategy (paragraph 81). Policy CC13 Railway Station Quarter Policy CC14 North Castleward Policy CC11 Derby Riverside If this planning were to go ahead it would have a significant negative impact on the village of Spondon, on what is already a village being put under pressure in respect of GP/Dentist/Schools capacities (not to mention, the current vehicles parking outside the local schools is already a safety issue for our children) The roads are already a genuine concern due to the present volume of traffic, inlcuding HGVs who use it as a thoroughfare to Ilkeston. The new development underway at Locko Park will further exacerbate this. The planning must not go ahead due to the above concerns.	
Tony Hiley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the proposed above planning. The reasons for this are numerous.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					As well as already significant pressures on the local infrastructure including traffic through the village /drainage/school GP and dentist limitations. This is to be further stretched due to the current approved planning by Erewash Borough Council for 250+ houses that are currently being built on the boundary to Spondon (Locko Park) Furthermore, the proposed planning (policy HA7) is on ACTIVE agricultural land rather than "Grey Belt". The proposal is unsound as it goes against the national policy by misclassifying this active green belt land as grey belt. Cleary there are other current substantial brownfield alternatives which need to be considered in line with the plans BROWNFIELD & CITY CENTRE FIRST strategy (paragraph 81). Policy CC13 Railway Station Quarter Policy CC14 North Castleward Policy CC11 Derby Riverside If this planning were to go ahead it would have a significant negative impact on the village of Spondon, on what is already a village being put under pressure in respect of GP/Dentist/Schools capacities (not to mention the current parking outside the local schools is already a safety issue for our children) The roads are already a genuine concern due to the present volume of traffic, inlcuding HGVs who use it as a thoroughfare to Ilkeston. The new development underway at Locko Park will further exacerbate this.	

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					This proposal is simply not justified. that cannot accommodate from a swelling population	
Christopher Hill	Policy HA7: Stoney Lane, Spondon	Objects		No	My concerns regarding the above proposal is that if this development is passed, Spondon will be reduced to Urban Sprawl. At present there is a development in process at what is known as Spondon Wood. There is a development to go through at Royal Hill Road and, One proposed adjacent the cricket ground. Spondon has been destroyed as a village it will become a town with no green spaces. The public need fresh air and green spaces. To develop Stoney Lane HA7 it would be necessary to change the designated Green Belt to Grey. The Government authorisation to do this is, the land has to be unworkable to use as farm land, and have previously had buildings, on it. This land does not come under this category as it is at present being used as fertile farm land. Also, Spondon has not got the required infrastructure to cope with school places, medical care and sewage system will struggle with the new developments. The roads will not be able to cope with hundreds of extra vehicles trying to navigate the roads to exit Spondon.	
Patricia Hill	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to the proposed 400 houses to be built as above. I strongly oppose the plan as Spondon has had its fair quota of developments recently, and there are more in the plans.	

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					Firstly the infrastructure will not cope ie: Schools, particularly secondary education, doctors, dentists, and the roads will not cope at peak times. There is only one road to get out of Spondon so drivers will have to detour, which will impact on surrounding villages. This development will be such bad news for Spondon residents, we will not have any green space to enjoy, it will be suffocating.	
Sheena Hill	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy Is "**UNSOUND**" • Not Justified • Not Consistent with National Policy Development Of 400 high quality houses- off Stoney Lane. **Questions for the Developers**:- **Will** the high quality homes have 3 or more bedrooms? **Will** some of the high quality homes be over 2 stories high if so how many & how high? **Is it** expected/ predicted 4 or more people in each home? Could it be 6-8 people? How many? **Is it** expected/ predicted each of the 400 homes might, have people visiting them? it might be friends, family, health professionals, council workers, traders, etc. **Is it** expected/ predicted that any children will be living in these high quality homes & affordable houses? **Will** there just be one developer for the site, or will there be more than one? If so who are they?	

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					Will some of the properties be DWELLINGS? **How** many affordable houses/ homes/ dwellings will there be? **Will** the developer actually adhere to this (affordable dwellings)? Have they done in the passed with previous developments or is it just a prediction that never happens? **What** is the track record for the developers to develop infrastructure? **Do** the developers:- Build schools (or allow land for a school)? Build Doctors Surgeries (or allow land for a doctors surgery)? Build community base hubs (or allow land for a community hub)? Bus stops? Are they in the plans? Roads, wide enough for parking on both sides? Even if people have drives – they tend to have visitors! **Will** the developers improve the Road down/alone Stoney Lane, to take into account the increase in traffic? OR- will the council have to put double yellow lines along the road (at the cost of the tax payer) due to the road being too narrow? **Spondon** has one road in & one road out of Spondon Village, which is very narrow, how will the developers, resolve this? Traffic is already, very bad! **What** will the developers do to improve the traffic flow from the A52?	

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					Has a survey been done re traffic flow off the A52 and around Spondon, if so by whom & when, over what period of time? **How** many, People are expected/ predicted to Live & visit, this site on Stoney Lane? (??? Three or more thousand) **How** long will it take (approximately) to Build the high quality houses & dwellings? On Stoney lane. Have the Developers kept there word on other developments? – how trustworthy are they?, who oversee & hold them to account on this development, on what they do, or don't do? **Council**:- **What** is the Council expected to do after the Developers have developed the land? **I wish to highlight the following**:- **The Deallocated site HA7 Stoney Lane – 400 Homes** **The site is** active agricultural land**, rather than poor -quality or previously developed "GREY BELT" (Misclassification on the part of the developers or planning).** Development **would contribute to the further expansion** of urban development sprawl**.**	

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					There are significant pressures on local infrastructure, including Roads, Drainage, School capacity, Doctors. **On this site there is wildlife that inhabit this farmed land, which have been seen & heard such as** Bats, Pheasants, Kestrels, A Bussard and an Owl **etc., as well as a public footpath.** **The council has substantial brownfield and city- centre housing opportunities which should be prioritised before releasing "GREEN BELT" farm land for development.** The proposed allocation appears inconsistent with the Plans stated "brown field and city centre first" strategy (Paragraph 81). Hence this this development for the Proposed Allocation of 400 houses off Stone Lane is UNSOUND.	
John Hinson	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to raise a strong objection in regard to the above policy. I believe that it is unsound based on the grounds that it is not justified and and inconsistent with national policy. **Not Justified** The re-classification of the land from Green Belt to Grey Belt is unjustified because it does not meet the national planning policy definition of Grey Belt as previously developed, poor quality or underperforming land. **Not Consistent with National Policy.** Development on productive agricultural land conflicts with the principles of national planning policy and also appears to	On the basis of the above, I would request that the following modification be made to the local Plan: 1. Remove the allocation of 400 homes from Site HA7 (Stoney Lane) from the local Plan. The allocation is **unsound** because it incorrectly reclassifies Green Belt land as Grey Belt without due consideration being given to the maximising of all

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					be in direct conflict with the stated commitment of the Council. **Evidence** • The land in question is actively managed farmland and has been producing crops for many years. It is entirely incorrect to define it as Grey Belt. This appears to be an arbitrary recategorisation which cynics might suggest has an ulterior motive. • It is in conflict with national planning principles to be developing greenfield sites when there are brownfield alternatives readily available. • In the light of current climate conditions and concerns regarding food security it does not seem an appropriate or logical decision to destroy productive agricultural land. • In addition to the production of crops, this area has considerable amenity value for the local populace. The value of easily accessible green spaces for both mental and physical well-being is by now well proven and it does not make good sense to destroy such spaces unnecessarily when there are other options available. • Over recent years, Spondon has received more than it's fair share of local developments and also the external development of Spondon Wood by Erewash Borough Council which have created considerable pressure on the local infrastructure. This plan adds considerably more demands with no attempt at alleviation of the problems which already exist.	existing brownfield and city centre options. In this regard it **fails** the **"Justified"** and **"Consistent with National Policy"** tests which should be the prime consideration. 2. Follow the Local Plan's stated policy of **"brownfield and City Centre first"** as defined in **Paragraph 81** by reallocating these 400 homes within the existing regeneration allocations:- Policy CC4 City Centre Mixed Use Sites Policy CC11 Derby Riverside Policy CC13 Railway Station Quarter Policy CC14 North Castleward I hope that this and all other representations regarding Policy HA7 are duly acknowledged and receive the attention that they deserve. Having seen past media reports in relation to the following of planning rules and

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					• The Council has already identified significant potential for future housing on both brownfield and city centre sites and these should be the priority for development. • Not only is the plan in conflict with national policy, it is also in direct contradiction to the Council's stated commitment to a "brownfield and City Centre first" strategy as laid out in Paragraph 81 of the Plan.	procedures in Derby, that seems doubtful, but one can only hope for improvement in such matters.
Simon Hodge	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to submit an individual representation opposing the proposed land allocation off Stoney Lane, Spondon, designated as Policy HA7 – Stoney Lane – 400 homes in the emerging Derby Local Plan. I believe Policy HA7 to be unsound and request that this allocation be reconsidered and removed from the Local Plan. 1. The allocation is not justified The proposed development would result in the loss of active agricultural land on the outskirts of Spondon. It has not been adequately demonstrated that the exceptional circumstances required to justify developing this land have been established. The site is not merely previously developed or of poor quality; its current agricultural use provides valuable open space and helps maintain the separation and character of Spondon. Constructing 400 homes would erode the boundary between Spondon and Ockbrook, undermining Spondon's unique character and community. The Council should clearly justify why this specific site is necessary and why	I therefore request that Policy HA7 be removed from the emerging Local Plan and that the land be reallocated to existing brownfield and city centre regeneration sites.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					reasonable alternatives cannot meet the housing needs before allocating this land for development. 2. Concerns regarding Green Belt designation The Green Belt issues warrant proper consideration. Although the consultation documents refer to the site as "Grey Belt," I am concerned that this designation should not automatically justify its allocation for development. The categorization of land within the Green Belt does not negate the need for the Council to thoroughly assess its actual characteristics, current agricultural use, contribution to preventing urban sprawl, and the implications of releasing it for development. The Council should provide clear evidence explaining why this site is suitable and essential for housing, rather than relying solely on its Green Belt classification. 3. Loss of agricultural land is a significant concern Developing 400 homes would permanently remove productive agricultural land. In light of current pressures on land use, food production, and environmental sustainability, the Council should consider whether permitting active farmland to be developed aligns with the best interests of residents and the environment. 4. Brownfield and regeneration sites should be prioritized I am concerned that the allocation of HA7 is unnecessary given the other housing opportunities	

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					identified in the emerging Local Plan. The consultation documents highlight significant capacity on brownfield and regeneration sites, including: Derby Riverside (Policy CC11) – 600 homes, Railway Station Quarter (Policy CC13) – 500 homes, North Castleward (Policy CC14) – 400 homes, and city centre mixed-use sites (Policy CC4) – 1,400 homes. This represents considerable potential housing capacity without encroaching on active agricultural land on Spondon's edge. The Council should demonstrate why these brownfield and regeneration options cannot be brought forward or accelerated before releasing greenfield agricultural land. The principle of prioritizing brownfield development appears to conflict with the proposed allocation, and the permanent loss of active farmland cannot be justified unless the Council can demonstrate a compelling need. Impact on Spondon Developing 400 homes would significantly and adversely affect Spondon's character and setting. The Council should conduct a comprehensive assessment of cumulative impacts on local roads, traffic, schools, community facilities, healthcare, drainage, flood risk, landscape, biodiversity, and wildlife, as well as the relationship between Spondon and the surrounding countryside. Spondon already faces infrastructure challenges—traffic congestion, drainage and flooding issues, shortages of GPs and schools—and adding 400 homes without plans for additional infrastructure would be detrimental.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Furthermore, the main access point from a high-speed road poses safety concerns. The agricultural land also supports local wildlife and is used by the community for walking and crossing between Spondon and Ockbrook. The Council must justify the environmental impacts before proceeding with this allocation. For these reasons, I consider Policy HA7 – Stoney Lane, Spondon – to be unsound. The allocation is unjustified because the Council has not demonstrated that releasing active agricultural land is necessary when sufficient brownfield and regeneration sites are available. It also conflicts with national planning policies, which require the Council to thoroughly assess the need for land release and prioritize previously developed sites before allocating productive agricultural land.	
Steven Hogg	Policy HA7: Stoney Lane, Spondon	Objects		No	Please deallocate Site HA7 (Stoney Lane, Spondon-400 homes) from the Local Plan. I believe the allocation to be UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests. Specifically, it: • misclassifies active agricultural Green Belt land as 'Grey Belt' • does not prioritise the reasonable use of brownfield alternatives, which is in conflict with the Plan's stated strategy.	

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					I am concerned about the additional pressures that 400 homes at this location would place on local infrastructure, and in particular the implications for the safety and congestion of roads. For years I have enjoyed pleasant walks through these fields and would be greatly saddened if this local access to nature and open space was destroyed. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated "brownfield and City Centre first' strategy (Paragraph 81)."	
Paul Hurst	Policy HA7: Stoney Lane, Spondon	Objects		No	As you should be aware traffic issues are a major concern in Spondon with some big housing developments already in progress in Spondon adding further strain to the traffic situation with no plans to improve the situation. If a bypass around Spondon was built the land proposed for building 400 homes on Stoney Lane would be needed to join the A52. With such an increase in population in Spondon this will impact dramatically to already stretched services in the area Schools, Doctors and other local services. With the amount of brown belt areas you have at your disposal within the city boundary I find it criminal to take good green belt land for house building.	
Ms Wanda Iskrzak	Policy HA7: Stoney Lane, Spondon	Objects		No	I want to raise my objection to the above proposed development.	I strongly request that the HA7 site is deallocated. The area as

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					You have incorrectly designated this land as grey belt, when it is actually green belt, in order for your proposal to be passed through. I also would like to highlight that this is inconsistent with National policy and contradicts the councils commitment to a, 'brownfield and city first strategy' The proposal is unsound, the site is agricultural land and further expansion will add to the urban sprawl and Spondon,s infrastructure can not support this housing estate, especially when there are brownfield and city housing opportunities that should be prioritised.	been has been misclasified as grey belt when it is green belt. The council should reallocate these 400 homes into existing brownfield and city centre regeneration allocations prioritised under CC4, policy CC11,policy CC13 or policy CC14 in accordance with the plans stated brownfield and city centre first strategy (paragraph 81)
Angela Johnston	Policy HA7: Stoney Lane, Spondon	Objects		No	I strongly object to the proposed development of 400 new homes off Stoney Lane, Spondon. Policy HA7 is unsound. The reasons for this are as follows: • The site is active agricultural land, rather than poor-quality or previously developed “Grey Belt” • The site currently performs an important Green Belt function. Development would contribute to the further expansion of urban development and urban sprawl. • There are significant pressures on local infrastructure, including roads, drainage and school capacity.	I am requesting that site HA7 (Stoney Lane, Spondon – 400 homes) be deallocated from the Local Plan. As stated previously, the allocation is unsound . It fails the ‘Justified’ and ‘Consistent with National Policy’ tests by misclassifying active Green Belt farmland as ‘Grey Belt’ without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing

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					• The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. • The proposed allocation appears inconsistent with the Plan's stated "brownfield and City Centre first" strategy.	brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81).
Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Object		No	As set out in earlier Regulation 18 stage representations, Harworth Group is supportive of the provisions of Allocation HA7 and is committed to delivering sustainable development where people want to live. The site presents a significant opportunity to deliver a high quality residential development in a highly sustainable location to assist in meeting Derby's identified housing need. The site is capable of delivering circa 450 no. new dwellings, including affordable dwellings, as part of an attractive landscaped setting with new public open space. Harworth Group has a number of comments which it kindly requests the Inspector takes into consideration. For ease of reference, the policy wording is provided in italics with Harworth Group's comments below.	**Land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an eastern urban extension to the suburb of Spondon.** Harworth Group is supportive of this requirement and has demonstrated through previous representations that the site has the capacity to deliver circa 450 no. dwellings. It is therefore agreed that the yield of the site should be expressed as a minimum. Harworth Group does, however, kindly request that the wording of this

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						sentence is amended as follows to reflect the relatively modest scale of the development and the origin on Spondon as a village: *'Land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an ~~eastern~~ ~~urban~~ extension to the ~~suburb~~ eastern part of Spondon.'*
Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Object		No	The Council will require: **a)** ***that the site delivers a minimum of 40% affordable housing subject to demonstrating that this is achievable;*** Harworth Group is committed to delivering sustainable development and recognise the important role affordable housing provision plays in this. However, it is noted that the affordable housing requirement for Allocation HA7 is expressed differently to the requirements set out in Policy HA4, which requires 'up to 40%' affordable housing on Green Belt sites, as opposed to a 'minimum of 40%'.	Harworth Group therefore, kindly request that the wording of this requirement is amended as follows to ensure consistency: *'that the site delivers ~~a minimum of~~ up to 40% affordable housing subject to demonstrating that this is achievable'.*

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					It is considered critical that site specific requirements and affordable housing policy requirements are consistent for the same type of development.	
Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Support		Yes	h) financial contributions for transport improvements off-site to be paid to the Council to mitigate for the highway impacts of the development; Harworth Group is committed to delivering accessible, sustainable development and, subject to viability, will deliver or fund the necessary upgrades to transport infrastructure to achieve this commensurate to the scale and impact of the development.	
Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Support		Yes	*i)* financial contributions towards the provision of improved education infrastructure to mitigate the impacts of development; Harworth Group is committed to delivering socially sustainable development and, subject to viability, will fund the necessary improvements to education infrastructure to achieve this commensurate to the scale and impact of the development.	
Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Support		Yes	Harworth Group is supportive of site specific requirements b), c), d), e), f), g), j), k) and l) and has no further comments to make in relation to these.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Sarah Juniper	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to the proposed allocation of land at Stoney Lane, Spondon under Policy HA7 for approximately 400 homes. In my view, this allocation is unsound because it is **not justified** and is **not consistent with national planning policy**. The decision to allocate this site has not, in my opinion, properly demonstrated that this is the most appropriate location for such a substantial amount of new housing, particularly when there are other opportunities within the existing urban area that should be considered first. **The site is active agricultural land** The land at Stoney Lane is not previously developed land. It is active agricultural farmland and should not simply be treated as an expendable area of land on the edge of the city. The fact that the land was harvested only weeks ago is a clear indication that this remains working agricultural land. It is therefore difficult to understand the justification for describing or treating the site as a form of lower-value "grey belt" land when it is actively used for agriculture. Once this land is developed, its agricultural use and open character will be permanently lost. **Further urban expansion and sprawl**	I therefore request that the Council **delete Policy HA7 and remove the Stoney Lane, Spondon site from the Local Plan as a housing allocation**. The 400 homes proposed for HA7 should instead be redistributed through suitable existing brownfield, city-centre and regeneration opportunities. In particular, the Council should investigate whether the housing requirement can be accommodated through the regeneration and development opportunities identified under its city-centre policies, including **Policy CC4, Policy CC11, Policy CC13 and Policy CC14**, where appropriate and where those sites are capable of being delivered. This would provide a much more consistent approach with the Council's stated brownfield and city-centre-first strategy,

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					The proposed development would extend the built-up area of Spondon further into open countryside. A development of 400 homes is not a minor rounding-off of the existing settlement; it represents a significant urban extension. This would contribute to the continued outward expansion of Derby and increase the pressure for further development around the edge of the city. There is a real concern that, once this area of open land is developed, the boundary of the urban area will simply move further into the surrounding countryside. The Council should be very careful about allowing a pattern of development that gradually erodes the distinction between the existing urban area and the countryside. **Existing infrastructure is already under pressure** There are also significant concerns about whether the local infrastructure can properly accommodate a development of this scale. Particular concerns include: • pressure on the local road network and junctions; • the ability of the existing drainage system to cope with additional development and surface-water runoff;	while avoiding the unnecessary loss of productive agricultural land and limiting further urban sprawl. In summary, I believe HA7 should be removed because the allocation is **unsound: it is not justified and it is not consistent with national policy**. The Council should make better use of its existing urban land and regeneration opportunities before resorting to the development of active farmland on the edge of Spondon. I respectfully ask the Council and the Planning Inspector to consider this objection and the requested modification when assessing the soundness of the Local Plan.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					• pressure on local schools and education provision; and • the wider effect of adding hundreds of additional households to existing local services. These are not minor matters that can simply be dealt with through contributions at a later stage. The starting point should be whether the location is genuinely suitable for 400 homes in the first place. It is particularly notable that Policy HA7 itself requires financial contributions towards transport and education infrastructure and a comprehensive surface-water drainage solution. This demonstrates that the Council is already aware that development at this location would place additional demands on infrastructure. **The proposed access is a serious concern** I am also concerned about the proposed access arrangements. The proposed single vehicular access onto Stoney Lane would serve a development of around 400 homes. In my view, this raises serious questions about highway capacity, congestion and the safety of people using Stoney Lane, including pedestrians, cyclists and existing residents.	

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					The Council should not rely on financial contributions or future highway works to overcome fundamental problems with the suitability of the access. If the proposed entry arrangement creates significant health and safety risks, that is a fundamental reason to reconsider whether the site should be allocated at all. **Brownfield and city-centre opportunities should come first** Derby has substantial opportunities for housing through the redevelopment of brownfield land, regeneration areas and underused sites within the existing urban area. Those opportunities should be prioritised before releasing productive agricultural land on the edge of the city for development. The proposed allocation therefore appears difficult to reconcile with the Council's stated **"brownfield and city centre first"** approach. If the Council's strategy is genuinely to make best use of previously developed land and regeneration opportunities before expanding onto greenfield land, then it needs to demonstrate much more clearly why those opportunities cannot accommodate the housing proposed for HA7. It is not enough simply to identify Stoney Lane as capable of accommodating 400 homes. The Council should demonstrate that reasonable brownfield and city-centre opportunities have	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					been properly assessed and optimised before deciding that active agricultural land should be released. **The allocation is not justified** For these reasons, I do not consider Policy HA7 to be justified. The allocation would result in the permanent loss of active agricultural land, further extend the urban area of Spondon, place additional pressure on already constrained infrastructure and create significant concerns regarding highway access and safety. At the same time, the Council has opportunities to direct housing towards brownfield and regeneration sites within the existing urban area. The evidence therefore does not demonstrate that allocating this particular site for 400 homes is the most appropriate strategy when reasonable alternatives exist. **The allocation is not consistent with national policy** I also consider Policy HA7 to be inconsistent with national planning policy because it would involve the release of greenfield agricultural land without sufficient justification for why development cannot be directed towards suitable previously developed and urban sites first. The Council should adopt a plan that makes effective use of suitable brownfield land, supports regeneration and avoids	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					unnecessary outward expansion where more sustainable alternatives are available.	
Simon juniper	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to you to raise my objections with the proposed policy HA7 stoney lane spondon 400 homes. Development. As a local resident and business owner of Ormskirk rise Spondon. I believe, along with many others that the proposal is unsound, for many reasons. Having lived next to the farm land for 15 years I can tell you that it has been farmed consistently and is most definitely viable not of poor quality. How this fits into being re-classified as grey belt is beyond me, it should remain as green belt as I don't believe it is justified and consistent with national policy, green belt is there to protect urban sprawl and this is exactly what is needed here. There are many other viable site that should be considered within derbys ample brown field and city centre first strategy. Spondon has recently seen a mass of new housing developments and the area is more than struggling to cope. with serious concerns to school places. Access to doctors surgery is nigh on impossible and there is no chance of getting a dentist. With regards to access to the site. I have some serious concerns around the road infrastructure as the proposed junction is already dangerous with drivers constantly crashing	

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					at the junction, with a massive increase in traffic this will only increase the serious risk of accidents and injuries. So in conclusion The green belt farmland has been misclasified as rebels. The plan is inconsistent with local housing strategy for brownfield and city centre first strategy Local infrastructure is under significant pressure This is the last green belt land east of the city and as such should be prioritised to protect urban sprawl	
Miss Mia Danielle Keeton	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a local Spondon resident to express my serious concerns regarding the proposed development of approximately 400 new homes off Stoney Lane, Spondon, Derby, identified in the Local Plan for Derby (2023–2043) as Policy HA7. I am not normally someone who feels compelled to make my views heard through public consultations; however, I believe the proposed allocation is unsuitable and that its wider and cumulative impacts on Spondon and the surrounding area have not been adequately considered. The land identified has been classified as 'Grey Belt'; however, I strongly question whether this classification appropriately reflects the nature and function of the site. The land has not previously been developed, is actively used for farming and agricultural purposes, and remains completely open and	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					undeveloped in character. Development of this scale would result in the permanent loss of this open landscape and fundamentally alter the character of this part of Spondon. I am also concerned that brownfield land and other possible alternatives have not been fully optimised before land such as this is considered for development. Derby City Council has identified numerous brownfield areas through its 'brownfield and City Centre first' approach (Paragraph 81). These sites should be prioritised wherever possible to regenerate underused areas, improve the city and protect established communities and remaining areas of open land. As a Spondon resident with a young family who has lived in the area for the past five years, I have already witnessed the pressures created by substantial developments that have been approved locally, including the Royal Hill Road site and the Bloor Homes development off Dale Road. These developments have contributed to the continued expansion of urban sprawl and increased pressure on local infrastructure, including schools, GP services, dentists, roads and drainage, alongside environmental and ecological pressures on local wildlife and habitats. The proposed HA7 development should therefore not be considered in isolation. The cumulative impact of existing, approved and proposed developments in and around Spondon must be properly assessed when determining whether the area can sustainably accommodate approximately 400 additional homes.	

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					Spondon may sit within the city boundary, but much of its infrastructure and road network continues to reflect its historic village character. Many roads are narrow and already experience significant traffic. I have serious concerns about whether the existing road network could safely and effectively accommodate the additional traffic generated by hundreds of new households, particularly alongside increased construction traffic and HGV movements during a development of this scale. The existing Bloor Homes development off Dale Road should also be considered when assessing the cumulative highways impact of further development in this area, as residents have already experienced increased traffic and disruption associated with development at this site. The impact of existing development provides an important indication of the pressures that further large-scale housing development could place on Spondon's road network. Development of the land off Stoney Lane would also affect an area valued by existing residents, including myself and my family, for access to the countryside, nature and walking routes. These routes provide connections towards neighbouring communities such as Ockbrook and Borrowash, allowing residents to enjoy the local countryside and access businesses and amenities in neighbouring villages on foot. Further development would also risk additional disturbance to wildlife and habitats that have already been affected by housing development elsewhere in the local area, including the development off Dale Road.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					My concerns extend to the people who would ultimately purchase and live in these proposed homes. Housing development must be accompanied by adequate infrastructure. Adding hundreds of households to an area without sufficient capacity within schools, healthcare services, roads, drainage and other essential infrastructure risks negatively affecting both existing residents and the future residents of the development itself. New housing should contribute towards creating sustainable communities rather than placing further pressure on infrastructure that is already under strain. I fully understand and support the need for appropriate housing, economic development and growth within Derby. However, this should not come at the expense of sustainable planning or the character and wellbeing of established communities. Brownfield and previously developed land should be properly exhausted and optimised, and the cumulative impact of development already taking place around Spondon should be fully understood before further large-scale expansion onto open agricultural land is pursued. These concerns are not mine alone. Through conversations with numerous local residents, I have encountered considerable concern about the proposed allocation and its potential impact on the future of Spondon. There is a genuine fear that continued development of this scale, without corresponding improvements to infrastructure and services, will permanently alter the character of the area and diminish the quality of life of both existing and future residents.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					I therefore respectfully ask Derby City Council to reconsider the inclusion of this land under Policy HA7 and to fully assess the suitability of alternative and brownfield sites before allocating this area for approximately 400 new homes. At a minimum, I believe the Council must be able to demonstrate that the proposed development can be accommodated without unacceptable impacts on local infrastructure, highways, the environment, wildlife, access to open countryside and the established character of Spondon.	
Neil Kellogg	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to formally register my objection to the inclusion of the **'Policy HA7 - Stoney Lane Site'** in the Local Plan for Derby (2023-2043) submission before it goes to the Planning Inspector. The land is and has been for as long as local people can remember greenbelt, a well used productive area of farmland and the inclusion is therefore completely unjustified. Never can it be considered to meet the requirements of being a 'greybelt' land category. 'Greybelt' requires the land to be 'failing' farmland and there is a lack of evidence in this respect which brings the conclusion that this site is clearly not consistent with National Planning Policy and should remain undeveloped 'greenbelt'. Surely as an active Local Planning Authority you must have to demonstrate that the use of all 'brownfield' sites for future residential development have been fully investigated and dismissed before turning to develop agricultural 'greenbelt' land under the guise that it is 'greybelt'.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					It is my understanding that this is not the case. I understand that there are still many areas of 'brownfield land' within the City still to be re-developed - please exhaust these sites before taking away productive farmland which if developed will be gone forever as a producer of food. This area of land has always been regarded as part of the 'green-wedge' separating Derby City and Erewash Borough Administrative Districts and should remain so. The land in its entirety needs to remain 'green-wedge' separating the long standing settlements of Spondon and Ockbrook, rather than dragging Ockbrook into the Derby City sprawl. You need to further encourage the re-development of the City core, increasing footfall to reinforce the financial strength of hospitality and City businesses before stretching housing out more thinly into the suburbs. Your adopted policy of 'City Centre First' included in the Plan seems to have been overlooked in this instance. Please keep me informed on progress of the Planning submission.	
Ruth Kellogg	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of Site HA7 at Stoney Lane, Spondon, for approximately 400 homes. I believe the proposed allocation is unsound and should be reconsidered for the following reasons.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					1. The site is active agricultural land The land at Stoney Lane is active agricultural farmland and should not simply be treated as an appropriate development opportunity without properly demonstrating why this land needs to be released for housing. Developing this site would result in the permanent loss of productive agricultural land and would extend the built-up area of Spondon further into the surrounding countryside. I am particularly concerned that agricultural Green Belt land is being considered for development when there appear to be significant opportunities for housing on previously developed and regeneration sites elsewhere within Derby. 2. Brownfield alternatives should be prioritised The Council already has substantial brownfield and city-centre regeneration opportunities identified for housing. These include: ● Derby Riverside (Policy CC11) – approximately 600 homes ● Railway Station Quarter (Policy CC13) – approximately 500 homes ● North Castleward (Policy CC14) – approximately 400 homes ● City Centre mixed-use sites (Policy CC4) – over 1,400 homes These allocations represent a significant number of potential homes on previously developed or regeneration sites. I therefore question why the Council needs to release an additional 400 homes-worth of active agricultural land on the edge of Spondon when substantial brownfield and city-centre opportunities already exist.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The Council should demonstrate clearly that these alternatives have been fully considered and that they cannot reasonably provide the housing capacity required before allocating agricultural Green Belt land for development. 3. The proposal appears inconsistent with the Council's own strategy The proposed allocation also appears difficult to reconcile with the Council's stated "brownfield and City Centre first" approach, referred to in Paragraph 81 of the Plan. If the Council has identified substantial opportunities for housing on brownfield and regeneration sites, these should be properly prioritised before releasing valuable agricultural land on the edge of existing communities. Allocating HA7 while these alternatives remain available appears inconsistent with the stated strategy. 4. Impact of further urban expansion Developing 400 homes at Stoney Lane would contribute to the further expansion of the urban area of Spondon. This is not simply a matter of adding another housing development. It would represent a significant change to the character and landscape of the area and would result in the loss of open agricultural land. I am also concerned about the cumulative impact of additional development on local infrastructure, particularly roads, drainage and school capacity.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The Council should demonstrate that the necessary infrastructure can accommodate the proposed development without placing unacceptable additional pressure on existing services and the surrounding community. 5. The allocation should be reconsidered For these reasons, I believe the proposed allocation of HA7 is not justified and is not consistent with the Council's stated approach to prioritising brownfield and City Centre development. I ask the Council to reconsider the allocation of Site HA7 and, where possible, meet housing requirements through existing brownfield and regeneration opportunities before releasing active agricultural Green Belt land. I therefore formally object to the allocation of Site HA7, Stoney Lane, Spondon, for 400 homes and ask that the site be removed from the Local Plan, or that its allocation is at least reconsidered following a proper assessment of all reasonable brownfield alternatives.	
Thomas Kellogg	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to register my objection to the proposed allocation of Site HA7 at Stoney Lane, Spondon, for the development of approximately 400 homes. I have concerns about both the principle of developing this particular site and whether the Council has demonstrated that it is necessary when there are other potential locations for housing within Derby. Loss of agricultural land and expansion of Spondon	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The proposed site is currently agricultural land and forms part of the open countryside surrounding Spondon. Developing it would result in the permanent loss of agricultural land and would push the built-up area further into the countryside. I do not believe this should happen unless the Council can demonstrate a clear need for this particular site and show that other reasonable alternatives have been properly considered first. Brownfield sites should be used before agricultural land There appear to be substantial opportunities for additional housing on brownfield and regeneration sites within Derby. The Local Plan itself identifies sites including: ● Derby Riverside (Policy CC11) – approximately 600 homes ● Railway Station Quarter (Policy CC13) – approximately 500 homes ● North Castleward (Policy CC14) – approximately 400 homes ● City Centre mixed-use sites (Policy CC4) – over 1,400 homes These sites have the potential to provide a significant number of homes without the need to develop active agricultural land on the edge of Spondon. The Council should therefore provide convincing evidence that these brownfield and regeneration opportunities cannot accommodate the required housing before agricultural land is released for development.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Inconsistency with the Council's stated approach I am also concerned that the allocation of HA7 appears inconsistent with the Council's stated "brownfield and City Centre first" strategy referred to in Paragraph 81 of the Plan. If the Council has identified substantial housing capacity within existing urban and previously developed areas, I believe those opportunities should be prioritised before extending the urban boundary into agricultural land. Pressure on local infrastructure A development of around 400 additional homes would inevitably increase pressure on the local area. There are already concerns about the capacity of local roads, drainage systems and schools, and the Council should demonstrate that the infrastructure required to support this development is available or can realistically be provided. The impact should also be considered alongside other existing and proposed developments in and around Spondon, rather than looking at HA7 in isolation. Request for the site to be reconsidered Taking these concerns together, I do not believe the case for allocating HA7 has been adequately demonstrated. In particular, I believe the Council needs to properly establish why active agricultural land should be released when significant brownfield and city-centre housing opportunities have already been identified.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					I therefore formally object to the proposed allocation of Site HA7, Stoney Lane, Spondon, for approximately 400 homes. I ask the Council to remove HA7 from the proposed Local Plan allocation, or at the very least to reconsider the site following a thorough assessment of all reasonable brownfield and regeneration alternatives.	
Chris Kemp	Policy HA7: Stoney Lane, Spondon	Objects		No	The council has classified the Stoney Lane site as "Grey belt" to justify moving it from Green belt. However, national planning policy defines grey belt as previously developed, poor quality or under performing greenbelt land. Stoney Lane site is an active agricultural farmland that helps prevent urban sprawl and performs an important Green Belt function. This policy is unsound, not justified and not consistent with national policy and I wish to Challenge this proposal and register my objection. It is not justified- * The council has wrongly categorised active agriculture farmland as Grey belt * It has not demonstrated that all reasonable brownfield alternatives have been fully considered It is not consistent with National Policy- * Allocating working farmland as Grey Belt conflicts with national planning policy * The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (paragraph 8.1), yet this allocation releases Green Belt farmland before fully utilising Brownfield sites.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					* Brownfield alternatives already available- The council already has major Brownfield sites allocated for housing, including- * Derby Riverside bracket (policy CC11) – 600 homes * Railway station Quarter (policy CC13) – 500 homes * North Castlewood (policy CC14) – 400 homes * City Centre mixed use sites (policy CC4) – over 1400 homes	
Derek Kemp	Policy HA7: Stoney Lane, Spondon	Objects		No	Regarding the subject of development- proposed 400 new homes on active farmland off Stoney Lane, Spondon. The council has classified the Stoney Lane site as "Grey belt" to justify moving it from Green belt. However, national planning policy defines grey belt as previously developed, poor quality or under performing greenbelt land. Stoney Lane site is an active agricultural farmland that helps prevent urban sprawl and performs an important Green Belt function. This policy is unsound, not justified and not consistent with national policy and I wish to Challenge this proposal and register my objection. It is not justified- * The council has wrongly categorised active agriculture farmland as Grey belt * It has not demonstrated that all reasonable brownfield alternatives have been fully considered It is not consistent with National Policy- * Allocating working farmland as Grey Belt conflicts with national planning policy	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					* The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (paragraph 8.1), yet this allocation releases Green Belt farmland before fully utilising Brownfield sites. * Brownfield alternatives already available- The council already has major Brownfield sites allocated for housing, including- * Derby Riverside bracket (policy CC11) – 600 homes * Railway station Quarter (policy CC13) – 500 homes * North Castlewood (policy CC14) – 400 homes * City Centre mixed use sites (policy CC4) – over 1400 homes. The proposal takes no regard to the continuing issues of increased traffic, lack of increase in educational needs, doctors surgeries etc. The term "greybelt" is now an excuse to designate areas that would never be considered for development. Greenbelt is essential for all our health and wellbeing that is why we have it!	
Brian Kennedy	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to express my concern regarding the unsound reclassification of the Stoney Lane, Spondon site (HA7) from Green Belt to Grey Belt. This is active agricultural farmland and the reclassification is therefore contrary to national planning policy, particularly with several alternative brownfield sites available within the Derby area. Current residents of Spondon are already well-aware of the traffic constraints on leaving the area. Willowcroft Road and Nottingham Road are routinely at a standstill during peak periods, and they remain the only practical routes towards Derby. Frequent roadworks only worsen the situation. Locko	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Road has its own congestion problems and, for many, would involve a significant increase in mileage, fuel use and travel time simply to exit Spondon. Doctors' surgeries, schools, and local infrastructure are already under increasing strain with residents of what was once a quiet village environment now being steadily absorbed into the expanding Derby urban sprawl. Another 400 homes on top of the ongoing Dale Road development is not realistic or sustainable. The proposal is wholly inappropriate and should be halted without delay.	
Lisa Kenny	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy Is "**UNSOUND**" • Not Justified • Not Consistent with National Policy Development Of 400 high quality houses- off Stoney Lane. **Questions for the Developers**:- **Will** the high quality homes have 3 or more bedrooms? **Will** some of the high quality homes be over 2 stories high if so how many & how high? **Is it** expected/ predicted 4 or more people in each home? Could it be 6-8 people? How many? **Is it** expected/ predicted each of the 400 homes might, have people visiting them? it might be friends, family, health professionals, council workers, traders, etc. **Is it** expected/ predicted that any children will be living in these high quality homes & affordable houses?	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Will there just be one developer for the site, or will there be more than one? If so who are they? **Will** some of the properties be DWELLINGS? **How** many affordable houses/ homes/ dwellings will there be? **Will** the developer actually adhere to this (affordable dwellings)? Have they done in the passed with previous developments or is it just a prediction that never happens? **What** is the track record for the developers to develop infrastructure? **Do** the developers:- Build schools (or allow land for a school)? Build Doctors Surgeries (or allow land for a doctors surgery)? Build community base hubs (or allow land for a community hub)? Bus stops? Are they in the plans? Roads, wide enough for parking on both sides? Even if people have drives – they tend to have visitors! **Will** the developers improve the Road down/alone Stoney Lane, to take into account the increase in traffic? OR- will the council have to put double yellow lines along the road (at the cost of the tax payer) due to the road being too narrow? **Spondon** has one road in & one road out of Spondon Village, which is very narrow, how will the developers, resolve this? Traffic is already, very bad! **What** will the developers do to improve the traffic flow from the A52?	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Has a survey been done re traffic flow off the A52 and around Spondon, if so by whom & when, over what period of time? **How** many, People are expected/ predicted to Live & visit, this site on Stoney Lane? (??? Three or more thousand) **How** long will it take (approximately) to Build the high quality houses & dwellings? On Stoney lane. Have the Developers kept their word on other developments? – how trustworthy are they?, who oversees & holds them to account on this development, on what they do, or don't do? Council:- **What** is the Council expected to do after the Developers have developed the land? **I wish to highlight the following**:- The Deallocated site HA7 Stoney Lane – 400 Homes The site is **active agricultural land,** rather than poor -quality or previously developed "GREY BELT" **(Misclassification on the part of the developers or planning).** Development would contribute to the further expansion of urban development sprawl. **There are significant pressures on local infrastructure,** including Roads, Drainage, School capacity, Doctors. The council has substantial brownfield and city- centre housing opportunities which should be prioritised before releasing "**GREEN BELT"** farm land for development.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The proposed allocation appears inconsistent with the Plans stated <u>"brown field and city centre first"</u> strategy (Paragraph 81)**.** Hence this this development for the Proposed Allocation of 400 houses off Stone Lane is **<u>UNSOUND.</u>**	
Vincent Kenny	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy Is "**<u>UNSOUND</u>**" • Not Justified • Not Consistent with National Policy The area is not suitable, due to lack of infrastructure of amenities, poor roads, location, risk of further flooding. This is farmed green belt land with wild life living in it! **I strongly object to Policy HA7.** **<u>The proposed allocation appears inconsistent with the Plans stated "brown field and city centre first" strategy (Paragraph 81). Hence this this development for the Proposed Allocation of 400 houses off Stone Lane is UNSOUND.</u>**	
Lindsay Kerry	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as “Grey Belt” I am particularly concerned by the Council’s treatment of this site in relation to the emerging Grey Belt approach.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that:	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					* the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure. Requested modification I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing;	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available. I ask that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector for consideration as part of the Regulation 19 examination.	
Mrs Margaret Key	Policy HA7: Stoney Lane, Spondon	Objects		No	This policy is unsound in as much as it is not justified and is not consistent with National Policy. The site is active agricultural land not poor quality or previously developed 'grey belt'. Development would contribute to the further expansion of urban development and urban sprawl. There are significant pressures on local infrastructure including roads, drainage, medical and school capacity. The council has substantial Brownfield and city Centre housing opportunities which should be prioritised before releasing Greenbelt farmland for development.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The proposed allocation appears inconsistent with the plan stated to “Brownfield and city centre first“ strategy. de allocate site HA7 bracket stony Lane, pond – 400 homes closed brackets from the local plan. Green belt farmland has been misclassified as grey belt without demonstrating that all reasonable Brownfield alternatives have been fully optimised, making this allocation unsound as it fails the “justified“ and “consistent with national policy“ tests. Existing Brownfield and city centre regeneration allocations prioritised on the policy CC4, policy C11 (Derby Riverside) policy C13 (railway station Quarter) or policy C14 (North Castlewood) should have the reallocation of the 400 dwellings in accordance with the plan stated “ brownfield and city centre first“ strategy (paragraph 81). Spondon is already overpopulated with roads jammed with too much traffic, schools overcrowded and doctors inaccessible.	
Michael Kightly	Policy HA7: Stoney Lane, Spondon	Objects		No	Regarding above policy, doe`s any one even realise that we are well over loaded with traffic,Got insufficient Doctors,Dentists,Schools and Congestion. Already i believe other homes are being planned or in progress around Spondon. This is a working farm and this goes against National Policy. It is NOT a sound proposal and prevents urban sprawl. There is plenty of brown field areas including DerbyRiverside, North Castleward, Around the station currently around 3,000 homes.,	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Apartments etc etc . I cant see how you could justify this proposal going through. The village is small, narrow roads to which with even more traffic could be an accident to happen. Please listen to village residents and dont pass this rediculous plan.	
Brajan King	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to Policy HA7 – Stoney Lane, Spondon as part of the Regulation 19 consultation. I understand Derby needs more housing, including affordable housing, and I'm not against development in Spondon in principle. My concern is whether this particular site has been sufficiently justified for a minimum of 400 homes. One concern is the loss of agricultural land. The Council's Sustainability Appraisal identifies HA7 as Grade 3 and 4 agricultural land and gives the impact on soils a Significant Negative rating. I contacted the Council about this and have been told that no agricultural land survey or reclassification has been carried out for HA7. The Natural England regional map I was directed to specifically says it does not distinguish between Grade 3a and 3b, which normally requires more detailed survey work. This means we currently don't know whether some of the Grade 3 land is Grade 3a and therefore considered Best and Most Versatile agricultural land. Given that this farmland will be permanently lost, I think this should be established. My bigger concern is transport and the cumulative pressure on Spondon.	I would like HA7 to be reconsidered, or for the Council to provide clearer evidence before progressing the allocation, particularly the completed HA7 transport modelling, cumulative impact of surrounding developments and a detailed Agricultural Land Classification assessment.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The Council has confirmed to me that further modelling specifically looking at HA7's transport impacts and the required mitigation is still being undertaken. It therefore seems strange that residents are being asked whether the plan is sound before this work is available. This is particularly relevant as the Transport Assessment for the much smaller Royal Hill Road development already identifies the Willowcroft Road/Nottingham Road junction as operating over capacity, with limited scope for physical improvements. I also question how sustainable HA7 will be in practice. Even from the closest existing houses to the proposed site, Spondon station is around a mile and 25 minutes' walk away, with no station car park. The Council's Sustainability Appraisal refers to walking/cycling connections and possible bus access, but the detailed transport work showing how this will actually operate has not been done. There also needs to be proper consideration of the cumulative development around Spondon. Fawndale Rise may technically be in Erewash, but it is effectively joined onto Spondon and its residents will use many of the same roads, schools, shops and other services. Royal Hill Road and other nearby development also need to be considered alongside HA7. For these reasons, I consider Policy HA7 to be unsound as it has not been sufficiently justified.	
Ian Lakin	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to voice my opposition to the proposal, identified as Policy HA7, to build 400 new homes on active farmland off	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Stoney Lane, Spondon, Derby. I find it difficult to believe that The Council has classified this site as “Grey Belt” bearing in mind it provides a beautiful walking route to Victoria Avenue, Ockbrook with the footpath flanked by hedgerows and fields before crossing a secluded stream over a pretty footbridge. Over the course of this long hot Summer it has been a consistent pleasure, particularly in the evening, to walk along this path. The fields between Spondon and Ockbrook are an important and popular stretch of the countryside that add a great deal to the residents’ quality of life and sense of well being. Furthermore this proposal appears to contradict The Council’s own commitment to a “brownfield and City Centre first” strategy, with sites such as Derby Riverside, Railway Station Quarter, North Castleward and City Centre Mixed Use Sites available as brownfield sites. Policy HA7 would also increase significant pressures on local infrastructure, including roads, drainage and school capacity. I therefore believe that Policy HA7 is unsound.	
David Lewis	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to voice my concern with regard to the proposed allocation of 400 houses off Stoney Lane Spondon. This policy HA7 is UNSOUND. Not Justified and Not consistent with National Policy. There are significant pressures on local infrastructure eg local shops, Doctors.	

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					Drainage, When we have significant rainfall water drains from the lower end of Stoney Lane on to the A52. These 400 houses should be re-allocated to existing brownfield and City Centre regeneration allocations. In line with the Plan's stated "brownfield and city centre" first strategy.	
Kate Licence	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to confirm that I believe that the policy above is unsound as it fails the justified and consistent with national policy , there are alternatives that can be looked at such as Derby riverside why allocate active agricultural farmland. The development would contribute to further expansion of urban development and urban sprawl! There is already significant pressure to the infrastructure including roads drainage and school capacity.	
Joanne Lovett	Policy HA7: Stoney Lane, Spondon	Objects		No	I consider the proposed allocation of land at Stoney Lane, Spondon (Policy HA7 - 400 homes) to be UNSOUND on the following grounds: • Not Justified • Not Consistent with National Policy Reasons and Evidence The proposed allocation raises significant concerns about the justification for releasing this land for housing. The site comprises active agricultural land and should not, in my view, be treated as an appropriate form of "Grey Belt" land simply to facilitate further expansion of the urban area.	I therefore request that the Council **deallocates Policy HA7 (Stoney Lane, Spondon - 400 homes)** from the Local Plan. The 400-home requirement should instead be reviewed against the capacity available within existing brownfield and city-centre regeneration locations, with priority given to opportunities identified

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The loss of productive agricultural land to development requires particularly strong justification, especially where there are other opportunities for accommodating housing within existing urban areas. Development at Stoney Lane would also represent a further outward expansion of development around Spondon, contributing to urban sprawl and the continued erosion of the Green Belt. The cumulative effect of such allocations should be considered alongside the individual merits of the site. Once this agricultural land is developed, its contribution to the openness and separation of settlements cannot readily be recovered. There are also concerns about whether the necessary infrastructure can adequately support a development of approximately 400 homes. Existing pressures on the local road network, drainage infrastructure and school capacity need to be properly assessed and addressed before such an allocation is confirmed. Infrastructure improvements should not simply be assumed to follow development where there is uncertainty about whether existing networks have sufficient capacity. More fundamentally, the Council should demonstrate that its available brownfield, urban and city-centre opportunities have been fully and realistically explored and optimised before releasing Green Belt agricultural land for housing. There appears to be a tension between the allocation of HA7 and the Plan's stated approach of prioritising brownfield land and city-centre opportunities.	through **Policies CC4, CC11, CC13 and CC14,** or other suitable previously developed land. This would provide a more coherent approach with the Plan's stated **brownfield and city-centre-first strategy,** while avoiding the unnecessary loss of active agricultural Green Belt land and reducing the contribution of the allocation to further urban sprawl. Accordingly, Policy HA7 should be removed because its allocation is **UNSOUND: Not Justified and Not Consistent with National Policy.** As a resident of Stoney Lane, I am so shocked that you are planning to have the entrance to the site on an already dangerous and busy part of the road, which is also a main walkway for not only junior

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					In particular, the Plan should demonstrate why the required housing capacity cannot instead be accommodated, wholly or partly, through existing or enhanced regeneration opportunities, including the areas identified under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward). The justification for HA7 therefore appears insufficient when considered against the availability of alternative locations within the existing urban area. Allocating agricultural Green Belt land while substantial brownfield and regeneration opportunities remain is difficult to reconcile with a genuine "brownfield and City Centre first" approach. For these reasons, I consider that the allocation has not been adequately justified and does not demonstrate sufficient consistency with the relevant national planning approach to Green Belt release, particularly where reasonable alternatives within the existing built-up area have not been shown to have been fully optimised.	aged children but also a busy nursery! This is an accident waiting to happen and I would like to know if there is plans to build an extra Doctors in the area too?
Audrey & Rob Mann	Policy HA7: Stoney Lane, Spondon	Objects		No	The proposed site is agricultural land, rather than poor-quality. The council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. This appears inconsistent with **the Plan's stated "brownfield and City Centre first"** strategy.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Development would put more pressure on: - local school capacity - access to Doctors and Dentist - water management i.e. drainage etc - roads - entry and exit to the site is extremely close to the A52, I'm worried that queues could be backed up onto a very busy road (and that myself could be in one of these queues). The Council should relocate these 400 dwellings to existing brownfield and city centre regeneration that I believe are live within the Derby City Centre	
Paula Maples	Policy HA7: Stoney Lane, Spondon	Objects	No	No	Not justified and not consistent with National policy . The site is active agricultural land, not poor quality "grey belt". There are significant pressure already on schools, doctors and roads with heavy queues to leave the village every day.	The allocation is unsound as it fails the justified and consistent national policy test by misclassifying the land as Greg Belt. The "Deallocation of site HA7" is required from the local plan. The 400 dwellings need to be reallocated to existing brownfield and city centre regeneration allocations prioritised under Policy CC11, CC13 or CC14.
Bernard Marsh	Policy HA7: Stoney Lane, Spondon	Objects		No	I am a resident of Spondon [redacted] and I am concerned about the number of new houses proposed in the HA7- Stoney Lane, Spondon.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					My objections are as follows 1. The site is used as agricultural land NOT BROWN SITE 2. We had in the recent past RAW SURAGE RUNNING DOWN Sandringham drive,the sewage plant would not be able to cope. 3. The surgery would not be able to cope 4. The traffic is bad through Spondon now with HGV going through we need a 7.5 ton limit. 5. The school run parking will get worse. I may well think of other obections later	
Nicholas Maxwell	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of 400 homes on Stoney Lane, Spondon, and to ask that Policy HA7 is reconsidered as part of the current Local Plan consultation. My main concern is that the proposed development would result in the loss of active agricultural land and would represent a further expansion of development around Spondon. I do not believe this is an appropriate location for such a substantial housing allocation when other previously developed and regeneration sites are available elsewhere in Derby. The Stoney Lane site is productive agricultural land and should not, in my view, simply be treated as a “Grey Belt” site without properly demonstrating why reasonable alternatives have been exhausted. The loss of farmland is particularly concerning given the long-term and irreversible nature of development.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					I am also concerned about the impact the development would have on bees, pollinating insects and other wildlife. Agricultural land, hedgerows, field margins and surrounding habitats can provide important food, shelter and nesting areas for bees, birds, mammals and other species. Building 400 homes could lead to habitat loss, disturbance, increased traffic, light pollution and the fragmentation of wildlife corridors. This could have a lasting effect on local biodiversity, particularly at a time when bee populations and other pollinating insects are already under pressure. Any assessment should properly consider these impacts and demonstrate how they would be avoided, reduced or adequately mitigated. I am also concerned about the additional pressure 400 homes would place on local infrastructure, including roads, drainage, schools and other services. Spondon already experiences pressures associated with traffic and local infrastructure, and I would like these matters to be properly addressed before any decision is made to allocate this site. I note that the Local Plan identifies significant opportunities for housing on brownfield and city-centre sites, including Derby Riverside, the Railway Station Quarter, North Castleward and other city-centre mixed-use sites. These opportunities should, in my opinion, be fully prioritised before releasing active agricultural land and wildlife habitat for development. I therefore ask the Council to consider the following:	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					- That Policy HA7 is regarded as unsound, specifically on the grounds that it is not justified and not consistent with national planning policy, where applicable. - That the Council properly assesses whether sufficient brownfield and regeneration opportunities are available before allocating this site. - That the Stoney Lane allocation is reconsidered in light of the loss of agricultural land, the potential harm to bees and wildlife, the impact on Spondon's infrastructure and the Council's stated approach of prioritising brownfield and city-centre development. - That the proposed 400-home allocation is removed or appropriately modified if the evidence does not demonstrate that the site is necessary, justified and suitable. - That a thorough ecological assessment is carried out, including consideration of bees, pollinators, wildlife habitats, hedgerows and wildlife corridors, before any allocation is progressed. Please treat this email as my individual representation regarding Policy HA7 – Stoney Lane, Spondon – 400 homes.	
David & Sarah McArdle	Policy HA7: Stoney Lane, Spondon	Objects		No	Even before I present my reasons why this proposed development goes ahead, I would like to point out the land is an active farm, not a grey belt area. What should be done is a Public Enquiry into who and how this was reclassified from historic Green Belt to Grey belt. What process was undertaken, why did the residents in the area not get notification or opportunity to offer opinion or objections to the reclassification. Who benefits from this, an individual, individuals, councils or organisation?	

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					The proposed grey belt plot fails to be classed as grey belt, for the following reasons: 1. Previously Developed Land (PDL). This land has never had any previous development upon it, dating back to before the spread of Derby to include Spondon 2. Low-Contributing Green Belt Land (The Purposes Test). Only this week the farmer was out muck spreading the field, making it ready for crops to be sown, either late Autumn or early Spring. If the field was low contributing the farmer would not use time and limited resources on it. Pictures have been attached. Also, under NPPF (Footnote 7) the argument is that the site has ancient public footpaths and bridleways. Labour stated in their election campaign the following, when referring to grey belt. • poor quality land, car parks and wastelands • poor quality scrubland, mothballed on the outskirts of town • a car park or similar land which does not affect the beauty of the countryside • a disused petrol stations The proposed site fails to meet any of those criteria, thus is not consistent with National Policy. The Council has failed to exhaust all of the available brownfield sites, across various parts of Derby, which in moderate estimates would yield 3000 homes, which currently have existing networks of utilities,	

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					roadways and bus routes already there, and access to larger schools, and / or the capability of building new ones. Spondon does not have that, unless you dig up more working farm fields. This renders the council failing to adhere to the principle of 'brown field and City Centre first'. I am not sure if any laws have been broken, or if any laws cover the act of randomly changing land from green to grey, to develop housing, where 3000 much easier and more sensible and cost effective solutions exist, however someone needs to be investigated as to why perfectly good farmland was targeted.	
Roger W Meggison	Policy HA7: Stoney Lane, Spondon	Objects		No	In my opinion the Policy HA7 is unsound. There is already significant pressure on the local infrastructure including roads and schools around Spondon. This proposal seems not to be consistent with the "brownfield and City Centre first" strategy. I also believe the land has been missclasified and the Council should reallocate the 400 homes into available brownfield sites and the city centre regeneration allocations. This proposal would cause additional expansion of urban development and sprawl.	This HA7 proposal for 400 homes should be removed from the Local Plan because of the above points and missclassification of the farmland as "Grey Belt" when alternative brownfield sites have not been fully explored.
David Miller	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to register my objection to the above policy as I believe it to be Unsound as it is Unjustified and is not consistent with national policy.	

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					The reasons for this are as follows: a. The site is, and always has been , active agricultural land. It is not Grey Belt. b. The site is an effective limit on the urban sprawl of Spondon which is already under great pressure for services. There is mounting pressure on schools and G.P services.The roads in the village are also severely congested. c. There are several brownfield and urban regeneration sites within Derby which would deliver housing in the city and provide urban renewal.	
Gordon Mills	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to lodge my objection to the proposed housing development of 400 homes at **Stoney Lane, Spondon (Policy HA7)** and to request it is de-allocated from the Local Plan. There are several reasons for my objection:- • The site has been mis-classified as "Grey Belt" when it is actually active Green Belt farmland. • More appropriate Brown Belt sites exist in Derby for such a development. • Spondon was already at "full capacity" before 2 other developments were recently approved and are underway.	Please de-allocate Policy HA7 from the Local plan before more money and effort is wasted in promoting a development which is unsound and at odds with Local and National policies.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					• As such, a further development of this scale (400 dwellings) will impose an unrealistic additional burden on the infrastructure of Spondon. • The proximity to the busy A52 by-pass road makes it unsuitable for housing due to noise and air pollution from traffic. • The development appears to be taking the "easy option" of developing Green Belt rather than better utilising City centre space. • This further reduction of farmland impacts the need to improve food security and self sufficiency for the UK as a whole. • Neglecting City centre Brown Belt opportunities extends urban sprawl with significant negative environmental effects. • Policy HA7 is not consistent with the "brownfield and City Centre first" strategy.	
Patricia Mills	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to express my concerns about the proposed housing development **Policy HA7** planned for the bottom od **Stoney Lane Spondon Derby** **My main concerns are;** • The site chosen is not "Grey Belt" as classified by Derby Council but is in fact "Green Belt" ; it is active farmland. I pass this site everyday and in fact used to live nearby. • There are several "Brownfield" alternative sites in Derby which could be used. • This plan is not consistent with National Policy where brownfield sites should be used where available.	

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					Brownfield sites in Derby include The Railway Station Quarter, Derby Riverside, and North Castleward. • Spondon is already undergoing 3 very large housing developments which will lead to increased traffic and will overstretch services such as local schools, doctors and dentists. • The proposed Stoney Lane housing development borders the very busy A52 road to Nottingham and would result in future residents suffering from polluted air and constant noise. Hardly ideal living conditions. **In Summary Policy HA7 is;** • Not Justified • Not Cosistent with National Policy Therefore the Policy is **UNSOUND** and I therefore ask you to reject it for all the reasons given.	
Paul Neal	Policy HA7: Stoney Lane, Spondon	Objects		No	Living in the immediate area of this proposal, I would like to register my objection for the proposed site of possible 400 homes on the development. The proposed allocation of this site is considered "Unsound", **(1) Not Justified**, and is **(2) Not Consistent with National Policy**. For the following reasons: 1. **Not Justified** Declassifying the land from "Green Belt" to "Grey Belt" to enable building has been incorrectly categorised, as this land	

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					has been, for many years, and still is, currently used for Agriculture/crop growth. There are other areas in Derby that are classified as "Brownfield/Grey Belt" and should be utilised before destroying green spaces, that are currently being enjoyed both by residents to walk and for farming. I have major concerns regarding safety as traffic leaving the A52 onto Stoney Lane as the exit lane from the A52, is short, along with the proposed location of the road to the proposed site would cause an accident hot spot, additional traffic leaving the proposed site road entering the A52 would cause traffic problems on Stoney Lane. The area is already struggling to provide services for residents already housed namely; doctors, dentists, schools and a limited bus service shared with Chaddesden. **2. <u>Not Consistent with National Policy</u>** The Council should reconsider the allocation of actively used agricultural land which conflicts with the principles of the national planning policy and directly contradicts the councils own commitment to use alternative areas first. For the proposed 400 homes should therefore be shared out between the " Brownfield/Grey Belt" and "City Regeneration" allocations, and not declassify Green Belt areas as in accordance with Paragraph 81 of the plan.	
Robert and Karen Norton	Policy HA7: Stoney Lane, Spondon	Objects		No	My wife and I wish to state our objections to the proposed construction of 400 new homes adjacent to Stoney Lane, Spondon - Policy HA7. We believe this Policy is unsound. It is	

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					inconsistent with national housing policy and not justifiable as a project. Our reasons are as follows: The proposal to build on this site contradicts the Local Plan for Derby's own housing strategy, which states that brownfield and city centre sites should be considered before those in the outer suburbs (see Paragraph 81 of the Plan). There are both brownfield and city centre alternatives. These are located at Derby Riverside, North Castleward, the Railway Station Quarter and various other mixed-use city centre sites. Collectively, these have a capacity for some 2,900 homes. Therefore, the Council should be locating any new housing at these sites first before considering the development at Stoney Lane. Because of their central location these sites would afford new residents much better access to schools, transport facilities, hospitals and other medical services, and other community facilities than would an estate on the outskirts of Spondon. Our understanding is that the only local secondary school in the Spondon area, West Park, has no capacity for providing additional school places at all. Both the local GP surgeries struggle to offer appointments to their existing patients so will inevitably struggle if there is pressure to take on new ones. We understand the land earmarked for the new housing is liable to flooding, which surely makes it unsuitable for	

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					housebuilding. Further, Spondon already has a significant problem with traffic, and the addition of 400 new houses will only make things worse. I understand that the Council has redesignated the Stoney Lane site as Grey Belt, thus overturning its original status as Green belt. National Planning Policy states that Green belt land may be redefined as Grey belt if it has been developed already; is of poor quality; or is underused as Green belt land. This land is productive agricultural land so doesn't appear to fit into any of these three categories. It acts as a buffer between Spondon and the neighbouring villages of Ockbrook and Borrowash thus helping to prevent urban sprawl, which, as you will be aware, is what Green belt was intended to do. For these reasons designating the land as grey belt isn't justified and isn't consistent with National Policy. Policy HA7 is therefore unsound. We understand that the exit road from the new estate would emerge right on top of the junction where Stoney Lane meets the A52. This is already a poor junction. It has an inadequate slip road for traffic leaving the A52 and the driver's view of what is ahead when they make their exit is poor due to vegetation and a tight bend. Traffic may struggle to avoid cars emerging right on top of them from the side road, even at 30mph. In short, it will make using the A52 exit road quite dangerous - there have been serious accidents here already.	

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					Spondon is already a large village, but up until now has managed to maintain a good community atmosphere. There is decent social cohesion, and many Spondon residents are active in their community because they cherish it. If it becomes yet another characterless, ugly urban sprawl then this community spirit and social cohesion could easily be lost. We urge you to reconsider Policy HA7 and build elsewhere. Thank you for considering our objections.	
Alison Nunn	Policy HA7: Stoney Lane, Spondon	Objects		No	I am emailing to object to this planning application for the following reasons: 1. This is "unsound" as the land has been incorrectly classified as Grey belt when it is in fact a very active, productive farmland and therefore is agricultural land-green belt. This land is not poor quality and has sheep and other livestock grazing on it. 2. The council has not ensured that all brownfield sites have been taken into consideration first. 3. The local plan is not compliant with National Policy of "brownfield and city centre first". There are many alternative brownfiled sites including ; Derby Riverside(policy CC11);Railway Station Quarter(CC13);North Castleward(CC14);City centre Mixed -use sites (CC4). 4. This development would put increasing pressure on roads, drainage, local facilities like doctors and schools. The housing already underway on Dale Road	

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					will increase all these pressures. Spondon cannot survive with more housing.	
Laura Nuttall	Policy HA7: Stoney Lane, Spondon	Objects		No	This representation relate specifically to policy HA7 Stoney Lane Spondon regarding the proposal to build 400 homes. I believe that the policy is unsound. It is not justified as the council has incorrectly categories active agricultural farmland as grey belt without demonstrating that all reasonable Brownfield alternatives have been fully considered. It is not consistent with national policy as allocating active agricultural farmland for development conflicts with the principles of national planning policy. Further or more it appears to directly contradict the councils and commitment to a Brown field and city centre 1st strategy which is set out in paragraph 81 of the plan. I would like to highlight the following points. The land is not poor quality or previously developed. It is active healthy agricultural land. The proposed development would further contribute to the expansion of unappealing urban development and sprawl in the area. There are already significant pressures on local infrastructure, including Our roads drainage School capacities dental surgeries Doctors and pharmacies. There is no proposal to	In conclusion, please deallocate site HA7 from the Local plan. The allocation is unsound and inconsistent with national policy. The proposed 400 dwellings should be prioritised under policy CC4, Policy CC 11, Policy CC 13, or policy CC 14. This would align with the plans stated Brownfield and city centre first strategy of paragraph 81.

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					increase any of these services to the area and therefore it's not suitable for a further 400 homes. The council already has substantial Brownfield and city Centre housing opportunities which should be prior authorised before releasing our Greenbelt farmland for development. The plan contradicts the strategy of Brownfield and City Centre first please leave our village area alone.	
Mr J.m and Mrs Ja Oldershaw	Policy HA7: Stoney Lane, Spondon	Objects		No	Dear Sirs,re the above proposed development foe 400 homes,this policy is deemed to be UNSOUND.This site is NOT GREY BELT,It. is active agricultural GREEN land. There are multiple BROWN field site able to accommodate such developments. Furthermore Doctors,dentists,schools are already over stretched!!roads are also congested in Spondon.The above reasons are therefore in our opinion contra to any further development.	
Josh Ong	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to you regarding Policy HA7 - Stoney Lane Spondon. The policy is unsound for the following reasons: 1. The site is active agricultural land, rather than poor quality or previously developed “Grey Belts”. 2. The council has substantial brownfield and city centre housing opportunities which should be prioritised before releasing Green Belt farmland for development.	

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					The council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castlewood), in accordance with the Plan's stated 'brownfield and city centre first' strategy (Paragraph 81).	
Kevin Palmer*	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to policy HA7 in the Plan which allocates good and active farmland off Stoney Lane, Spondon, currently identified as Green Belt, for residential development of some 400 homes. Background: The land has always been agricultural and as a pupil more than 60 years ago at Asterdale Primary School on the other side of what was then known as the Borrowash by-pass we used to be taken across to the fields for nature walks. During the Covid pandemic many people used to go across this land for walks across the fields for exercise and fresh air, sometimes taking very popular routes into Ockbrook and back. The land is in the Green Belt - including on the current Local Plan - and this was designed to keep the communities of Spondon in Derby and Ockbrook in Erewash apart and separate rather than joining together and producing an enlarged conurbation linking the cities of Derby and Nottingham..This was demonstrated before the last Derby and Derbyshire County Structure Plan around the turn of the century when there were very strong objections by people from Spondon and Ockbrook and Borrowash about the idea	For these reasons I opposed the policy HA7 and ask that it be removed from the Local Plan, with the council looking for alternate sites to make up the housing allocation required.

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					of developing housing on that land which Derby City Council opposed for the reasons stated.. The result was that the inspector who conducted the public inquiry agreed and dismissed the idea of building on that land, much to great relief of local people. This land, which is in regular farmland use, is the only farmland left in the green belt on the eastern side of the city and continues into Ockbrook parish. Yet the council has now jumped on the bandwagon of suddenly declaring the land as grey belt to justify its removal from Green Belt status to allow homes to be built there. This follows on from Erewash Borough Council declaring agricultural land on Dale Road near Spondon Wood that had Green Belt status for decades as grey belt to allow more than 250 homes to be built adjacent to Derby City Council's eastern boundary. There is no need to build new homes on this site to satisfy local need. For many months the number of homes for sale in Spondon on the Rightmove website has been around 90 – equivalent to the number that Miller Homes have planning permission to build on Royal Hill Road in the green wedge between the village and Chaddesden. This and the Dale Road site were strongly opposed by local residents , not just because of their designated status but because of concerns about infrastructure, particularly road issues, schools, and sewage disposal as well as the effect on already-crowded facilities. But now that number has increased by around one third to 124. It is thought that some of these may be long-standing residents who do not want the hassle of new home builds, thus weakening community cohesion and spirit.	

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					Plus there are proposals from a company to build more homes in the green wedge off Derby Road/Acorn Way where previous plans have been repeatedly refused by the council, a decision backed when applicants have appealed. So, I would submit, this policy HA7 is unsound, not justified and does not conform to national policy guidelines. Allocating working farmland in Green Belt is not consistent with the national planning framework. The council's Local Plan paragraph 81 commits the authority to a brownfield and city centre first strategy, but HA7 releases Green Belt agricultural land before utilising brownfield sites in the city. The village of Spondon, which apart from industry to the south is surrounded by Green Belt or green wedge cannot be classed in any way as part of the city centre. There are brownfield sites allocated for housing at Derby Riverside (policy CC11) – 600 homes; the Railway Station Quarter (CC13) - 500 homes;, North Castleward (CC14) – 400 homes, and more than 1,400 homes on mixed use sites in the city city. I believe there are more brownfield sites available using old industrial and commercial premises that could offer more homes. Finally, any idea of constructing an access or egress to and from any housing on this site from Stoney Lane is a ridiculous non-starter. Stoney Lane is one of the few main arteries to and from Spondon village. It is busy with vehicles coming off the A52 at speed and vehicles going on to the A52. There would be a conflict of traffic interests which would be a major safety issue.	

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					This policy HA7 does nothing to address or alleviate the traffic problems – particularly the large number of heavy goods vehicles going through the crowded and narrow streets in the busy centre of the village – and another 800 cars, let alone other vehicles, will only add to them.	
Lesley Parkinson	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to express my concern, that the planning policy HA7 is unsound. The land is currently used as agriculture land and as a farmer's daughter I understand the value of productive farmland. There are plenty of brown filed sites where housing can be put - which are not suitable for agriculture. The current traffic situation in Spondon is horrendous and will be worse once the Erewash newbuild site is completed. It is impossible to see a GP in Spondon and there is no NHS dentist available unless you are on benefits.	In view of the above I request that Site HA7 Spondon is be deallocated from the local plan as it is unsound.
Barbara & Kevin Peach	Policy HA7: Stoney Lane, Spondon	Objects		No	We believe that **Policy HA7 is UNSOUND**. Our objections to the above proposed development are listed below:- **Loss of Green Belt**. - We believe that the Council is wrong in the re-classifying of this land as Grey belt. - The land is active agricultural farmland and the development of this land is therefore conflicting with national planning policy. - It provides a valuable buffer between distinct villages. - Losing Green Belt land increases carbon emissions by destroying natural carbon sinks and also releases stored	Deallocate Site HA7 (Stoney Lane, Spondon) from the Local Plan

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					carbon back into the atmosphere during the construction period. - Increased impact on Mental Health. During Covid, it was found that people's mental health suffered adversely in urban surroundings compared to those that could access Green Belt fields, woods etc. - **Derby has considerable Brownfield alternatives** for housing as opposed to the loss of this Green Belt agricultural land including:- - Derby Riverside (600 homes - Policy CC11) - Railway Station Quarter (500 homes - Policy CC13) - North Castleward (400 homes - Policy CC14) - Other City Centre Sites (1,400 homes - Policy CC4) **Traffic** - Construction - the use of Heavy plant, material production and new infrastructure adds large amounts of greenhouse gases. - This development would create car dependent urban sprawl Roads cannot cope. - The access point off Stoney Lane is inadequate for 400 homes (potentially 500+ vehicles on the development) - Potential hazard of traffic backing up & slowing traffic off A52 from Derby due to right-turning traffic into development. Slowing A52 traffic form Derby at Lodge Lane junction is already a problem at peak times as is the Ockbrook/Borrowash junction and lowering the speed limit to 50mph on this section would not alleviate this problem - Increase 'rat-runs' over narrow streets eg Stoney Lane, Ladybower Road, Gravel Pit Lane, South Avenue to avoid	

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					already considerable traffic problems through Spondon Village for access to Derby. - Potential increase in response time for Emergency services through bottlenecks in Spondon village preventing crucial help. **Local Infrastructure** - Increased burden on Doctors, Dentists etc - Already virtually impossible to get to see a Doctor in Spondon. - Increased burden on Schooling especially Senior school - Inadequate public transport	
Stephen Peat	Policy HA7: Stoney Lane, Spondon	Objects		No	RE: The objection to the Local Plan for Derby for period between (2023-2043) regulation 19 submission Draft Plan. This includes the objection to the HA7 Stoney Lane including the development of 400 Dwellings within the Stoney Lane Site. In the previous Consultation on HA7 site I listed my factors why I believe the HA7 Stoney Lane site is not suitable including why the Stoney Lane site is not suitable for development because the land is not classed has Grey Belt when you examine the classification in my letter dated 17/02/2026 and 31/01/2026 document Local Plan HA7 Stoney Lane These letters covered the URBANIST ARCHIECTURE, which examined the Grey Belt policy a term passed in Parliament in December 2024, (NPPF) that identified the meaning of the Grey and Green Belt.	(1) Required Modification to make the Plan Sound? • When you examine regulation 19 of the local plan of the (NPPF). I believe this local plan including Stoney Lane should be investigated by the planning inspector to make the following modification to the Local Plan to ensure soundness. (2) The Type of Modification needed?

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					I have explained how A, B, or C in Paragraph 143 of the (NPPF), and Paragraph 155 of Section 13 is an important point of my objection. Why Paragraph 155 Matters for my Objections For Spondon and Derby, this paragraph is crucial because: When you examine these two letters that I submitted in my previous correspondence it highlighted major concerns with this development at different angles showing this Stoney Lane Location is not a suitable site for development. When you examine the paragraph 36 of the National Policy Framework (NPPF) this site is unsound for development and my Letter sent on and 31/01/2026 document Local Plan HA7 Stoney Lane and letter dated 17/02/2026. (1) This Stoney Lane is not justified because the proposed allocation is not based on appropriate or robust evidence base mentioned in my previous letters that this development goes against the spatial strategy when alternatives already exist. For example, in the Local Plan HA7 Stoney Plan it highlighted new sites are available including the building of more apartments, and building properties upwards. **(2)** Local Plan HA7 Stoney Plan explains that this site is not **Consistent with National Policy.** In the classification and release of active Green Belt Land Farm Land as 'Grey belt' directly misinterprets National Planning Rules,	• Please deallocate HA7 Policy Stoney Lane- 400 dwellings from the entirely from the Derby and the new South Derbyshire local Plan. The 400-houses allocated for Stoney Lane should be located to other brownfield regeneration sites include the building of more apartments and flats that are in the City Centre and surrounding areas of Derby include car parks and old industrial land. This is mentioned in policies (CC4, CC11, CC13 OR CC14). For example, many European Countries include the Ukraine often have higher density urban housing in like with NPPF paragraph 81(brownfield and City Centre is the First priority in a local Plan. For example, when you look at the land east of Stoney Lane should be fully reinstated to protect the Derby to

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					definitions and contradicts Derby City Council own spatial principles. **(3)** In the first half of my document covered the Stoney Lane site is farmland, and was once owned by my relatives who farmed the area until the 1950s. The land was sold due to high tax death duties during the 1950s. I am also aware the Stoney Lane site does contain both domestic and farm animal burials including cats and dogs. The land was sold to another farmer in late 1960. **(4)** This land was never was classed as a Grey Belt because it was formed over 300 years ago when farm boundaries were created across the UK and between Ockbrook and Spondon. (A) **There is a Misclassification of Active Farmland as "Grey Belt (Inconsistency with National Policy)** (B) When you examine paragraph 302 of the draft plan states that the Stoney Lane land was classed as Green Belt for since the 1950s but Derby City Council now class this land as **Grey Belt** to support Urban extension of Spondon. (1) In my previous letters I mention the faults of the Green and Grey Belt within the National Planning policy that I have examined and written in my policy document 31/01/2026 document Local Plan HA7. This examined both Grey and Green Belt within the document.	Nottingham Green Belt Policy EN5. I believe since both Ockbrook, Borrowash and Spondon do not have future burial ground because Spondon has reached capacity, Ockbrook and Borrowash has reached capacity but have space for shared family graves but no future graves for new and existing population. Many people in Spondon and Borrowash including Ockbrook believe we need a new cemetery to cater for a least 450 burials east of Derby including double body burials. When you look at my previous correspondence on the Stoney Lane Issue the only new Cemetery is based on the other site of Mickleover than needs three buses to visit the site but this will be full if 1200+ new homes approved on land east and south of Mickleover will take up the spaces quickly.

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					(2) The policy document did define grey belt within the URBANIST ARCHIECTURE who examined the definition of the Gery belt compared with the Green Belt. This is listed below. (1) What is a grey Belt in planning terms? Grey Belt in planning refers to land within the Green Belt that is previously developed or contributes only weakly to core purposes. These areas typically offer limited value in preventing urban sprawl, keeping settlements separate or preserving the character of historic towns, and may be considered suitable for sustainable development. (2) Grey belt definition is defined in Annexe 2, that land within the Green Belt comprising previously developed land, and/or any land that, in either case, does not strongly contribute to any purpose of A, B, or C in paragraph 143. This excludes land where the application of polices relating to the area or assets in footnote 7, other than Green Belt, would provide a strong reason for refusing or restricting development. (3) Grey Belt land includes obvious candidates like disused petrol stations, surface carparks, and edge-of-town scrubland, which covers any Green Belt land that plays a weaker role in fulfilling its core purpose. (4) In Paragraph 155 of Section 13, which establishes four tests to determine whether Grey Belt development is not inappropriate in the Green Belt. Pass all four tests,	Since Dale Road Park is located North of Stoney Lane with connections to Stoney Lane should be doubled in size with connections to the new cemetery with a Linear Park to the bottom of Stoney Lane. A 400-house development is not suitable for Stoney Lane knowing Highway England believe the Stoney Lane Junction is not safe due to being close to the entrance of the development, that would cause traffic to backup on to the A52 leading to accidents.

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					and your development bypasses the need for very special circumstances entirely. • Why paragraph 155 matters in my objection especially for Spondon, Erewash, Derby and the enlarged Derby City Council. Why Paragraph 155 Matters for my Objections For Spondon and Derby, this paragraph is crucial because: • Can Developers must **prove** unmet need, sustainability, and compliance with the Golden Rules I believe Not? • The Council must assess whether the site's release would **undermine the wider Green Belt**, not just the parcel itself. This would affect other parts of the Green Belt next to the site after Derby City Council expands into Erewash and South Derbyshire. • I believe paragraph 155 shows the land at Stoney Lane has failed this test, this means the **remains inappropriate** and should be refused. (5) **What makes land a Grey Belt?** Prevent Urban Sprawl: The land does not act as a critical buffer against uncontrolled expansion. It may already be surrounded by development, enclosed infrastructure, or lack the openness typically associated with the Countryside.	

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					(6) **Stopping neighbouring towns and villages from merging**? The site does not play a significant role in preventing towns and villages from merging. It may be on the periphery of an urban area, or its development would not erode meaningful gaps between distinct settlements. **(7) Preserving the Character of historic settlement:** The land does not contribute to the setting, identity or architectural significance or a historic town or village. It is not a defining landscape feature or an area that enhances local heritage. **(8)** The Grey Belt does not include land that benefits from strong environmental protection or planning restrictions, where national polices provide a clear reason for restricting development. **(9) Habitat sites, areas of Natural Beauty, National Parks, Flood risk Zones, World Heritage Sites, Registered Parks and gardens, Ancient Woodland, and a Nature Reserve.** **A Grey Belt Status doesn't mean guaranteed development** **(1)** Each proposal has a range of factors to determine whether the development is appropriate. **(2) Grey Belt** development must address a housing shortfall and align with the local plan.	

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					(3) Employment, Commercial or industrial Grey Belt requires market studies, and a lack of suitable space. **(4) Community facility Grey Belt development needs a strategic assessment showing demand for schools, healthcare, or public services.** **(5) Mixed-use Grey Belt development must justify the balance of residential, employment, and community use.** The HA7: Stoney Lane, Spondon would breach the Grey Belt development term within the Green Belt, and would affect infrastructure capacity and sustainability: (1) Housing Grey Belt development must have access to Schools, healthcare, public transport, and local amenities to ensure it supports sustainable living but Spondon Schools, healthcare and amenities have reached over capacity to take this 400-home new development. (2) Community facility Grey Belt development must be located where sufficient transport links and utilities can support public access and long-term viability. **(3) All Grey Belt development should be in a sustainable location with good transport infrastructure and amenities, ensuring minimal strain on local services with sustainable polices.**	

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					(4) Community and environmental Impact: All Grey belt development must preserve local character, biodiversity and heritage assets. Large-scale Grey Belt development may require mitigation for air quality, flood risk, or ecological impact. Housing Grey Belt development should provide green spaces. Commercial Grey Belt development must mitigate traffic and noise. (5) Community Grey Belt development should enhance social infrastructure without disrupting neighbourhoods. **The question asks when you examine the grey belt policy at HA7 Stoney Lane, Spondon, on page 74 of the Derby City Council Local Plan.** **(1) When you examine the grey belt in the National Planning Policy Framework, in unveiling the Grey Belt, the Stoney Lane site for 400 houses is not suitable, and does not fit the Grey Belt entitlement for sustainable development.** **(2)** Please see 31/01/2026 document Local Plan HA7 Stoney Lane of Community and Environmental Impact. • **The Performance of Site HA7 Stoney Lane:** remain active Open agricultural field that performs to provide food from cereals to beans, and provides Green Belt Functions. The Stoney Lane site maintains visual openness, safeguards the Countryside from Urban encroachment, prevents outwards urban	

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					sprawl of the Spondon Urban boundary towards neighbouring rural establishments like Ockbrook and Borrowash. • The Stoney Lane Green belt also helps regulate temperature of the environment from heat generated from the A52 because the trees and grasses provide shading from the heat of vehicles that would be lost if bult with 400 houses on the site. For example, when you measure the temperature near the A52 the air temperature is 10 degrees higher compared with Stoney Lane Site. The site will cause higher temperature affecting residents with higher temperatures from the surrounding areas. • I also believe there is an Absence of Degradation. This means HA7 Site is not disused, degraded or a brownfield infill. The Reclassification high-performance farm “Green belt Land as “Grey Belt” sets out od and unsound precedent that undermines national Green Belt protection listed and set out in the National Planning Policy Framework. **Why is Derby City Council Local plan being a failure to optimise Brown Field alternatives, i.e., (Unjustified Strategy)** **The question what makes the strategy Justified?** • To make this Local Plan justified. The strategy should be appropriate; this includes looking at reasonable alternatives location and checking the evidence	

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					before deciding HA7 for development. For example, when you examine paragraph 81 of the draft plan it commits Derby City to use Brownfield and the City Centre first in the policy of spatial strategy. • Placing and construction 400 homes on Green Belt farmland within the Stoney Lane area before looking at high value brownfield capacity within Urban core areas, that directly contradicts Policy HA1 and Paragraph 81: • The Local plan the fail to address **Unallocated City Centre Capacity:** For example, The Council should use the substantial brownfield and regeneration locations in the City Centre capable of absorbing the growth of residents. • The locations in the City could be used **if Policy C11 Derby Riverside** could allocate 600 homes, and **Policy CC13 Railway Station Quarter** could build 500 homes direct to major railway routes. • Policy CC14 and Policy CC4 at North Castleward and mixed-use allocations could contain 400 urban regeneration land matching Stoney Lane building capacity, and the CC4 site could contain 1400 homes across central brownfield areas. • A site on the opposite site of the River Derwent in the photo below can take 200 properties A footbridge could connect people to this site across the river into	

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					the site. The site could provide around 200-250 houses and apartments. A site access leads to Station Road Borrowash. The site contains the storage of HGV trailers on a ¼ of the land. The rest of this grey belt land could contain housing and flats within this site saving the Stoney Lane Green Belt land. • The site has will have less environmental effects compared with Stoney Lane, not located near a busy A52, it has an entrance to Station Road with cycle paths to Borrowash. • There are also land near Mansfield Road include disused Industrial Land that could house two or three bedrooms, and apartments. There are also 1200 homes planned for Mickleover or near the border which will add to the hosing numbers in both this present Council and the new Council from early 2027. • The Sequential Approach has failed; this is due to the allocation of Greenfield/Greenbelt land on the outer administrative periphery while brownfields regeneration sites inside the Ring Road remain available. This demonstrates that Derby City Council has failed to prove that the release of Site HA7 is necessary or justified. **(3) Stoney Lane Cemetery Closure.** • **I have written to** Councillor Ndukwe Ndukwe cabinet member for Street Pride on the concerns that Stoney Lane Cemetery is now full.	

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					The people of Spondon do not want to travel to the other side of Mickleover to visit their relatives in the Cemetery. • I have spoken to several people living in Spondon, Ockbrook and Borrowash say they need a new Cemetery. They have informed me that there are no burial spaces left for new people knowing since the new Pope have discouraged cremation and future Catholics promote greater use of Burial. • **The new PM Andy Burnham** is a Catholic, and would support the building of more Cemeteries due to his religious believes. • The am aware the Highway Agency do not like the development of 400 houses being close to the Stoney Lane A52 junction but welcome if the Land was used for a larger park, and a cemetery because traffic flows would be low compared with traffic with 400 homes having over 2000 cars backing up on the A52 increasing Accident risks or deaths. An accident near the Stoney Lane Junction has occurred on Monday 27th of July involved three cars with one driver had serious injuries with other passengers and drivers being injured in the accident. **Why Spondon may need new burial provision in the future:**	

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					• Even though Spondon Cemetery is close to full today, several factors point toward future need: • 1️⃣ Population growth • Spondon's population is rising • Proposed 400-home developments will increase demand • More residents = longer-term burial pressure • 2️⃣ Landlocked cemetery • No realistic expansion area • Once full, it cannot grow • 3️⃣ Derby's east side has limited burial space • Other nearby cemeteries (Nottingham Road, Borrowash, Chaddesden) also have finite capacity • This creates regional pressure • 4️⃣ Demographic shift • Derby's ageing population means burial demand will rise over the next 20 years **What a "new cemetery" would mean?** If Spondon *did* need new burial provision, it would likely take one of these forms: Option A — A new cemetery on the edge of Spondon • Requires 3–10 acres • Must avoid flood zones • Must avoid green belt unless exceptional circumstances • Would face strong planning scrutiny Option B — Expansion of an existing cemetery nearby	

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					• Borrowash or Chaddesden could expand if land becomes available • Less controversial than building a new one Option C — A multi-parish cemetery serving Spondon + Ockbrook + Borrowash • Shared cost • Shared land More realistic politically **New Prime Minister Andy Burnham Greenbelt Policy Update** The new Prime Minister Andy Burnham on PMQ on the 2nd September 2026 speaking in the commons want to a conservative MP on the Green Belt stated that the Prime Minister favours using Brown Field sites, including building upwards in a more balance approach to development. The Greenbelt is needed for housing but with a larger reduction in the building of large estates that has no public transport access facilities like Schools, Doctors and Dentist. The Prime Minister also believes you cannot overwhelm an area with new housing that will cause greater pressure on the local community with higher population number using oversubscribed facilities and NHS services that are under pressure with no new places to cater for the new population without affecting the present existing population and residents in a particular area. When you examine these answers on the Local Plan HA7 shows HA7 should not be in the Derby Local Plan because of the existing pressures of Spondon is overwhelming on	

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					present services like GP and Dental Services, and School places are oversubscribed including West Park School. At present West Park School is over 100 students oversubscribed, but with new houses means millions of pounds are needed for Schools, a brand-new Doctors and Dental Surgery, and a new cemetery. The other pressure that the Spondon Road network has only one entry out of the Suburb of Spondon, and the road is called Willowcroft Road, and this road has hundreds of vehicles travelling through the Spondon District Centre. For example, traffic congestion in Spondon often reaches near Dale Road Shops taking vehicles up to 10 minutes to leave Spondon, and longer if accidents occur on the A52. The other issue planners failed to address about the high volumes of traffic pollution Spondon faces with having one entry out of Spondon, and this was addressed in the House of parliament on the 1st of September 2026. When an MP mentioned over 500 houses are planned to be built on a B road that is highly congested. The PM answered planners need to go back to the drawing board because the development would be not suitable for a single road area that highly congested. He mentioned some developer's plans were turned down because of the lack of suitable road space to take the traffic volume from the new development, and the lack of public transport accessing the site failed to active and green travel plan polices cited in the Manchester Mayor development policies.	

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					I think in this conclusion we need to reexamine the local plan because Spondon is highly developed with a poor highway network, services are highly under pressure with no space to create a new medical and dental surgery to cover an expanding population. The local plan has no plans to create a new access on the A52 with a new cross roads junction on the A52 near Stoney Lane Junction to take traffic away from Willowcroft Road, and this type of road scheme would cost over £25 million to construct including hours of delays on the A52. In the letter I mentioned that under the (CBA) the true costs of this development would exceed over £54 million when you add up the cost for a larger population on the community of Spondon you will see that building 400+ houses will affect other sections of the local community with limited access to healthcare, schools and increased pollution risk with increased volumes of traffic accessing one access out of Spondon affecting the health of local residents who live along this route. I hope the planners would examine this HA7 plans again because the costs exceed the benefits on the community of Spondon in their physical, mental and wellbeing's including not forgetting the dead who want a space for rest after death.	
Mrs Claire R Pegg	Policy HA7: Stoney Lane, Spondon	Objects		No	I write, with dismay, to protest about the housing policy HA7 for Stoney Lane. The council is absolutely wrong in identifying the land as "grey belt", which it very clearly is not; it is agricultural farmland in	I understand there is a need for housing, and that there are other ways of going about it. I

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					active use. National Planning Policy, to which the council must adhere, defines grey belt land as poor quality green belt - the area identified on Stoney Lane clearly does not fall into that category. Randomly picking a piece of green belt, declassifying it as grey belt in an attempt to justify building on it, and ignoring looking at brownfield sites elsewhere does not equate with National Policy. There is also the very serious implications of building further housing around Spondon. No consideration has been given, no provision provided, and no plan presented, for the pressures extra housing entails, namely the needs of those new residents for doctor's surgeries, dentists, schools, nurseries etc. All these facilities within the Spondon area are already overstretched and cannot reasonably be expected to accommodate more. At the very least any new proposed house building complex, anywhere, should include surgeries and a nursery/school, clearly marked up on any plans submitted before any consideration at all could be given - along with an un-negotiable agreement that such buildings would actually be built, should the plan be agreed. Extra housing also brings extra vehicles onto narrow roads not suitable for increased traffic (many more than one car per house would be expected these days), and this has not been considered at all.	therefore join with others in stating the following request: "Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as "Grey Belt" without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (paragraph 81).

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						I trust the council will see sense, as well as practicality, and re-think the whole matter with serious consideration of all these issues.
Sheila and Geoff Pendrick	Policy HA7: Stoney Lane, Spondon	Objects		No	Please consider reallocating the building of 400 homes currently being planned for Stoney Lane in Spondon to current brownfield sites and City Centre regeneration. Policy HA7 is unsound as Green Belt agricultural farmland has been wrongly classified as Grey Belt. This is not justified when there are brownfield alternatives and conflicts with the principles of national planning policy. The Green Belt status was put in place to avoid urban sprawl which sadly, is gradually taking place in our area with the resultant pressures on local infrastructure. In this area of Spondon we are currently concerned about the effect of the house building at Spondon Woods which already causes noise and traffic holdups and on completion will put pressure on all of our services. Please reconsider this unsound policy.	
Sophie Pickles	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to **Policy HA7 – Stoney Lane, Spondon**, which proposes the allocation of approximately 400 homes on the existing agricultural land. I strongly object to the inclusion of this site within the Local Plan and believe that Policy HA7 should be considered	I respectfully request that **Policy HA7 – Stoney Lane, Spondon – is removed/deallocated from the Local Plan**. I believe the 400-home allocation should instead be

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					unsound, as the proposed allocation is not justified and is not consistent with national planning policy. My concerns are as follows: **1. Loss of active agricultural land and Green Belt** The land at Stoney Lane is currently active agricultural land and provides an important open and undeveloped area on the edge of Spondon. I do not believe that this land should be released for housing when there are significant opportunities to make better use of previously developed and brownfield land elsewhere within Derby. Developing this site would result in the permanent loss of productive agricultural land and would contribute to the further expansion of the urban area into open countryside. **2. Increased urban sprawl** The proposed development would substantially extend the built-up area of Spondon and would contribute to urban sprawl. The cumulative impact of further development around the village needs to be properly considered, rather than looking at this allocation in isolation. Spondon already has a substantial amount of housing and development pressure. Adding a further 400 homes would change the character of this part of the community and place additional pressure on existing infrastructure and services. **3. Pressure on local roads and transport infrastructure** I have serious concerns about the additional traffic that 400 new homes would generate.	met, where appropriate, through the better utilisation of suitable brownfield, previously developed and regeneration sites, in accordance with the Plan's stated brownfield and City Centre first strategy. For the purposes of the Regulation 19 consultation, I therefore consider Policy HA7 to be **UNSOUND**, specifically because it is: • **Not Justified**; and • **Not Consistent with National Planning Policy.** I ask that this objection is formally recorded as part of the Regulation 19 consultation and passed to the Planning Inspector for consideration as part of the independent examination of the Local Plan.

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					Stoney Lane and the surrounding road network already experience traffic pressures, and I am concerned that the existing infrastructure is not capable of accommodating the additional vehicles associated with a development of this scale without significant improvements. The impact on congestion, road safety, pedestrian routes and access to and from Spondon should be fully assessed before this land is allocated for development. **4. Pressure on local infrastructure and services** A development of 400 homes would inevitably place additional pressure on local schools, healthcare services, drainage, sewerage, public transport and other community infrastructure. I am concerned that the existing capacity of these services has not been adequately demonstrated to support a development of this scale and that the wider cumulative impact of development in and around Spondon needs to be properly considered. **5. Brownfield land should be prioritised** I believe the Council should make full use of suitable brownfield and previously developed land before releasing active agricultural land for housing. The Local Plan already identifies significant opportunities for housing on sites such as Derby Riverside, the Railway Station Quarter, North Castleward and city-centre mixed-use sites.	

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					Where there are opportunities to deliver housing through regeneration and redevelopment of previously developed land, these should be prioritised rather than sacrificing productive agricultural land on the edge of Spondon. **6. Conflict with the Council's brownfield and City Centre first approach** The allocation of HA7 appears inconsistent with the Plan's stated commitment to a **"brownfield and City Centre first"** approach. I therefore believe the Council needs to demonstrate why this particular greenfield agricultural site is necessary when other identified opportunities for housing remain available. **7. The allocation is not justified** For the reasons above, I do not believe that the proposed allocation of 400 homes at Stoney Lane has been sufficiently justified. In particular, I believe that the Council should demonstrate that all reasonable brownfield and previously developed alternatives have been properly considered and optimised before allocating active agricultural land for development.	
Stuart Pickles	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to submit an individual response to the proposed allocation of 400 homes off Stoney Lane Spondon (Policy HA7) I believe that the policy is not justified. The council has prematurely designated active agricultural land as Grey Belt. This fails to meet the sequential testing requirements, as they have not demonstrated that all reasonable & available Brownfield alternatives have been fully considered.	

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					I also submit video & photo evidence of the proposed land being furrowed recently, which I believe is normally done to improve soil condition & optimize crop growth. The policy is also not consistent with National Policy. As my photographic & video evidence will prove, the land in question is active agricultural land & not poor quality or Grey Belt that's been developed. The proposed development would contribute to unsustainable urban expansion that threatens the distinctive character of Spondon. An issue that Spondon has already disproportionately absorbed. Further residential homes will place an unmanageable burden on overstretched local services & infrastructure. Specifically local schools, GP surgeries, roads & drainage systems. The council already possesses a large supply of brownfield & city centre opportunities, which in line with National Policy should be prioritised for further development. The proposal is not consistent with Derby's plan to use Brownfield & City centre first strategy, rather than develop active greenbelt land farmland within Spondon. All of the reasons behind my objection to this plan, should verify legitimate reasons for this proposal to be declined.	
Stephen Plant	Policy HA7: Stoney Lane, Spondon	Objects		No	I am a resident of Spondon and live next to Stoney Lane, I have lived in Spondon most of my life and am very concerned	I request that the Council amends the Local Plan by

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					that the proposed building site for 400 new homes is active agricultural farmland and performs an important Green Belt function. The site is active agricultural land rather than poor quality or previously developed 'Grey Belt.' Spondon as an urban development is currently experiencing a significant building of new homes next to Dale Road, the Stoney Lane development would contribute to further expansion and urban sprawl. Spondon already has significant pressures on local infrastructure, including roads, drainage, school capacity, dentists and doctors. The proposed development has been identified as Policy HA7 in the Local Plan for Derby. The policy HA7 is unsound as it is not justified and not consistent with national policy. The Council has incorrectly categorized the active agricultural farmland as grey belt without demonstrating that all reasonable brownfield alternatives have been fully considered. Allocating active agricultural farmland for development conflicts with the principles of national planning policy. I also refer to paragraph 81 of the Plan which states a commitment to a "brownfield and City Centre first" strategy, this proposal directly contradicts this statement. The Council has substantial brownfield and city center housing opportunities which should be prioritized before releasing green belt farmland for development. The policy HA7 is unsound as it is not justified and not consistent with national policy test by misclassifying active green belt agricultural farmland as grey belt without demonstrating that all reasonable brownfield alternatives have been fully considered. The Council should reallocate the 400 proposed dwellings into existing brownfield and city center regeneration allocations as listed below: -	deallocating Site HA7 (Stoney Lane, 400 homes).

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					City Centre mixed use sites – Policy CC4 Derby Riverside – Policy CC11 Railway Station Quarter – Policy CC14 North Castleward – Policy CC4	
Richard Preedy	Policy HA7: Stoney Lane, Spondon	Objects		No	There is no way this can be classed as “Grey Belt” land. As it is actively farmed. The site would contribute to a greater expansion of Urban Development. There is already great pressures on local infrastructure, including roads, draining and school capacity. There is at the Councils disposal, substantial brown field and City centre opportunities, which should be used before using Green Belt farm land for development. The Council’s Plan states that "Brown Field and City Centre first”, should be used before any other allocation. I would like therefore, to remove site HA7, Stoney Lane, Spondon, from the local plan. The plan is unsound as it fails National Policy tests, misclassifying active Green Belt farm land as Grey Belt. The Council need to demonstrate that all possible Brown Field alternativies has been fully investigated. The Council should reallocate these 400 dwellings into City Centre, Brown Field regeneration allocations. Access to and from the Stoney Lane site would be dangerous with its proximity to the A52. The main route out of Spondon is via Willowcroft Road which already gets very congested and a site with 400 homes would generate a minimum of 400 cars and more than likely at least 600 cars on Spondons already	

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					overcrowded roads. More than anything it would mean a loss of valuable active farmland. <u>Please do not allow Policy HA7 to go ahead.</u>	
Janet Pullen	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy HA7-Stoney lane Spondon. Unsound the village is becoming to big not enough doctors ,schools or roads in and out of the village	
H E Radford	Policy HA7: Stoney Lane, Spondon	Objects		No	Thank you for your update on building on Green Land (agriculture) 4. Would like to say, there was a law that building was banned within 200 meters of POWER LINES. There are power lines going directly over proposed sites on Stoney Lane, Spondon. What are these laws for if they can be changed Willy Nilly. i.e. GREEN BELT, POWER LINES Myself strongly agree with your sumerisation. 1 HA7 2 UNSOUND 3 MY EVIDENCE 4 MY REQUEST SPECIFIC MODIFICATION (AS ABOVE NUMBER 4)	
Nick Raycraft	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe that the policy is unsound and is not justified and is not consistent with National Policy. The site is an active agricultural land and is not poor quality land and is not previously developed grey belt land . A retro grade step reminiscent of the 1950s and 1960s.	I request a modification The HA7 site ie Stoney Lane Spondon should be removed as it is unsound and fails the justified and consistent National Policy tests by wrongly

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					The development with add to the further expansion of urban development and urban sprawl. There is significant pressure on local infrastructure including roads drainage schools capacity and medical facilities The Council has substantial brown field and city centre housing opportunities which should be prioritised before releasing green belt farm land for development. The proposed allocation appears to be inconsistent with the Plan's stated brownfield and city centre first strategy. The land should remain as agricultural to help increase food security for the UK	classifying Green Belt farm land as grey land and it has not shown that all the reasonable brown field lands have been fully optimised. The Council should reallocate these 400 houses into existing brownfield and city centre re generation allocations that were prioritised under PolicyCC4 Policy CC22 (Derby Riverside) Policy CC13 Railway Station Quarter or Policy CC14 North Castle ward in accordance with the plans stated brownfield and City centre strategy para 81
Amber Read	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan.	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their

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					In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as “Grey Belt” I am particularly concerned by the Council’s treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development.	individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it

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					The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities.	is the most appropriate or sustainable option available. I ask that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector for consideration as part of the Regulation 19 examination.

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					I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network	

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					has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing.	

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					6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation.	

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					The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site;	

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					* the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.	
Byron William Read	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission

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					The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an "eastern urban extension to the suburb of Spondon." This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust	to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it

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					justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities.	is the most appropriate or sustainable option available. I ask that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector for consideration as part of the Regulation 19 examination.

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					I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation.	

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					I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure.	

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					alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound	

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Luke Read	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under **Policy HA7**, for a minimum of 400 homes.	**Requested modification** I therefore respectfully request that the Council **deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan**.

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					I consider the allocation to be **UNSOUND**, specifically on the grounds that it is **not justified** and is **not consistent with national planning policy**. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. **1. The principle and scale of the allocation** The proposal is not for a small, incremental addition to Spondon. It is for a **minimum of 400 homes**and is explicitly described within Policy HA7 as an **"eastern urban extension to the suburb of Spondon."** This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth.	The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under **Policy CC4, Policy CC11, Policy CC13 and Policy CC14**, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development;

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					I do not believe that the Council has demonstrated this sufficiently. **2. The treatment of the site as "Grey Belt"** I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is **active agricultural farmland**, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. **3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised** This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension.	5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to **this particular allocation, at this particular scale, in this particular location**, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available. I ask that this representation is formally recorded against **Policy HA7 – Stoney Lane, Spondon**, and forwarded to the independent Planning Inspector for consideration as part of the Regulation 19 examination.

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					There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: • **Policy CC11 – Derby Riverside** • **Policy CC13 – Railway Station Quarter** • **Policy CC14 – North Castleward** • **Policy CC4 – City Centre Mixed-Use Sites** These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. **4. Transport and existing congestion** The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue.	

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					Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires **financial contributions towards transport improvements to mitigate the highway impacts of the development**. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. **5. Pressure on schools, healthcare and community infrastructure** The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring	

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					access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring **financial contributions towards improved education infrastructure**. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. **6. Drainage and surface water** I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a **"comprehensive surface water drainage solution"**. This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. **7. Loss of open countryside and impact on Spondon's character** The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside.	

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					These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. **8. The allocation must be considered against the overall strategy** I am not arguing that Derby should not build new homes. My objection is that **where those homes are built matters**. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. **9. Conclusion – Policy HA7 is unsound** For the reasons set out above, I consider **Policy HA7 – Stoney Lane, Spondon to be UNSOUND**.	

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					In particular, I consider it: **Not Justified**, because the Council has not adequately demonstrated that: • the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; • the release of active agricultural land is necessary; • brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; • the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and • the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: **Not Consistent with National Planning Policy**, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.	
David Reece	Policy HA7: Stoney Lane, Spondon	Objects		No	There are to many houses being built in spondon there is a housing estate being built Built on dale road spondon you can't get in to see a doctor now there are not enough facilities and with reservoirs now at there lowest your building more houses with out even a thought	

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Michelle Richardson	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to make known my objection to this planned development which is Unsound. Spondon is a village with a strong community and we wish to retain this with the green belt land that has gradually been whittled away by poor planning decisions allowing land used for agriculture purpose to be developed. We have schools over subscribed, Doctor surgeries that struggle with their current patients, roads that have regular traffic congestion with one main exit via Willowcroft Road if heading towards Derby. The heavy traffic that has to use the village to reach Ilkeston also impacts on the safety of pedestrians. Policy HA7 is Unsound for the following reasons: Stoney Lane is farming agricultural land not as suggested by the Council as land that is developed, poor-quality or underperforming. The Council by its categorisation of this active agricultural farming land has done so without demonstrating all reasonable brownfield alternatives have been fully considered. This active agricultural farmland selected for development is in conflict and inconsistent with National Planning Policy. In addition Council owns commitment to a “brownfield and City Centre first” strategy as set out in Paragraph 81 of the Plan. The Council has significant alternative brownfield sites which would meet with city-centre regeneration already identified for housing, including: - Derby Riverside (Policy CC11 - 600 homes	

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					- Railway Station Quarter (Policy CC13) - 500 homes - North Castleward (Policy CC14) - 400 homes - City Centre Mixed-Use Sites (Policy CC4) - Over 1,400 homes This shows there is significant alternative brownfield sites available to the Council to meet its housing objectives, support the City regeneration and does not impact on a village that has in recent years had significant development eroding our agricultural farmland, our green-space and risks our becoming joined to local suburbs Chaddesden and villages, Borrowash and Ockbrook. Please refuse this application	
Ken Roberts	Policy HA7: Stoney Lane, Spondon	Objects		No	Please note my strong objection to this scheme. Its inclusion in the Local plan is unsound. The land is not Grey belt. It is Green belt agricultural land. Misclassitying this land is wrong and fails the Local plan "Brownfield and City centre first " and " Consistent with National Policy2 tests. Spondon infrastructure can not cope . The 400 homes should be reallocated to existing Brownfield sites	Policy HA7 needs to be deallocated.
Audrey Rothwell	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy.	Requested modification I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered

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					I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an "eastern urban extension to the suburb of Spondon." This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt"	as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and

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					* Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services.	

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					Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services.	

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Matt Rothwell	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the	

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					Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an "eastern urban extension to the suburb of Spondon." This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious	

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					example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities.	

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					I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation.	

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					I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that	

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					adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation.	

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					The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND.	
Stella Salt	Policy HA7: Stoney Lane, Spondon	Objects		No	I am formally making representation to the proposed development of 400 new homes on active farmland off Stoney Lane, Spondon, which is identified as Policy HA7 in the Local Plan for Derby. Policy HA 7 is unsound on the following grounds: It is not justified & not consistent with the principles of the National Policy in that the Council has incorrectly categorised the Stoney Lane site as Grey belt. The Stoney Lane site is	In conclusion, I am requesting that Site HA 7 should be de-allocated from the Local Plan & the proposed 400 new houses should be allocated to & between other existing brownfield & city centre regeneration allocations prioritised under Policy CC4,

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					active agricultural farmland & is, therefore, quite clearly, green belt. Additionally, it should be noted that the land (currently active agricultural land) contributes to preventing urban sprawl & performs an important green belt function in this regard. Brownfield alternative sites are available within the area covered by Derby City Council &, as such, these should be thoroughly explored & utilised for the purposes of additional new houses. In addition to the Stoney Lane site being valuable & active green belt land, any further additional houses within & around the village of Spondon would add a significant impact on a village whose infrastructure (roads, drainage, GP practices, school capacity) is already creaking. It is well documented that, during rush hour especially, Spondon very easily & quickly becomes gridlocked. Building an additional 400 homes would add to these already significant pressures.	Policy CC11, Policy CC13 & Policy CC14, in accordance with the Plan's stated "brownfield & city centre first " strategy (Para.81).
Janice Sanders	Policy HA7: Stoney Lane, Spondon	Objects		No	The above Policy is not justified and unsound. I have lived in Spondon for 54 years and the land has always been active agricultural land and classed as green belt. I think it's wrong to classify it as grey belt. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations in accordance with the Plan's stated brownfield and City Centre strategy. There are substantial opportunities to build houses on previously developed and regeneration sites rather than on green belt farmland on the edge of Spondon.	

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					There are already significant pressures on local infrastructure, including drainage, school capacity, doctors and roads. We already have far too many big lorries going through Spondon Village. Building 400 more houses will cause even more traffic congestion and make the village unsafe. I hope all the points I have raised will be considered as I am sure all Spondon residents feel the same way.	

Nicky Scire	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe that Policy HA7 is unsound for several reasons:
					• The Policy is not justified because the land has been wrongly categorised as Grey Belt when it is agricultural farmland and the council has not demonstrated that all reasonable brownfield sites have been considered
					• It is in conflict with the National Planning Policy of not allocating working farmland as Grey Belt
					• The council's own Policy commits to a "Brownfield and city centre first" strategy (paragraph 8) yet this allocation releases Green Belt farmland before utilising available Brown Field sites
					• The council has major Brown Field sites already allocated for housing, including:
					  ○ Derby Riverside (Policy CC11) - 600 homes
					  ○ Railway Station Quarter (Policy CC13) - 500 homes
					  ○ North Castleward (Policy CC14) - 400 homes
					  ○ City Ctr Mixed-Use sites (Policy CC4) - 1,400 homes
						I request the following modification:
						Deallocate Site HA7 (Stoney Lane Spondon - 400 homes) from the local plan. The allocation is Unsound as it fails the "Justified" & "Consistent with National Policy" tests by misclassifying active Green Belt Farmland as Grey Belt without showing that all reasonable Brown Field sites have been fully utilised.
						The council should re-allocate these 400 homes into existing policies, e.g. CC11, CC13, CC14, CC4.

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					The land is active agricultural farmland and development of this would extend the urban sprawl where there is already existing pressure on roads, drainage, school capacity and local services.	
Mr M.J. SHAW	Policy HA7: Stoney Lane, Spondon	Objects		No	Please accept my objection to the above proposed building development for the following reasons. The land has always been Green Belt. It is agricultural farmland and is actively used as such. I understand the Council has now classified it as Grey Belt. I also believe this is not in line with the national planning policy which defines the classification of Grey belt land as land in a Green Belt that is underperforming, of poor quality or previously developed. I believe that the land in question is none of these. Policy HA7 is in my opinion unsound, Not justified as the land been incorrectly categorised because not all alternative Brownfield sites have not been fully considered. This conflicts with the principles of the National Policy also appears to go against the Councils own commitment to a brownfield and City Centre first strategy. Ref Paragraph 81 of the plan. To Conclude, The roads, school capacity, Doctors, Dentists and drainage are struggling to cope without extra pressure brought about by extra housing. We already have a large house building project off Dale Road Spondon that will add to already struggling	

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					infrastructure. The roads around Spondon are regularly flooded during consistent rain as the drainage can't cope. This development would contribute to urban sprawl and development. The site is not poor quality or previously built on. It is well maintained and regularly used agricultural farm land. Not Grey Belt. Their are substantial city centre housing opportunities and brownfield sites available before using Green Belt farming land. The plan to use this land for development seems to go against the Plans stated brownfield and City Centre first.	
Samantha Shaw	Policy HA7: Stoney Lane, Spondon	Objects		No	I have a few concerns and questions. 1) How can this be classed as grey belt? Every single year this land is farmed. Crops are grown here yearly without fail. Please see pictures attached. Only 2 weeks ago the farmer was here on the combine harvester. Every year everyone in this area people know not to leave washing out during this time. When reading up on what is classed as grey belt, I'm struggling to understand how this land has fell in this category? 2) The entry to HA7. This is just off the a52. A 70mph road, with a tight and small slip road to join stoney lane. I couldn't tell you the amount of times the crash barrier has been replaced due to be being a tight corner as it is, never mind	

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					coming round the corner and there being ques of cars attempting to turn into HA7. It's also right next to the bridge, a vital bridge for children to walk to Asterdale school. 3) Schools and doctors. West park is the only secondary school in Spondon. How can this school accommodate 400+ houses worth of pupils? They have already refused prior payouts when asked to take on more pupils from other housing developments, why do you think they will accept HA7? I don't need to comment on GP practices, it's clear. This is not about me not accepting houses need to be built, they are so needed. However I feel cheated by this. The planning and ideas are poor. Adding houses is adding stress on resources such as schools and GPs. If time and thought went into this more people would not be so upset. Where are the schools, the dr's, the children's centres? There is nothing. I've lived in Spondon all my life, my son will also grow up here too. I have no desire to move. But things like this push working hard people away. Everyone deserves a home; but think for the future. Would you move here? Probably not.	
Tracey Shaw	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to register my concern about the above development due to it being not justified and is not consistent with national policy. • The site is active agricultural land, rather than poor quality or previously developed "grey belt". I live very close to this land and can see that the farmer regularly plants in the land and tractors etc are seen often.	I request that the Site HA7 - Stoney Lane Spondon - 400 homes should be deallocated from the local plan. There are other projects going on in Derby which are existing brownfield and city centre regeneration allocations priorities under Policy CC4, Policy CC11 (Derby

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					• Development would contribute to the further expansion of urban development and urban sprawl. • There are significant pressures on local infrastructure, including roads, drainage and school capacity. • The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. • The proposed allocation appears inconsistent with the Plan's stated "brownfield and City Centre first" strategy.	Riverside), Policy CC13 Railway Station Quarter and Policy CC14 North Castleward in accordance with the City Centre first strategy in Paragraph 81. This plan is unsound and does not meet the Justified and consistent with national policy tests as the land has been misclassified as it is Green Belt land and not Grey Belt. It needs to be proven that reasonable brownfield sites have been optimised.
Helen Shepherd	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test.	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request

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					1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as “Grey Belt” I am particularly concerned by the Council’s treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development.	that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available.

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					The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities.	

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					I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor	

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					does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water	

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					I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation.	

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					The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and	

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					* the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.	
Keith Shiers	Policy HA7: Stoney Lane, Spondon	Objects		No	I want to make you aware of a number of objections that I have regarding the proposed development of 400 new homes on active farmland off Stoney Lane, Spondon, identified as Policy HA7 in the emerging plan for Derby. The Policy HA7 is **UNSOUND**. I have lived in Spondon for over 60 years and the land identified in the policy has always been AGRICULTURAL LAND. I have regularly walked the footpaths in the area and consider it an important green belt function between my property, the A52 and Ockbrook. The Policy HA7 is **NOT JUSTIFIED**. In my long association with Spondon and regularly using the footpaths, it is apparent that the Council has INCORRECTLY categorised this active agricultural farmland as Grey Belt. There are **BROWNFIELD ALTERNATIVES**. The Council has already identified significant brownfield and city-centre regeneration opportunities (Policy CC4, CC11, CC13 and CC14) These allocations demonstrate that there are substantial opportunities for housing to be delivered on	

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					previously developed and regeneration sites rather than developing active Greenbelt Farmland on the edge of Spondon. Development would therefore be against the 'brownfield and City Centre first' strategy and also conflicts with the principles of the national planning principles. Infrastructure and Amenities. Spondon has seen some significant development over recent years to the extent that Spondon is now saturated. This proposed development and location would put increased pressure on already strained resources and amenities of Spondon, particularly schools and medical access, which this development will only exacerbate Transport The development would significantly increase traffic through Spondon and present further problems on traffic flow in the area. The area cannot cope with any more traffic. Current bus services are erratic and generally overcrowded at peak times. The proposed development would not help the situation. I therefore strongly object to Policy HA7 - Stoney Lane - 400 homes as aforementioned:	
Rhianne Shrimpton	Policy HA7: Stoney Lane, Spondon	Objects		No	The proposal is unsound as the land in question has been incorrectly categorised as greybelt land. The land is active farmland and therefore greenbelt; vital in helping to prevent urban sprawl and support wildlife and biodiversity. The footpaths on the land are a much needed area for local people to exercise, walk their dogs and enjoy a breather from city life. The fields are used to farm crops to feed our nation. It is an important area in a constantly expanding city and therefore categorising it as greybelt is totally unjustified.	

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					The proposal is not consistent with national planning policy when categorising land. Further more, in accordance with the the plan's stated 'brownfield and city centre first' strategy (paragraph 81) the council commits to using brownfield and city centre land first, therefore allocating green belt active farmland for house building makes no sense. The council already has major brownfield sites allocated for housing, these include: -Derby Riverside -Railway station quarter -North castleward -Mixed sites in the city centre which should be optimised for use before even considering greybelt let alone greenbelt land. A new housing estate in Spondon will put pressure on our already stretched services such as schools, doctors and dentists, not to mention the increase in traffic in our village. As I'm sure you're aware, Bloor homes have begun building houses near Dale road and the local residents of Spondon are already feeling the effects of noise and dust pollution, not to mention the impact that an influx of people moving to our village will have once the homes are complete. We simply cannot have any more homes built in our village. I understand people need somewhere to live but using any land other than brownbelt to build on is unsound. Thank you for taking my objection into consideration.	

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Amanda & Robert Simpson	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing this email with regards to Policy HA7 -Stoney Lane,Spondon - 400 Homes I just wanted to say "Really " I mean we just had how many homes on Spondon Wood, where the hell are they all going to go to school , doctors, …… It's also Not justified in the fact that you are not being " Consistent with National Policy as just to suit you have made Green belt into "Grey Belt" just to suit can here the pennies jiggling already , that land is still contributing to prevention of Urban sprawl and is still performing as an important Green Belt Function, can't you change the rules to suit, not to be trusted with any policies are you…… Evidently what about Roads drainage and capacity with regards to doctors,schools etc THIS SHOULD NOT BE ALLOWED OR APPROVED	
Ashley Sims	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to formally object to Policy HA7 – Stoney Lane, Spondon, which proposes the development of a minimum of 400 homes on land to the east of Stoney Lane. I consider the allocation to be unsound because it is not justified by the evidence presented and is not consistent with national planning policy. *The allocation is not justified* The proposed development would constitute a substantial urban extension onto land which is currently active agricultural land. The Council has not, in my view, demonstrated sufficiently why this particular site needs to be released for development when there are other opportunities for housing within the existing urban area.	The Council should therefore remove Policy HA7 and deallocate the Stoney Lane site from the Plan. If the Council considers that these 400 homes are still required to meet its housing requirement, those homes should first be directed towards suitable brownfield, previously developed and City Centre sites, including the opportunities identified under Policies CC11, CC13 and CC14, before relying

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					This is particularly important given the requirements of the National Planning Policy Framework. National policy requires plan-making authorities, before relying upon Green Belt land to meet development needs, to demonstrate that they have fully examined other reasonable options. This includes making as much use as possible of suitable brownfield sites and under-utilised land. The Council should therefore provide clear evidence demonstrating: • what suitable brownfield and previously developed sites have been assessed; • what capacity those sites have to accommodate additional housing; • whether opportunities for greater density within existing urban areas have been fully explored; and • why those alternatives are insufficient before allocating active agricultural land at Stoney Lane. Without this evidence, the allocation of HA7 cannot reasonably be regarded as a properly justified planning strategy. *The Grey Belt classification requires proper justification* I also object to the classification of the site as Grey Belt. The NPPF defines Grey Belt as Green Belt land comprising previously developed land and/or other land which does not strongly contribute to specified Green Belt purposes. The Council therefore needs to provide a clear and transparent assessment of the Stoney Lane site against the national definition rather than simply treating its classification as Grey Belt as sufficient justification for development. In particular, the fact that land may be capable of being classified as Grey Belt does not in itself remove the need to	upon the development of active agricultural land on the edge of Spondon. I therefore respectfully request that the Inspector finds Policy HA7 unsound and recommends its deletion or appropriate modification unless the Council can provide clear and proportionate evidence demonstrating that the allocation is justified, that reasonable alternatives have been fully considered, and that the allocation is consistent with national planning policy.

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					demonstrate that development is justified or that the wider requirements of national planning policy have been satisfied. The NPPF specifically requires authorities to examine other reasonable options for meeting development needs and, where Green Belt land needs to be released, gives priority to previously developed land before Grey Belt land which is not previously developed. The Council therefore needs to demonstrate why the proposed development of this agricultural site is necessary when other brownfield and City Centre opportunities remain available. *Conflict with the Council's own development strategy* The allocation also appears difficult to reconcile with the Council's stated "brownfield and City Centre first" approach to development. There are other sites within the Plan, including Policies CC11, CC13 and CC14, which provide opportunities for development within the existing urban area. It is difficult to see how the allocation of 400 homes on agricultural land on the edge of Spondon represents a genuine brownfield-first approach unless the Council can demonstrate that the reasonable capacity of these existing urban opportunities has been fully exhausted. The Council should therefore provide a clear explanation of why these sites cannot accommodate a greater proportion of the housing requirement before land at Stoney Lane is released. *Urban sprawl and Green Belt purposes* The proposed development would create a significant eastern extension to Spondon. The Council's own policy wording	

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					describes HA7 as an "eastern urban extension to the suburb of Spondon." This raises legitimate concerns regarding the impact of the development on the openness and permanence of the Green Belt and the potential for further outward expansion of the urban area. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, while one of the purposes of the Green Belt is to safeguard the countryside from encroachment. The Council should therefore demonstrate clearly why this particular urban extension represents an appropriate and sustainable pattern of development and how its impacts on the Green Belt have been properly assessed. *Infrastructure and sustainability concerns* There are also significant concerns regarding the ability of existing infrastructure to accommodate a development of this scale. The proposed allocation itself acknowledges the need for: • transport improvements; • additional education infrastructure; • a comprehensive surface-water drainage solution; • green infrastructure; • open space; and • other infrastructure contributions. The fact that these requirements are specifically identified within Policy HA7 demonstrates that the development would create significant additional demands on local infrastructure. There are particular concerns regarding school capacity, surface-water drainage and the local highway network,	

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					including the impact of additional traffic on Stoney Lane and the surrounding roads. These impacts need to be properly evidenced and assessed as part of the plan-making process rather than being left to be addressed at a later planning application stage. *Conclusion* For the reasons above, I consider Policy HA7 to be unsound. The allocation is not justified, because the Council has not adequately demonstrated why 400 homes need to be allocated on active agricultural land at Stoney Lane when other brownfield, previously developed and City Centre opportunities exist. I also consider the allocation to be inconsistent with national planning policy, particularly the requirement to fully examine reasonable alternatives, maximise the use of suitable brownfield and under-utilised land, and apply the national approach to Green Belt and Grey Belt land.	
Kendal Skivington	Policy HA7: Stoney Lane, Spondon	Objects		No	I'm writing to you with my objection's to the above Policy HA7 Stoney lane, to build 400 new homes on the land behind Stoney lane in Spondon. I appreciate your value time in reading this email, as sure you are going to receive many regarding this. It is my consideration that this policy is UNSOUND under Paragraph 36 of the National Planning Framework. The land you are proposing should be classed as GREEN BELT, this land has been farmed for many many years and is still farmed every year by local farmers. This is precious agricultural land, which our country so desperately needs to keep, while I do also understand the need for more housing,	

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					other BROWNFIELD sites with Derby City, which you have already highlighted could easily take these extra house. I'm sure you are only to aware of all the usual NIMBY arguments there are against new home being built, and the impact on local infrastructure: Schools Doctors Dentists Transport These are all valid arguments, my objections still include these points, however I have other serious concerns with the number of houses proposed along with the entrance and exit of the site. The impact this will have on the community and it local enviroment will be far reaching and devastating to the local community. **<u>Safety concerns of the entrance? exit</u>** My understanding is that will only be ONE entrance/exit to the site, this being on Stoney lane. this is right ontop of a very busy slip road off the A52. Which even in its current state is not fit for purpose. tghe volume and speed of traffic that uses and passes this junction is at time frightening. In the last two weeks thetre has been two very serious accidents on which involved the Air Ambulance landing on the A52. The site entrance to too closure to this alfeady dangerous junction. Stoney lane is a walkway to and from Asterdale Primary school for many children and their families. To have a building site that would have heavy plant vechiles continually using it during school drop off doesnt even bare thinking about what dangers the small children will face. Along with	

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					thjis after the site is completed with 400 homes, thats the potential for 800+ cars leaving the site at school run times, it will only be a matter of time before a child is hurt ior even worse. There is also a Primary school on Sandrigham drive, which is one of the main routes in and out of Spondon. I suspect any traffic that leaves the site would turn on to the A52 to head towards Nottingham, or if they go to Derby they would still head towards the Ocbrook/Borrowash exit, then go back on A52 to head towards Derby. This will cause massive tailbacks during peak times at both these junction. Or the traffic would just head through Spondon village, which even now cant cope with the gtraffic during peak times, as ther is only one road out of the small village. **<u>Impact on local enviroment</u>** This land as I have already mentioned is farmed by local farmers planting wheat and barley every year. This is vital and much need agricultural land that forms a GREEN wedge between Spondon/Ockbrook/Borrowash. It is used by hundreds of loacls for walking. dog walking and enjoyiong the green space. In an age where we are trying to keep children off electronic devices and out into the frsh air and country side, PLEASE keep this valuable open space that locals can walk to with their families and not have to use cars to get close to nature. I have spotted red kites in the last two years flying in the fields on this site, we need to keep this land as GREEN BELT it is farmed, and our children need to see this.	

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					If this site goes ahead along with the Bloor and Miller home site, Spondon area will increase by 25%, without any new Primary schools, Doctors, Dentists ETC. I hope you do read this email and its not just filed away, my concerns for the entrance and ext of this site are extremly worrying as I have already mentioned the junction in its current state is not fit for purpose, God help us if 400 home get built. Spondon has already seen the major issues that have been caused by the dale road site and they are only weeks in to the devlopment. Also will the council compensate the houses that back onto this development for the devaluation of their propery due to the homes being bulit in their backyard. I cant even begin to imgine the dust and noise this site will produce. Kind Regards A very worried Spondon resident	
Alison Slater	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to register my objection to the proposed development on the Stoney Lane site. I believe Policy HA7 (Stoney Lane, Spondon - 400 homes) is UNSOUND, not justified and not consistent with National Policy. **NOT JUSTIFIED and NOT CONSISTENT WITH NATIONALPOLICY** • The site is currently active agricultural farmland, it has been classified as 'GREY BELT' to justify its removal from the Green Belt, the national planning policy defines Grey Belt as land within the Green Belt that is poor quality, or underperforming or has been	I request that Site HA7 (Stoney Lane, Spondon- 400 home) should be removed from the local Plan. I consider the allocation of this site to be Un-justified, Unsound and In-Consistent with National Policy. The council should reallocate the 400 dwellings into existing brownfield and city-centre regeneration allocations. (Policies CC4, CC11,CC13 and CC14).

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					previously developed. I watched the crops being harvested from these fields a few weeks ago. • The land has been incorrectly defined as Grey Belt without any justification why other sites that are brownfield or city-centre regeneration are not being considered for this development. There are many sites that should be considered before removing active farmland from the greenbelt. • Developing this site would contribute to the urban sprawl, Spondon is a great community and further development would dilute the pride and care that makes this a great village. • I feel very strongly that Spondon doesn't have the infrastructure to support 400 properties on this site, including roads, drains, school capacity and health care. As a resident of Stoney Lane I see traffic every day heading to the A52, the junction onto the A52 already struggles to cope with the volume of vehicles, there is a very short slip road to leave or join the road and adding the access road to the new development so close to this junction I feel will be very dangerous and will cause congestion and increased accidents. I have also experienced the traffic going through the village, again the roads are already insufficient for the current traffic and that is before the new developments already in progress are completed.	
Ian Slater	Policy HA7: Stoney Lane, Spondon	Objects		No	I I would like to register my objection to the proposed development on the Stoney Lane site. I believe Policy HA7	The Site HA7 (Stoney Lane - 400 Homes) is UNSOUND as it does not comply with the "Justified"

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					(Stoney Lane, Spondon - 400 homes) is unsound, not justified and not consistent with National Policy. • Not Justified - Classifying as Grey Belt. It is active agricultural farmland and should not have been reclassified without demonstrating that all brownfield sites had been fully considered. • Not Consistent with National Policy - Allocating Active Agricultural Farmland for development conflicts with National Planning Policy and the Council's own strategy of "Brownfield and City Centre First". Development of this site would add to further expansion of Urban Sprawl. It would place significant extra demands on local infrastructure such as roads, school capacity and other amenities. Highway access/egress at Stoney Lane is very close to the strategic road A52 junction which would add further risk to commuters and pedestrians at this already inadequate intersection. The Council has already identified other brownfield development opportunities (CC4, CC11, CC13, CC14) which should be delivered before developing active Green Belt Land.	and "Consistent with National Policy" tests by misclassifying active Green Belt Land as Gray Belt and therefore should be deallocated from the Local Plan. The 400 dwellings should be, in accordance with the Plan's stated "Brownfield and City Centre First" strategy, be reallocated into existing brownfield and city centre regeneration allocations prioritised under Policy CC4 (City Centre Mixed- Use Sites), Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter), CC14 (North Castleward).
Councillor Smale*	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing in my official capacity as Local Ward Councillor for Spondon to submit a formal representation regarding the *Local Plan for Derby 2023 to 2043 Regulation 19 Submission Draft Plan*. Having thoroughly reviewed the pre-submission draft documents, supporting evidence, and the *Test of Soundness*	**Deallocate Policy HA7 (Stoney Lane, Spondon - 400 dwellings) in its entirety from the Local Plan.** The 400-dwelling allocation should be redistributed to

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					Guidance Note, I wish to state in the strongest possible terms my objection to **Policy HA7 (Land East of Stoney Lane, Spondon)** . It is my considered representation that the inclusion of Policy HA7 renders the draft Local Plan **UNSOUND** under Paragraph 36 of the National Planning Policy Framework (NPPF) on two specific grounds: **1. Not Justified:** The proposed allocation is not based on an appropriate or robust evidence base, nor does it reflect a justifiable spatial strategy when reasonable alternatives exist. **2. Not Consistent with National Policy:** The classification and release of active Green Belt farmland as "Grey Belt" directly misinterprets national planning definitions and contradicts the Council's own stated spatial principles. Below, I set out the detailed grounds for this objection. **1. Misclassification of Active Farmland as "Grey Belt" (Inconsistency with National Policy)** Paragraph 302 of the draft Plan states that land east of Stoney Lane was previously in the Green Belt, but was identified through Council analysis as "grey belt" land to facilitate an eastern urban extension of Spondon.	allocated brownfield regeneration sites within the City Centre (under Policies CC4, CC11, CC13, or CC14), optimising higher density urban housing in line with Paragraph 81 ("brownfield and City Centre first"). The land east of Stoney Lane should be fully reinstated as protected Nottingham-Derby Green Belt under Policy EN5.

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					This determination represents a fundamental flaw in the evidence base and conflicts with National Planning Policy: **National Definition of "Grey Belt":** National planning guidance explicitly defines "Grey Belt" as land within the Green Belt that is previously developed (brownfield) or makes a demonstrably weak or limited contribution to core Green Belt purposes. • **Performance of Site HA7:** The land allocated under Policy HA7 is an active, open agricultural field that performs vital Green Belt functions. Specifically, it maintains visual openness, safeguards the countryside from urban encroachment, and prevents the outward sprawl of the Spondon urban boundary toward neighbouring rural parishes. • **Absence of Degradation:** Site HA7 is not disused, degraded, or brownfield infill. Reclassifying high-performing agricultural Green Belt as "Grey Belt" sets an unsound precedent that undermines national Green Belt protections set out in the NPPF. Failure to Optimise Reasonable Brownfield Alternatives (Unjustified Strategy) For a plan to be **Justified**, it must represent an appropriate strategy, considering reasonable alternatives, based on proportionate evidence. Furthermore, Paragraph 81 of the	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					draft Plan explicitly commits Derby City Council to a **"brownfield, and City Centre first"** spatial strategy. Releasing 400 dwellings on Green Belt farmland at Stoney Lane before fully exhausting high-priority brownfield capacity within the urban core directly contradicts Policy HA1 and Paragraph 81: • **Unallocated City Centre Capacity:** The draft Local Plan identifies substantial brownfield and regeneration allocations within the City Centre capable of absorbing significant residential growth. Key examples include: ○ **Policy CC11 (Derby Riverside):** Allocated for a minimum of 600 homes on brownfield waterfront land. ○ **Policy CC13 (Railway Station Quarter):** Allocated for a minimum of 500 homes on underutilised transport-adjacent sites. ○ **Policy CC14 (North Castleward):** Allocated for 400 homes on urban regeneration land— matching the Stoney Lane yield precisely. ○ **Policy CC4 (Mixed-Use Allocations):** Identifies capacity for over	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					1,400 homes across central brownfield opportunity sites. • **Failure of the Sequential Approach:** Allocating greenfield/Green Belt land on the outer administrative periphery while brownfield regeneration sites inside the Ring Road remain available demonstrates that the Council has failed to prove that the release of Site HA7 is necessary or justified. Infrastructure Constraints and Local Impacts The allocation of 400 homes under Policy HA7 introduces severe cumulative impacts on local infrastructure and community services that have not been adequately resolved within the policy criteria: • **Highways & Strategic Road Access:** Primary vehicular access is proposed onto Stoney Lane at its southern end, immediately adjacent to the A52 trunk road junction. Stoney Lane is already subject to severe peak-time congestion. Injecting traffic from 400 additional households at this restricted bottleneck poses serious highway safety and network capacity issues that cannot be mitigated by minor off-site financial contributions. • **Educational Capacity:** Policy HA7(i) relies on financial contributions toward off-site education	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					infrastructure rather than delivering on-site provision. Secondary catchment schools are already operating at full capacity. • **Environmental & Topographical Buffering:** The site forms a prominent gateway into Derby from the east. Developing built structures of this density on open agricultural land permanently harms the visual landscape and setting of the city's eastern boundary, failing the placemaking requirements set out in Policy GD1 and Policy GD2.	
Betty Smith	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to register my objections to the above planning policy number HA7 Stoney Lane Spondon. I think the policy is unsound, not justified and inconsitent with National Policy. The land is active agricultural land, rather than poor quality or previously developed 'grey belt' The development would cause more stress to the already stressed out services that we have in Spondon, ie doctors, dentists, bus services, roads, schools. The substantial brownfield and city centre housing opportunities should be prioritised before releasing Green Belt farmland for development.	

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					The proposed allocation appears inconsistent with the Plan's stated 'brown field and city centre first' strategy. I have lived on [redacted] since 1958 and have enjoyed having the fields, being considered for housing, as a special place to walk my dogs, take my children , grandchildren and now my great grandchildren for walks. It upsets me greatly that any housing plans should be considered for this area, when there are many more suitable places that aren't green belt. The facilities in Spondon are stretched now without having all this extra strain on them. PLEASE reconsider this planning application for the sake of all the people of Spondon.	
Marcus Smith	Policy HA7: Stoney Lane, Spondon	Objects	No	No	It is my considered representation that the inclusion of Policy HA7 renders the draft Local Plan fundamentally UNSOUND under the provisions of Paragraph 35 and 36 of the NPPF, failing specifically on the statutory tests of being Justified and Consistent with National Policy. 1. Misclassification of High-Performing Green Belt as "Grey Belt" (Inconsistency with National Policy) Paragraph 302 of the draft Plan asserts that land east of Stoney Lane constitutes "grey belt" land capable of facilitating an eastern urban extension to Spondon. This determination represents a fundamental flaw in the Council's supporting evidence base and directly conflicts with national planning policy. • Contradiction of Statutory Definitions: National planning guidance restricts the definition of "Grey Belt" to land within	6. I request that the site is deallocated from the local plan. The allocation is unsound as it fails the justified and consistent with national policy tests by misclassify an active green belt farmland as grey belt without demonstrating or giving evidence that that brownfield site alternatives have been fully optimised and tested for reuse. 7. The council must reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					the Green Belt that is previously developed (brownfield) or makes a demonstrably weak or limited contribution to core Green Belt purposes. Site HA7 fits neither criterion. • Demonstrated Green Belt Performance: Site HA7 comprises highly active, contiguous agricultural fields that rigorously fulfill multiple statutory Green Belt purposes under NPPF Paragraph 143. Specifically, it maintains absolute visual and spatial openness, safeguards the countryside from urban encroachment, and prevents the outward sprawl of the Spondon urban boundary into neighbouring rural parishes. • Unsound Precedent: The site exhibits an absolute absence of degradation, contamination, or brownfield infill characteristics. Reclassifying a pristine, high-performing agricultural parcel as "Grey Belt" undermines national Green Belt protections, rendering the plan inconsistent with national policy. 2. Failure to Fulfill the Sequential Approach & Optimise Brownfield Alternatives (Unjustified Strategy) To satisfy the test of soundness, a spatial allocation must be Justified, representing an appropriate strategy when evaluated against reasonable alternatives, backed by proportionate evidence. The draft Plan completely fails this threshold by violating its own stated development hierarchy. • Breach of Core Spatial Strategy: Paragraph 81 of the draft Plan commits Derby City Council to a mandatory "brownfield and City Centre first" spatial strategy. The release of 400 greenfield dwellings at Stoney Lane before fully exhausting high-priority brownfield capacity within the urban core directly breaches Policy HA1. Sufficient Sustainable	prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter), or Policy CC14 (North Castleward) in accordance with the Plan's stated brownfield and city first strategy. The fact that this hasn't been considered is a massive oversight by planners and officials and they must be held to account.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Alternatives Available: The draft Local Plan explicitly identifies substantial, viable brownfield and regeneration allocations within the City Centre capable of absorbing this exact quantum of residential growth. Key examples include: • Policy CC11 (Derby Riverside): Minimum of 600 homes on brownfield waterfront land. • Policy CC13 (Railway Station Quarter): Minimum of 500 homes on underutilised transport-adjacent sites. • Policy CC14 (North Castleward): 400 homes on urban regeneration land—matching the Stoney Lane yield precisely. • Policy CC4 (Mixed-Use Allocations): Capacity for over 1,400 homes across central brownfield opportunity sites. • Failure of the Spatial Hierarchy: Allocating greenfield/Green Belt land on the outer administrative periphery while highly sustainable brownfield regeneration sites inside the Ring Road remain unexhausted proves that the allocation of Site HA7 is neither necessary nor justified. 3. Severe Infrastructure Constraints and Lack of Deliverability (Ineffective Policy) The allocation of 400 homes under Policy HA7 introduces severe cumulative impacts on local infrastructure and community services that cannot be resolved under the current policy criteria, rendering the allocation Ineffective. • Severe Highway Safety and Capacity Issues: Primary vehicular access is proposed onto Stoney Lane at its southern terminus, immediately adjacent to the strategic A52 trunk road junction. Stoney Lane is an over-capacity local corridor subject to critical peak-time gridlock. Injecting a projected 1,000+ daily vehicle movements from 400 additional	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					households into this highly restricted bottleneck creates severe highway safety hazards and compromises network capacity. These impacts cannot be mitigated by minor off-site Section 106 financial contributions. • Failure of Educational Infrastructure Provision: Policy HA7(i) relies heavily on financial contributions toward off-site education infrastructure rather than delivering on-site provision. Secondary catchment schools serving Spondon are verified to be operating at full capacity. The plan fails to demonstrate how or where physical school expansions can legally and structurally occur. • Irreparable Harm to Landscape Character and Gateway Settings: The site forms a prominent visual gateway into the Derby urban area from the east. Developing built structures of this density on open agricultural land permanently erases the rural setting of the city's eastern boundary, failing the statutory placemaking and character requirements set out in Policy GD1 and Policy GD2.	
Mark Smith	Policy HA7: Stoney Lane, Spondon	Objects		No	My main concern is It appears that the council has erroneously reclassified the area as Grey Belt when there is no evidence that it is anything other than Green Belt. As a resident of Spondon for 57 years, this area has always been actively farmed is not poor quality, nor has it been previously developed. I would like to see the sound justification for changing the classification as I suspect it will be weak and tenuous at best. This area is important for preventing further urban sprawl when there are other brownfield sites that could be used	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					instead. Accepting that they would not be as profitable or easy to build on, they should be the first place to build upon. Suggested Brownfield sites that have already been reviewed with substantial opportunity, should be built upon first are, but not limited to as follows. City Centre 1,400 homes Policy CC4. Derby Riverside 600 Homes Policy CC11. Castleward Policy CC14. Railway Quarter Policy CC13. Also, of significant concern is the effect on the already highly pressured services in the area (to be exasperated by the current development at Spondon Wood) Doctors and Dentists availability are currently deteriorating with waiting lists getting longer than they ever have been and will only be made worse at the expense of general public health. West Park School has recently expanded to what the headmaster called beyond the ideal size so would probably need further expansion to meet needs. Roads in and out of Spondon ave always been pressured with more homes creating further traffic delays and would be a source of stress and pollution. This area is also used as a popular walking area where people can destress without being forced to interact with numerous members of the public as would become the case when people will only be able to walk in the fewer remaining ever smaller green areas. I would like to suggest that this area should not be considered until the aforementioned developments have been utilised	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					and even then there should be reservations about the relentless sprawl heading towards Ockbrook.	
Martin Smith	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the inclusion of **Policy HA7 – Stoney Lane, Spondon** in the proposed Local Plan for Derby 2023–2043. The policy proposes a **minimum of 400 new homes** on land east of Stoney Lane, currently comprising active agricultural farmland and open Green Belt land. I live very close to the fields proposed for development and am therefore directly affected by the proposed allocation. I am also aware of the considerable concern amongst local residents about the cumulative effect of further development on Spondon's roads, schools, healthcare, drainage, amenities and wider infrastructure. I consider Policy HA7 to be **UNSOUND**, specifically because it is: • **Not Justified**; and • **Not Consistent with National Policy**. I strongly request that Policy HA7 is **deleted from the Local Plan** and that the proposed 400 dwellings are instead accommodated through appropriate brownfield, previously developed, underutilised and city-centre regeneration opportunities. **1. The release of this Green Belt land has not been adequately justified** The proposed HA7 site is active agricultural farmland forming part of the open countryside adjoining Spondon.	**Requested modification** For all of the reasons set out above, I request the following modification to the Local Plan: **DELETE POLICY HA7 – STONEY LANE, SPONDON, INCLUDING THE PROPOSED ALLOCATION OF A MINIMUM OF 400 DWELLINGS.** The Council should instead seek to accommodate these 400 dwellings through suitable existing urban, brownfield, previously developed, underutilised and city-centre regeneration opportunities, including the substantial housing capacity identified within the Plan's city-centre allocations. In particular, the Council should demonstrate that the capacity identified through **Policy CC4, Policy CC12 (Derby Riverside), Policy CC14 (Railway Station Quarter) and Policy CC15 (North Castleward)** has been fully considered and optimised

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					Its development would result in the permanent loss of open agricultural land and would extend the built-up area of Spondon into the countryside. The NPPF places significant importance on protecting the Green Belt and identifies purposes including checking unrestricted sprawl and preventing the merging of towns. I recognise that the current NPPF allows certain Green Belt land to fall within the definition of **grey belt**. However, this does not mean that a site is suitable for development merely because it has been identified or classified as grey belt. The Council must demonstrate, with robust site-specific evidence, why this particular site meets the current grey-belt definition, how it performs against the relevant Green Belt purposes and why its release is justified. The Council must also demonstrate that it has **fully examined all reasonable alternatives for meeting its development needs**, including making as much use as possible of suitable brownfield and underutilised land. I do not consider that the case for releasing HA7 has been sufficiently demonstrated. **2. The Council must demonstrate that the site genuinely represents an appropriate grey-belt release** The fact that land may be considered grey belt does not remove the requirement for proper planning judgement. The current NPPF requires that, where Green Belt land needs to be released for development, priority is given to **previously**	before releasing additional open agricultural Green Belt land. **18. Information I request the Council and Planning Inspector to consider** Before the Plan proceeds to examination, I ask that the Council provides clear evidence addressing: 1. precisely why the Stoney Lane site qualifies as grey belt; 2. the site's contribution to each relevant Green Belt purpose; 3. what reasonable brownfield, previously developed and underutilised alternatives have been considered; 4. why those alternatives cannot accommodate the proposed 400 homes; 5. how the Council has assessed the cumulative impact of HA7 together with the 259 homes at Dale Road and up to 90

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					developed land, followed by grey belt land which is not previously developed, before other Green Belt locations. The NPPF also makes clear that the overall strategy must be based upon making as much use as possible of suitable brownfield sites and underutilised land and must promote sustainable patterns of development. The Council should therefore provide clear evidence demonstrating: 1. precisely why HA7 qualifies as grey belt; 2. the site's contribution to the relevant Green Belt purposes; 3. why the release of this particular agricultural site is necessary; 4. what suitable brownfield and previously developed alternatives have been considered; 5. whether those alternatives have been fully optimised; 6. why those alternatives cannot accommodate the proposed housing; and 7. why HA7 represents a more sustainable location than the reasonable alternatives. Simply labelling the site grey belt is not sufficient justification for allocating it for 400 homes. **3. The allocation conflicts with the Council's brownfield and city-centre-first approach** The proposed release of open agricultural Green Belt land is particularly difficult to justify when the Council's own Local	homes at Royal Hill Road; 6. how additional traffic will affect the A52, its slip roads, junctions and the road network through Spondon; 7. how peak-time congestion will be affected; 8. how education capacity will accommodate the combined increase in population; 9. how healthcare and other community infrastructure will accommodate that growth; 10. how surface-water drainage and sewerage infrastructure will cope with the cumulative development; 11. what cross-boundary discussions have taken place with Erewash Borough Council and relevant transport authorities;

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					Plan strategy identifies substantial opportunities for housing within the existing urban area and city centre. The current Plan identifies significant capacity within the City Centre, including: • **Derby Riverside – minimum 600 homes (Policy CC12);** • **Railway Station Quarter – minimum 500 homes (Policy CC14);** • **North Castleward – minimum 400 homes (Policy CC15); and** • **at least 1,400 additional homes through mixed-use regeneration allocations identified in Policy CC4.** The Council's own draft Plan therefore identifies thousands of potential homes in highly sustainable city-centre and regeneration locations. This raises a fundamental question: **why is it necessary to release open agricultural Green Belt land at Stoney Lane when such substantial urban and regeneration opportunities already exist?** I am not objecting to the principle of Derby providing new homes. The issue is **where those homes should be located**. The NPPF expressly requires plans to make as much use as possible of suitable brownfield sites and underutilised land and, where Green Belt release is necessary, to give priority to previously developed land. The Council must therefore demonstrate that its brownfield and city-centre opportunities have been genuinely and	12. how the Council has assessed the cumulative landscape and visual impact of development around Spondon; and 13. why, given the substantial development already committed around Spondon and the availability of urban and city-centre opportunities elsewhere, a further 400 homes at Stoney Lane represents a sustainable and proportionate strategy. **Conclusion** I strongly object to the inclusion of **Policy HA7 – Stoney Lane, Spondon** in the proposed Local Plan. This is not simply an objection to new housing or a desire to prevent change. It is an objection based on **Green Belt policy, the loss of active agricultural land, urban sprawl, the availability of**

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					realistically optimised before resorting to the release of agricultural Green Belt land. **4. HA7 would cause further urban sprawl** The development would create a substantial eastern urban extension to Spondon. The Council's own proposed wording for HA7 describes it as an **"eastern urban extension"** and requires an eastern landscaping buffer specifically to soften the visual impact of development from the Green Belt and open countryside beyond. This demonstrates the scale of the change proposed. The existing fields provide a clear open countryside setting and contribute to the separation between the built-up area and the countryside. Replacing this landscape with at least 400 dwellings, roads, lighting, gardens, driveways and associated infrastructure would represent a significant and permanent urbanising effect. A landscaping buffer may reduce some visual effects, but it cannot recreate the existing open agricultural landscape or reverse the fundamental change from countryside to urban development. The allocation therefore risks contributing to precisely the outward urban expansion and sprawl which Green Belt policy seeks to prevent.	**alternative urban and brownfield opportunities, cumulative development, highway capacity, A52 traffic, congestion, infrastructure capacity, education, healthcare, drainage, landscape impact and the sustainability of the proposed location**. The cumulative development already approved around Spondon must be taken into account. The Council cannot reasonably consider another 400 homes in isolation when residents are already facing the consequences of significant additional development in the area. The Local Plan is the appropriate stage at which to consider the **combined and long-term consequences of development**, rather than waiting until individual developments have been built and infrastructure pressure has become unavoidable. The Council's own HA7 policy recognises the need for transport mitigation, education

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					5. The cumulative impact of development around Spondon has not been properly addressed My strongest concern is that HA7 is being considered against a background of **substantial development already approved or under construction around Spondon**. This cannot reasonably be treated as a standalone 400-home allocation. A development of **259 dwellings on land west of Dale Road**, within Erewash Borough, has already been approved. In addition, planning permission has been granted following appeal for **up to 90 dwellings at Royal Hill Road, Spondon**. That represents approximately **349 additional dwellings already committed in the immediate area**, before the proposed 400 homes at Stoney Lane are considered. If HA7 is added, these three developments together represent approximately **749 additional dwellings**. This is a substantial increase in population and activity and will inevitably place additional pressure on local transport, schools, healthcare, drainage, public services and community facilities. The Council must assess this cumulative position rather than considering HA7 in isolation. **6. Traffic from the A52 and the cumulative effect on Spondon's road network**	contributions, drainage infrastructure, landscaping and other measures. This reinforces the need for a thorough assessment of whether the site is genuinely capable of accommodating development of this scale without unacceptable cumulative consequences. The NPPF requires the Council to make as much use as possible of suitable brownfield and underutilised land and to prioritise previously developed land where Green Belt release is necessary. I therefore respectfully request that the Planning Inspector finds **Policy HA7 UNSOUND** on the grounds that it is **NOT JUSTIFIED** and **NOT CONSISTENT WITH NATIONAL POLICY**, and that the allocation is removed from the Local Plan. **The requested modification is: Deallocate Site HA7 (Stoney Lane, Spondon – minimum 400 homes) from the Local Plan. The allocation is UNSOUND because it has not been demonstrated to be justified or**

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					I live close to the proposed site and am particularly concerned about the impact of additional traffic entering and travelling through Spondon. The A52 is an important route serving the area and traffic entering and leaving Spondon is already required to use a relatively constrained local highway network. The proposed HA7 development would generate substantial additional vehicle movements. Those movements would be added to traffic generated by the already-approved Dale Road and Royal Hill Road developments. The Council must therefore assess the **cumulative highway impact**, including: • the existing traffic situation; • the 259 homes approved at Dale Road; • the up to 90 homes approved at Royal Hill Road; • the proposed 400 homes at Stoney Lane; • traffic entering Spondon from the A52; • the A52 and its slip roads and junctions; • congestion at peak times; • junction capacity; • highway safety; • pedestrian and cycle movements; • public transport capacity and reliability; • air quality; and • the cumulative effects of other committed or planned development in the surrounding area.	**consistent with national planning policy, particularly in relation to the release of Green Belt land, the prioritisation of brownfield and previously developed land, sustainable patterns of development and the cumulative impacts of development on transport and infrastructure.** The Council should instead seek to accommodate the proposed housing through suitable existing brownfield, previously developed, underutilised and city-centre regeneration opportunities, including the housing capacity identified through **Policy CC4, Policy CC12 (Derby Riverside), Policy CC14 (Railway Station Quarter) and Policy CC15 (North Castleward)**. I ask that this representation is given full consideration during the examination of the Local Plan and is made available to the appointed Planning Inspector.

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					The fact that the Dale Road development itself requires significant highway mitigation, including contributions towards improvements to the **A52 westbound off-slip**, is highly relevant. It demonstrates that the transport impacts associated with additional housing in this area are already significant enough to require mitigation. It would therefore be inadequate to assess HA7 on the assumption that the road network can accommodate 400 homes without properly modelling the **combined effect of all committed and proposed development**. **7. Cross-boundary impacts with Erewash Borough Council must be considered** The Dale Road development is within Erewash Borough rather than Derby City. However, residents do not experience traffic, congestion or infrastructure according to administrative boundaries. Traffic generated by a development in Erewash can enter Spondon, use Derby's roads, affect Derby's junctions and add pressure to services used by Derby residents. The Council should therefore demonstrate that it has properly considered the **cross-boundary cumulative effects** of the Dale Road development when assessing HA7. It should also demonstrate appropriate engagement with Erewash Borough Council and relevant highways and transport authorities.	

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					The administrative boundary between the two councils cannot reasonably be used to compartmentalise the impacts of development. **8. Spondon's infrastructure is already under pressure** Spondon is already experiencing significant development pressure. The addition of a further 400 homes would increase demand for: • school places; • GP and healthcare services; • roads and junctions; • public transport; • drainage and sewerage; • waste and other local services; • recreational facilities; • open space; and • other community infrastructure. The Council's own HA7 policy recognises the need for contributions towards **transport improvements, education infrastructure and other infrastructure**, together with a comprehensive surface-water drainage solution. These requirements are not incidental. They demonstrate that the Council itself recognises that development of this scale will have material impacts requiring mitigation. However, developer contributions should not be treated as a blanket solution to cumulative infrastructure problems.	

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					The Council must demonstrate that the infrastructure required can be **delivered at the time it is needed**, at a scale sufficient to deal with the combined effects of development, rather than relying upon contributions whose eventual effectiveness remains uncertain. **9. Education capacity must be properly assessed cumulatively** The Council's own HA7 policy requires financial contributions towards improved education infrastructure to mitigate the impacts of the development. This is particularly important given the additional housing already approved around Spondon. The Council should therefore demonstrate that sufficient school capacity will be available to serve the combined population arising from: • existing development; • the Dale Road development; • the Royal Hill Road development; and • the proposed HA7 development. The capacity of local schools should not be assessed on the basis of HA7 alone. **10. Drainage and surface-water management** The development would replace a substantial area of currently undeveloped agricultural land with housing, roads and other hard surfaces.	

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					This has the potential to materially alter surface-water runoff and increase pressure on local drainage infrastructure. The Council's own HA7 policy acknowledges the need for a **comprehensive surface-water drainage solution**. The Council should provide robust evidence that the development can be accommodated without increasing flood risk or causing unacceptable drainage consequences for existing residents and properties. The assessment should consider climate change, cumulative development and the long-term effectiveness and maintenance of any sustainable drainage system. **11. Loss of active agricultural land** The allocation would permanently remove active agricultural land from agricultural use. Agricultural land is a finite resource and its loss should not be treated as insignificant when there are potential alternative locations for housing. The Council should therefore demonstrate that the agricultural value of the site has been properly assessed and that the permanent loss of this land is justified when reasonable alternatives are available. **12. Landscape, visual impact and the character of Spondon** The fields proposed for HA7 contribute significantly to the character and setting of Spondon.	

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					I live close to this land and am concerned about the permanent change that would result from replacing open farmland with a substantial residential estate. The resulting development would introduce housing, roads, lighting, vehicles and associated infrastructure into an area which is currently open countryside. This would materially change the landscape character and visual relationship between Spondon and the countryside beyond. The Council should therefore attach significant weight to the permanent loss of this open landscape. **13. The scale of development is becoming disproportionate for Spondon** The issue is not whether Spondon should accommodate any development. The issue is whether **another 400 homes can reasonably be added to a settlement which is already facing substantial additional development and infrastructure pressure**. With 259 homes approved at Dale Road and up to 90 homes approved at Royal Hill Road, adding another 400 homes would bring approximately 749 additional dwellings across these schemes. The Council must consider whether this cumulative level of development is proportionate to Spondon's existing	

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					infrastructure and whether the resulting pressure on roads, schools, healthcare and other services can realistically be accommodated. Spondon needs infrastructure that keeps pace with development — **not development that continually places additional strain on infrastructure that is already under pressure**. **14. HA7 is not the only way of meeting Derby's housing requirement** I recognise the importance of providing sufficient housing and do not suggest that Derby's housing requirement should simply be ignored. However, the existence of a housing requirement does not automatically make every potential housing site appropriate. The proper planning question is whether HA7 represents an appropriate, sustainable and justified location when compared with reasonable alternatives. The NPPF requires the Council to make as much use as possible of suitable brownfield sites and underutilised land, and where Green Belt release is necessary to give priority to previously developed land before non-previously-developed grey belt land. Given the substantial housing opportunities identified within the city centre and existing urban area, the Council must provide compelling evidence as to why open agricultural	

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					Green Belt land at Stoney Lane needs to be released at this stage. **15. Policy HA7 fails the Test of Soundness – NOT JUSTIFIED** I consider Policy HA7 to be **NOT JUSTIFIED** because the Council has not demonstrated that: • the release of this agricultural Green Belt site is necessary; • the site is the most appropriate location for the proposed housing; • all reasonable brownfield, previously developed and underutilised alternatives have been fully considered and optimised; • the proposed development represents a sustainable pattern of development; • the cumulative transport effects of existing and committed development have been properly assessed; • sufficient infrastructure can be delivered alongside the development; and • the permanent loss of open agricultural land and the resulting urban expansion are justified. **16. Policy HA7 fails the Test of Soundness – NOT CONSISTENT WITH NATIONAL POLICY** I also consider Policy HA7 to be **NOT CONSISTENT WITH NATIONAL POLICY**. The allocation has not been adequately demonstrated to accord with the NPPF's approach to: • Green Belt protection and release;	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					• grey-belt assessment; • prioritisation of previously developed land; • making effective use of suitable brownfield and underutilised land; • sustainable patterns of development; • transport capacity and congestion; • cumulative transport impacts; and • the provision of infrastructure necessary to support sustainable development.	
Mike B Smith	Policy HA7: Stoney Lane, Spondon	Objects		No	THE ABOVE POLICY IS UNSOUND It is Not Justified and Is not consistent with National Policy I write this as a local resident of Spondon (of some 40+ years) residing at [redacted] therefore with some knowledge of the village and justification for my views. The reasons that the above Policy HA7 is Unsound are as follows:- 1 - The site is active agricultural land, rather than poor quality or previously developed "Grey Belt" (It being used extensively for the growing of crops in the current year of 2026 and thus certainly active) 2 - Development would contribute to the further expansion of urban development and urban sprawl. 3 - There are already significant pressures on local infrastructure, including roads, drainage and school capacity.	I request that the Local Plan for Derby be modified by :- Deallocating Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan, because The allocation is Unsound as it fails the 'Justified' and 'Consistent with National Policy' tests by Misclassifying active Green Belt farmland as 'Grey Belt' without any demonstration that all reasonable brownfield alternatives have been fully optimised. The Council should actively look to reallocate the 400 homes identified as site HA7 (Stoney Lane, Spondon) into existing brownfield and city-centre regeneration allocations

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					4 - The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. 5 - The proposed allocation appears inconsistent with the Plan's stated "Brownfield and City-Centre first" strategy.	prioritised under :- Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castle Ward), All in accordance with the Plan's stated 'brownfield and City-Centre first' strategy (Ref Paragraph 81). I trust that you will consider this representation for the deallocation of Site HA7 (Stoney Lane, Spondon - 400 homes)
Mr M & Mrs DJ Stacey	Policy HA7: Stoney Lane, Spondon	Objects		No	We have lived in Spondon for 50 years and this Green Belt land has been agricultural land all of this time. We cannot understand how this can now be reclassified as Grey Belt suddenly when nothing has changed. The hedgerows are abundant in bird life not seen elsewhere close by as well as small mammals in the fields themselves. This really does appear to contradict the Councils own directive to utilise all brownfield and City Centre Sites before reclassifying active agricultural land. Currently you have identified 4 areas of brownfield / city centre sites totalling close to 3,000 homes which should be activated prior to looking at any green belt areas. Roads in Spondon and surrounding villages are insufficient to allow exit and return at peak times. The increases in traffic expected from the Spondon Wood & Royal Hill Road will only exacerbate this and the entrance to Stoney Lane site is so near to A52 is simply an accident waiting to happen.	

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					Spondon residents already have problems accessing Doctors surgeries & dental practices without the additional pressure from these extra homes. In conclusion we cannot see how this can be justified and does not adhere to national policy; therefore we feel strongly that HA7 (Stoney Lane, Spondon – 400 homes) should be deallocated from your local plan.	
Alison Doyle - Stevenson	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to make a formal representation regarding **Policy HA7 – Stoney Lane, Spondon**, which proposes the allocation of land east of Stoney Lane for a minimum of 400 new homes. I wish to state clearly that I consider **Policy HA7 to be UNSOUND** and I object to the proposed allocation. I recognise the need for new housing, including affordable housing, and I am not opposed to appropriate development in principle. However, I do not believe that allocating this particular site for at least 400 homes represents a justified, effective or sustainable approach to meeting Derby's housing needs. **Policy HA7** Policy HA7 states that:	I therefore request that **Policy HA7 and the proposed allocation of Stoney Lane for 400 homes be removed from the Local Plan**. If the Council is not prepared to remove the allocation, I request that Policy HA7 is substantially reconsidered and that no allocation proceeds unless robust evidence demonstrates that: • the development is genuinely necessary after reasonable brownfield and regeneration

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					"Land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an eastern urban extension to the suburb of Spondon." The policy also requires, amongst other matters, 40% affordable housing, landscaping and green infrastructure buffers, a single vehicular access onto Stoney Lane, financial contributions towards transport and education infrastructure, a comprehensive surface-water drainage solution, retention of trees and hedgerows where possible, and pedestrian connections. In my view, the inclusion of these mitigation requirements itself demonstrates the scale of the constraints associated with developing this site. I do not believe that the evidence presented provides sufficient confidence that development of at least 400 homes can be accommodated without unacceptable consequences for Spondon and the surrounding area. **1. Loss of active agricultural land and the Green Belt** The site is active agricultural farmland rather than previously developed or poor-quality land. I am particularly concerned about the decision to remove this land from the Green Belt and classify it as "Grey Belt". The fact that land may meet the technical definition of Grey Belt	alternatives have been exhausted; • the highway network can safely accommodate the cumulative additional traffic; • sufficient school and community infrastructure can be delivered alongside the development; • surface-water drainage can be satisfactorily addressed without increasing flood risk; • the impact of the loss of agricultural and formerly Green Belt land has been fully assessed; and • the scale and density of development can be accommodated

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					does not mean that development of the land is automatically the most appropriate or sustainable planning option. The land currently performs an important open and agricultural function at the eastern edge of Spondon. Development would represent a substantial physical expansion of the urban area into countryside. Once agricultural and open land is developed for housing, that loss is effectively permanent. I therefore question whether sufficient weight has been given to the long-term value of retaining this land and whether all reasonable alternatives have genuinely been exhausted before allocating it for development. **2. Brownfield and city-centre alternatives** I am concerned that the Council has not demonstrated sufficiently why development of this farmland is necessary when significant brownfield and regeneration opportunities exist elsewhere. The Council's strategy already identifies substantial opportunities for housing within the city centre and on previously developed sites. I believe the Council should prioritise brownfield land, regeneration sites and higher-density development within the	without unacceptable harm to the character and infrastructure of Spondon. I also request that this representation is submitted for consideration as part of the independent examination of the Local Plan.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					existing urban area before releasing agricultural land on the edge of Spondon. This would support regeneration while reducing unnecessary pressure on undeveloped land. **3. Highways and traffic impact** Policy HA7 proposes a **single point of vehicular access onto Stoney Lane at the southern end of the site**. This is a significant concern. A development of at least 400 homes would generate a substantial number of additional vehicle movements. Those movements would not exist in isolation; they would be added to existing local traffic and other planned development. The consequences for Stoney Lane and the surrounding highway network therefore need to be demonstrated robustly rather than assumed capable of being mitigated through financial contributions. I am particularly concerned about additional pressure on local roads, congestion, road safety and the cumulative impact of development. The policy's requirement for financial contributions towards off-site transport improvements does not, by itself, demonstrate that suitable improvements are physically	

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					achievable or that the impacts of the development can actually be satisfactorily mitigated. **4. Pressure on schools and other infrastructure** At least 400 additional homes will create additional demand for education and other community infrastructure. Policy HA7 acknowledges this by requiring financial contributions towards improved education infrastructure. However, a financial contribution is not the same as demonstrating that sufficient school capacity can actually be provided in the right place and at the right time. The Council should demonstrate clearly what additional capacity will be required, where that capacity will be provided and whether it can realistically be delivered before or alongside the proposed housing. The same principle should apply to other essential infrastructure and local services. Existing residents should not experience a deterioration in services because housing development has been permitted before the necessary infrastructure is available. **5. Drainage and surface water**	

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					Policy HA7 specifically requires a comprehensive surface-water drainage solution. Before allocating the site, I believe the Council should be satisfied through robust evidence that the development will not create or worsen drainage or flooding problems either within the development itself or for existing properties and land nearby. This should not simply be deferred until a future planning application. For an allocation of this scale, the Local Plan should demonstrate that a technically feasible and deliverable drainage solution exists. **6. Urban sprawl and the character of Spondon** The development would extend Spondon's built-up area significantly eastwards. Regardless of the technical classification applied to the land, replacing open agricultural land with an estate of at least 400 homes would fundamentally alter the character of this edge of Spondon. Landscaping buffers may soften views of development, but they cannot replicate the openness and character of agricultural countryside.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					I therefore believe insufficient weight has been given to the permanent change in the settlement edge and the cumulative effect of continued outward expansion. **7. The allocation is not sufficiently justified** I recognise that Derby needs additional housing and that the Council must prepare a Local Plan capable of meeting identified needs. However, identifying a housing requirement does not mean that every proposed allocation is automatically sound. Each allocation should be supported by proportionate evidence demonstrating that it is the most appropriate strategy when considered against reasonable alternatives and that the development proposed can realistically be delivered without unacceptable impacts. In the case of Policy HA7, I do not believe that case has been demonstrated sufficiently. The site involves the loss of agricultural land, removal from the Green Belt, significant outward expansion of Spondon, additional traffic movements and additional pressure on schools, drainage and other infrastructure. These are substantial planning considerations and should not be treated merely as matters capable of being dealt with through future mitigation.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Conclusion – Policy HA7 is unsound For the reasons above, I consider **Policy HA7 – Stoney Lane, Spondon to be UNSOUND**. In particular, I do not consider that sufficient evidence has been presented to demonstrate that allocating this site for a minimum of 400 homes represents the most appropriate and sustainable strategy when reasonable alternatives, including brownfield development, city-centre regeneration and other previously developed sites, are considered.	
David Southgate	Policy HA7: Stoney Lane, Spondon	Objects		No	It is of some concern that the above parcel ,which is a long-established and valued public-park and scarce city green space ,can be put into the same new 'Grey Belt Land' category ,with the same 'weakness' awards, as the adjoining parcel DY10 which is open arable farmland in a clearly different setting and landscape scale. Does this suggest an error ,or the scale of assessment/guidance is not detailed enough ?	
Charles Swanson	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to present my views about the above proposal. 1. The above proposal relates to a site that is active agricultural land, and is not of poor quality. It is therefore not a grey belt. 2. The development would contribute to what is referred to as urban sprawl. 3. There are significant pressures on local infrastructure , including GP and dental services, roads and drainage, school capacity, and, of course, police and other blue light services.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					4. There is sufficient brown belt capacity in the Greater Derby area which should be used first. 5. It is inconsistent with the plan known as the Brown Field and City First strategy. Derby City Council must listen to, and take into consideration the thoughts and views of households involved in this plan.	
Elaine Swanson	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the plan to build 400 new homes off Stoney Lane, Spondon (Policy HA7). The application is UNSOUND and UNJUSTIFIED. My objections are based on the following considerations: Grey belt: The land has been misclassified as such is unjustified. It should retain green belt status. National planning policy defines Grey Belt as previously developed, poor-quality or underperforming Green Belt land. The land proposed, off Stoney Lane, is active agricultural farmland. Allocating this land as Grey Belt conflicts with national planning policy. This land is also helping to prevent urban sprawl and performs an important Green Belt function. It is of huge benefit to local people who walk the footpaths, from both a physical and mental wellbeing perspective. It is also a valuable space for wildlife. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy. Allowing development off Stoney Land undermines this regeneration objective by discouraging the recycling of derelict and other urban land**.** Investment should be channeled toward brownfield sites within existing urban areas of Derby. There are already designated sites for development: Derby Riverside (Policy CC11), Railway Station Quarter (Policy CC13), North Castleward (Policy CC14), City	Deallocate Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised.

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					Centre Mixed-Use Sites (Policy CC4). The proposed 400 homes should be reallocated to such areas so they may be fully optimised in accordance with Derby's stated "brownfield and City Centre first" strategy. My other objections relate to existing infrastructure pressures. Spondon is a thriving and very busy community. Building 400 homes off Stoney Lane will have negative consequences for roads and transportation; drainage; and capacity of amenities such as schools, doctors and dentists.	
Thomas Sweeney	Policy HA7: Stoney Lane, Spondon	Objects		No	As a resident in Spondon, I am emailing to oppose the proposal of 400 homes being built on the GREEN BELT land off of Stoney Lane in Spondon. The policy is unsound. Under the relevant tests it is not justified and not consistent with national policy. The site is green belt, not grey belt - it is actively used for farming - see photo attached taken from our house at 19 Burnside Drive, showing the fields behind the houses on the opposite side of the road with a tractor actively farming the land, taken only a month ago. It is clear that development would contribute to the further expansion of urban development and urban sprawl. Currently, there are significant pressures on local infrastructure, including roads, drainage and school capacity and this development would only make matters worse. The council has substantial brownfield sites to use for housing developments as an alternative to this green belt land proposal and should be utilised first. Green belt farmland should be last resort. The proposed allocation appears	Please remove this HA7 Stoney Lane site from the Local Plan as the proposal is unsound and clearly mislabels Green belt farmland as grey belt without any evidence that all brownfield sites have been optimised which fails the Plan's own strategy and is inconsistent with national policy. The proposed 400 homes should be reallocated to the brownfield sites in the city centre under policy CC4, CC11, CC13 or CC14 as per the plan's 'brownfield and city centre first' strategy.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					inconsistent with the Plan's stated "brownfield and city centre first" strategy.	
Janis Szczekala	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally log my objection to the proposed housing allocation under Policy HA7 (Stoney Lane, Spondon) in the draft Derby Plan. I strongly oppose this allocation based on the following material planning considerations. 1. Loss of Privacy and Overlooking: My property at [redacted] sits directly on the boundary line of the proposed HA7 site and currently benefits from facing open Green Belt land. Developing this site will lead to a severe loss of privacy, as my rear garden and windows will be directly overlooked by a high-density housing estate. Building houses immediately behind my rear fence line will completely overpower my home, with an unacceptable loss of privacy, pollution and a total destruction of my residential amenity. 2. Critical Risk of Surface Water, Flooding and Drainage Overcapacity: The agricultural fields directly behind my home act as vital natural drainage, During periods of sustained or heavy rainfall, these fields are already highly saturated. Replacing this green space with hundreds of roofs, tarmac roads, and concrete driveways will	For these reasons i urge the Council to remove Policy HA7 from the Local Plan and protect the boundary of Spondon's established residential communities.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					entirely eliminate this natural absorption capacity. This creates an immediate risk of displaced surface water flooding directly into my rear garden and home.Furthermore, Spondon's existing sewer and highway drainage networks are notorious for being severely strained. Localized escape of water and blown drain covers are frequent issues on surrounding streets like Sandringham Drive, Dale Road, Sitwell Street. Forcing surface water runoff from a minimum of 400 new homes into this vulnerable network is dangerous and unsustainable. 3. Traffic, Noise and Air Pollution on Stoney Lane: The junction of Hampton Close and Stoney Lane is already difficult to navigate safely during peak hours due to existing traffic speeds and volumes. Funnelling traffic from hundreds of new homes onto Stoney Lane will cause severe gridlock, increase commuter delays, and significantly elevate noise and air pollution right outside our homes. 4. Construction Disruption and Safety Risks: Given our immediate proximity to the fields, residents on Hampton Close will face years of intense construction disruption, including heavy goods vehicle (HGV) movements, excessive dust, vibrations and noise. Stoney Lane is narrow and entirely unsuitable for sustained construction traffic, posing a direct safety risk to local pedestrians and children.	

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					5. Unsupportable strain on Spondon's infrastructure: Our local services are already at maximum capacity. It is incredibly difficult to secure timely appointments at Spondon GP surgeries or dental practices, and local schools are oversubscribed. Adding a development of this scale without a massive, pre-funded expansion of these services is completelu unsustainable. 6. Destruction of Local Ecology and Green Belt Barrier: The open space behind Hampton Close serves as a crucial natural barrier preventing urban sprawl towards the A52 and provides an established habitat for local wildlife. Because these active fields and mature hedgerows have remained undisturbed for many generations they host a rich variety of native British wildlife. Bats: Common Pipistrelle and Noctule bats (I regularly observe bats foraging and hunting directly over my rear garden and the adjacent field margins). Badgers and Foxes Hedgehogs and Small Rodents Birds of Prey (Barn Owls, Kestrels and Buzzards) Songbirds and Hedgerow Birds	

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					Frogs, Newts and Toads Bumblebees, Hoverflies and native Butterflies Replacing this green space with concrete will permanently damage local biodiversity.	
Robert Szczekala	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to submit my formal objection to Policy HA7, which allocates a minimum of 400 new homes on land east of Stoney Lane and adjacent to Hampton Close, Spondon. I contend that Policy HA7 is UNSOUND as it fails the National Planning Policy Framework tests of being Justified, Consistent with National Policy, and effective. 1. The Council's allocation relies heavily on classifying the Stoney Lane and Hampton Close site as 'Grey Belt' to circumvent established Green Belt protections. This designation is factually incorrect. The land spanning east of Stoney Lane and wrapping around Hampton Close consists of active, working agricultural fields currently in use for farming. It does not meet the national Planning definition of 'Grey Belt' which explicitly targets previously developed or severely underperformed land. Because this entire parcel is open, active countryside, developing it fails a primary purpose of the Green Belt: safeguarding the countryside from urban encroachment and preventing urban sprawl.	I request that the independent Planning Inspectorate remove Policy HA7 from the final Local Plan. The associated housing numbers should instead be redistributed to underutilised urban brownfield and city centre regeneration sites.

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					2. The Policy is NOT Consistent with National Policy or the Council's Own Strategy. including Policy HA7 directly contradicts the Council's own commitment to a "brownfield and City Centre first" growth strategy. National policy requires that sustainable brownfield alternatives be fully exhausted before releasing open Green Belt space. Feasible, highly sustainable brownfield sites - such as Derby Riverside (Policy CC11), the Railway Station Quarter (Policy CC13), and North Castleward (Policy CC14) already possess significant housing capacity and must take precedence over active Spondon farmland. 3. The Policy is NOT Effective (Severe infrastructure Constraints) The allocation fails to demonstrate how local infrastructure can sustainably handle 400 additional homes. Spondon's local networks are already overcapacity, and this development would cause unmitigated harm to: Highway Safety: introducing hundreds of daily car journeys will exacerbate severe traffic congestion and safety hazards at the constrained Stoney Lane junctions, surrounding residential access points like Hampton Close, and the A52 Brian Clough Way.	

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					Health care Access: Local GP surgeries and dental practices are already heavily oversubscribed, and residents face extreme delays securing appointments. Education: Local primary and secondary schools lack the physical capacity to handle the influx of children from a development of this scale. Because the allocation of Stoney Lane and Hampton Close is based on flawed land categorisation, violates the brownfield-first approach, and lacks viable infrastructure solutions, Policy HA7 is fundamentally unsound.	
Gerald Stanley Taranto	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to policy HA7 (Stoney Lane, Spondon) on the basis that it is <u>unsound</u> as it is not justified and not consistent with National Policy. My objections are based on the following facts: 1. The policy is not justified as the Council has wrongly categorised active agricultural farmland as Grey Belt. This land has been under successful cultivation for, at least, the last 50 years and continues to be so. In addition, allocating working farmland as Grey Belt conflicts with national planning policy. Development at this site extends already sprawling urban development and will almost certainly overwhelm existing infrastructure: both main roads through Spondon already suffer from traffic jams extending throughout Willowcroft Road, South Avenue, Moor Street and Sitwell Street every working day morning. Medical and educational facilities will also be unable	Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the local plan. The allocation is <u>unsound</u> as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside). Policy CC13 (Railway Station

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					to cope with this level of increased population in a small area. 2. The policy is not justified as the Council has not demonstrated that all reasonable brownfield alternatives have been fully considered. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (Paragraph 81), yet this allocation releases Green Belt farmland before fully utilising brownfield sites. There are a number of alternative, available, brownfield sites already allocated by the council, including: ▪ Derby Riverside (Policy CC11) - 600 homes; ▪ Railway Station Quarter (Policy CC13) - 500 homes; ▪ North Castleward (Policy CC14) - 400 homes; ▪ City Centre Mixed-Use Sites (Policy CC4) - Over 1,400 homes.	Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's slated "brownfield and City Centre first" strategy (Paragraph 61).
Richard Tatlow	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to the proposed development of the the above grey belt land. The policy is unsound based on the following tests, it is not consistent with national policy and not justified. The site is active agriculture land and NOT poor quality or previously developed "grey belt " land. Development would contribute to further expansion of urban developments and urban sprawl. There are already pressures on local infrastructure, including roads, drainage and school	I would like to request the following modification. Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt without

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					capacity. The council has substantial brownfield and city centre housing opportunities which should be prioritised ahead of green belt farmland. Finally the proposed allocation appears inconsistent with the plans stated “Brownfield and City centre first”	demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81).
Anne Taranto	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to policy HA7 (Stoney Lane, Spondon) on the basis that it is unsound as it is not justified and not consistent with National Policy. My objections are based on the following facts: 1. The policy is not justified as the Council has wrongly categorised active agricultural farmland as Grey Belt. This land has been under successful cultivation for, at least, the last 50 years and continues to be so. In addition, allocating working farmland as Grey Belt conflicts with national planning policy. Development at this site extends already sprawling urban development and will almost certainly overwhelm existing infrastructure: both main roads through Spondon already suffer from traffic jams extending throughout Willowcroft Road, South Avenue, Moor Street and Sitwell Street every working day morning.	Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the local plan. The allocation is unsound as it fails the 'Justified' and 'Consistent with National Policy tests by misclassifying active Green Belt farmland as 'Grey Belt’ without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4,

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					Local community health care and educational facilities will also be unable to cope with this level of increased population in a small area. 2. The policy is not justified as the Council has not demonstrated that all reasonable brownfield alternatives have been fully considered. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (Paragraph 81), yet this allocation releases Green Belt farmland before fully utilising brownfield sites. There are a number of alternative, available, brownfield sites already allocated by the council, including: ▪ Derby Riverside (Policy CC11) - 600 homes; ▪ Railway Station Quarter (Policy CC13) - 500 homes; ▪ North Castleward (Policy CC14) - 400 homes; ▪ City Centre Mixed-Use Sites (Policy CC4) - Over 1,400 homes.	Policy CC11 (Derby Riverside). Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's slated "brownfield and City Centre first" strategy (Paragraph 61).
Margaret Taylor	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to object to this policy It's not consistent with national policy as this is agricultural land so is not grey belt Why is city centre first policy not being implemented? Where is the infrastructure to support these homes; schools doctors, dentists etc? What about roads and drainage issues? have you driven on stoney lane? It's like driving across a field	

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					The slip road onto the A52 from stoney lane is far too short. If the houses do go ahead there really needs to be a better access road Surely this fails the tests by classifying the land as grey belt when it's green belt? (The farmer had a combine harvester on it the other day) These houses could be built on existing brownfield sites or, better yet, built in the regelation areas of the city such as around the railway station or at the riverside	
Ellie Bond-Thorne	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing regarding the plan to build 400 homes in Spondon. This plan is deeply saddening as me and my husband have just brought our first home on [redacted] which overlooks the lovely fields. These fields have been a massive factor in us buying this home as we hope to build a family here and have them grow up alongside the agricultural farmland that surrounds us. Upon walking on these fields within recent years we have noticed a substantial amount of flooding and are shocked that it would even be considered building on when the drainage within the area is unsound. Not only that it is also not justified as previously mentioned it is an agricultural farmland not the 'grey belt' the council has suggested. Lastly, to build on this land is not consistent with national policy which states to build within brownfield and City Centre first. A city centre is designed for the comings and goings of a	

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					lager volume of occupants and Stoney lane simply is not. The traffic caused by the 400 homes would be greatly concequential as the entrance and exit to the A52 is close by and ill fit due to its size. This land is very important to the community and the mental wellbeing of many of its occupants and too rid it would be a tragedy, we plead with you that you do not make a huge mistake by building on these lands.	
Zoe Threlfall	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally express my deep concern and strong objection to the proposed allocation of 400 homes at Stoney Lane, Spondon, under Policy HA7 of the Local Plan. While I understand the need for housing provision within the broader Derby area, I believe this specific allocation is fundamentally flawed and detrimental to our local community and environment. My primary concerns are based on the following points: 1. Loss of Active Agricultural Land The proposed site is not poor-quality or previously developed green belt land; it is active, productive agricultural farmland. Releasing this land for development would mean the permanent loss of a valuable environmental and agricultural asset. Once paved over, this land cannot be recovered, and its loss damages local biodiversity and food production capabilities. 2. Urban Sprawl and Merging of Boundaries Developing the Stoney Lane site would significantly contribute to the further expansion of urban development. Green belt land serves a	For the above reasons, I formally request the deletion of site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. In its current form, this allocation is fundamentally UNSOUND, as it fails both justified and consistent with national policy tests required for a legally compliant planning document. Specifically, the inclusion of HA7 relies on the unacceptable misclassification of active, productive Green Belt farmland as 'grey belt' land. The council has advanced this allocation without transparently demonstrating that all

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					vital purpose in checking the unrestricted sprawl of large built-up areas and preventing neighboring settlements from merging into one another. This development would erode the distinct character and boundaries of Spondon. 3. Unsustainable Pressure on Local Infrastructure Spondon's existing infrastructure is already operating at or beyond capacity. Adding 400 homes—which likely equates to hundreds of additional vehicles and residents—will place intolerable pressure on our community resources. Specifically, the local road network is already congested, the area has known drainage challenges that could be exacerbated by reduced natural land absorption, and local schools simply do not have the capacity to absorb the sudden influx of new pupils this development would bring. 4. Substantial Alternatives Exist The council already possesses substantial brownfield and city centre housing opportunities. These sites are often closer to existing transport hubs, major employment centers, and established infrastructure. It is environmentally and logically sound that these sites are prioritized and exhausted before any consideration is given to releasing pristine green belt farmland for development. 5. Inconsistency with Council Strategy The proposed allocation appears entirely inconsistent with the council's own stated 'brownfield and city centre first' strategy. Proceeding with Policy HA7 undermines the integrity of this strategy and	reasonable brownfield alternatives have been fully optimised, which is a strict prerequisite under national planning guidelines before any Green Belt boundaries can be considered for alteration. Rather than sacrificing vital agricultural land, the council should reallocate these 400 homes into the existing brownfield and city centre regeneration allocations. Capacity should be fully absorbed by areas already prioritised for development, such as those under Policy CC4, CC11 (Derby Riverside), CC13 (Railway Station Quarter), or CC14 (North Castle Ward). Directing housing delivery to these central areas would ensure the Local Plan actually operates in accordance with its own stated 'brownfield and city centre first' strategy, as explicitly

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					suggests a willingness to bypass sustainable urban regeneration in favor of easier, but far more damaging, greenfield development.	outlined in paragraph 81. Only by focusing on these urban regeneration sites can the council deliver a Local Plan that is both ecologically responsible and strategically sound. I strongly urge the council to re-evaluate Policy HA7, adhere to its stated strategic priorities, and remove the Stoney Lane site from the housing allocation plan. We must focus on revitalising our urban spaces and protecting our irreplaceable green belt. Thank you for your time and for taking these concerns into consideration. I look forward to your response and to seeing these points addressed in the upcoming planning reviews.
Samantha Timmis	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to you regarding the above proposal, I feel that this policy is UNSOUND. I feel that this is not justified and not consistent with National Policy due to the following:-	

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					• The site is active agricultural land, rather than poor quality or previously developed "Grey Belt". • Development would contribute to the furthest expansion of urban development and urban sprawl. • There are significant pressures on local infrastructure, including **roads, drainage and school capacity.** • The Council has substantial brownfield and city centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. • The proposed allocation appears inconsistent with the Plan's stated **"brownfield and City Centre first"** strategy. I strongly urge you to deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the "Justified" and "Consistent with National Policy" tests by misclassifying active Green Belt farmland as "Grey Belt" **without demonstrating that all reasonable brownfield alternatives have been fully optimised.** The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated **"brownfield and City Centre first"** strategy (Paragraph 81)". Furthermore, this land is used by residents who walk across this land which greatly helps their overall fitness and mental wellbeing. Some residents do not have the financial means to	

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					travel further afield for exercise and fresh air. If this land was used for housing, this would deprive residents of this important facility and could result in increased rates of depression and anxiety amongst local residents. I strongly urge you to reconsider this proposal.	
Mrs D Tinley	Policy HA7: Stoney Lane, Spondon	Objects		No	To whom it may concern, I wish to object to the building of 400 houses on Stoney Lane in Spondon. This is against the brownfield and City Centre first strategy set out in Paragraph 81 of the local Plan. The land is still in use as agricultural land so is Green belt NOT brownfield/Grey belt. Releasing Green belt land should be an absolute last resort or the Green belt will disappear meaning no UK grown food. Policy HA7 is unsound. Derby City Council should concentrate on their proposed Brownfield sites such as Derwent Riverside, Railway Station Quarter, North Castle Ward, City Centre Mixed Use sites as well as derelict private houses and business centres. Building on this Green belt land is not justified nor is it consistent with national policy. The land also has public footpaths and rights of way running through it. As well as objecting because it is Green belt, Spondon does not have the infrastructure to deal with 400 extra houses,	

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					presumably an additional 400 to 600 cars (on average 1 car per house) and between 400 to 1600 additional residents (on average 1 to 4 occupants per house). Leaving Spondon during rush hour can take up to half an hour now, without the addition traffic. There are not sufficient Doctors, schools, Dentists, etc.	
Adrian Tomlin	Policy HA7: Stoney Lane, Spondon	Objects		No	I am making representation to the above development being unsound. 1. **Policy HA7 – Stoney, Lane, Spondon – 400 Homes** 2. **This policy is <u>UNSOUND</u>** This is: **Not Justified** • Not Consistent with National Policy **See points below:** The site is active agricultural land, rather than poor-quality or previously developed "Grey Belt" • Development would contribute to the further expansion of urban development and urban sprawl. • There are significant pressures on local infrastructure, including roads, drainage, health services, and school capacity • The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development.	**Urgently deallocate** Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation of this land is **UNSOUND** as it fails to be Justified & Consistent with National Policy tests by misclassifying active Green Belt Farm land as Grey Belt without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should **reallocate** these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with

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					• The proposed allocation appears inconsistent with the Plan's stated "Brownfield & City Centre first" strategy.	the Plans stated "brownfield and City Centre first" strategy (Paragraph 81).
Cerrie Tomlin	Policy HA7: Stoney Lane, Spondon	Objects		No	I am making representation to the above development being unsound. 1. **Policy HA7 – Stoney, Lane, Spondon – 400 Homes** 2. **This policy is <u>UNSOUND</u>** This is: 1. **Not Justified** 2. Not Consistent with National Policy **See points below:** 3. The site is active agricultural land, rather than poor-quality or previously developed "Grey Belt" 4. Development would contribute to the further expansion of urban development and urban sprawl. 5. There are significant pressures on local infrastructure, including roads, drainage, health services, and school capacity 6. The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. 7. The proposed allocation appears inconsistent with the Plan's stated "Brownfield & City Centre first" strategy.	3. **<u>SPECIFIC MODIFICATION REQUEST</u>** **Urgently deallocate** Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. 1. The allocation of this land is **UNSOUND** as it fails to be Justified & Consistent with National Policy tests by misclassifying active Green Belt Farm land as Grey Belt without demonstrating that all reasonable brownfield alternatives have been fully optimised. 2. The Council should **reallocate** these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, CC11

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						(Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plans stated "brownfield and City Centre first" strategy (Paragraph 81).
Robert and Carol Unwin	Policy HA7: Stoney Lane, Spondon	Objects		No	We feel it is unjustified to build another 400 houses in a Spondon village area that has always been used as agricultural land in the 40 plus years we have lived in the village. We feel that this policy is not justified or consistent with national policy. It will undoubtedly increase pressure on the infrastructure of the village such as doctors, dentist and schools not to mention the the already high volume of traffic including heavy goods vehicles using the village as a through route to other destinations. We strongly object to this proposal and any others that may be planned in the future.	
Dr Austin and Mrs Mai Walker	Policy HA7: Stoney Lane, Spondon	Objects		No	We are writing because we are very concerned about the proposed development of 400 new homes on active farmland off Stoney Lane, Spondon. Spondon already has a number of additional houses being built and the site's development would add to further urban development in the village. There are already significant pressures on local infrastructure , including roads, drainage and school capacity.	We are asking you to deallocate Site HA7 from the Local Plan. We are persuaded that the allocation does not have a sound foundation. Have all reasonable brownfield sites been considered? The site is

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					We have only lived in Spondon for 6 years and have detected a significant increase in traffic through the narrow streets of the village and Dale Road in particular. The council therefore should be thinking of changing the site of these planned 400 dwellings. There are existing brownfield sites and city centre regeneration allocations. These are already prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward). This would then be consistent with the Plan's stated brownfield and City Centre first strategy.	active farmland but has been removed from the Green Belt and has been reclassified as Grey Belt. That seems to be without any justification.
Gareth Walker	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing regarding the proposed 400 houses at Stoney Lane in Spondon and its justification in the Derby Local plan. I wish to raise my objections to the proposal on the following grounds: The land at Stoney Lane has been classified as "grey belt" in the proposal but I believe this to be incorrect. "Grey belt" land is supposed to be of poor quality but the fields in question have been farmed for crops every year. This is also not consistent with national planning policy. The land is part of the green belt separating the city boundary from Ockbrook and so helps in preventing any urban sprawl. These proposed homes, along with the Royal Hill Road and Spondon Wood developments, will place a large burden on local amenities (schools/doctors/etc) which are already inadequate to the needs of current residents. The road system in Spondon will be overtaxed by the extra demand placed upon it. Furthermore the access to the	

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					development is not far from the A52 junction and so will create more congestion and possibilities for accidents. The Derby local plan proposal commits to prioritising the development of brownfield and city centre sites. There are multiple sites around the city that should be developed before any sites deemed “grey belt” should be considered. In conclusion, I believe that development HA7 at Stoney Lane Spondon should be removed from the local plan as its inclusion is unsound. The classification of the site as “grey belt” is incorrect and goes against national planning policy. The 400 proposed homes should be allocated to existing brownfield sites around the city as per the Derby local plan.	
Peter Wealthdale	Policy HA7: Stoney Lane, Spondon	Objects		No	I have looked over the proposal for Stoney Lane, and consider it “madness”. You have not considered the current traffic congestion, or parking in Spondon or for that matter in Borrowash ,which has even less parking than Spondon. We already have a site of 250+being built , plus the Royal Avenue site and possible Bluebells development, this will mean approx. 1000 extra houses and cars using the village. Without pulling down existing buildings and allround road improvements , I can,t see that this plan makes any sense, So I object most strongly.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Michael Wheatley	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally raise my objection to the inclusion of Policy HA7, Stoney Lane, Spondon, as a housing allocation for approximately 400 homes. I consider this policy to be **unsound**, principally because the site has, in my view, been incorrectly categorised as *grey belt* when the land is actively used agricultural farmland and should properly be regarded as **Green Belt**. The classification of the site is fundamental to the justification for its allocation. If the land has been incorrectly assessed as grey belt, the evidence base underpinning Policy HA7 is flawed and the allocation cannot reasonably be considered justified. **Incorrect classification of agricultural land** The site comprises active agricultural land and is not previously developed land. I therefore question the basis on which it has been identified as grey belt rather than Green Belt land. The Council should provide clear, site-specific evidence demonstrating how the site meets the applicable definition and criteria for grey belt land. In particular, the assessment should accurately reflect the site's current agricultural use, its Green Belt status, and the purposes served by the Green Belt in this location. If the site does not meet the relevant definition of grey belt land, its release for housing through Policy HA7 would require	

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					reconsideration. The Council should not rely upon an incorrect designation to justify the removal of this land from the Green Belt. **Conflict with the Council's brownfield and city-centre-first approach** I am also concerned that Policy HA7 is inconsistent with the Council's stated approach of prioritising **brownfield land and development within the city centre** before releasing Green Belt or other greenfield land for development. Policy HA7 proposes approximately 400 homes on active agricultural land outside the city centre. This appears difficult to reconcile with a strategy that prioritises the regeneration and redevelopment of brownfield sites and the city centre. There are alternative brownfield opportunities within Derby, including sites within and around the city centre, which should be properly assessed and exhausted before the Council seeks to allocate valuable agricultural and Green Belt land for development. The Council should therefore demonstrate, with robust evidence, why the housing requirement cannot be met to a greater extent through available brownfield and city-centre opportunities, and why the release of this particular site is necessary.	

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					Soundness of Policy HA7 For these reasons, I consider Policy HA7 to raise significant concerns in relation to the **justification, effectiveness and consistency** of the emerging plan. In particular, I request that the Council: 1. Reconsider the classification of the Stoney Lane site and provide the evidence supporting its identification as grey belt. 2. Properly assess the site's status as active agricultural land and its role within the Green Belt. 3. Demonstrate how the allocation is consistent with the relevant national planning policy requirements concerning Green Belt and grey belt land. 4. Provide a clear assessment of available brownfield and city-centre sites capable of contributing towards Derby's housing requirement. 5. Explain why those alternative sites cannot be prioritised before allocating approximately 400 homes at Stoney Lane. 6. Reassess Policy HA7 if the evidence does not demonstrate that the allocation is justified and consistent with national policy.	

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					I respectfully request that this objection is taken into account as part of the examination of the plan and that Policy HA7 is reconsidered unless the Council can provide robust evidence demonstrating that the site has been correctly categorised and that its allocation is necessary, justified and consistent with national planning policy. I would be grateful if you could confirm that this representation has been formally recorded against **Policy HA7 – Stoney Lane, Spondon**.	
A P Wooley	Policy HA7: Stoney Lane, Spondon	Objects	No	No	I wish to make a formal objection regarding the above proposed housing development in Spondon. I strongly believe that the proposition is completely unsound and should not go ahead. I fail to see the justification in classifying this land as 'Grey Belt'. To my understanding, 'Grey Belt' is a designation given to land that is poor-quality or underperforming Green Belt land or has been previously developed. Being a long-term Spondon resident of 46+ years, and living adjacent to this land, I can assure you that this land has never previously been developed and appears very productive indeed. I believe that the Council has wrongly categorised this active agricultural farmland as Grey Belt. Not only is it active, productive farmland it also helps to prevent urban sprawl and provides an important Green Belt function. At a time when so much agricultural land is being lost, surely it is vitally important that we protect the parts that remain, both for food production, and for boundaries?	In view of the above I sincerely request the deallocation of Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside),

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					It is also my belief that allocating farmland as Grey Belt conflicts with the National planning Policy. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (Paragraph 81), yet this current proposal releases Green Belt farmland before fully utilising available brownfield sites. As I understand it, the Council already has major brownfield sites allocated for housing, including: • Derby Riverside (Policy CC11) – 600 homes. • Railway Station Quarter (Policy CC13) – 500 homes. • North Castleward (Policy CC14) – 400 homes. • City Centre Mixed-Use Sites (Policy CC4) – Over 1,400 homes. Surely this demonstrates that, at present, not all available brownfield alternatives have been fully considered? I also believe there are other factors that need to be seriously considered here: Volume of traffic The road network is already overloaded with heavy traffic congestion, especially around peak times. The idea of adding hundreds more vehicles from a new estate would cause further chaos and seriously endanger Local Residents who must contend with this volume of traffic daily. For a pedestrian trying to cross Stoney Lane, Sandringham Drive, Sancroft Road, or Dale Road during these peak times it is very hazardous as commuters rush past. A pedestrian can be standing at the kerbside for many minutes before a crossing opportunity may be presented, and then hurry to avoid	Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81)."

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					oncoming traffic, especially in winter months when lighting and weather conditions are poor. I mention these roads as they will be the main routes in and out of Spondon from this estate. Construction traffic and impact on Local Residents during construction The construction of a project of this size, spread over this timeframe, is going to have a massive impact on the lives of Local Residents. Large numbers of construction vehicles, plus the vehicles of workers will add to the already huge volume of traffic using the local roads. The construction work will be noisy and dirty, making life for local people unpleasant. Winter will see mud on the roads making them dangerous for road users, especially cyclists and motor cyclists, and summer will see large amounts of dust. G.P. surgeries and dentists Trying to get an appointment to see an NHS medical practitioner is already very difficult with appointments being filled days, if not weeks in advance. The current population of Spondon is simply too large for the existing medical services to operate effectively. The additional populace this estate brings will make this problem even more acute. Is any provision being made to address this issue? Schools Spondon's schools are full-to-capacity and increasing the local population will only add further pressure to the system. What provision is to be made for additional school places?	

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					Spondon's aging infrastructure It seems only logical to ask that if a large new estate is added, will the local service infrastructure be able to cope? What about the water and electricity supply, and sewers to remove the resulting waste? At times of heavy rain our drainage system overflows causing damage to roads and property. Another estate will only exacerbate the problem. Mental health and a wonderful resource on our doorstep The pandemic shone a light on how important our green spaces are for people's mental health. It has long been understood the link between nature and its positive effects on mental state. To walk the public footpaths through these fields is a pleasure and a facility that many people enjoy every day, including, dog walkers, families, ramblers and commuters. Although, I'm sure, a right of way will be maintained through the new estate, an important open space will be greatly reduced. Should we not be protecting these natural resources for the benefit of all instead of building on them? Hasn't Spondon already done its bit for development? With the developments on Royal Hill Road, Dove Meadow, Nottingham Road and Spondon Wood, plus smaller infill over the years, hasn't Spondon provided sufficient space already for development? Our small community has grown and grown in recent years and is in danger of merging with the urban sprawl of Derby. Surely our local boundaries and Green Belt land is now more important to protect than ever?	
Jonathan Woollard	Policy HA7: Stoney Lane, Spondon	Objects		No	Remove site HA7 (Stoney Lane, Spondon, 400 homes) from the Local Plan. The allocation is unsound as it fails the	The 400 homes should instead be reassigned to brownfield and

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					'justified' and 'consistent with national policy' tests, relying on the classification of Green Belt farmland as 'grey belt' without showing that brownfield alternatives have been fully maximised. There are significant pressures on local infrastructure including roads, drainage, energy supply and access to GP surgeries. This development will increase all these pressures.	city centre regeneration sites under Policies CC4, C11 (Derby Riverside), CC13 (Railway Station Quarter) and CC14 (North Castleward), in line with the Plan's 'brownfield and city centre first' approach (Paragraph 81).
Frances and Geoffrey Woolley	Policy HA7: Stoney Lane, Spondon	Objects		No	We consider that the above policy for 400 homes at the above on agricultural land conflicts with the principles of national planning policy. Spondon cannot contend with further homes being built due to heavy lorries thundering through our village, lack of doctors and schools. The council has substantial brownfield and city centre housing opportunities which should be prioritised before using green belt farmland and a small village. We trust common sense will prevail and take Spondon out of consideration for building more homes and making life more difficult for its residents.	
P Wooley	Policy HA7: Stoney Lane, Spondon	Objects	No	No	I consider this specific allocation as UNSOUND on the following grounds under paragraph 35 of the National Planning Policy framework (NPPF): Not justified: The site selected is not backed by proportionate, robust evidence regarding local transport capacity, environmental impacts, or Green Belt and Green Wedge release.	To make the local plan sound, I request that the Planning Inspector consider the following modifications: Deallocate Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the ‘justified’ and ‘Consistent

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					Not Effective: Serious highway capacity, noise, infrastructure constraints jeopardise the delivery and viability of the site. Not consistent with National Policy: The allocation conflicts with the national policy regarding Green Belt protection, air quality, noise pollution, and sustainable transport integration. 2. Detailed grounds of Unsoundness. A. Transport and Highways Impact (Unsound: Unjustified and Ineffective) A 52 Brian Clough Way Congestion. The site directly borders the A52, which at times is already a severely congested strategic trunk road. The additional vehicle trips from 400+ houses, combined with existing traffic plus the additional traffic from other current and recent developments around Spondon will significantly add to and worsen congestion at key junctions (e.g. Spondon roundabout/Raynesway interchange and even Pentagon Island) Local Road Network Constraints: Local Road networks around Stoney Lane are narrow and ill equipped to absorb substantial additional residential traffic, raising severe highway safety concerns for both pedestrians (including people using the adjacent infant/junior Asterdale School on the South side of the A52 junction) and for cyclists. This traffic will also impact the centre of Spondon along with other areas of Spondon which are already heavily congested at times. This additional traffic along with that from other current housing schemes will also adversely affect roads in nearby Ockbrook.	with National Policy' tests by misclassifying active Green Belt farmland as 'grey Belt' without demonstrating that all reasonable alternatives have been fully optimised. The council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11, (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy 14 (North Castleward), in accordance with the Plan's stated brownfield and City Centre first' strategy (Paragraph 81).

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					B. Air Quality, Environmental Health and Liveability. (Unsound. Consistent with National Policy) A 52 noise and Pollution. Positioning 400 homes immediately adjacent to the high speed high volume A52 introduces significant air and noise pollution risks. While the plan mentions acoustic buffering, relying on artificial buffers raises doubts about whether acceptable living conditions (NPPF Section 15) can be achieved across the site. Viability Constraints: The cost of extensive mitigation measures (e.g., sound barriers, acoustic glazing, enhanced ventilation systems} undermines the site viability, making the high target of 40% affordable housing unrealistic or deliverable. (Effective) C. Loss of Green Belt /Green gap and Ecological Harm (Unsound: Unjustified) Exceptional circumstances not Demonstrated. Releasing Green Belt land and Green Wedge land and changing to Grey belt at Stoney lane lacks justification, particularly when brownfield - first site capacity in the city centre has not been fully optimised. Also Crops grown in 2026 on this site and now harvested were just as good as any in these fields between Spondon and Ockbrook and contradicts the suggestion that this land is poor agricultural grey belt. Brownfield sites available include: Derby Riverside (policy CC11) – 600 homes Railway Station quarter (policy CC13) - 500 homes North Castleward (policy CC14) – 400 homes City Centre Mixed-Use Sites (policy – CC4) – Over 1400 homes	

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					Urban Sprawl: Developing this site weakens the open green boundary of Spondon, reducing the vital buffer separating the suburb from neighbouring settlements and harming local biodiversity. D. infrastructure and Community Capacity (Unsound and ineffective) Cumulative Strain: Spondon has absorbed significant residential development over recent years with some currently still in progress. The Infrastructure Delivery plan (IDP) fails to demonstrate how local GP surgeries, primary/secondary school places, and surface water drainage systems will cope with an additonal 400 households.	
Tamsin Youren	Policy HA7: Stoney Lane, Spondon	Objects		No	The Policy above is unsound and does not comply or is consistent with national planning policy. The reclassification from Green Belt to Grey Belt contravenes national planning policy. The farmland is not under-performing or poor-quality and is, and has been for many decades, been in permanent use as productive farmland. The land also supports a mixed biodiversity of wildlife, included increasingly threatened skylarks, ground nesting birds such as pheasants, grouse and skylarks as well as providing a much-needed green belt to do exactly what it was set up to do: protect green areas on the outskirts of urban developments and prevent urban sprawl. There are countless brownfield sites across the city that can be utilised and haven't been considered, including the recently vacated Albert Looms sites in Megaloughton Lane in	I request that the site is deallocated from the local plan. The allocation is unsound as it fails the justified and consistent with national policy tests by misclassify an active green belt farmland as grey belt without demonstrating or giving evidence that that brownfield site alternatives have been fully optimised and tested for reuse. The council must reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4,

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					Spondon. What the city does not need are more business centres that will remain vacant as many of the new ones have that have been built recently, but the intelligent re-use and development of these sites into housing (much like the successful redevelopment of the former Rolls Royce site off the ring road). Infrastructure: Spondon already has limited entrances/exits to the A52. For eastbound traffic from the north of the A52, the Stoney Lane exit is the primary route leaving the village. The slip road is already challenging to use and to build a substantial development here would require the installation of a huge junction to allow access east and west bound, creating more traffic management problems and volume of traffic. The route westbound towards the city is via Spondon village, which is already very busy during peak commuter times; many drivers simply drive up to the Borrowash junction and return westbound towards the city, once more creating more traffic along Stoney Lane. The current housing market in the village and across the UK has seen a huge increase in property available for sale. Today alone there are 121 properties for sale, which suggest there isn't a need for new homes to be built. Once again, and as mentioned consistently with other proposed developments, schools in the village are already full and unable to support more pupils. Developments across the city as well in the local area haven't yielded the promised additional of medical services such as doctors, dentists and pharmacies, once again adding to further pressures on community resources.	Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter), or Policy CC14 (North Castleward) in accordance with the Plan's stated brownfield and city first strategy. The fact that this hasn't been considered is a massive oversight by planners and officials and they must be held to account.

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					Above all, it is vital that the Green Belt status is not compromised and used as an excuse to avoid development of the plentiful brownfield sites across the city and the reclassification of empty business units across the city.	
Carole Zajciw	Policy HA7: Stoney Lane, Spondon	Objects		No	I am contacting you in relation to the above planning application for a proposed 400 homes to be built off Stoney Lane. I believe that Policy HA7 is unsound as this is **not justified or consistent with National Policy.** My objections to this development are as follows this is designated as active agricultural land and not consistent with the 'Brownfield and City Centre first' strategy. • the land is misclassified as Grey Belt and all other brownfield alternatives should be utilised • the land performs an important Green Belt function and currently contributes to preventing urban sprawl • other identified brownfield sites have substantial opportunities and capacity • Spondon's infrastructure - schools, doctors surgery, roads, drainage and access cannot accommodate this potential influx • there are already significant pressures on the village due to the high volume of lorries, cars, trucks etc. which causes significant travel issues at peak times already • the additional traffic through the village centre could make unsafe for pedestrians (young and old)	I would like to see the site deallocated from the Local Plan. • this development should be reallocated to the exisiting 'regeneration brownfield and city centre sites' already in existence and should be prioritised there before releasing Green Belt farm land

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					• the village cannot cope with a potential additional 400+ cars on top of the already significant volume of housing already in construction, and additional proposed developments in this village area.	
Geoffrey Lowe	Paragraph 302	Objects	No	No	This area is not 'Grey Belt'. The land is actively farmed, good quality, agricultural land.	The proposal to build on this land off Stoney Lane should be removed.
Policy HA8: Former Police Station, Cotton Lane						
Roy Woolley*	Policy HA8: Former Police Station, Cotton Lane	Objects	Yes	No	Policy HA8 (Former Police Station, Cotton Lane), Policy CC4 (Residential-Led Allocations), and Housing Strategy (Para 176) • Soundness Tests Failed: Justified, Effective, and Consistent with National Policy (NPPF 198 – Ground Conditions and Pollution) • Participation at Hearing: Yes 'Data Deficits' is the technical background PDF uploaded in response to 485 with file name Data_Deficits_Regulation_19_Draft__Roy_Woolley_FINAL.pdf. Reason the Policy is Unsound: The plan allocates extensive new residential development (Data Deficits, Section 8) along and feeding directly into the Osmaston Road / AQMA No. 1 corridor—including HA8 (Cotton Lane, 100+ dwellings), HA10 (Rolls-Royce Elton Road), HA11 (Shaftesbury Street), HA15 (Former Ivy House School), Marble Square, and over 2,000 dwellings across City Centre brownfield allocations (Policy CC4), including 674 at Eagle Quarter without assessing cumulative exposure within an entrenched pollution sink. 1. Intensifying Sensitive Receptors in an Unresolved AQMA: Placing high-density family and specialist residential (Data Deficits, Section 8) uses into a corridor that has failed to achieve sustained AQMA revocation for over 25 years (Data	1. Amend Policy HA8 and corridor-related allocations to require a comprehensive cumulative corridor transport and air quality appraisal prior to master planning, accounting for diverted network flows and commercial trip generation. 2. Condition major residential approvals upon the provision of dedicated active travel links that do not route pedestrians and schoolchildren directly along narrow, congested canyon kerbsides.

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					Deficits, Section 1) directly contravenes national policy on health and pollution exposure; as per NPPF 198: “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.” 2. Ignored Cumulative Trip Generation: Traffic assessments treat allocations piecemeal. DfT count points on Osmaston Road (Sensors 27256 and 47261) demonstrate heavy reliance on uncounted estimates, while key feeder links such as Ascot Drive (carrying increasing traffic) have not been counted by DfT since 2009 (Data Deficits, Section 3). Furthermore, historical highway decisions (sealing Litchurch Lane onto London Road) forced more industrial and commuter traffic onto Osmaston Road (Data Deficits, Section 7). Adding residential trip generation from HA8 and wider sites onto this network without cumulative capacity modelling is unjustified. 3. Severe Pre-Existing Health Vulnerabilities: Health data from 2004 showed that premature coronary heart disease (CHD) mortality in Osmaston was 43.4% higher than the city average. As of 2026, Child poverty remains significantly higher in Osmaston and other similarly deprived Derby wards (Data Deficits, Section 9). Funnelling additional traffic and introducing new residents without binding mitigation actively compounds established health inequalities, contrary to NPPF requirements.	
Policy HA9: Bramblebrook House/Humbleton View, Littleover						

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Fisher German of behalf of Bloor Homes	Policy HA9: Bramblebrook House Humbleton View, Littleover	Support	Yes	Yes	No objection to the site, however in respect of five-year housing land supply assumptions the Council should consider whether there is a need to discount in accordance with the PPG Paragraph: 026 Reference ID: 68-035-20190722: "How can authorities count older people's housing in the housing land supply? Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market. Further guidance is set out in Housing for Older and Disabled People."	
Policy HA12: North of Sinfin Moor Lane						
Councillor Tim Prosser	Policy HA12: North of Sinfin Moor Lane	Objects		No	The version approved by council gave the following explanation for this allocation: *"This land is identified in the current local plan as proposed public open space as part of a wider designation to create a new park between Shelton Lock and Chellaston.* ***This park has not been delivered, and the land is not within the control of the Council and therefore cannot remain as proposed public open space in the local plan as there is no mechanism to deliver the policy."*** That justification was not itself one of the three EN3 tests — it was not a "surplus to requirement" assessment (a), it was not "replaced by equivalent or better provision" (b), and it was not "alternative sports/recreational provision" (c). It was a	

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					deliverability argument (the land was never in Council control, so the designation was always aspirational). **In the document published for Regulation 19 consultation, this entire explanation has been deleted, and nothing has been put in its place.** The policy text for HA12 now says nothing at all about the site's open space history, the abandoned park designation, or why that designation is being removed. Rather than curing the EN3 compliance problem, the published version has made it worse: there is now no explanation anywhere in the plan for the loss of this previously-designated open space. Has an Open Space Study assessment actually been carried out for this site? If the answer is "no, because the designation was never delivered," on what basis does the published plan consider the loss of this land compliant with Policy EN3, which governs the loss of open space elsewhere in the same document?	
Policy HA14: Kitchener Avenue/Browning Street						
Councillor Tim Prosser	Policy HA14: Kitchener Avenue/Browning Street	Objects		No	HA14 appears to be one of only two identified lapsed playing field sites in Derby; the Council's own adopted methodology requires open space use and "excess of provision" to be considered and evidenced before redevelopment; the cited evidence shows shortfalls rather than excess; and a Section 77/Academies Act consent process sits outside the Local Plan entirely — none of which is acknowledged, referenced, or addressed in HA14's policy text or supporting paragraphs in the submitted plan. This has not changed between the two versions of the document.	

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					HA14's policy text doesn't reference the site's school history at all — it's simply described as *"a grass field owned by Derby City Council."* The plan cites an Open Space Study that, by its own stated methodology, is the wrong document to justify releasing former school playing field land. **The Council's principal Open Space Study, cited in the evidence base specifically to support Policy EN3, cannot be used to justify releasing HA14 under EN3's "surplus to requirement" test (criterion a), because school playing field land was structurally excluded from its scope from the outset:** *"Types of provision not assessed or included as part of the study are private gardens, institutional grounds, school playing fields or private sport clubs. Such forms of provision are not available to members of the public to access to the same level as typical open space." (Section 3.1)* This Open Space Study is dated **May 2018** — nearly eight years old by the time of this Regulation 19 consultation, based on a site audit that is now equally stale. For a plan being examined against 2026/2027 population and demand levels, relying on unrefreshed 2018 open space audit data is itself a potential "justified"/robust-evidence soundness point. Derby's Playing Pitch Strategy names the site directly. From Part 5 (Strategic Recommendations), under	

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					"Recommendation a — Protect playing field sites through local planning policy": *"There are two lapsed playing field sites identified in Derby;* ***former Normanton Primary School and Village Primary School****. Normanton Primary School playing fields were previously identified for potential development but has not presently been taken forward for development of any kind."* "Lapsed" status does not let the Council off the hook — this document says so explicitly, and directly contradicts how HA14 is currently drafted in the Local Plan: *"Lapsed - last known use was as a playing field more than five years ago. These sites* ***fall outside of Sport England's statutory remit but still have to be assessed using the criteria in paragraph 97*** *of the National Planning Policy Framework and Sport England would nonetheless challenge a proposed loss of playing pitches/playing field which fails to meet such criteria.* ***It should be emphasised that the lawful planning use of a lapsed site is still that of a playing field.****"* The Strategy's own recommended priority order for any lapsed site — including this one — is explicit and sequential: 1. "Explore the feasibility of bringing the site back into use…" 2. "The site could become public open space to meet a need identified in the Open Space Study; **or**" 3. "Redevelop the site for an alternative use but use the capital receipt to invest in existing sites in the locality"	

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					Housing is only the *third* option in the Council's own adopted methodology, and only after the first two have been considered — there is no evidence in the HA14 policy text that this sequence was followed or documented. **The Sport England "excess" test — the evidence points the wrong way** For a lapsed/disused site specifically, Sport England's **Policy Exception E1** requires: *"A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport."* But this same document's headline findings show **shortfalls, not excess**, across almost every relevant pitch sport and analysis area of the city — football shortfalls at youth 9v9 now, worsening to nearly all formats by 2028; 3G pitch shortfalls in the North East and South East; rugby union shortfalls. There is no citywide "excess" finding anywhere in this strategy that could support the E1 exception. The Council's own evidence base appears to point *against* the "excess" finding the exception requires, which is a serious problem for delivering HA14 as allocated, independent of anything in the Local Plan text itself. **Also:** *"Local authorities wanting to dispose of school playing field land need consent under **Section 77 of the Schools Standards and Framework Act 1998**, but consent is now also required*	

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					*for disposal of any land used by a school or academy under **Schedule 1 to the Academies Act 2010**."* This sits entirely outside the Local Plan process. Even if the plan is adopted with HA14 intact, the Secretary of State's consent for change of use would still be a separate, undisclosed precondition to delivery, relevant to whether HA14 is realistically "effective"/deliverable within the plan period as required by the soundness tests. **One more evidential weak point** This Strategy is dated **June 2018** and states its own findings should be treated as out of date if not reviewed within three years of sign-off, with underlying supply/demand data ideally refreshed every two years. It is now **eight years old** with no evidence of a refresh cited in the Local Plan's evidence base. That compounds the earlier point about the 2018 Open Space Study: the Council's key open space/playing field evidence base is stale by its own stated standards, a further "robust, up-to-date evidence" soundness point under NPPF para 96 (quoted directly in this Strategy) relevant to essentially every open space and playing field allocation in the plan, not just HA14.	
Policy HA16: Gypsy and Traveller Site Allocation						
Andreas Baker	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	We and I am sure other residents also do not want this, this is wanton destruction of a nice green area for no reason. We do not wish to be plagued by these people they do not pay tax they leave their rubbish and mess for every one else to clean up and [redacted].	

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					I do not care if you think this is bigoted having had to put up with them pitching up illegally in Chaddesden area they are a nuisance and trouble. If they were law abiding and paid tax kept the place clean I and many would not have objection to them but they do not.	
Matthew Buchanan*	Policy HA16: Gypsy and Traveller Site Allocation	Objects	No	No	I object to Policy HA16 because I do not consider that the evidence currently demonstrates that this particular allocation is adequately justified when its environmental, recreational and active-travel impacts are weighed against reasonable alternatives. The need for additional Gypsy and Traveller accommodation is not disputed. Policy H12 itself recognises that need and provides for future accommodation through "site(s)" and planning permissions. However, the Regulation 19 evidence appears to proceed on the basis that accommodating all 17 pitches on one site is the Council's preferred option, rather than demonstrating why a distributed solution across more than one suitable location would not be reasonable. This matters because the Plan contains major strategic housing allocations where entirely new residential neighbourhoods, infrastructure and services are already being planned. HA1 Rykneld Road is allocated for at least 800 homes with a new primary school, expanded local-centre provision, improved bus services, new walking and cycling routes, highway works, flood mitigation, green infrastructure and public open space. HA3 East of Moorway Lane is allocated for at least 335 homes and includes new highway access, public open space, biodiversity improvements, walking and cycling connections and a local centre. I have been unable to identify in the published evidence an assessment of the reasonable alternative of	I therefore request that Policy HA16 is reconsidered and that the Council: publishes or identifies the assessment of a distributed-site alternative; demonstrates why HA16 performs better than reasonable alternatives; undertakes or publishes robust site-specific ecological and arboricultural evidence; demonstrates how existing active-travel routes and accessible public open space will be retained; and clarifies how the environmental effects acknowledged in the Sustainability Appraisal are consistent with the Plan's wider policies on green infrastructure, biodiversity and trees.

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					incorporating smaller numbers of permanent Traveller pitches within one or more of these large strategic residential allocations, rather than concentrating all provision at HA16. Appendix F records that residents previously raised concern about the adequacy of the alternatives assessment, and the Council responded that the Regulation 19 Sustainability Appraisal now contains the rationale for site selection. I therefore ask the Council to identify where a distributed-site option was assessed and, if it was not, to explain why it was not treated as a reasonable alternative. There are also significant site-specific concerns at HA16. The Local Plan itself acknowledges that the site contains active travel links and mature trees, while Policy HA16 states that the remainder of the site beyond the fenced Traveller accommodation should remain accessible public open space. The Sustainability Appraisal further acknowledges that development would result in the loss of existing public open space and records a negative leisure and recreation effect. The biodiversity assessment also requires closer scrutiny. The Sustainability Appraisal expressly asks whether development will maintain or enhance woodland and tree cover, prevent habitat fragmentation and support the city's natural capital. On the ground, the site contains mature trees, naturally regenerating woodland, dense understory vegetation and connected habitat structure. The assessment nevertheless records a positive biodiversity effect. I do not consider that the published evidence clearly demonstrates how the existing ecological value of the site has been established before reaching that conclusion. There is a similar unresolved issue with access and public use. If part of the site is to be enclosed and fenced, the Council should demonstrate now — at	

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					allocation stage — how existing active-travel routes and meaningful accessible public open space will be retained. Policy HA16 states that the exact siting and access arrangements will be considered later, at planning-application stage. In my view, that leaves an important question unanswered: whether the allocation can in fact accommodate 17 pitches while satisfactorily retaining mature trees, ecological connectivity, public open space and active-travel links. I therefore request that Policy HA16 is reconsidered and that the Council: publishes or identifies the assessment of a distributed-site alternative; demonstrates why HA16 performs better than reasonable alternatives; undertakes or publishes robust site-specific ecological and arboricultural evidence; demonstrates how existing active-travel routes and accessible public open space will be retained; and clarifies how the environmental effects acknowledged in the Sustainability Appraisal are consistent with the Plan's wider policies on green infrastructure, biodiversity and trees. I support the provision of suitable Gypsy and Traveller accommodation. My objection concerns the evidence supporting the selection of this particular site and whether the allocation has been shown to be justified and sound.	
Sam Clark	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I am emailing in response to proposed changes in my local area. I have been made aware of the proposed use of land on public open space in Wilmorton, Pride Park, Derby. The proposal being that the natural green woodland be turned into a traveller site. I believe that this will have a substantial negative effect on the area as a whole. This woodland is important as it is an open	

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					public space used by many and taking this away would limit the options in the area for any green space for people to use, thus having a negative impact. The space is a public walkway used by all to connect Wilmorton to the City Centre, The train station and beyond. Limiting or removing this access would force the public to find other means, including reverting to driving thus having a negative impact on the environment. The land itself is home to mature trees and established habit for animals. This is not a justifiable reason to take away trees that have been there for centuries and to destroy homes for wildlife, forcing them elsewhere or killing them all together. There are other sites throughout Derbyshire that are far more suitable with less consequence and the council will have to prove that they have been assessed prior to any work taking place. I urge the council to reconsider this project and to start the process again. I understand the need for sites like this but this land is not the place for it. The impact on the environment and the wider community would be catastrophic.	
Joe Cross	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I have unfortunately been informed earlier today that there are considerations for a permanent traveller site to be build on Wilmorton recreation area. I am a home owner on [redacted] and I strongly object any proposal of this kind. Statistics show this would drastically impact the value of my home in a negative way, similarly this green space has been beneficial for young people and families with small children for as long as I have lived here. It would be a massive shame to lose this in the local community	

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					I take pride in the community here at Wilmorton and this plan has caused concern for a number of residents. I have worries of the overall peace and order of the neighbourhood should a 17 patch site be built there. This area already has limited resources of schools, healthcare centres and public facilities. By pushing more into this space only creates a significant strain on these resources and limits the availability for other users who have lived here for a prolonged period of time Traveller spaces are evidently needed, however I urge this is not at the expense of the safety and needs of this community I hope this email assists in the decision proposed.	
George Fletcher*	Policy HA16: Gypsy and Traveller Site Allocation	Objects	No	No	There has been no assessment of Wilmorton Park's suitability for travellers against any other site in Derby, including the other 46 parks. The rules say that there must be a sequential Approach and Alternatives: For a park conversion to be considered justified, the local planning authority must show during examination that they explored alternative locations and that other options were undeliverable due to severe constraints (such as absolute Green Belt protection, flood risk, or lack of access). Additionally, there has been no assessment of the adverse affects on the approx. 320 households in Wilmorton of this development. There is no stated estimate of the proportion of the park that will be undamaged after the development, so how can any decisions be made?	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Councillor Alan Graves	Policy HA16: Gypsy and Traveller Site Allocation	Objects	No	No	Further to the Test of Soundness Guidance Note, here are my comments on the Regulation 19 draft, specifically Policy HA17 (Gypsy and Traveller Site Allocation, Wilmorton). This builds	

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					on the representation I've already submitted via the consultation portal. **Question 1: Legal compliance** • Evidence base accessibility: the "info4derby" link on the Council website (source for deprivation/socioeconomic data) is not working, which limits the public's ability to scrutinise the evidence underpinning this allocation during the statutory consultation period. • I'd query whether the Sustainability Appraisal has properly assessed the loss of open/green space at this location, including its use by existing services (a mental health facility on London Road, the YMCA, local schools and residents). **Question 2: Soundness** Positively prepared — The Plan repeatedly states a brownfield/regeneration-first approach, but HA17 allocates an existing green space. Several brownfield sites appear not to have been considered as alternatives for this allocation despite featuring in the Council's own Green Wedge review as suitable for development: the MotoX land behind the old DET building/Riverside function suite (ref. 0289), the former BT building on Raynesway behind Lidl, land between the Raynesway slip road and Belmore Way, land adjacent to the Cinch superstore and Severn Trent site off Raynesway (ref. 0279), the unnamed parcel ref. 290, land behind Kuhne & Nagel on the A6, and the Rolls-Royce Marine Operations site (ref. RR1). I'd ask that the site selection evidence explain why these were discounted in favour of HA17.	

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					Justified — The proposed site sits only 1km from the existing Traveller site at Imari Park. With the city spanning roughly 14–15km, the evidence base should set out the site selection methodology, including spacing/distribution rationale, and why this proximity was considered acceptable. Effective — Deliverability is questionable given access constraints: the surrounding streets are narrow, densely parked terraced streets unsuited to regular manoeuvring of tow vehicles and caravans (combined length 13–14m, width 2.44m). Access via London Road or Pride Parkway would add pressure to a junction (Pride Parkway/City Point) that already queues back during peak periods. I'd also question whether the infrastructure evidence base has tested capacity at local GP practices, dentists, and Lakeside School, which is already oversubscribed. Consistent with national policy — The allocation should be tested against the NPPF's brownfield-first presumption and open space protection policies alongside the duty to provide for Traveller accommodation needs; as drafted, HA17 appears to sit in tension with the Plan's own stated regeneration strategy. I'd also note that a community petition on this allocation has attracted 706 signatures to date and will be submitted to Democratic Services before the consultation closes, as evidence of the strength of local concern.	
Phil Harrison	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	Hello I have lived in wilmorton 42 years I am disabled and would not feel safe with a campsite for travelers, through the years we have had travellers [redacted]. I own my own home	

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					and would not be able to sell if I had to. We have now been subjected to too many hmos in these little houses. I am in my 60s and classed as a seriously vulnerable person. Why don't you put them in Duffield it's quieter there and lots of space there thank you please do not put this site on wilmorton. On Fri, 13 Mar 2026, 19:04 wrote: Planning for traveler's site in Wilmorton, l strongly object to this as I have lived in Wilmorton for 42 years it is the only place that is safe for children to play and walk a dog.I do not want my property to be dropped in price. I am a disabled person and feel this purposel will distroy the community.	
Pam Holliday	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I refer to the Emerging Local Plan for Derby regarding the proposal of an establishment of a Traveller/Gypsy site on Wilmorton Recreation Ground, Wilmorton, Derby. I object to the proposal of a traveller/gypsy site at this location in the strongest terms. I fully appreciate the Council is duty bound to find suitable sites for travellers but while travellers' needs are part of the equation, another part is the recognition of the interests of the settled community. Specifically:- **Environmental** – the proposed site presently contains many trees and bushes that are a haven for small animal and bird life and also help block the view and noise from the busy dual carriageway that is Pride Parkway. Undoubtedly all these trees and bushes will be removed (never to be replaced) to accommodate the site and result in the displacement/loss of	

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					said animals and bird life and increased visual and noise pollution from the road. Trees once removed are lost for ever. So many mature trees have been felled on the Recreation Ground over the last few years and have never been replaced. Trees are vital for the environment and the health of our planet. **Loss of amenity** – the proposed site will considerably further reduce the size of the recreation ground by at least a third (a large chunk of the recreation ground was also lost some years ago to the allotments). If this scheme goes ahead, there won't be much recreation ground left. The recreation ground is popular with dog walkers, joggers, golfers, folk from local businesses enjoying their lunch break, and families - especially in the summer with sunbathing, picnics and ball games. The recreation ground is a valuable asset for all the residents of Wilmorton, surrounded as we are by industry, businesses and lack of greenery. Houses in Wilmorton don't have large gardens – only small back yards – and the green space of the Wilmorton Recreation Ground is the only large open green amenity area residents can easily access on our doorstep. The propped development would make the recreation ground a far less desirable place in which to walk and spend quality time. Also, I choose to live in Wilmorton because of the peace and quiet it currently provides. A development of this nature would result in a significant increase in the population, be severely detrimental to the value of houses, add to existing	

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					parking problems in the area and will have a serious impact on noise levels, given its proximity to established residences. **Infrastructure Capacity** – local services are already overstretched. The addition of 17 plus families will put unbearable pressure on local GP surgeries and schools in the Wilmorton area. **Road Safety** – the proposed site will border a very busy dual carriageway and present a danger to children living on the site. **Access** – access and egress to the proposed site is off a very busy dual carriageway. This is totally unsuitable for the large vehicles used by gypsies and travellers. **Construction of Pride Parkway in 1997** - Somebody on the Facebook "Spotted Alvaston and Surrounding Areas" page posted this comment:- *"…and if I remember it was agreed the remaining land from the road construction was to be left as open space for residents - it was part of allowing the road to go through…"* It seems to me to imply that the construction of Pride Parkway was given the go ahead on the condition that the area of land we know as Wilmorton recreation ground was to be permanently allocated as <u>open amenity space for residents</u>. This needs to be looked into. The City Council/County Council will undoubtedly have records from when Pride Parkway was constructed. These records need to be found and studied to see if this was indeed the case.	

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					I urge the Council to reject this proposal and look for more suitable, alternative sites that do not negatively affect the existing environment and community	
UPNR Ka	Policy HA16: Gypsy and Traveller Site Allocation	Objects	No	No	I would like to see if the Council has considered the existing nature, trees, roads before making plans to allocate space for 17 permanent caravan pitches. This will add pressure to the A6 and other local roads which are already unable to keep up growing needs, population and vehicles. There was already a building constructed near allotments to reduce free green space for residents. This plan will see a lot of matured trees go down and disturb the biodiversity let alone the congestion. This is another blow to already shirking space in our towns.	While I understand need for such space for Gypsy or such purposes, there is abundant space in the city's outskirts/other areas to allocate for such projects. Or may be council needs think on the right number of pitches to balance everything in the area including existing infra, green /open space and residents.
Ann Mason	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I do not believe a lot of what this plan promises and I certainly do not agree with a Gypsy Site so close to existing residents in Alvaston, this is wrong!	
Councillor Tim Prosser	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	There are four issues with HA16, one of which has been partly addressed between the agreed version and the version published for Regulation 19 consultation. 1. Cross-reference to “Policy H10” instead of the correct H12 — **partly corrected** 2. The apparent breach of Policy EN3 (no exception criteria satisfied for the open space loss) — **unresolved**	

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					3. Section 123(2A) Local Government Act 1972 open space disposal procedure (separate statutory hurdle) — **unresolved** 4. The 17-pitch figure's traceability to published, current needs evidence — **partly addressed** Cross-reference In the Item 10 version, Policy HA16 stated: **In the document published for Regulation 19 consultation, the operative policy box has been corrected to cite "Policy H12."** However, the fix is incomplete: the supporting text immediately below the policy box, which states the criteria "will be applied to any application," **still cites "(see Policy H10)"** — the old, incorrect reference Apparent breach of Policy EN3 The proposed site is currently Public Open Space. The policy text itself gives away the site's current status, and this wording is unchanged between both versions of the document: "…appropriate fencing and planting to form an enclosed site for the Traveller community… **The remainder of the site beyond the fenced off Gypsy and Traveller accommodation should remain as accessible public open space**…" The word "remain" only makes sense if the **whole site currently functions as accessible public open space** — the policy is carving out a fenced, exclusive-use residential portion from what is presently open to the public, while the leftover fragment stays open. Testing this against Policy EN3's three exceptions for loss of open space:	

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					(a) *surplus to requirement assessment* — none is cited or referenced for this site anywhere in the text; (b) *equivalent or better replacement elsewhere* — not offered; the "remaining" open space is smaller, on the same site, not a replacement in a "suitable location" as EN3 requires; (c) *alternative sports/recreational provision outweighing the loss* — does not apply at all; this is residential accommodation, not sport or recreation. Unlike the Rolls-Royce cricket pitch relocation (which offers a replacement site) or even HA12 as originally drafted (which at least attempted a "not deliverable" argument), **HA16 does not fit any of EN3's three exceptions** — it is simply silent on the point, in both versions of the document. Disposal of open space land This sits **entirely outside the Local Plan/planning permission process** and would apply regardless of what the plan says: **Section 123(2A) of the Local Government Act 1972** requires a council to advertise, for two consecutive weeks in a local newspaper, its intention to dispose of land that "consists or forms part of an open space," and to consider any objections received, before disposal can proceed. This applies to any land that has been used by the public as open space, whether or not formally designated. Given the policy text's own description of the site as currently "accessible public open space," this statutory advertising/objection process would be a precondition to delivering HA16 as drafted, and there is	

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					nothing in either version of the plan indicating it has been anticipated or flagged. It is a real procedural risk to deliverability, separate from the EN3/soundness point, and is unaffected by the changes made between the two drafts. The 17-pitch figure — partly addressed, but new questions raised The agreed version of the plan's evidence base list stated: *"Gypsies and Travellers Accommodation Assessment (**GTAA), 2024**"* — a document that could not be found published anywhere on the Council's evidence base webpage, which lists only the 2015 GTAA and refers in passing to a GTAA "published in July 2023." The July 2023 GTAA — the most recent, methodologically current assessment that actually covers Derby and is publicly available — gives Derby City's **full pitch need for the entire 2020–2040 period** as **14 pitches** (ethnic definition) / **13 pitches** (PPTS 2015 definition) in Table 5.10. That is the *entire* 20-year need, comfortably spanning the Local Plan period (2023–2043), yet the Item 10 version allocated land for a minimum of 17 permanent caravan pitches — more than the entire assessed 20-year need under the only current, published GTAA that covers Derby. **The document published for Regulation 19 consultation adds a new paragraph reconciling this figure:** *"The evidence indicated a need for some 14 pitches for permanent Gypsy and Traveller accommodation within the city between 2020 and 2040. Policy HA16 makes provision for 17 pitches to cover the period between 2040 and 2043 (the end of the plan period) given a need for one further pitch a year as set out in the GTAA. The site allocated to meet Gypsy*	

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					and Traveller need is large enough to meet need should the GTAA need requirements vary when the study is reviewed." This is a genuine attempt to close the evidence gap (14 + 3, at an assumed rate of one further pitch per year for 2040–2043 = 17), but it raises fresh questions rather than resolving the matter fully: 1. The "one further pitch a year" rate for 2040–2043 is not stated anywhere in the 2023 GTAA and is not sourced to any other document named in the plan. Where does this rate come from, and has it been tested against the GTAA's own household growth methodology? 2. It remains unclear whether this reconciliation is based on the 2023 GTAA or the still-unverified "2024" GTAA, since the new paragraph does not specify a year. 3. **The entire evidence base list — including the "GTAA, 2024" citation — has been deleted from the document published for Regulation 19 consultation**, and replaced with unrelated text about which older plans are superseded. The published document therefore contains no consolidated evidence base list at all. Rather than resolving the traceability problem, this removes the only citation trail a consultee had for checking the source of the figures relied upon in the plan. The Council should confirm which GTAA (and which specific data) the 17-pitch figure and its extrapolation now rest on, and should reinstate a complete, accurate evidence base list in the document published for consultation.	

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Alan Pywell	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I am writing as a local resident to register my strongest technical objection to the proposed allocation of land west of Pride Parkway in Wilmorton for a permanent Gypsy and Traveller site under Policy HA16 of the emerging Local Plan. While I recognise the Council's statutory duty to meet the housing needs of diverse communities, this specific location fails to satisfy the strict criteria set out in **Policy H12 (Gypsies, Travellers and Travelling Showpeople)**. My objections are based strictly on material planning considerations and the criteria set forth in Policy H12: **1. Severe Deficiencies in Highway Safety and Cumulative Parking Saturation (Policy H12, Section e)** Policy H12 explicitly mandates that sites must be *"accessed safely by vehicles from the public highway."* The surrounding road network is entirely incapable of safely absorbing the transport movements required by this development due to severe pre-existing capacity constraints: ● **HMO Density and Pavement Parking:** The immediate Wilmorton area contains a high concentration of Houses in Multiple Occupation (HMOs). This high residential density has already led to acute parking saturation, with regular, widespread vehicle parking on pavements along local streets like Bowmer Road. This severely restricts road width and compromises pedestrian safety. Many residential homes now have 2 or 3 vehicles parked down streets in this immediate area. ● **Refuse collection:** The bottom of Bowmer Road is already heavily congested with parked vehicles and there have been many occasions that refuse	For these technical highway capacity, match-day safety, and environmental asset reasons, the land west of Pride Parkway is entirely unsuitable. I request that the Council removes this allocation from the Local Plan and prioritises unconstrained brownfield alternatives.

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					collection on a Friday has been aborted resulting in Eton Street residents not having bins emptied. This was due to the refuse vehicle being unable to pass. ● **Incompatibility with Caravan Movements:** Bowmer Road's restricted geometry is already routinely choked by this HMO overflow parking. It is physically impossible for long towing vehicles, multi-axle caravans, or heavy emergency vehicles to safely maneuver, turn, or exit without creating severe structural blockages and a high risk of collisions. Alternatively any entrance/exit off the already busy dual carriageway from Pride Pkwy/Hattow St would cause obstruction in a bottle neck that already suffers severe congestion. ● **Match-Day Gridlock:** This existing daily congestion is heavily exacerbated on match days by Derby County Football Club and travelling supporters. Pride Parkway regularly reaches total gridlock. Introducing slow-moving, long vehicles into an area already suffering from HMO saturation and match-day traffic poses an unacceptable hazard to highway safety. **2. Direct Destruction of Environment and Loss of Landscape Buffer (Policy H12, Section f)** Policy H12 requires sites to provide a good quality of life for occupiers while *"minimising the impact on the amenity of nearby residents and the character of the local area."* ● **Established mature trees:** The required removal of established mature trees on this site to make way for hardstanding pitches explicitly violates this. These trees function as a critical environmental, visual, and	

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					acoustic barrier between the Wilmorton residential community and the heavy traffic of Pride Parkway. The proposed site is a woodland area that's been established over 25yrs. ● **Destruction of footpaths:** The proposed layout requires taking up or heavily diverting well-used public footpaths crossing this green space. This path is a vital asset for community recreation and active travel. Enclosing or disrupting this right-of-way directly diminishes the residential amenity of established Wilmorton residents, conflicting with Section 4 of the policy. **4. Flood Risk Vulnerability (Policy H12, Section d)** Policy H12 states that *"due to the highly vulnerable nature of caravans and mobile homes, sites in Flood Zone 3 will not be supported."* Because parts of the River Derwent catchment carry high localized flood risks, the Council must formally demonstrate via a site-specific Flood Risk Assessment (FRA) that this allocation will not displace floodwater or compromise the physical safety of highly vulnerable mobile homes.	
George Fletcher*	Paragraph 311	Objects	No	No	The only suitability criteria considered is that it is council owned land. However, most of the other 46 parks are also council owned.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Jim McCulloch	Paragraph 311	Objects		No	I am writing to submit a formal objection to the allocation of land west of Pride Parkway in Wilmorton for a 17-pitch Gypsy	The Wilmorton allocation is unsound, geographically over-

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					and Traveller site within the Regulation 19 Draft Local Plan. This representation argues that the current allocation fails the test of soundness under national planning policy due to poor spatial distribution, conflict with local green protections, and a total failure to look ahead to the expanded infrastructure network created by the newly confirmed Local Government Reorganisation (LGR). The incorporation of precise spatial, demographic, and compounded public health metrics demonstrates that this allocation represents an unsustainable over-concentration that actively harms the health equity goals of both the settled and Traveller communities. The specific grounds for objection are outlined below: • **Unacceptable Monocultural Density South of the River Derwent:** The draft plan creates an artificial, single-use residential density by placing 100% of the city's permanent and newly proposed Gypsy and Traveller allocations south of the River Derwent. Derby's primary existing permanent provision is already established south of the river at Imari Park on Russell Street in Osmaston (17 permanent pitches). Squeezing this new 17-pitch site into the Wilmorton/Meadow Lane pocket forces all permanent pitches into a narrow geographic radius. When anchoring a boundary from Imari Park, across the proposed Wilmorton site, and down to New City Park (which contributes 40 established residential park home pitches), the entire target zone shrinks to a highly	concentrated within a 0.60 square kilometer bottleneck, short-sighted in light of LGR restructuring, and actively contradicts the Council's health equity mandates. I request that this allocation be removed from the final submission plan. A comprehensive, sequential assessment must be undertaken to relocate the 17-pitch requirement fairly to alternative locations north of the river, utilizing the superior health, transport, and land-use infrastructure within Chaddesden or Spondon to actively improve life outcomes for both the Traveller and settled communities.

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					compact 0.45 to 0.60 square kilometers (roughly 45 to 60 hectares). Aggregating 100% of the city's permanent Gypsy and Traveller allocations into a corridor under 0.60 square kilometers creates an unsustainable monocultural footprint. This intense concentration places an unfair infrastructure burden on local schools, health services, and park networks in this specific sector of the city. • **Severe Institutional Imbalance Relative to Local Housing Stock:** The immediate, established residential block of Wilmorton (surrounding City Park Homes) consists of roughly 700 houses. Introducing a 17-pitch permanent Traveller allocation directly adjacent to this pocket—while a 40-pitch residential park estate (New City Park) and a 17-pitch permanent Gypsy/Traveller site (Imari Park) operate within a straight-line radius of less than 1 kilometer—radically skews the local housing mix. This clustering means that managed park homes and Traveller provisions will represent a disproportionately high ratio of total residential units within this 0.60 square kilometer pocket. This clear spatial clustering violates the core objective of the Planning Policy for Traveller Sites (PPTS), which requires that local authorities ensure layout sizes do not dominate the nearest settled community. • **Failure to Align with Local Government Reorganisation (LGR) Frameworks:** The current draft plan relies on an outdated spatial boundary. Following the Government's formal decision on July 16, 2026, Derby City Council and its	

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					neighbors are being abolished to form a unified Derbyshire South Unitary Authority. Under this expanded legislative and geographic footprint, the upcoming authority will encompass all of Derby, South Derbyshire, Erewash, and southern Amber Valley. It is structurally unsound to force a high-density allocation into a highly constrained 45-to-60 hectare city bottleneck. The incoming LGR boundary opens up a vast geographic area spanning hundreds of square kilometers and includes strategically linked development corridors that can accommodate these needs far more effectively and sustainably. • **Violating the Marmot Principles & Entrenching Compounded Health Inequalities:** Derby City Council is explicitly committed to the Marmot Place Framework to combat health disparities. Public health data indicates that the River Derwent acts as a distinct health boundary; the southern pockets (Alvaston, Osmaston, and Wilmorton) suffer a severe 9-year deficit in overall life expectancy and a low Healthy Life Expectancy (HLE) of just 54 to 57 years, leaving residents to navigate chronic illness decades too early. This local deficit critically compounds a severe national health crisis. Nationally, Gypsy and Traveller communities have a life expectancy 10 to 12 years lower than the general public, with an estimated baseline HLE bottleneck of just 40 to 45 years. Furthermore, 42% of this community suffers from long-term chronic illnesses—predominantly respiratory and cardiovascular diseases. Forcing 100% of the city's new and	

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					existing permanent allocations into a narrow, highly congested 0.60 square kilometer southern urban corridor—sandwiched directly between the heavy traffic air pollution of Pride Parkway and active rail networks—acts as an act of environmental injustice. It deliberately clusters a population highly susceptible to chronic respiratory failure into the precise geographic zone of Derby that features the worst baseline air quality and the most overburdened healthcare infrastructure. • **Securing Better Health Outcomes North of the River:** To deliver genuinely better health and life outcomes for future Traveller generations, allocations must be situated north of the River Derwent in wards like Chaddesden or Spondon. In these northern wards, the Healthy Life Expectancy climbs significantly to 64 to 68+ years, offering an extra 7 to 11 years of active, disease-free life. Relocating the site allocation north of the river actively promotes better health outcomes by providing cleaner environmental baselines, resilient infrastructure and connectivity (via the A52, Raynesway, and the Chaddesden Mobility Hub), and unburdened primary care capacity that can offer preventative rather than reactive chronic condition treatment. • **Violation of Local Green Space (LGS) and Local Green Infrastructure Protections:** The proposed Wilmorton site directly encroaches upon land designated as protected Local Green Space (LGS) and vital Local Green Infrastructure buffers running through the Meadow Lane corridor toward Alvaston	

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					Park. This narrow green buffer is the only barrier preventing the 700-home Wilmorton residential zone from being entirely consumed by surrounding commercial expansion. Sacrificing these protected green assets for permanent development undermines the core environmental sustainability objectives of the wider Local Plan.	
Rachel Smith*	Paragraph 311	Objects	No	No	I am very concerned regarding the prpposal of a Gypsy site in Wilmorton. This will cause a negative environmental impact. Firstly cuttinh down trees when we should br planting them and the amount of extra cars in an already overcrowded area. It is also well documented that travellers dont look aftrr these aread. I am also very concerned that this will affect property prices in the area. I will have to leave if you proceed and I have lived here for 30 years.	
7. Economy						
Community Campaigner David Barton	Paragraph 312	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and	Entirety of Document- Traditional Architecture will provide the greatest surge in economic growth whilst mitigating against concerns held by a majority of key stakeholders.

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					unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Community Campaigner David Barton	Paragraph 312	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as	Entirety of Document- Traditional Architecture blends perfectly with the natural and built environments alike and so is the preferred option to achieve all targets.

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					selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Community Campaigner David Barton	Paragraph 312	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly	Entirety of Document- Traditional Architecture will see a surge in sustainable high quality investment opportunities that must be capitalised upon.

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					reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Policy E1: New Employment Locations						
Carney Sweeny on behalf of SmartParc Ltd	Policy E1: New Employment Locations	Support		Yes	Our client is the landowner and developer of the SmartParc site, which has secured planning permission with development having been commenced on site. Plot 1 and Plot 8 have been completed and occupied, with development of Plot 9 and the Energy Centre also having been completed. Further reserved matters approvals have been secured for Plot 4 and Plot 6a demonstrating a commitment to the delivery of this site. Overall, our client is supportive of the principle to allocate the SmartParc site for employment uses under Policy E1 and Policy E6. It is noted that most of our previous representations to draft Policy E6 have been taken on board with the proposed uses reflecting the approved uses under planning permission: 23/00148/VAR.	

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Planning and Design Group on behalf of Wheeldon Brothers*	Policy E1: New Employment Locations	Object	Yes	No	The Plan is considered unsound insofar as it excludes the contained western frontage of Land East of Sir Frank Whittle Road from the employment strategy and retains the whole site within the Green Wedge without a proportionate assessment of the frontage-focused alternative now promoted. The detailed reasons are set out in the enclosed representation. In summary, the omission is not justified by the Sustainability Appraisal or Green Wedge Review, does not adequately address the qualitative need for smaller local employment sites and treats ecological, heritage, contamination and access matters as barriers without evidence that they are incapable of mitigation.	The modifications sought are set out in full under “Suggested Modifications” in the enclosed representation. Modify Policy E1 and the Policies Map to allocate the western frontage of Land East of Sir Frank Whittle Way, between the A61 and the Great Northern Greenway, for employment-led commercial development. The allocation should support smaller local industrial and employment units and complementary mixed commercial and roadside retail uses, subject to criteria addressing landscape containment, ecology and BNG, heritage and archaeology, access, drainage and design. Modify Policy EN6 and the Policies Map so that only the allocated western frontage is removed from the Chaddesden/Derwent Industrial Area Green Wedge, with the Greenway forming its eastern boundary and the wider land

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						east of the Greenway remaining protected as Green Wedge.
Policy E2: Existing Employment Locations						
Rapleys LLP on behalf of Lidl GB Ltd	Policy E2: Existing Employment Locations	Object	No	No	Draft Policy E2 sets out a series of criteria for when it may be appropriate to redevelop existing or proposed employment land, or employment buildings, for alternative uses. It is Lidl's view that greater flexibility should be incorporated into these criteria, particularly in respect of the types of uses that may be supported within safeguarded and allocated employment sites. The approach taken must be consistent with national planning reforms that have deliberately broadened the definition of employment generating uses through the introduction of Use Class E (Commercial, Business and Service) in September 2020. The Government's intention in creating Class E is clear: a wide range of commercial, business and service activities are now recognised as employment generating economic uses, many of which can deliver equal or greater economic benefits than traditional Class B uses. Class E uses typically support high levels of job creation, provide accessible local services, and contribute positively to economic resilience. There is therefore a logical and policy consistent basis for grouping Class E uses alongside Class B uses within employment locations. Lidl stores typically generate around 40 full-time equivalent	In order to be considered sound, Lidl proposes that the wording of Draft Policy E2 is amended to all confirm that all Class E uses should be explicitly supported within existing employment locations.

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					jobs, all paid at or above the Living Wage Foundation rate for eligible employees, and without the use of zero hour contracts. This represents a significant and reliable contribution to local employment. In many cases, the level of job creation associated with a Lidl store exceeds that of a comparable Class B floorspace. Lidl's operational model also supports training, career progression and long-term employment opportunities within the local area. On this basis, Lidl considers that all Class E uses should be explicitly supported within existing employment locations, recognising their economic contribution, alignment with national policy direction, and ability to deliver high-quality employment opportunities. A more flexible and inclusive approach to employment land policy would ensure that safeguarded sites can respond to modern economic needs, support investment, and accommodate a broader range of employment generating uses.	
Policy E3: Local Labour Agreements						
Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy E3: Local Labour Agreements	Support	Yes	No	Policy E3 is one of the most powerful equity levers in the plan, and its supporting text makes my argument for me: paragraph 327 states plainly that Local Labour Agreements are 'an important mechanism for addressing health inequalities', and paragraphs 329 and 330 identify the priority cohorts, young people not in education or employment, people with SEND and learning disabilities, and care leavers, alongside the Council's Employment and Skills team already coordinating recruitment pipelines into inclusive jobs. This is exactly right,	• Specify in Policy E3 that Local Labour Agreements and Section 106 heads of terms should include targeted recruitment and skills pathways from the city's most deprived wards and the priority cohorts named at paragraph 329, developed with Derby College, the University of

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					and I strongly support it. The modification I seek is to carry that ambition from the supporting text into the operative policy, and to extend it from labour into supply chains. Development on the scale this plan proposes will generate two decades of contracts, jobs and training places; Table 1 records that 45 of Derby's 151 LSOAs are among England's most income-deprived 20% and that there is a gap between the wages of jobs in the city and the incomes of its residents. Procurement shapes markets: without explicit commitments, supply chain spend defaults to established, larger contractors, and skills routes default to those already closest to opportunity. A policy whose equality purpose lives only in supporting text is vulnerable to being negotiated away scheme by scheme.	Derby and community organisations. • Include apprenticeship and employment commitments monitored and reported by ethnicity, sex, disability and age, so that 'local labour' demonstrably includes the whole of the local labour force. The Appendix 1 indicator for E3 currently counts only the number of agreements signed; it should also capture who benefits from them. • Include supply chain commitments to local SMEs, explicitly including underrepresented and diverse-owned businesses, with spend transparently reported. This retains wealth in Derby's communities and builds the resilient, diversified business base the Economy chapter seeks.
Policy E5: Land South of Wilmore Road (Infinity Park)						

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Derby Climate Coalition	Policy E5: Land South of Wilmore Road (Infinity Park)	Support		Yes	We support the addition of points j) and k) regarding active travel.	
Policy E6: SmartParc, Spondon						
Carney Sweeny on behalf of SmartParc Ltd	Policy E6: SmartParc, Spondon	Support		Yes	Our client is the landowner and developer of the SmartParc site, which has secured planning permission with development having been commenced on site. Plot 1 and Plot 8 have been completed and occupied, with development of Plot 9 and the Energy Centre also having been completed. Further reserved matters approvals have been secured for Plot 4 and Plot 6a demonstrating a commitment to the delivery of this site. Overall, our client is supportive of the principle to allocate the SmartParc site for employment uses under Policy E1 and Policy E6. It is noted that most of our previous representations to draft Policy E6 have been taken on board with the proposed uses reflecting the approved uses under planning permission: 23/00148/VAR. One comment which has not been taken into account is the reference to 'where justified' in the policy wording. It is unclear what justification the LPA would be seeking as proposed uses, including ancillary uses are already permitted under planning permission reference: 23/00148/VAR. The reference to 'where justified' should therefore be removed from the policy wording as the principle of the proposed uses has already been established through the grant of planning	Our proposed deletion/s to draft Policy E6 is shown in red text below: *<u>Amendment to Draft Policy E6:</u>* *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*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					permission.	*new manufacturing (B2), storage and distribution (B8) uses, associated Use Class E and Class F1 uses and other ancillary uses ~~where justified~~. New office development (E(g)(i)) will be supported where it meets the provisions of Policy E4, including 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*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						food and drink industry, will be resisted.
Fisher German on behalf of Bloor Homes	Policy E6: SmartParc, Spondon	Support	Yes	Yes	The continued identification of SmartParc, Spondon for strategic employment growth is supported. This should be supported with commensurate residential development within Spondon, highlighting the integral sustainability of the Spondon suburb offering high quality living and working opportunities.	
Policy E9: Defined Centres						
Lichfields on behalf of Derbion	Policy E9: Defined Centres	Object		No	Derbion does not consider the policy to be sound. Policy E9 defines the hierarchy of centres, with the City Centre, as identified by Policy CC2, being the sequentially preferable location for main town centre uses. The PSA, defined in Policy CC8, is to be the focus for new retail. The Policy also confirms that the City Centre will be a focus for commerce, culture, leisure and the visitor economy, and the CAA will be a focus for new office development (Class E(g)(i)) under policies E4 and CC7. The Policy states that new food, drink, and leisure uses will be directed to the City Centre as a whole, but specifically encouraged to the CAA in the first instance. *Policy Consideration* The inclusion of Derbion in the PSA and CAA is supported; however we object to Derbion's other sites including	The CAA boundary should be further extended to include Bradshaw Way and Riverside Car Park and recognise that the sites are entirely suitable locations for a range of commercial activities or new office development. An expanded CAA which incorporates both sites will help the plan capitalise on Derby's regeneration potential. Subject to this amendment, the Defined Centres policy would be acceptable.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Bradshaw Way and Riverside not being included within the CAA. The Policy specifically seeks to focus office development and new food, drink, and leisure uses to the CAA and the drafting has the effect that such uses outside of the CAA would garner less support in policy terms. *Tests of Soundness* 1 Positively prepared – Derbion's sites at Bradshaw Way and Riverside Car Park are not included within the CAA boundary despite being in a highly accessible and sustainable location. The policy does not recognise the sites' suitability to accommodate a range of commercial, office and food/drink/leisure uses.	
Policy E10: Main Town Centre Uses Outside of Centres						
Rapleys LLP on behalf of Lidl GB Ltd	Policy E10: Main Town Centre Uses Outside of Centres	Object	No	No	As currently drafted, Policy E10 proposes a locally set retail impact threshold requiring a Retail Impact Assessment for all retail and leisure proposals over 280 sq m (net) located outside defined centres. Over the past 10–20 years, the food retail sector has undergone a significant structural shift. The majority of convenience shopping is now undertaken in mid- to large format foodstores, many of which operate successfully in edge- or out-of-centre locations. These formats are typically unsuited to central locations due to their operational requirements, parking needs, and catchment driven shopping	In the absence of clear evidence supporting the 280 sq m threshold, we consider that a higher, more proportionate threshold, such as 2,500 sq m, would better reflect modern food retail formats, align with national guidance, and ensure that policy requirements remain justified and effective.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					patterns. As a result, the primary trade draw effects of new foodstore development tend to fall on existing edge- or out-of-centre facilities, rather than on retailers trading within defined town centres. It is essential that food retail requirements align with wider policy objectives to ensure that local communities have convenient access to affordable foodstore provision close to where they live and work. A proportionate and locally responsive impact threshold is therefore important to support sustainable patterns of development, reduce the need to travel, and maintain a competitive and accessible food retail offer for residents. Given this context, the risk of significant adverse impacts arising from a new foodstore of below 2,500 sq m in an edge- or out-of-centre location is generally considered low. A threshold of 2,500 sq m would provide an appropriate safeguard against larger format schemes with greater potential to affect town centre vitality and viability, while ensuring that smaller, well-located proposals are not subject to disproportionate policy hurdles. We understand that the proposed locally set threshold of 280 sq m net is drawn from the Council's Retail & Centres Study (July 2026). However, having reviewed the Study, we are unclear how the evidence justifies a threshold as low as 280 sq m. The published material does not set out an impact based rationale for selecting this figure, nor does it demonstrate that proposals of this scale pose a realistic risk of significant adverse impacts on Derby's defined centres.	

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Policy E11: Tourism and Culture						
Derby Climate Coalition	Policy E11: Tourism and Culture	Support	Yes	Yes	We strongly support the addition of point i) regarding access.	
Historic England	Policy E11: Tourism and Culture	Support			Policy E11: Tourism and Culture	Support
Theatres Trust	Policy E11: Tourism and Culture	Support	Yes	Yes	We welcome the plan's support for cultural facilities, which is consistent with both the current and previous versions of the NPPF.	
8. Natural Environment						
Community Campaigner David Barton	Paragraph 408	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present	Entirety of Document- Authentic Traditional Architecture will confer the greatest complementary support for nature and surrounding ecosystems.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Policy EN1: Green and Blue Infrastructure						
Derby Climate Coalition	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	Generally support, but the addition of a couple of “where possible” weakens this policy compared with the Reg 18 draft. and they should be deleted.	Delete "where possible" and revert to Reg18 Draft wording.
Rob Hoddinott	Policy EN1: Green and Blue Infrastructure	Object	No	No	“ Proposals which cause loss or harm to the green and blue infrastructure network will not be supported unless the need for, and the benefits of the development clearly outweigh any adverse impacts.” The assessment for HA16 is flawed as it ignores the depravity index issues in the location so that the site can be put forward. Other brownfield sites have not been demonstrated as being assessed to the public.	Use brownfield sites.
Home Builders Federation*	Policy EN1: Green and Blue Infrastructure	Object		No	*Policy EN1 is not considered to be sound as it is not effective, justified, or consistent with national policy*	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					It is unclear from this policy is how the level of urban greening that would be required through the use of the Urban Greening Factor relates to the statutory national requirement 10% Biodiversity Net Gain (BNG). There would appear to be the potential for significant overlap with BNG that will need to be explored to ensure that the Council is not creating unnecessary administrative burdens on all applicants. A If the Council were to take forward the use of the Urban Greening Factor, HBF would suggest that it is not a requirement on all major sites. For example, some medium size sites or sites near existing open spaces might be encouraged but not required to use the urban greening factor to inform the design. It would also seem inappropriate to require its use where specific provision has been agreed as part of a site allocation. The Plan will also need to clearly set out UGF relates to the wider BNG and LNRS objectives.	
Lichfields on behalf of Derbion	Policy EN1: Green and Blue Infrastructure	Object		No	Policy EN1 outlines the approach to safeguarding, enhancing and providing new green and blue infrastructure. This includes an expectation for development proposals. Major development proposals are expected to demonstrate that the feasibility of integrating and maintaining these has been fully investigated. The policy further requires all major development proposals. *Policy Consideration* Derbion objects to the current policy drafting which requires to maximise the use of green roofs and walls and	The Policy wording should be amended to recognise situations where proposals cannot meet the stated UGF targets and therefore allow for robust, site-specific evidence to be submitted to demonstrate that this cannot reasonably be achieved and that a lower score would be acceptable. This

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					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. While Derbion supports the principle of promoting further urban greening in new development and wider national policy trends, it is essential that Policy EN1 retains flexibility to ensure these requirements do not act to stifle development from coming forward because of viability issues. *Tests of Soundness* 1 Justified – The application of a fixed UGF target to all sites risks being overly rigid and does not consider whether any Site-specific constraints (including existing built form, site configuration, or viability) may make the delivery unachievable.	would ensure that greening objectives are pursued wherever feasible while avoiding a rigid approach that could compromise deliverability. *"Where viable, all major development must maximise the provision of on-site green infrastructure by providing:* *l) an Urban Greening Factor score of at least 0.5 for residential development on greenfield sites* *m) an Urban Greening Factor score of at least 0.4 for residential development* *n) an Urban Greening Factor score of at least 0.3 for mixed-use or commercial development Where it can be demonstrated through robust Site-specific evidence that these requirements are unviable, a lower threshold will be permitted."*
Lichfields on behalf of Derby Station Quarter	Policy EN1: Green and Blue Infrastructure	Support		Yes	Policy EN1 sets out the Council's strategy for the protection, enhancement and delivery of green and blue infrastructure,	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					including minimum Urban Greening Factor (UGF) thresholds for new development. In our Regulation 18 representations, the Derby Station Quarter Board supported the objective of increasing urban greening, but recommended that the policy be applied with an appropriate degree of flexibility, so that the requirements did not inadvertently constrain otherwise sustainable development on viability grounds, particularly on constrained city centre brownfield sites. We welcome the introduction of “where possible” and “where viable” caveats throughout Policy EN1 since the Regulation 18 Draft, consistent with the flexibility we previously requested. We consider that this approach appropriately balances the Council's ambitions for urban greening with the need to ensure that policy requirements do not undermine the deliverability of development on constrained brownfield sites, including within the Station Quarter. We consider Policy EN1 to be sound and have no further comments to raise.	
Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	This Regulation 19 draft deserves credit for its honesty. Paragraph 6 now acknowledges that 'spatial inequalities persist in regard to the accessibility of green spaces, transport links, and environmental quality'; paragraph 17 acknowledges that deprivation is uneven across the city; and paragraph 430 states plainly that 'access to high quality public open space is not evenly distributed', with paragraph 432 recording the contrast found by the Council's own Open Space Study. I	Amend Policy EN1 or EN3 to require assessment of accessible green space provision against the Appendix 5 standards, disaggregated by ward-level deprivation, and to prioritise green infrastructure investment and developer contributions

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					welcome these admissions unreservedly, alongside the protection of Green Wedges and the ambition for a connected green and blue network. The gap is that no operative policy acts on them. Having established that access is unequal, the plan sets no requirement to assess provision against the Appendix 5 standards by deprivation, and no priority for directing green infrastructure investment to the wards where access and health outcomes are worst, despite the 11.1-year life expectancy gap recorded at paragraph 19. A concession in the evidence with no corresponding mechanism in policy is the definition of a plan that is not effective on this point: the two maps, deprivation and green space access, are both in the plan's evidence base, and the policies never lay one over the other. Second, nature's standing where wedges narrow. The vision at paragraph 50 accepts that some wedges have become narrower to accommodate housing, compensated by 'qualitative enhancements'. Enhancement promises are only as strong as their stewardship: without secured funding, defined responsibility and a voice for ecological interests in long-term management, enhancement becomes a landscaping condition that fades after practical completion. Nature is a stakeholder in these decisions, not merely a constraint awaiting a stronger argument.	where access and health outcomes are poorest, giving policy effect to the plan's own findings at paragraphs 6, 430 and 432. • Where Green Wedge land has been narrowed (paragraph 50), require that qualitative enhancements be secured with long-term stewardship and management funding through Policy GD9, with governance that includes community and ecological representation for the lifetime of the management arrangement.
Beverley Rhodes*	Policy EN1: Green and Blue Infrastructure				Derby City Local Plan response All areas of greenspace are important to reduce the loss of wildlife in the City. I find it very unusual that the concept of Local Nature Reserve has been remove from the Plan. As a recognisable part of Derby City Countryside looked after by local people I do feel that it would be wise for the Council to recognise this element of the natural environment. Why? Local Nature Reserves are a contract between Council and Natural England, local people	In order to retain a shared commitment towards all the green space areas then the LNRs and their management plans need to be mentioned more than once. Lets support our volunteers! In summary:

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					and the biodiversity of Derby, in which we attempt to improve the biodiversity of open space areas. LNRs are a designation that were originally protected in the Local Plan for the people of DErby. Local Nature Reserves provide 78% of the Accessible Green Space Target set by Natural England and there are 11 of them in Derby. They are important for Derby people and essential spaces for the Council to be proud of. Local Wildlife Sites ARE marked on the Local Plan but not all of these sites are public areas and very few have a management plan to improve the quality of wildlife in the City. Whilst they need protecting and with a buffer zone, they only play a small part in biodiversity improvement and they are designated as Local Nature Reserves with management plans. Biodiversity is important. It is access to high quality biodiversity which leads to wildlife entering gardens, being part of photographs, healthy living, recreation and sport, education, and better living for people in Derby. You have talked about Green Infrastructure but it is clear that has been frequently threatened by development and is now shrunk. So The Green Infrastructure, green wedges, green belt, LWS can ONLY work for biodiversity if there are Local Nature reserves and their management plan is in place to make improvements for biodiversity. Local Nature Reserves are also the hub of our public engagement, each one providing time, time, time, skills, valuable effort, ideas, shared opportunities, litter picking and visions for wildlife in the City and the Plan needs to recognise how critical the link between us as ordinary people and the Council needs to be maintained. Trust, as we have had challenged at ChAddesden Wood, is so very easily lost. The management plan produced to support LNRs is an opportunity to restore that Trus. Please place them back on	• Local Nature Reserves are defined areas of wildlife and biodiversity that are supported by a management plan with specific targets that will improve biodiversity value. They are the areas of the City driving wildlife improvement for the benefit of your green infrastructure. • Local Nature Reserves are areas of land where the management plan provides a focus for a range of partners to enable them to work together for t he benefit of the people and wildlife of the City. Partners include volunteers, site users, cyclist, Councillors, Council departments, external partners and so many more. • Having the knowledge of where LNRs are in the City should be used to drive new areas of green space, with management plans, to improve their wildlife value for people. • Both LNRs and LWS are protected from development in the new NPPF. I am available to

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					the map. The rewilding at Allestree Park is one example of doing better for LNRs because it has a management plan. Please be reminded DWT do not look after other LNRs but remain important for the people that live nearby for them. DWT have not been behind the LNRs it is local people and they need to be rewarded for their challenging and persistent effort to improve biodiversity in the City. LNRs are also on areas of green space that are not protected from development as is a LWS, such as sports pitches, caravan parks, rugby, paths etc.	make further comments when required. [redacted]
Derby Climate Coalition	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	Generally support, but the addition of a couple of “where possible” weakens this policy compared with the Reg 18 draft. and they should be deleted.	Delete "where possible" and revert to Reg18 Draft wording.
The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy EN1: Green and Blue Infrastructure	Object		No	Policy EN1, requires amongst other areas for major development maximise on site green infrastructure via provide Urban Greening via an Urbak Greening Factor of at least 0.5 for residential development on greenfield site, an Urban Greening Factor score of at least 0.4 for other residential development and an Urban Greening Factor score of at least 0.3 for mixed-use or commercial development. The council should note that it is often expensive to deliver ‘Urban Greening’ including green walls and roofs, as well as being costly and difficult to maintain. Without good management practices, these features can suffer and become a visual amenity issue rather than a benefit. There can therefore be viability issues with urban greening as there can be significant costs for the installation of green features such as green walls and roofs.	

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					The Council will be aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the council's policy requirements should therefore be robust and be used to form deliverable and realistic policies. WE have considered the Viability Assessment accompanying the local plan and it is not clear that Urban Green ng has been considered within it as an additional cost. It therefore likely that the requirement would create additional viability challenges for development and should be deleted from the plan. The council should note that where Urban Greening requirements have been introduced in other locations such as London, delivery of housing since the London Plan was adopted in 2021 has been severely hampered, to the degree that the government has recently announced an emergency package of measures aimed at accelerating housing building in London given slow delivery which in our view has been caused by the viability challenges. The council should therefore reconsider the policy requirement and ensure it is realistic and viable.	
George Fletcher*	Paragraph 412	Objects	No	No	Destroying Wilmorton Park is completely at odds with this policy. No assessment has been made against any of the other 46 parks has been made.	An alternative location needs to be found that does not involve destroying the key green space

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						of the approx. 320 households of Wilmorton.
Derbyshire Swift Conservation	Paragraph 418	Objects	Yes	No	There is no reference to the National Planning Policy Framework (NPPF) and there is no contingency to reduce non-compliance by including a post-construction check	The Swifts Local Network Planning Group have produced a standard planning condition which we propose is utilised in this Local Plan. This condition is based on a condensed version of the British Standard standard condition, with elements of the Brighton & Hove standard condition, plus additional text relating to post-construction evidence. Standard condition: No development shall take place until written details are approved by the local planning authority of the model and location of [X] integrated swift bricks, to be fully installed prior to completion of the external walls of each building and retained thereafter. A plan for the selection, siting, positioning and installation should be submitted to, and approved in writing by, the local planning authority. The plan should identify, as a minimum: a) the type and number of swift bricks to be installed; b) the specific

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						buildings on the development into which boxes are to be installed, shown on appropriate scale drawings; c) the location on each building where bricks are to be installed, shown on appropriate building plans and elevations. The integral nest box plan should be implemented in accordance with the approved details and all nest bricks retained in that manner thereafter. Swift bricks should be used unless these are not practical due to the nature of construction, in which case alternative designs of suitable swift boxes should be provided in their place for approval by the local planning authority. Evidence in the form of photographs of swift bricks installation, and approval by a suitably qualified ecologist, must be provided prior to occupation. Reason: To enhance the biodiversity of the site and to comply with the NPPG

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Policy EN2: Dark Infrastructure						
Derby Climate Coalition	Policy EN2: Dark Infrastructure	Objects	Yes	Yes	We support the inclusion of this policy.	
Historic England	Policy EN2: Dark Infrastructure	Support			Policy EN2 we welcome the references to heritage within the policy.	
Policy EN3: Open Space, Sport and Recreation Buildings						
George Fletcher*	Policy EN3: Open Space, Sport and Recreation Buildings	Objects	No	No	I don't believe any of the policy objectives listed have been achieved by destroying Wilmorton Park.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Rob Hoddinott	Policy EN3: Open Space, Sport and Recreation Buildings	Object	No	No	HA16 is totally contrary to this policy. In the local plan consultation I proposed numerous waste land sites which could house this facility, that has been ignored and not referenced in the consultation. This is open space that is being removed and contrary to almost every element of the local plan which repeatedly talks about preserving green space.	It needs moving to a brown city centre site not remove prime green space located next to a very deprived area.
Rob Hoddinott	Policy EN3: Open Space, Sport and Recreation Buildings	Object	No	No	“an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location” This has not been applied in the case of HA16	

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Dr Beatty	Paragraph 429	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Leave the much needed green space in wilmorton
Dr Beatty	Paragraph 430	Objects	No	No	Wilmorton is in an area of deprivation and The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this policy	Leave the green space in wilmorton
George Fletcher*	Paragraph 430	Objects	No	No	Destroying Wilmorton Park is contrary to this statement.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
George Fletcher*	Paragraph 430	Objects	No	No	Destroying Wilmorton Park which is in adeprived area, is contrary to this statement.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Dr Beatty	Paragraph 431	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this policy	Leave the green space in wilmorton
Dr Beatty	Paragraph 432	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this policy. In an area of terraced house and fe s population, the removal of a green space and old established trees should not be allowed.	Keep the green space in wilmorton

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Dr Beatty	Paragraph 433	Objects	No	No	If the developer is the council, it appears the rules don't apply	
George Fletcher*	Paragraph 435	Objects	No	No	No evidence that such an audit been carried out in the case of destroying Wilmorton Park.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Policy EN5: Green Belt						
Amber Valley Borough Council	Policy EN5: Green Belt				The draft Local Plan Policy EN5: Green Belt states that: The principle, general extent and permanence of the Nottingham-Derby Green Belt within the city is supported and maintained… Chapter 3 of the Derby Green Belt Assessment (undertaken by LUC on behalf of the City Council) published in September 2025, sets out the Assessment Methodology. It refers to several terms used within the PPG which it considers require further definition to be applied as part of its assessment process. In paragraph 3.25, which refers to the Purpose A definition of 'Near to' it states that: Although villages are not large built-up areas, a village that lacks very strong separation from a large built-up area is considered a 'satellite' settlement, the land around which still has some association with the large built-up area and therefore makes some contribution to Purpose A. To the north and east of Derby, Quarndon, Little Eaton, Breadsall, Ockbrook and Borrowash would all be considered satellite settlements.	

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					Paragraph 3.39 refers to the contribution of a parcel to Purpose A, which is determined in line with the illustrative factors listed in the PPG guidance, but with an additional 'very strong' level of contribution. It refers to factors which can tip a 'strong' rating into the 'very strong' category which include: • A very strong sense of separation from the urban area, with no notable urbanising influence from it; or • A significant impact on the separation of a satellite settlement from a large built-up area, resulting in a very incongruous impact on the settlement pattern. Amber Valley Borough Council is currently undertaking a Green Belt Review and as part of this process an initial assessment of Derby City Council's Green Belt Study has identified methodological concerns relating to the interpretation of Green Belt Purpose A. In particular, the concept of 'satellite settlements' appears to depart from the approach set out in national policy and risks widening the application of Purpose A beyond its intended focus on preventing the unrestricted sprawl of large built-up areas. Furthermore, Annex E of the National Planning Policy Framework (NPPF) refers to land making a strong, moderate or weak contribution to the relevant Green Belt purposes. The introduction of a 'Very Strong' category therefore represents a more restrictive interpretation of Green Belt function than would result from a direct application of the NPPF. It is unclear how the above methodology has impacted upon the assessment of individual parcels, in particular where they	

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					are considered to be 'strong' in relation to purpose A, and whether this approach has led to parcels therefore not being considered as grey belt. Part of the land which separates Quarndon from the Allestree suburb of Derby lies within Derby City and part lies within Amber Valley, with much of it lying within the Green Belt. The study identifies the part of the Green Belt to the north of Allestree as being important in relation to Green Belt purposes, which appears to position the settlement as a satellite settlement within the wider urban area. The Council is unable to reach a definitive view on this matter until its own Green Belt Review has been completed, and would wish to reserve the right to not refer to Quarndon as a satellite settlement pending the conclusion of its own Green Belt Review. Until such time as that is the case, the Council cannot be satisfied that such a designation is consistent with its own methodology and emerging evidence base, and that it would not prejudice the assessment of other parcels of land within Amber Valley which lie between Quarndon and Allestree. Notwithstanding the conclusions in the Derby Green Belt Review regarding the purpose of individual parcels, paragraph 146 of the NPPF (2024) refers to exceptional circumstances which may justify the alteration of the Green Belt boundary, including where an authority cannot meet its identified need for homes.	

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					In this respect, given the above concerns regarding the methodology of the Derby Green Belt Review there is uncertainty as to whether all sources of supply have been fully exhausted in seeking to meet Derby's own housing needs. Accordingly, the Council would wish to reserve the right to comment further on this matter once its own assessment work has been completed.	
Derbyshire County Council	Policy EN5: Green Belt	Supports	Yes	Yes	As noted above, two Green Belt Reviews / Assessments have previously been carried out of the Nottingham – Derby Green Belt. The important conclusions of both of these Green Belt Reviews, was that the area of the Nottingham – Derby Green Belt between the two urban areas of Derby and Nottingham and extending northwards towards the settlements in the Amber Valley were strategically the most important areas of the Green Belt in meeting the main Green Belt purposes set out in national policy, particularly its function in constraining the eastward sprawl of Derby City and preventing the coalescence of the cities of Nottingham and 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.	

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Fisher German on behalf of Bloor Homes	Policy EN5: Green Belt	Objects	Yes	No	The references in the Plan to applications being determined in accordance with National Policy are supported, particularly Grey Belt principles which are a key element of the amendments to the Framework in December 2024 and the 2026 NPPF. Paragraph 147 of the Framework states "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development…has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground". It is clear therefore the Council should have had an agreed Statement of Common Ground prior to concluding Green Belt release was necessary. As discussed earlier in these representations, the 2026 SoCG does not provide sufficient detail in terms of the approach to the City's unmet need. Paragraph 146 of the Framework states "exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken	

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					together) of the remaining Green Belt, when considered across the area of the plan" [our emphasis]. Table 4.2 of the consultation document confirms that all three promoted Green Belt sites considered, Locko Road Spondon, Stoney Lane Spondon and Asterdale Leisure Centre would not have a fundamental impact on the Green Belt if developed. Paragraph 4.12 of the Derby GBA states "While these three sites represent a notable proportion of the limited Green Belt within Derby, they constitute only a very small fraction of the wider Nottingham–Derby Green Belt as a whole" [our emphasis]. Paragraph 4.13 continues "the potential development sites are sufficiently disparate from each other that they would not have a cumulative effect on the Green Belt purposes". Taken tother, it is clear that even if all three sites were to be developed, this would not fundamentally undermine the purposes of the Gren Belt, according to the Council's own Green Belt evidence, thus would not conflict with Paragraph 146. . Whilst detailed commentary on Grey Belt and Locko Road is provided below, it is noted that the Council's Green Belt Assessment clearly concludes that development of all the assessed promoted sites (Locko Road, Stoney Lane and Asterdale Leisure Centre) would not fundamentally impact the purposes of the remaining Green Belt purposes when taken together. Therefore, even if the Council does not consider the site as Grey Belt, the site should still be selected, as there is no rule or requirement that the Council should only release Grey Belt land.	

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					On the contrary Paragraph 148 of the Framework sets out the clear hierarchy under which Green Belt land should be released. It states, "where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations" [our emphasis]. Therefore, even if accepting the site was not Grey Belt (which is not our position), that does not preclude it from being allocated, it simply must come after the exhaustion of sequentially preferable Grey Belt locations. Given alternative locations have clearly been exhausted in that there remains significant unmet needs, the Council must then use lower functioning Green Belt land to meet as much housing need as possible, particularly in the context that its own evidence confirms the development of all would not fundamentally undermine the remaining purposes of the Green Belt as per Paragraph 146 of the Framework. As discussed below, the Council's own evidence broadly acknowledges that Locko Road is lower functioning Green Belt land, scoring only slightly above Stoney Lane against Purposes A and C, thus should still be selected to meet needs as fully as possible in accordance with NPPF Paragraph 146 which as set out above requires authorities to meet needs in full – or logically as fully as they are able. Locko Road, Spondon As set out above, BHL's case is clear that Locko Road qualifies as Grey Belt. The Inspector's attention is directed to the appended Green Belt Appraisal by Define (Define GBA) which sets out our position fully. The Define GBA outlines clear flaws with the Derby City Green Belt Assessment (DGBA)	

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					undertaken by LUC. These arguments are presented at a high level below, but the full case is set out in the Define GBA. Firstly, the manner in which the DBGA subdivides the Locko Road site into separate parcels results in the site being assessed in an illogical, contrived and unrepresentative way. The approach adopted by LUC artificially creates constraints and negative effects that do not arise when the site is considered in its entirety, as it has consistently been promoted. This is evidenced by previous submissions to the Council, including the Call for Sites submission (Site Reference DER0345), which has always presented Locko Road as a single, cohesive development opportunity. The DGBA splits the Locko Road proposal into parcels DY6 (abutting the Spondon urban fringe) and DY7 (to the north disconnected to the Derby City urban fringe) as shown on Figure 2 below. Attention is drawn to Paragraph 2.4.7 of the Define GBA (Appendix 1) which states: "The DGBA states that parcel DY6 abuts the urban edge of Spondon and does not benefit from a physical feature that restricts and contains development (DGBA, page 87, 2nd bullet). The DGBA then separately concludes (DGBA, page 94, 3rd bullet) that development of parcel DY7 would result in an incongruous pattern of development as it is remote from the urban edge of Spondon and relies on how development might sit on the site's topography, notwithstanding that landform/topography is not part of the criteria set out in para 005 of the PPG methodology."	

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					LUC have failed to apply their own methodology here, informed by the Framework, which stipulate that the boundaries of the parcels assessed should use "physical features that are readily recognisable and likely to be permanent" (NPPF Paragraph 149f, DGBA Paragraph 3.28). Extending north from Spondon, the most obvious boundary is the one utilised by the proposed scheme, the Lees Brook west of Locko Road and unnamed watercourse to the east. The boundary selected by LUC does not follow historic field patterns or any strong physical boundaries on the ground. In coming to the conclusion that DY6 does not benefit from a physical feature that restricts and contains development, raises the clear question why LUC drew the parcel boundary in that location, given their own methodology was that parcels should be defined by significant variations in physical elements. Our clear view is that when the parcel is assessed as a whole, then there is a clear defensible boundary to the north. Again, the LUC report is inconsistent, as it does not recognise the Lees Brook as a physical feature capable of restricting and containing development, despite coming to the entirely opposite conclusion in respect of the East of Spondon proposals (DY10) stating: "The outer edge of the parcel follows a well-treed hedgerow and stream (marking the city boundary) which would limit the urbanising impact of development on adjacent open land". That statement accurately describes the northern boundary of the Locko Road proposals. If there is a difference between the two, it's that the Locko Road tree belt is more established, but our	

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					case is they should be viewed as performing the same overall function. There are obvious flaws in the LUC report which have artificially impacted the assessment of the Locko Road proposals. Define provide a comprehensive Grey and Green Belt assessment of the Locko Road site in its entirety, as promoted, at Section 3 of their report. This work underpins the forthcoming application which is being submitted speculatively under Grey Belt/Golden Rules principles. BHL are of the clear view when the site (as promoted and as will be submitted as part of the application) is assessed comprehensively and not as separate parcels it meets the applicable tests of Grey Belt land. As set out above, even if it does not, that does not preclude the Council from allocating it in light of the massive shortfall in deliverable housing land it is required to address. Is the site Grey Belt? Again, the below summarises the Define GBA, and the Inspectors are again directed towards it. To qualify as Grey Belt as per the definition at page 73 of the 2024 Framework the following criteria must be met – it must be either brownfield land or greenfield land which does not contribute strongly to purposes A, B and D of paragraph 143 of the Framework. Grey Belt land excludes land where the application of policies relating to footnote 7 (excluding Green Belt) provide strong reason to restrict or refuse the development. Again, a full assessment is provided in the appended Define report, but BHL's case is presented at a high level below for ease of reference.	

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					Purpose A – to check the unrestricted sprawl of large built up areas LUC score the site as performing a Strong function towards Purpose A, Define argue this should be Moderate. The PPG provides illustrative features which may indicate what scoring a site should receive. It is agreed that the site is adjacent to a large built-up area. To make a strong contribution to Purpose A, the PPG suggests sites should lack "physical feature(s) in reasonable proximity that could restrict and contain development". The key area of difference between BHL and DCC is whether Lees Brook and the surrounding tree belt qualify as a physical feature that contains development. BHL are clear that the same conclusions should have been reached by LUC as they do for DY10 i.e. that a watercourse with surrounding tree belt amounts to a physical feature which restricts development. Moreover, when considering Locko Road specifically, the topography of that part of the site would also clearly restrict development. As such, there is a clear physical feature in reasonable proximity which would restrict and contain development. Another potential feature listed in the PPG relates to the creation of an incongruous pattern of development, with an example of an extended finger of development extending into the Green Belt. Again, BHL's position is that the development would not amount to an extended finger into the Green Belt, nor would it be incongruous pattern of development. BHL therefore conclude the site should have been scored as	

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					making a moderate contribution to purpose A, in the same way DCC / LUC have scored parcel DY10 Purpose B – to prevent neighbouring towns merging into one another Define agree with LUC in that the land makes a highly limited contribution to the merging of towns (Weak/No). Purpose D - to preserve the setting and special character of historic towns Define agree with LUC in that the land makes a highly limited contribution to the preservation and character of historic towns (Weak/No). Therefore, under an assessment of the purposes of the Green Belt relative to Grey Belt, the only difference between Locko Road and the proposed allocation east of Spondon is the assessment under Purpose A. BHL assert that following the PPG guidance and the logic applied in respect of DY10, where a wooded watercourse on the city boundary was found to form a physical feature which restricts development, Locko Road should have been scored as moderate and thus qualify as Grey Belt. Footnote 7 The NPPF confirms that Footnote 7 areas can exclude land as Grey Belt if they provide a strong reason to prevent development. It is noted that the site lies within reasonable proximity to Locko Park, which contains a Grade II Listed Hall, and the parkland for which is also Grade II registered. It is noted that the Council's evidence does not allege that the site	

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					should be excluded on Footnote 7 principles. Regardless, significant work has been undertaken in preparation of the emerging Planning Application. BHL's Heritage Assessment by Pegasus Group (Appendix 4) confirms that the site is considered to contribute to the significance of the Locko Park assets through setting, being part of the wider agricultural surrounds which have some historic illustrative value as to the wider context of the assets, and which provides some of the separation the complex currently has from the built up area of Spondon. However, intervisibility is noted to be extremely limited, comprising a heavily filtered and distant glimpse through a tree belt from the upper levels of the house, limited similar glimpses from the parkland, and no direct intervisibility from the lodges. Where visibility of the site occurs, it has a backdrop of existing built form of Spondon. The site is also experienced in dynamic views along Locko Road and along footpath approaches, although separated from the parkland by intervening undeveloped land. The proposed development comprises change of character to the site, although the northern areas will be used for drainage and green infrastructure, with the areas of residential development placed in the southern areas. There will be some reduction in the historic illustrative value the site contributes to the assets through setting, as part of the historic agricultural context, and providing part of the current separation. However, agricultural context and separation will remain along Locko Road.	

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					Overall, the proposed development is anticipated to cause less than substantial harm at the low end of the spectrum to the parkland, and at the very low end of the spectrum to Locko Park house and lodges. This impact is not considered to be significant and would thus not amount to a strong reason to prevent development. No other Footnote 7 constraints are considered to be impacted. Therefore, a Footnote 7 area does not provide a reason to preclude Grey Belt status. Grey Belt Conclusions The site, when considered consistently and correctly, should be assessed as Grey Belt. It makes no contribution to two of the relevant purposes of the Green Belt (Purpose B and D), and a moderate against the other (Purpose A). This is the same scoring matrix as the Council's preferred allocation. The grounds for a strong contribution against Purpose A are not considered consistent with the Council's own methodology or tenable against the guidance within the PPG. BHL therefore urge the Council to reassess the site in this context. Regardless, as set out above, even if the Inspectors agree with the Council that the site is not Grey Belt, this does not preclude its allocation, and the Plan remains obliged by the Framework to utilise non-Grey Belt land in the Green Belt to meet housing needs in full where all Grey Belt land has been utilised (NPPF Paragraphs 146 and 148).	
Councillor J Wright	Policy EN5: Green Belt	Objects		No	Not justified: • The Council at its meeting dated 26th February approved an amendment to the MTFP that:	

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					○ It was moved by Councillor J Wright and seconded by Councillor Smale that the minute was amended by the addition of the following words: 1. That £0.150m be added to the budget for Communities and Place for the purposes of Regeneration of the City Centre through Housing, to be funded from resource to support additional capacity as defined by the Delivery Board to deliver future savings and efficiencies of £0.250m. 2. To note that a £0.150m one-off external, specialist consultancy report will identify suitable locations in the city centre for homes. The city centre having better/closer public transport, health, education, employment prospects and leisure facilities than green field sites will provide the infrastructure required for residents that would benefit most: younger residents, older (including those with extra care needs), looked-after children, and temporary accommodation. The report will focus on: • building upon the capacity work already undertaken for the local plan to consider the provision of minimum, maximum and average unit numbers for the strategic city centre sites Riverside,	

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					Castleward, Northern Gateway and Station Gateway • the capacity testing should include master-planning/layouts for the major city centre housing led regeneration sites as stated above. Particularly for Riverside • the report could additionally provide some high level evidence around strategic housing requirement, viability testing, market demand/requirement and deliverability of these sites. The report will also aim to identify sufficient locations/numbers to reduce / remove the pressure on our green belt and green wedges. The initiative will lead to increased certainty for developers by providing a robust demand analysis, increased social housing for the city and protection of 8 our precious green spaces. o This motion provided a counter-balance to the previously completed 'Green Belt Review' that examined the city's green belt, wedges and other green spaces to identify sufficient locations to help to meet the city's housing needs requirement. This review focussed only on protected green spaces within the city boundaries and there was no comparative brownfield site review to	

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					support the Council's stated ambitions of a) protecting and enhancing the green belt/wedges and utilising a 'brownfield first' approach. The budget amendment, above, was agreed to support a comprehensive review of brownfield/other non-green sites within the city centre and develop 'City centre regeneration through housing' strategy. This report has not yet been produced to provide that balance to the green belt review and so preceding with the emerging plan is not balanced, is inconsistent with national policy, local policy 'brownfield and city centre first (para 81) and fails to comply with Council policy regarding the budget whilst also frustrating the will of the Council by not waiting for the 'city centre regeneration through housing' review to be completed and integrated into the process.	
Policy EN6: Green Wedges						
Derby Climate Coalition	Policy EN6: Green Wedges	Objects	Yes	No	We would support EN6 if the rest of the plan had done so. We note that mentions of changes to the green wedges in the housing allocations in the Reg 18 draft have been removed in this draft. While this is understandable as they are not really policy, it does hide the position from those readers only	The Council needs to make up its mind if it supports Green Wedges or not. If it does, then references to modifying them in the housing allocations chapter

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					looking at parts of the plan. See also para 448 and policy EN7.	should be deleted. If it does not think it possible or desirable to retain the policy as in the adopted plan, it should delete EN6 (and OBJ8) and just rely on EN7.
Dorina Balan*	Policy EN6: Green Wedges	Objects	Yes	No	Please see attached full Regulation 19 Representation document. In summary: the plan is not positively prepared, not justified, not effective, and not consistent with national policy in its treatment of Site 415 (Railway Line at Whitehouse Farm, Shelton Lock, Derby, DE24 9QF, Title No. DY92232) under Policy EN6 (Green Wedges). Full details in attached document.	Please see attached full Regulation 19 Representation document for full details of requested modifications. In summary: remove Site 415 from the Green Wedge designation and allocate it for residential development of approximately 20-28 bungalows.
Dorina Balan*	Policy EN6: Green Wedges	Objects	Yes	No	This representation objects to the designation of Site 415 (Railway Line at Whitehouse Farm, Shelton Lock, Derby, DE24 9QF, Title No. DY92232) under Policy EN6 (Green Wedges) in the Proposed Submission Local Plan. The plan is unsound for all four reasons: NOT POSITIVELY PREPARED Derby City Council's own evidence confirms an unmet housing need of approximately 5,840 homes over the plan period. The city can only accommodate 12,500 homes against a total requirement of 18,340 homes. Site 415 is a brownfield-character former railway site — no rails or infrastructure remain, only compacted earthworks — 3.84 acres, 600 metres long, in Flood Zone 1, with two existing access points (Heigham Close and Hoveton Close), no TPOs, no ecological designations, existing utility infrastructure confirmed, and a completely clean planning history. Its exclusion from allocation whilst	The following modifications are requested (full details in attached representation document): Modification 1: Follow the council's own Green Wedge Review recommendation (Paras 4.270-4.272, Part 2, September 2025) and reclassify the Allenton/Sinfin Industrial Area Green Wedge as a Green Gap, consistent with the evidence base. The plan has departed from this recommendation without justification — that departure

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					Derby faces a housing shortfall of nearly 6,000 homes is contrary to the positively prepared test. NOT JUSTIFIED The council's own Green Wedge Review (Part 2, September 2025, Paras 4.270-4.272) recommended this Green Wedge be reclassified as a Green Gap due to its compromised position — the plan has not followed this recommendation without providing any justification. The council's own evidence rates Site 415 as the lowest harm site of all promoted sites in the entire Green Wedge (low-moderate harm — Para 4.259, Page 174). The plan's own supporting text at paragraph 447 explicitly states: "Green Wedges do not have the permanence of the Green Belt" — acknowledging the designation is not absolute. The plan allocates housing immediately adjacent under Policy HA12 — specifically referencing "proximity of development to the railway embankment to the east" (which is Site 415) — creating a fundamental inconsistency that is not justified. A directly relevant and material planning appeal decision further demonstrates that the plan is not justified: Appeal Reference APP/C1055/W/24/3356476 (Land west of Royal Hill Road, Spondon, Derby) was decided by Inspector Andrew Smith on 16 May 2025. The Inspector allowed 90 homes on a Derby Green Wedge site, making the following findings which are directly applicable to Site 415: — "Policy CP18 cannot be considered fully consistent with the Framework." (Para 38) — Policy EN6 in the emerging plan is the successor to CP18. The same finding applies. — "Green Wedges, whilst not having the permanence of Green Belt..." (Para 8) — directly supporting the argument that the designation should not be applied as if it were absolute. — "The adverse impacts identified, comprising moderate harm to the function of the [Green Wedge]... would not, in	should be corrected. Modification 2: Remove Site 415 (Railway Line at Whitehouse Farm, Shelton Lock, Derby, DE24 9QF, Title No. DY92232) from any Green Wedge or Green Gap designation, on the grounds that it: — Sits on the eastern periphery of the designation and does not perform the settlement separation function — Is rated the lowest harm site in the entire Green Wedge by the council's own evidence (low-moderate harm, Green Wedge Review Para 4.259) — Is brownfield-character previously disturbed land (former railway trackbed — no rails, no infrastructure, only compacted earthworks) — Is completely inaccessible and provides no public amenity — Is immediately adjacent to the Policy HA12 housing allocation, with the plan itself referencing "the railway embankment to the east" — Has a directly comparable appeal decision (APP/C1055/W/24/3356476, Spondon Derby, May 2025)

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					combination, significantly and demonstrably outweigh the proposal's substantial benefits." (Para 43) — the Inspector allowed 90 homes despite MODERATE harm. Site 415 has been rated LOW-MODERATE harm — lower than the Spondon site. The planning balance is even more firmly in favour of development on my site. — Para 33 confirmed "a significant supply shortfall is presently calculable" in Derby — Derby's housing position has not improved since May 2025 and the unmet need of 5,840 homes in the emerging Local Plan confirms this. NOT EFFECTIVE Site 415 is highly deliverable — two existing access points, Flood Zone 1, no statutory constraints, existing utility infrastructure nearby, and a clean planning history. Its exclusion reduces the plan's effectiveness in addressing Derby's 5,840 home shortfall. NOT CONSISTENT WITH NATIONAL POLICY The NPPF 2024 requires significant weight to be given to housing need. The plan is also inconsistent with the Grey Belt principle introduced by the NPPF 2024. The Proposed Submission Local Plan itself includes the NPPF 2024 Grey Belt definition in its Glossary: "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143." Whilst Grey Belt technically applies to Green Belt, the underlying principle — that land not strongly contributing to its designation should not receive blanket protection — is directly applicable here. The council applied this logic to Stoney Lane, Spondon (Policy HA7). The same logic applies to Site 415 — a former railway trackbed on the periphery of the designation, rated lowest harm, providing no public amenity, and with housing allocated immediately adjacent. Site 415 does not perform the Green Wedge function. It does not	where 90 homes were allowed in a Derby Green Wedge despite MODERATE harm — higher than the low-moderate harm on Site 415 Modification 3: Allocate Site 415 for residential development with a policy framework supporting a bungalow-led development of approximately 20-28 homes, with access from Heigham Close and Hoveton Close, design conditions ensuring compatibility with the bungalow character of Shelton Lock, 10% Biodiversity Net Gain, and timber reuse under Policy CL5. Alternative Modification: Modify Policy EN6 or its supporting text to make clear that Site 415, given its peripheral location, lowest harm rating, brownfield character, adjacency to the HA12 housing allocation, and the context of Derby's unmet housing need of 5,840 homes, should be considered on its individual merits with significant weight given to housing need. Full details, evidence, and suggested policy wording are set out in the

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					separate distinct settlements. Whilst open to farmland on its western side, the countryside linkage function is performed by the wider body of the Green Wedge — not this narrow peripheral strip. The council's own Green Wedge Review confirms Site 415 "does not divide the GW for most of its length." The site is completely inaccessible on foot — overgrown, fly-tipped, and providing no public amenity or open space benefit. A Green Wedge designation is intended to protect valued open space. This site delivers none. Full details are set out in the attached Regulation 19 Representation document (Regulation_19_Representation_Site415_DEFINITIVE.docx) submitted with this representation.	attached Regulation 19 Representation document.
George Fletcher*	Policy EN6: Green Wedges	Objects	No	No	Turning Wilmorton Park into a traveller camp does not meet this criteria.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Councillor J Wright	Policy EN6: Green Wedges	Objects		No	Not justified: • The Council at its meeting dated 26th February approved an amendment to the MTFP that: o It was moved by Councillor J Wright and seconded by Councillor Smale that the minute was amended by the addition of the following words: 1. That £0.150m be added to the budget for Communities and Place for the purposes of Regeneration of the City	

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					Centre through Housing, to be funded from resource to support additional capacity as defined by the Delivery Board to deliver future savings and efficiencies of £0.250m. 2. To note that a £0.150m one-off external, specialist consultancy report will identify suitable locations in the city centre for homes. The city centre having better/closer public transport, health, education, employment prospects and leisure facilities than green field sites will provide the infrastructure required for residents that would benefit most: younger residents, older (including those with extra care needs), looked-after children, and temporary accommodation. The report will focus on: • building upon the capacity work already undertaken for the local plan to consider the provision of minimum, maximum and average unit numbers for the strategic city centre sites Riverside, Castleward, Northern Gateway and Station Gateway • the capacity testing should include master-planning/layouts for the major city centre housing led regeneration sites as stated above. Particularly for Riverside • the report could additionally	

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					provide some high level evidence around strategic housing requirement, viability testing, market demand/requirement and deliverability of these sites. The report will also aim to identify sufficient locations/numbers to reduce / remove the pressure on our green belt and green wedges. The initiative will lead to increased certainty for developers by providing a robust demand analysis, increased social housing for the city and protection of 8 our precious green spaces. This motion provided a counter-balance to the previously completed 'Green Belt Review' that examined the city's green belt, wedges and other green spaces to identify sufficient locations to help to meet the city's housing needs requirement. This review focussed only on protected green spaces within the city boundaries and there was no comparative brownfield site review to support the Council's stated ambitions of a) protecting and enhancing the green belt/wedges and utilising a 'brownfield first' approach. The budget amendment, above, was agreed to support a comprehensive review of brownfield/other non-green sites within the city centre and develop 'City centre regeneration through housing' strategy. This report has not yet been produced to provide that balance to the green belt review and so preceding with the emerging plan is not balanced, is inconsistent with national policy, local policy 'brownfield and city centre first (para 81) and fails to comply with Council	

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					policy regarding the budget whilst also frustrating the will of the Council by not waiting for the 'city centre regeneration through housing' review to be completed and integrated into the process.	
Dr Beatty	Paragraph 444	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton
Dr Beatty	Paragraph 445	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton
Dr Beatty	Paragraph 447	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton
Dr Beatty	Paragraph 448	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this The council want to build on a greed wedge in wilmorton. This clearly is the opposite of what is proposed here. Who holds the council to account?	Keep the green space in wilmorton
Derby Climate Coalition	Paragraph 448.	Objects	Yes	No	Given that parts of the plan show that the Council has succumbed to development pressure in places, we do not believe that the Council will be willing or able to ensure that the principle of the Green Wedge will not be adversely affected.	See comment on EN6
George Fletcher*	Paragraph 448	Objects	No	No	Destroying Wilmorton Park is completely contrary to this paragraph.	An alternative location needs to be found that does not involve destroying the key green space

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						of the approx. 320 households of Wilmorton.
Policy EN7: Green Gaps						
Derby Climate Coalition	Policy EN7: Green Gaps	Objects	Yes	No	As para 449 makes clear, this policy has been invented to make up for the fact that the Council has not been willing or able to maintain objective and details of the Green Wedge policy in the adopted local plan. If that were the case, this policy would be unnecessary.	See comment on EN6.
George Fletcher*	Policy EN7: Green Gaps	Objects	No	No	It is not possible to tell if Wilmorton Park is a green gap or wedge. However destroying it is contrary to the aims of this policy.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Policy EN8: Biodiversity and Geodiversity						
Spring Planning on behacamplf of the Trustees of the Sisters of the Holy Name	Policy EN8: Biodiversity and Geodiversity	Objects		No	It is considered that the proposed wording of Policy EN8, as outlined below, remains too restrictive in requiring development to meet all these criteria. The way the policy is currently worded suggests that Local Wildlife sites have to achieve a higher test than more regionally or nationally significant sites. This is on the basis that development on a Local Wildlife Site would need to accord with criterion 'a' to 'h'. It is considered that if development proposals can demonstrate that there are benefits which outweigh any harm and mitigation/compensation can be delivered this should be sufficient. Demonstrating that a scheme could	On this basis it is therefore maintained that (f) should be deleted from draft Policy EN8. This amendment would better align Policy EN8 with the wording of draft Policy EN1 which states that *"Proposals which cause loss or harm to the green and blue infrastructure network will not be supported unless the need for, and the benefits of the development*

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					not be delivered on alternative sites, which are not in the control of the applicant to bring forward, is excessive where the other two criteria can be adequately addressed. It is considered that Policy EN8 is currently unsound as this is unjustified. *"Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Locally Designated Site such as Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and/ or ancient woodlands, veteran trees and hedgerows or wildlife corridors, priority habitats and species will only be exceptionally permitted where:* *f) they cannot be located on alternative sites that would cause less or no harm; and* *g) the public benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats; and* h) *adequate mitigation or, as a last resort, compensation measures are provided."*	*clearly outweigh any adverse impacts. Where impacts are unavoidable, development will only be supported if suitable mitigation measures are provided."*
Dr Beatty	Paragraph 454	Objects	No	No	Had this been done and published for the area in Wilmorton? The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	
Dr Beatty	Paragraph 455	Objects	No	No	Significant harm to the green space in wilmorton is not being avoided The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Policy EN9: Trees and Hedgerows						
Forestry Commission	Policy EN9: Trees and Hedgerows				While trees, woodlands and other green infrastructure are considered in your local plan. There is the opportunity to further strengthen this. For example, regarding retention of trees "where possible", an expectation should be expressed that existing trees will be retained except in exceptional circumstances. A minimum canopy cover standard for new development could also be set, which should include not only tree lined streets, but use a variety of planting styles from open grown standard trees, small spinneys, community orchards and shelterbelts. Climate resilient species should also be chosen. Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience. Specific mention of tree planting could be suggested as part of mitigation strategies to improve air quality in particular, where new development activity has potential to create additional noise or air pollution.	
The Woodland Trust	Policy EN9: Trees and Hedgerows	Objects	Yes	No	The Woodland Trust welcomes the inclusion of Policy EN9 and supports the recognition of the important contribution that trees, woodlands and hedgerows make to Derby. However, amendments are required to ensure the policy is effective, justified and fully consistent with national policy.	The policy should include a clear and measurable tree replacement requirement where the loss of trees is exceptionally justified. The current wording lacks certainty and may result in inconsistent outcomes. A

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						minimum replacement ratio, such as three new trees planted for every one tree lost, should be specified to secure a net increase in canopy cover and ensure that losses are adequately compensated over time. Secondly, the policy should require replacement and new planting to comprise native tree and hedgerow species that reflect Derby's local landscape character. Where practicable, stock should be sourced from local or regional nurseries to support local provenance and strengthen resilience to pests and diseases. Finally, the wording relating to ancient woodland, ancient trees and veteran trees should be strengthened and aligned directly with national policy. Ancient woodland is an irreplaceable habitat and ancient and veteran trees are nationally important assets. The policy should mirror the wording of the NPPF and make clear that development resulting in the loss or deterioration of

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						ancient woodland, ancient trees or veteran trees should be refused other than in wholly exceptional circumstances, rather than simply specifying this would be in cases where the benefits clearly outweigh the loss. This would ensure that the policy is fully consistent with national policy and provides clear guidance for applicants and decision-makers.
Dr Beatty	Paragraph 456	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton
Dr Beatty	Paragraph 457	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	We should keep the green space in wilmorton
Dr Beatty	Paragraph 458	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	We should keep the green space in wilmorton
Dr Beatty	Paragraph 458	Objects	No	No	The councils application for The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton
Dr Beatty	Paragraph 460	Objects	No	No	The councils application for The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Policy EN10: Biodiversity Net Gain						
Home Builders Federation*	Policy EN10: Biodiversity Net Gain	Object		No	*Policy EN10 is not considered to be sound as it is not effective, justified, or consistent with national policy* The first raft of intended changes to national BNG policy and practice have now been implemented. This includes the introduction of a 0.2 Ha ex-emption and small sites being able to deliver off-site. The BNG policy and supporting text needs updating to reflect these changes	
Lichfields on behalf of Derby Station Quarter	Policy EN10: Biodiversity Net Gain	Object		No	Policy EN10 sets out the Council's approach to securing measurable Biodiversity Net Gain (BNG) as part of new development. The Derby Station Quarter Board supports the principle of delivering measurable BNG and recognises its contribution to creating and enhancing habitats. However, BNG, and the metrics, processes and validation requirements by which it is assessed and secured, are already comprehensively defined in national legislation (the Environment Act 2021) and associated statutory guidance, which apply directly to all qualifying development regardless of local plan policy. The Derby Station Quarter Board notes that no changes have been made to Policy EN10 since the Regulation 18 Draft, and we therefore reiterate our previous representations on this policy in full. In our view, it has not been demonstrated why additional local policy	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					wording or validation requirements are necessary, over and above the statutory framework which already applies. We consider this raises a soundness concern in respect of the "justified" test, as the need for local policy requirements which duplicate national legislation has not, in our view, been supported by proportionate evidence. We therefore suggest that Policy EN10 is amended to remove any requirements which duplicate the statutory BNG framework, and to confine the policy to matters not already addressed through national legislation. This would ensure the policy is justified and does not impose unnecessary or duplicative burdens on development.	
Pegasus Planning on behalf of Catesby Estates*	Policy EN10: Biodiversity Net Gain	Object	Yes	No	Policy EN10: Biodiversity Net Gain is an unnecessary duplication of a national policy. A 10% biodiversity net gain is a mandatory requirement with significant national guidance available to guide the process of achieving the requirements. Paragraph 16f of the NPPF advises that Local Plans should avoid unnecessary duplication. The proposed policy also adds an unnecessary sequential element to how off-site units are secured. The statutory requirements already set out a sequential approach to the location of off-site units related to the whether the site is within the same, adjacent or other Local Planning Authority or National Character Area. The proposed policy approach	Policy EN10 should be deleted in order that there is no unnecessary duplication of statutory requirements and national policy.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					overreaches national policy and law by adding further levels of complexity, by seeking a ward by ward assessment to be undertaken. In addition to this, there does not appear to be the necessary evidence on the availability of registered units on a ward by ward basis to support this approach in any event and therefore there are questions about whether this approach is feasible. The added local considerations go beyond those set out in law and are unnecessary, inappropriate and impractical. There is no indication that this ward by ward approach will deliver better biodiversity outcomes, in fact a biodiversity improvement close to the site could be less important than one strategically placed within an important corridor.	
The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy EN10: Biodiversity Net Gain	Object		No	Policy EN10: Biodiversity Net Gain states '*Where off-site compensation is required, this shall be provided in-line with the Council's sequential approach'*. The Council should reconsider and delete the additional wording it proposes with regard to BNG and the mitigation hierarchy to ensure that the plan is consistent with national policy. The Council should note that Paragraph: 006 Reference ID: 74-006-20240214 of the government guidance on Biodiversity Net gain states that '*Plan-*	For the policy to be consistent with national policy and legislation the Council should: • Reconsider the additional policy wording to ensure it is consistent with recently published legislation and planning

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					*makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the use of a different biodiversity metric or biodiversity gain hierarch*y.'.	guidance. As a minimum delete the wording '~~*Where off-site compensation is required, this shall be provided in-line with the Council's sequential approach*~~' as it is not consistent with national policy.
The Woodland Trust	Policy EN10: Biodiversity Net Gain	Object	Yes	No	The Woodland Trust welcomes the inclusion of Policy EN10 and supports the Council's commitment to securing biodiversity net gain through new development. However, the policy should be strengthened to ensure that biodiversity gains are delivered as close as possible to the location where impacts occur to ensure the policy is sound.	The policy should establish a clear spatial hierarchy for the delivery of biodiversity net gain units. This should require developers to prioritise biodiversity enhancements on-site in the first instance. Where it can be robustly demonstrated that on-site provision is not feasible, biodiversity units should be secured within the Derby City Council area. Only where opportunities cannot be identified within the local authority should off-site units be delivered elsewhere, and then priority should be given to sites within neighbouring local authorities that are ecologically connected to Derby and

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						contribute to local nature recovery objectives.
Policy EN11: Air Quality						
Derby Climate Coalition	Paragraph 476	Objects	Yes	Yes	We are pleased to see the addition of this para compared to the Reg 18 draft, as we consider that it strengthens the policy.	
Pegasus Planning on behalf of Catesby Estates*	Policy EN11: Air Quality	Object	Yes	No	Policy EN11: Air Quality states: '*Major development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this, a statement should be submitted demonstrating:* *g) how proposals have considered ways to maximise benefits to local air quality',* Policy EN11: Air Quality (criteria g) appears to go beyond mitigating the impacts of development, requiring <u>improvements</u> to air quality. It is important that the policy does not go beyond what is directly related to development, any improvements can be encouraged but should not be required. There is significant duplication between this policy and EN213 Pollution. It is unclear why a separate policy on Air Quality and Land Contamination is needed when the Pollution policy also covers these matters.	Policy EN11: Air Quality (g) should be modified to be clear that air quality improvements are encouraged rather than required. Without modification the Policy is unjustified and unsound.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Roy Woolley*	Policy EN11: Air Quality	Object	Yes	No	• Matter / Policy Reference: Policy EN11 (Air Quality, Paras 474–480) and Policy EN13 (Pollution, Para 485) • Soundness Tests Failed: Justified, Effective, and Consistent with National Policy Reason the Policy is Unsound: Policy EN11 and EN13 rely on an evidence base that is procedurally and scientifically ambiguous, rendering the spatial strategy and development management criteria neither Justified nor Effective. LAQM.TG22 and LAQM.PG22 refer, respectively, to the Defra Local Air Quality Management Technical and Policy Guidance documents. The references cited are collected in Chapters 10 and 11 of 'Data Deficits' – a PDF uploaded in the response to Point 485 with file name Data_Deficits_Regulation_19_Draft__Roy_Woolley_FINAL.pdf. The council's baseline assertion of ongoing compliance across AQMA No. 1, which, as mentioned, specifies 'the entire length of Osmaston Road', is undermined by severe empirical data issues detailed in the accompanying technical PDF (Data Deficits: Sections 2,4,5): 1. The 2.3 km Topographic Monitoring Void: Along the Osmaston Road corridor, a spatial gap of 2,343m exists between two NO2 diffusion tubes spanning 69.3% of the monitored road. In addition, this gap is not a uniform plane; the Defra Digital Terrain Model (DTM) data shows a 15-metre vertical depression/topographic basin floor (falling from 62.74 m ASL to 46.47m ASL). 2. Decommissioning of Critical Receptors: The removal of tube DT18 in 2020 meant that NO2 levels in the most populous area of Osmaston Road, and the one with the most complicated traffic flows, were omitted from any further analysis. 3. Invalid Micro-Siting: Some monitoring tubes (notably RW1, OR3, and OR4) are near dense vegetation, which contrasts with several specific LAQM.TG requirements	1. Reinstall a diffusion tube in the Ascot Drive-Mitre Island corridor. 2. At a minimum, install PMx monitoring on this stretch of road. 3. Seek tube placements with clear access to the surrounding air. 4. Consider ways to redirect pedestrian traffic away from this stretch of road. 5. A full assessment of air quality, including current and future PMx and NO2 levels, must be undertaken before any transport additions or changes are made to this section of road. 6. Amend the Local Plan Monitoring Framework to introduce a mandatory remedial trigger should any monitoring data indicate annual mean exceedances of NO2 or persistent PM2.5 hotspots.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					such as 'Sites should be in as open a setting as possible in relation to surrounding buildings.' (Para 7.148), 'The site should be open to the sky, with no overhanging vegetation or buildings.' (Para 7.208), and 'It is important to note that vegetation needs cutting back occasionally.' (Para 7.149). 4. Failure to Model Combined Factors: EN11 treats developments as isolated schemes that rely on generalised dispersion models and fails to address the cumulative nature of increased or altered traffic flows. 5. Particulate Matter (1): The 2025 ASR (pp.7) discusses PM2.5 in the context of bonfire complaint enforcement, chimney smoke, wood-burning stoves and the dust from construction sites. LAQM.TG22 also explicitly mentions 'soot from vehicle exhausts' and 'dust from tyres and brakes' as the sources of (primary) PM2.5 (para 2.73) – two things which, considering the length and the high and potentially increasing volumes of traffic on Osmaston Road, should be monitored. 6. Particulate Matter (2): LAQM.TG22 also states (Para 7.12) that for NO2/Particulate Matter assessments, the following are some of the types of roads that should be considered: 'Narrow congested streets with residential properties close to the kerb.' 'Roads with high HDV flows.' 'Junctions' and 'Roads with significantly changed traffic flows' - Osmaston Road meets several of these criteria (Data Deficits: Sections 3,4,7, 8).	
Dr Beatty	Paragraph 460	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this , as it will directly impact sir quality in the immediate area	Keep the green space in wilmorton

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Councillor Tim Prosser	Paragraph 476	Objects		Yes	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including: • A new development test under the Air Quality policy's supporting text, that "development must avoid generating additional car traffic or creating conditions that worsen pollution." Para 476 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.	
Policy EN12: Contaminated Land						
George Fletcher*	Paragraph 483	Objects	No	No	Wilmorton Park is known to sit on contaminated land. There is no evidence that an assessment of the suitability of the other 46 parks has been made with respect to this matter.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Policy EN13: Pollution						
George Fletcher*	Policy EN13: Pollution		No	No	There is no evidence that these criteria have been met with sto installing a traveller camp on Wilmorton Park.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
Roy Woolley*	Policy EN13: Pollution	Objects	Yes	No	Reason the Policy is Unsound: Policy EN11 and EN13 rely on an evidence base that is procedurally and scientifically ambiguous, rendering the spatial strategy and development management criteria neither Justified nor Effective. LAQM.TG22 and LAQM.PG22 refer, respectively, to the Defra Local Air Quality Management Technical and Policy Guidance documents. The references cited are collected in Chapters 10 and 11 of 'Data Deficits' – a PDF uploaded in the response to Point 485 with file name Data_Deficits_Regulation_19_Draft__Roy_Woolley_FINAL.pdf. The council's baseline assertion of ongoing compliance across AQMA No. 1, which, as mentioned, specifies 'the entire length of Osmaston Road', is undermined by severe empirical data issues detailed in the accompanying technical PDF (Data Deficits: Sections 2,4,5): 1. The 2.3 km Topographic Monitoring Void: Along the Osmaston Road corridor, a spatial gap of 2,343m exists between two NO2 diffusion tubes spanning 69.3% of the monitored road. In addition, this gap is not a uniform plane; the Defra Digital Terrain Model (DTM) data shows a 15-metre vertical depression/topographic basin floor (falling from 62.74 m ASL to 46.47m ASL). 2. Decommissioning of Critical Receptors: The removal of tube DT18 in 2020 meant that NO2 levels in the most populous area of Osmaston Road, and the one with the most	1. Reinstall a diffusion tube in the Ascot Drive-Mitre Island corridor. 2. At a minimum, install PMx monitoring on this stretch of road. 3. Seek tube placements with clear access to the surrounding air. 4. Consider ways to redirect pedestrian traffic away from this stretch of road. 5. A full assessment of air quality, including current and future PMx and NO2 levels, must be undertaken before any transport additions or changes are made to this section of road. 6. Amend the Local Plan Monitoring Framework to introduce a mandatory remedial trigger should any monitoring data indicate annual mean exceedances of NO2 or persistent PM2.5 hotspots.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					complicated traffic flows, were omitted from any further analysis. 3. Invalid Micro-Siting: Some monitoring tubes (notably RW1, OR3, and OR4) are near dense vegetation, which contrasts with several specific LAQM.TG requirements such as 'Sites should be in as open a setting as possible in relation to surrounding buildings.' (Para 7.148), 'The site should be open to the sky, with no overhanging vegetation or buildings.' (Para 7.208), and 'It is important to note that vegetation needs cutting back occasionally.' (Para 7.149). 4. Failure to Model Combined Factors: EN11 treats developments as isolated schemes that rely on generalised dispersion models and fails to address the cumulative nature of increased or altered traffic flows. 5. Particulate Matter (1): The 2025 ASR (pp.7) discusses PM2.5 in the context of bonfire complaint enforcement, chimney smoke, wood-burning stoves and the dust from construction sites. LAQM.TG22 also explicitly mentions 'soot from vehicle exhausts' and 'dust from tyres and brakes' as the sources of (primary) PM2.5 (para 2.73) – two things which, considering the length and the high and potentially increasing volumes of traffic on Osmaston Road, should be monitored. 6. Particulate Matter (2): LAQM.TG22 also states (Para 7.12) that for NO2/Particulate Matter assessments, the following are some of the types of roads that should be considered: 'Narrow congested streets with residential properties close to the kerb.' 'Roads with high HDV flows.' 'Junctions' and 'Roads with significantly changed traffic flows' - Osmaston Road meets several of these criteria (Data Deficits: Sections 3,4,7, 8).	
Roy Woolley*	Paragraph 485	Objects	Yes	No	Governance & Statutory Silos • Matter / Policy Reference: Policy EN13 (Pollution, Supporting Paragraph 485) •	1. Update Paragraph 485 to reference the statutory duties

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Soundness Tests Failed: Effective and Consistent with National Policy • Participation at Hearing: Yes LAQM.TG22 and LAQM.PG22 refer, respectively, to the Defra Local Air Quality Management Technical and Policy Guidance documents. The references cited are collected in Chapters 10 and 11 of 'Data Deficits' – a PDF uploaded with the comments for this point. Reason the Policy is Unsound: Paragraph 485 of Policy EN13 states that the council will seek to "complement and not duplicate the work of other agencies" and cites statutory duties under the Environment Act 1995. This approach renders the plan ineffective. 1. Reliance on Superseded Frameworks: Citing the Environment Act 1995 document (Data Deficits: Section 1) while failing to integrate the strengthened statutory duties introduced by the Environment Act 2021—specifically regarding mandatory inter-departmental AQAPs, binding PM2.5 targets, and proactive public exposure reduction—reflects an outdated regulatory baseline. 2. Departmental Silos: The plan assumes planning decisions and statutory air quality management are independent workstreams (Data Deficits: Section 6). LAQM.PG22 Para 5.5 requires that AQAPs should integrate transport, planning, and public health departments. 3. Lack of Transparency and Public Engagement: The plan provides no mechanism for public exposure reporting or inter-agency accountability, ignoring Defra guidance on public access to air quality information following the Ella Adoo-Kissi-Debrah Prevention of Future Deaths report (PG22 Chapter 6).	and targets of the Environment Act 2021. 2. Add explicit policy wording mandating that major site allocations within or adjoining AQMA No. 1 must be subject to a published Health Impact Assessment (HIA) prepared jointly with the Director of Public Health and integrated into the council's statutory Air Quality Action Plan.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
9. Historic Environment						
Community Campaigner David Barton	Paragraph 486.	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	Entirety of Document- Traditional Architecture can showcase the value of the City's biggest single USP which interlocks economy, ecology and environment altogether seamlessly.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Historic England	Paragraph 486	Support			We recognise that a number of proposed site allocations within the Plan already have planning permission/ have commenced and as a result we understand that these allocations underwent heritage assessment as part of a planning application, where required, and so we do not raise any specific queries on these sites.	
Historic England	Paragraph 486	Support			We welcome and support the inclusion of Chapter 9 in the document, and we welcome the opportunity to have given comments on the policy wording previously and welcome the amendments that are now reflected within the text.	
Historic England	Paragraph 486	Object			Paragraph 486 – amend 'historic parks and gardens' with 'Registered Parks and Gardens' and elsewhere in the document.	
Policy HE1: Conserving and Enhancing the Historic Environment						
Pegasus Planning on behalf of Catesby Estates*	Policy HE1: Conserving and Enhancing the Historic Environment	Object	Yes	No	*Justification and Consistency with National Policy* Policy HE1 criterion (e): *"require proposals for new development, located within Archaeological Alert Areas, or other areas of archaeological potential to initially be accompanied by a desk-based assessment of available evidence. Where appropriate further archaeological evaluation may also be required. This should be submitted before the planning application is determined to inform design and enable an informed and reasonable planning decision".*	Policy HE1 criterion (e) should be modified to remove the requirement for archaeological assessment to be undertaken before any decision can be taken, as this is unnecessary and unjustified. Policy HE1 criterion (f) should be modified so that so that reference is

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					It is unclear why the provision of archaeological assessment is required before any decision can be taken. It is common for the written specification to be agreed post decision or for this to be agreed and conditioned as a pre-commencement condition, particularly for outline applications which aim to establish the principle of development. Policy HE1 (f) states: *"ensure that development within the city avoids or minimises harm to the significance of heritage assets located outside of the city boundary, within adjoining local authority areas, particularly through impacts upon the setting of assets, both through individual and cumulative impacts".* This appears to be higher test than the national policy requirements where less than substantial harm can be weighed against public benefits.	harm is consistent with national planning policy.
Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy HE1: Conserving and Enhancing the Historic Environment	Objects	Yes	No	The Historic Environment chapter is thorough and rightly ambitious for the Derwent Valley Mills World Heritage Site, the city's listed buildings and its 16 conservation areas. Derby's industrial story is genuinely of international importance and I support its protection without reservation. But the plan's definition of heritage stops, in effect, at the railway age. Paragraph 490 traces the city's 'rich legacy of heritage assets' from the Roman fort through Georgian townhouses to twentieth-century industrial heritage, and	• Commit to a review of the Local List with a community nomination round targeted at heritage currently underrepresented, supported by outreach in the wards concerned.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					there it ends. Derby's story since 1945 has been written substantially by communities from Pakistan, India, the Caribbean and, more recently, Eastern Europe; paragraph 16 records their presence, concentrated in Normanton, Arboretum, Blagreaves and Littleover. The places that carry their memory and identity, places of worship, community halls, shops, streetscapes, are largely invisible in the plan's heritage framework. Objective OBJ16 (paragraph 70) promises 'an exciting cultural offer representative of our communities'; the heritage policies do not yet deliver the planning side of that promise. And as paragraph 28 itself warns, once historic features are lost, they cannot be replaced, any more than a mill can. A heritage framework justified by evidence that overlooks part of the city's significance is incomplete.	• Amend the supporting text to Policy HE1 to recognise social and communal value, the significance a place holds for a community's identity and collective memory, as a dimension of heritage significance, consistent with Historic England's published approach to assessing significance. • Reference the cultural infrastructure of Derby's diverse communities within Policy E11 (Tourism and Culture), so that the visitor and cultural economy reflects the whole city's story.
Policy HE4: Listed Buildings and Locally Listed Buildings						
Historic England	Policy HE4: Listed Buildings and Locally Listed Buildings	Object			Policy HE4 we recommend rewording the opening sentence, instead of considering the 'desirability' to preserve the significance of heritage assets, ensure that it is clear that the significance of heritage assets will be protected and where possible, enhanced. Additionally, the paragraph relating to 'substantial harm' should aim to avoid harm in the first instance and mitigate harm. We consider that the text needs rewriting to ensure that harm to the significance of heritage assets is avoided and mitigated, where possible.	

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Policy HE6: Archaeology and Scheduled Monuments						
Historic England	Policy HE6: Archaeology and Scheduled Monuments	Object			Policy HE6 the final paragraph – any works should be approved with the local authority archaeological service and any recording should be updated on the Historic Environment Record, as a minimum.	
Policy HE7: Historic Parks, Gardens and Designed Landscapes						
Historic England	Policy HE7: Historic Parks, Gardens and Designed Landscapes	Object			Policy HE7 amend references to 'Registered'.	
Historic England	Paragraph 553	Object			Paragraph 553 should reference the need to protect the significance of heritage assets, including their setting.	
10. Climate Change						
Community Campaigner David Barton	Paragraph 556	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Policy CL1: Flood Risk and Water Management						
Pegasus Planning on behalf of Catesby Estates*	Policy CL1: Flood Risk and Water Management	Object	Yes	No	Proposed Policy CL1: Flood Risk and Water Management repeats national policy on the sequential test and Sustainable Drainage Systems, and is another example of unnecessary duplication of a national policy. Paragraph 16f of the NPPF advises that Local Plans should avoid unnecessary duplication.	CL1: Flood Risk and Water Management should be modified to remove policy elements which duplicate national policy so that it is consistent with NPPF 16 f of the NPPF.
Derby Climate Coalition	Policy CL1: Flood Risk and Water Management	Objects	Yes	No	We support this including the minor changes from the Reg 18 draft, except for the deletion compared with the Reg 18 draft of “Proposals should demonstrate that there is adequate	Given that drought conditions in the last two summers followed

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					wastewater infrastructure and water supply capacity to serve the development. Where it is likely to create a specific shortfall or exacerbate existing deficiencies, developers will be required to adequately mitigate or compensate for those deficiencies".	by floods, we think this wording should be re-instated.
Historic England	Policy CL1: Flood Risk and Water Management	Object			Policy CL1 should also reference the need for flood alleviation measures and drainage solutions to protect the significance of heritage assets and their setting and ensure that the historic environment is fully considered in any proposals.	
Policy CL2: Our City Our River (OCOR)						
Historic England	Policy CL2: Our City Our River (OCOR)	Object			Policy CL2 we welcome the reference to heritage. The policy should be clear that any proposals are fully considerate of the significance of the historic environment and do not harm the significance of heritage assets and their setting.	
Policy CL3: Sustainable Design & Construction						
Derby Climate Coalition	Policy CL3: Sustainable Design & Construction	Objects		No	The policy lacks teeth.	Insert "at the latest" at the end of the first line between "carbon" and "by 2035". Under "Energy Hierarchy" change "should" to "must".
Historic England	Policy CL3: Sustainable Design & Construction	Support			Policy CLC3 we welcome references to the historic environment. The maintenance and retention of heritage assets is a positive tool in the climate change agenda.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Lichfields on behalf of Derby Station Quarter	Policy CL3: Sustainable Design & Construction	Support		Yes	Policy CL3 sets out the Council's requirements for sustainable design and construction, including adherence to the Energy Hierarchy and a fabric-first approach. The Derby Station Quarter Board supports these overarching objectives. However, our Regulation 18 representations raised concern that the Regulation 18 Draft required major non-residential development to achieve a minimum BREEAM 'Excellent' rating, and larger residential schemes to achieve BREEAM Communities 'Excellent', without an explicit viability caveat. We considered this represented a very high policy bar which, without an accompanying whole-plan viability assessment, risked undermining the deliverability of allocated city centre sites, where abnormal costs and regeneration objectives already place pressure on scheme viability. A similar issue was recently identified in the Regulation 19 consultation of the South Warwickshire Local Plan, whereby the inspector identified the potential for stringent sustainability requirements to undermine other aspects of the plan delivery, unless appropriate caveats were included to make clear that they would be subject to viability. The Derby Station Quarter Board welcomes the removal of the BREEAM 'Excellent' requirement in the Publication Draft. This directly addresses the soundness concern raised in our Regulation 18 representations regarding the effectiveness and deliverability of this standard, and represents a material reduction in delivery risk for regeneration schemes within the city centre, including the Station Quarter. We note that the requirement to provide an energy assessment has been retained, which we have no objection to. We consider Policy CL3 to be sound and have no further comments to raise.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Pegasus Planning on behalf of Catesby Estates*	Policy CL3: Sustainable Design & Construction	Object	Yes	No	*Sustainability Statement* Three policies: Policy CL3: Sustainable Design & Construction, Policy CL6: Embodied Carbon and Policy CC6: Tall Buildings, all require developments to be supported by a Sustainability Statement. It is considered that the approach is not consistent with paragraph 16 (d) and (f) of the Framework as the policies that are not clearly written and unambiguous, and present unnecessary duplication. *Energy Efficiency* Policy CL3 states that new builds need to meet the fabric energy efficiency required under Part L of the Building Regulations. The part of policy CL3 is unnecessary duplication with other regulatory regimes and is not consistent with paragraph 16 (f) of the NPPF. *Water Efficiency* On water efficiency the draft policy requires all new dwellings to achieve the Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described in the Building Regulations. This is the national optional technical housing standard.	Policy CL3 should be modified to: • Clarify the role of the required Sustainability Statement. • Remove the reference to meeting Building Regulations as this is unnecessary duplication with other regulatory regimes and is not consistent with paragraph 16 (f) of the NPPF. • Remove the reference to local water efficiency requirements as these are not justified by evidence.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The Building Regulations require all new dwellings to achieve a 125 litres per day per person (Part G), so this draft policy goes beyond the current national requirements. Water efficiency is a matter dealt with through Building Regulations and there is insufficient evidence provided for a locally needed lower requirement. Furthermore, there is no indication of consultation with key stakeholders such as Severn Trent Water or the Environment Agency which would justify the requirement There is also no evidence that the impact on viability has been tested and therefore the implications on housing supply.	

The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy CL3: Sustainable Design & Construction	Object		No	Whilst the council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards by 2035 that go beyond government targets. The council should note that the Future Homes and Building Standards Circular 01/2026 was published on 24th March 2026 amends part L of the Building Regulations. The Future Homes and Buildings Standards will ensure that new homes and non-domestic buildings are built with low carbon heating and high levels of energy efficiency, so that buildings constructed to these standards will not require retrofitting to become zero carbon in use as the electricity grid decarbonises. It is noted that the new NPPF at policy PM13 with respect to setting standards states the following: 'iii. Energy efficiency, for which any standards that go beyond the current or proposed Building Regulations should have a clear and robustly costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development. Any such standards should be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP) or other approved calculation methodology.' It is also noted that the viability assessment accompanying the local plan only seems to take account of the Future homes Standards and does not go beyond that. It is our view that rather than having a separate policy that introduces separate standards, but does not do this by	

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					suggesting an uplift of TER or specifying a SAP, the council should instead rely on the building regulations and Future Homes Standards. This will allow developers to be consistent in the standards they are delivering and to keep up with requirements and for the plan to be consistent with the 2026 NPPF.	
Policy CL4: Renewable & Low Carbon Energy						
Derby Climate Coalition	Policy CL4: Renewable & Low Carbon Energy	Objects	Yes	No	This policy seems unnecessarily restrictive , given that the city needs to encourage low carbon energy. The supporting text suggests that most of the criteria should only apply to major schemes like iEnergy's, but we worry that it will discourage local, volunteer-led groups from starting negotiations.	Clarify what type and size of scheme this policy applies to.
Historic England	Policy CL4: Renewable & Low Carbon Energy	Support			Policy CLC4 we welcome reference to the historic environment within this policy.	
Policy CL5: Low Carbon Energy Centres						
Derby Climate Coalition	Policy CL5: Low Carbon Energy Centres	Supports	Yes	Yes	We support this policy, which is new since the Reg 18 draft.	
Historic England	Policy CL5: Low Carbon Energy Centres	Objects			Policy CLC5, incorporate heritage into the final sentence.	

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Policy CL6: Embodied Carbon						
Derby Climate Coalition	Policy CL6: Embodied Carbon	Supports	Yes	Yes	We support this policy.	
Historic England	Policy CL6: Embodied Carbon	Objects			Policy CLC6, incorporate the maintenance and retention of heritage assets within this policy.	
The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy CL6: Embodied Carbon	Object		No	Policy CL6 requires development to take opportunities to reduce the development's embodied carbon content by conserving resources, minimising the use of materials by reusing and recycling, and reducing the amount of material sent for disposal. As such we would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan"* (Paragraph: 002 Reference ID: 10-002-20190509). The introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can justified by the council. The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies	The council should also consider removing the policy area from the draft Local Plan given draft policy HO9 within the consultation draft NPPF.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					should be robustly assessed in the forthcoming Local Plan Viability Assessment. Additionally, new development will often be far more sustainable in many circumstances including building fabric by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site. The council also need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration as in our experience this is not yet readily available from the majority of suppliers.	
11. Infrastructure and Community						
Community Campaigner David Barton	Paragraph 601	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.

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					selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Dr Beatty	Paragraph 603	Objects	No	No	The removal of green space in wilmorton to show horn traveller accommodation in seems to be the opposite of yhis	Keep the green space in wilmorton
Dr Beatty	Paragraph 608	Objects	No	No	The loss of a community green space in wilmorton to show horn traveller accommodation in is the opposite of this	Keep the green space in wilmorton
Policy IC1: Social and Community Facilities						
Campaign for Pubs	Policy IC1: Social and Community Facilities	Objects	Yes	No	The 'public house' is part of our history and heritage, and a cornerstone of communities up and down the land, in our cities, towns, villages. Yet our pubs are under threat, and we are losing them at a distressing rate. They have long been too easy to close down and then convert or demolish, which makes them vulnerable to those who do not value them or want to preserve them in the same way that most of us do. The losses are exaggerated by weakness of many existing local	Public houses are often among the last remaining community facilities in rural settlements, playing a vital role in reducing social isolation, supporting local employment, encouraging tourism and strengthening community cohesion. The loss

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					plans which make the achievement of change of use far too easy. We consider that the conditions proposed for the Protection of Existing Community Facilities within Policy IC1 are too weak to offer adequate protection to public houses and other community facilities.	of a public house can have a significant adverse impact on the social and economic wellbeing of towns and villages across the Blaby district, which has experienced a number of pub closures in recent years, with some sites subsequently proposed for residential development. Once a pub is lost, it is often impossible to replace – particularly in villages, where it may be the last remaining meeting place. Local councillors have an important role to play in protecting community assets, including public houses. Local plans need to identify the assets deserving protection, and install robust policies which target protection for traditional public houses which should include (ALL of the following conditions to be satisfied): Marketing - It is incumbent on an applicant to prove that reasonable efforts have been made to sell or let the premises as a public house. Marketing evidence must be provided which demonstrates

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						that the premises have been marketed for a sustained period of at least 12 months with a reputable commercial estate agent with experience in the pub and retail trade. The pub must have been priced as a public house and not as a private house or development opportunity (the value of a building as a private house is usually significantly higher than its value as a public house). Viability - A viable pub is simply one that can make enough to cover its bills, pay the wages of its staff and fund the necessary upkeep of the building, plus in the case of a non-community pub, leaving enough to make an acceptable living for the business owner/operator. In the case of a community pub, it just needs to cover its costs and wages and the upkeep of the building. That is still a viable and sustainable pub model – and allows a pub to continue to operate and employ local people bring money into the local community, which

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						otherwise would be lost. Often pubcos, supermarkets and developers cynically argue that pubs are not 'viable' because they haven't made enough to suit their own inflated commercial interests, even though the pub has a good turnover and is profitable. Sometimes, even despite profitability, pub owners seek to close and develop pubs to cash in. It is wrong that any viable pub should be lost, especially where there is an individual, company or community prepared to buy it and retain it as a pub. Many licensees, communities and other companies and individuals have been denied the chance to buy and run a pub, which is outrageous. Councils often fall for claims by developers planning consultants that pubs are 'unviable' and worse still have ignored the fact that a pub did have a clear and viable future as a pub. It is incumbent upon an applicant to provide evidence of the trading history

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						of the pub. This must be supported with financial evidence of past trade from a reputable source such as an accountant. Potential - planners should consider the potential for a pub to trade successfully under the guidance of an experienced pub operator. Loss of the last traditional pub in an area should be strongly resisted. It is equally valid that more than one traditional pub can successfully trade in an area where there is demand for the variety of services that public houses can offer. We will stress again that ALL conditions must be satisfied. We have lost many valuable community facilities due to local plans allowing change of use based on one condition being satisfied.
Derbyshire County Council	Policy IC1: Social and Community Facilities	Supports	Yes	Yes	It is noted that there are references to potentially requiring developer contributions to meet the additional demands on libraries caused by new developments (p30 of the IDP Draft Infrastructure Delivery Plan (IDP). However, it would be helpful if this also mentioned museums, as new developments often trigger the deposit of archaeological and paper archives generated by construction activity. It would also be helpful if this was linked to Policy CC5 (Non-	

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					Residential Regen Opportunities) item b) which specifically identifies opportunities to improve Derby Museum, Art Gallery & former Central Library building (p228 of the Local Plan Reg 19 draft), and possibly Policy E11 (Tourism & Culture) on p124).	
NHS Property Services	Policy IC1: Social and Community Facilities	Supports	Yes	Yes	Draft Policy IC1 focuses on the Council's objective to ensure the provision of high-quality, inclusive social and community facilities and services and the protection of existing local community facilities. Supporting paragraph 604 (g) includes public health care facilities, including GP surgeries, dental practices, pharmacies, community health services and wellbeing units within the definition of local community facilities. Supporting paragraph 609 states that where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will be considered sufficient to justify the loss of an existing healthcare facility. The policy also requires developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities as set out in Draft Policy GD9. NHSPS supports the provision of sufficient, quality community facilities and welcomes the Council's inclusion of an additional supporting paragraph (609) which includes NHSPS wording as requested at Regulation 18 stage.	For the purposes of clarity in the interpretation of the policy, NHSPS are seeking the following modification (shown in red italics) to Draft Policy IC1 Supporting Paragraph 609. NHSPS would request that the wording is amended to clarify that the NHS estate strategy or service transformation plan would be considered sufficient to satisfy draft Policy IC1, and that the NHS would not be subject to additional requirements that may delay the delivery of essential healthcare facilities and services for the community. Proposed Modification to Supporting Paragraph 609:

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					Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information	Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will be considered sufficient to justify the loss of an existing healthcare facility *and will satisfy the requirements under Draft Policy IC1.*
Pegasus Planning on behalf of Catesby Estates*	Policy IC1: Social and Community Facilities	Object	Yes	No	Policy IC1 states that: *"Where a development proposal would generate a site-specific impact which requires mitigation, the impact will be mitigated on-site or through the provision of financial contributions in accordance with the Council's Planning Obligations SPD <u>or successor</u>". (emphasis added)* With the introduction of new national planning system, Council's can no longer adopt new Supplementary Planning Documents. In this context the reference to "successor" documents to SPD is incorrect and ambiguous and contrary to paragraph	Policy IC1 should be modified to remove the reference to successor documents to SPDs, as such document do not exist under the new planning system, and are therefore incorrect and ambiguous and contrary to paragraph 16 of the NPPF.

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					16 of the NPPF.	
Policy IC2: Cemetery						
Stephen Peat	Policy IC2: Cemetery	Objects			Derby City Council on August 28th, 2026 has invited residents on the future of **Markeaton Crematorium.** The only problem not all the people of Derby want to be cremated. For example, there are groups in Derby who want to be buried from the Catholic, Jewish and Islamic who believe in burials include the new American Pope wanted Catholics to be buried because if followed the ways of Jesus. I believe Derby needs to consult on a new burial ground one in the West of Derby and one in the East of Derby covering residents living in the West, and residents living in the East of Derby including Ockbrook and Borrowash especially in the new Southern Derbyshire Council starting from April 2027 with new elections with full Council going live in April 2028. Both George Simmett of Spondon and A.W Lymn Funeral Care Services agree a new Cemetery is needed for the East of Derby because several clients who use these services are not happy with the closure of Stoney Lane Cemetery. They do not want to travel to Nottingham Road or a future burial ground near Mickleover which requires three buses to visit the site. In the new Council from 2027 and live in early 2028 will need to examine this issue in the new Council. This is why some of the NA7 Stoney Lane could be used with a reduction in housing number to below 100. But there are many areas of	

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					Brownfield land is around Derby to build the 400 houses outside Spondon. I hope Derby City and Southern Derbyshire new Councillors will need to discuss this issue including planning a new cemetery in the local plan.	
Policy IC3: Education Provision						
Derbyshire County Council	Policy IC3: Education Provision	Supports	Yes	Yes	It is welcomed and supported that the County Council's comments made on the Regulation 18 Plan have been taken into account in the Regulation 19 Plan with a comment on Policy HA5 now incorporated on page 80; h) financial contributions to be made towards primary and secondary education infrastructure. A new school/schools for this cross-boundary community is to be provided on the South Derbyshire part of the site. Derbyshire County Council would welcome the opportunity for further collaborative working and engagement going forward to consider the cross boundary school place planning implications of the fifteen proposed housing sites.	
12. Transport and Movement						
Community Campaigner David Barton	Paragraph 630	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon

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					Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	alongside appropriate retrofitting of Old Builds.
Policy T1: Active and Sustainable Transport						
Derby Climate Coalition	Policy T1: Active and Sustainable Transport	Supports	Yes	Yes	We strongly support this policy, especially the need to follow the transport hierarchy, but have a couple of comments. Point h) has changed from “400m from a bus stop” in the Reg 18 Draft to “being located within walking distance of a bus stop”. We would prefer “locations that are well served by frequent high quality bus services” as in the equivalent policy (CP23) in the current plan. In an urban environment, there is no point in having a convenient bus stop if it is only served	Change point h) as mentioned in 5 above.

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					occasionally. We are pleased to see the addition of point j) to "encourage low car development wherever possible".	
Derbyshire County Council	Policy T1: Active and Sustainable Transport	Supports	Yes	Yes	An important consideration in the City Council's policy approach to the above, is that the four HMA authorities of Derbyshire County Council, Derby City Council, Amber Valley Borough Council and South Derbyshire District Council and supported by National Highways, have recently jointly commissioned Systra Consultants to undertake comprehensive transport modelling works of all the strategic housing and employment sites being either committed or proposed for allocation in the three LPAs respective. The transport modelling works were completed by Systra and the final report was provided to the four authorities in January 2026. Using the East Midlands Gateway Model, the modelling works have applied a range of scenarios (as below) to understand the likely impacts of the strategic sites on the highway network and the likely mitigation required to address their likely impacts. 2044 Do Minimum – Baseline containing committed development only. 2044 Do Something 1 – Local Plan development excluding mitigation. 2044 Do Something 2 – Scenario 1 and "Known Mitigation" measures. 2044 Do Something 3a/3b – Do Something 2 and PT, Active Mode, and Highway Mitigation. 2044 A38 Sensitivity Test – removes the A38 Grade Separation to understand implications for the HMA strategy. 2044 A38 Sensitivity Test – removes the A38 Grade Separation to understand implications for the HMA strategy	

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					The outputs from the modelling works have been important in informing the City Council's policy approach in Policies T1 and T2. The modelling works clearly demonstrate and support the importance and need for the implementation of the A38 Derby Junctions Grade Separation scheme and implementation of South Derby Integrated Transport Link, including the A50 junction, in delivering housing and employment growth in the HMA. Both of these schemes are supported by Derbyshire County Council. In particular, the modelling works conclude that: In the absence of the known mitigation improvement schemes (the A38 improvements, EMIP mitigation and new A50 junction), the existing infrastructure struggles to accommodate the extra HMA traffic and as a result some non-development traffic moves away from key routes such as the A38 and A50 onto alternative, less suitable roads. The extra traffic generated by the HMA developments cause congestion increases at a number of junctions across the Derby HMA area, with junctions within Derby City being the most significantly affected. The identified Known Mitigation schemes are expected to significantly influence route choice and congestion across the network, improving accessibility to development sites at Infinity Garden Village, EMIP and Boulton Moor. The schemes will also influence longer distance routings by improve accessibility of the A38, A50 and M1 on the SRN. The modelling report also highlights the need for significant public transport improvements to support growth in the City and wider HMA and recommends a series of route	

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					improvements to existing services in and around the City. In particular, the report concludes that: The public transport enhancements encourage a greater number of passengers to use public transport in both peaks, especially from the larger strategic sites on the edge of Derby where public transport mode share is significantly positively impacted. Active mode improvements are expected to encourage some journeys to move away from car; however, the impact is generally small and consequently there is a relatively neutral impact on highway flows and congestion.	
Derby Climate Coalition	Paragraph 638	Supports	Yes	Yes	We are pleased to see the Study result and think it deserves wider publicity!	
Policy T2: Strategic Transport Infrastructure						
Amber Valley Borough Council	Policy T2: Strategic Transport Infrastructure				An Area of Future Growth at Brun Lane, Mackworth is identified in the adopted Amber Valley Borough Local Plan, with the potential for 2,000 homes and related infrastructure. The area of land immediately to the southwest lies in South Derbyshire and is identified in the draft South Derbyshire Local Plan Part 1 Review as a Long Term Strategic Housing Growth Area South of Mackworth. It is imperative that proposals for any development proposal which comes forward at these sites is part of a comprehensive and coordinated scheme as endorsed by the above mentioned long term polices, including a comprehensive master plan and appropriate delivery of infrastructure and services, particularly linked to the City Council aspiration for additional highway linkages.	The sub point c should be split to refer to facilitating active travel links between this area and the City as follows: c) Implementation of a new west of Mickleover integrated transport link as part of a package of transport interventions; d) construction of new active travel routes and provision of public transport between the City and the Area for

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					In Derby City's Hearing Statement for the Amber Local Plan examination, it stated: "A connection around the west of Mickleover is fundamental in terms of optimising route choice for car borne trips so that they do not travel through inappropriate existing congested parts of the network, such as Mickleover District Centre, but also for providing access and connectivity between growth for public transport and non-vehicular modes. The proposed link between the A52 and B5020 would provide one of the key parts of a connection that could potentially link up the growth on the western fringes of Mickleover. As such, it is important locally, and from a more strategic infrastructure perspective, that this link is provided". Amber Valley highlighted at the time (Dec 2024) that the City had produced no evidence on routing and options of routes. It is noted that the wording of policy TP2 - Strategic Transport Infrastructure, has been amended to: Policy T2: Strategic Transport Infrastructure The Council will work with partners to deliver a long-term transport strategy for the city and the region and support the implementation of strategic proposals and initiatives that help create an economically and environmentally sustainable transport network. Initiatives will include: c) implementation of a new link road between the A52 and B5020 and the construction of new cycle and walking	Future Growth at Brun Lane, Mackworth In Amber Valley and South Derbyshire;

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					routes from the Amber Valley allocation at Brun Lane into the city; The amendment to Policy T2 identifies as an 'initiative' the "implementation of a new link road between the A52 and B5020 and the construction of new cycle and walking routes from the Amber Valley allocation at Brun Lane into the city". This seeks to allocate a link road in an area wholly outside of the administrative area of Derby City. The HMA Strategic Transport Assessment considered a series of interventions associated with development in Amber Valley and South Derbyshire in the Radbourne Lane area. It refers to a link in this area as part of a West of Mickleover Integrated Transport Link. This is part of a package of interventions in and around Derby to mitigate the impacts of development on the highway network. No further work has been undertaken to consider how a link could be implemented, including where it might go, and so reference to the Brun Lane site should be removed. Instead, the Policy should refer to increasing capacity and mitigating impacts of development to the West of the City through a West of Mickleover Integrated Transport Link between the A516 and the A52 as part of a package of transport interventions. It is concluded that this policy is unsound as is it's not effective as involves provision of infrastructure in neighbouring authority areas. This could be overcome by amending the policy as set out above.	

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Caddick Land*	Policy T2: Strategic Transport Infrastructure	Objects	Yes	No	Section 1 of these representations explain the significant change in circumstances since the Regulation 18 Stage consultation; specifically the removal of funding for the A38 junction improvement projects which are critical to future growth within Derby and the wider HMA. A38 Junctions projects and status The 'A38 Derby Junctions' was a significant project (of some £600m) to deliver major upgrades to three roundabouts to the west and north of Derby city centre: • A38/A5111 Kingsway • A38/A52 Markeaton • A38/A61 Little Eaton Each of these junctions experience existing significant congestion and require upgrading to accommodate existing and future traffic growth. In June 2026 the Government announced the potential cancellation of the project (in The Defence Investment Plan Funding explainer), stating: 'DfT will provide savings of up to £700m from its roads funding. The Department will consult on reductions to the third Road Investment Strategy (RIS3) - including the potential cancellation of the A38 Derby Junctions and A46 Newark Bypass schemes, both of which are yet to enter contract and not as far along as other road schemes. There will be stakeholder consultations before any final decision is taken.'	

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					The implication is clear; there is a genuine likelihood the project will not progress. Derby Local Plan and the A38 junctions project The importance of the A38 junctions is interwoven with the local plan strategy, the proposed site allocations to deliver growth, and the infrastructure needed to deliver the plan. The local plan states: Essential and complementary infrastructure both inside and outside the city will have progressed. The South Derby Integrated Transport Link (Phases 1 and 2) will be completed and A38 grade separation will be delivered. (Paragraph 53). And; In order to deliver a safe, sustainable and efficient transport network it will be necessary to implement a range of different transport infrastructure projects and actions. Some of these will be to address existing problems on the network, some will be to facilitate growth, and some will be to improve and protect the network of pedestrian and cycle routes that cross the city. The schemes in question will not just be implemented by the City Council but partner organisations such as National Highways and Network Rail. The A38 carries heavy flows of north-south long-distance traffic. Also, where it passes through Derby, significant volumes of local traffic cross or join and leave the A38. This	

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					results in congestion and delays at the A38/A5111 Kingsway roundabout, the A38/A52 Markeaton roundabout and the A38/A61 Abbey Hill roundabout. Following the conclusion of the Government's Spending Review, funding for the A38 Derby Junctions scheme has now been confirmed and work is underway on the Development Consent Order. There is no definite timescale for this work, but it is anticipated that it will be in the lifetime of the plan. The Council will ensure that any land needed to implement these schemes will be protected. (Paragraphs 641 and 642). This is understandably reflected in Policy T2 (Strategic Transport Infrastructure) which states: … Initiatives will include: a) the implementation of National Highways A38 Derby Junctions Grade Separation scheme;… This approach is underpinned by the local plan evidence base, which itself is predicated on this infrastructure being delivered within the plan period and at such a time to resolve existing constraints and support growth (i.e., the infrastructure is needed now, and certainly early in the plan period). Evidence base and associated documents – Sustainability Appraisal The Sustainability Appraisal conclusions are reliant on the A38 Junctions project, and it therefore follows the Sustainability	

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					Appraisal is not robust if the A38 project is cancelled. On that basis alone the plan would not be based on reasonable or up to date evidence and would be unsound. For example, the Sustainability Appraisal identifies potential benefits of the plan, under indicator SA11 'Air, Noise, and Light Pollution' on the basis: 'A further positive cumulative effect could result from a reduction in journey times and congestion on the highway network as a result of the A38 Derby Junctions in combination with the local plan and neighbouring local plans / transport plans' Evidently, if the A38 project did not progress the benefits would not be realised and there is a risk of potentially significant adverse impacts on SA11. The same conclusion applies to indicator SA15 (transport and accessibility). Evidence base and associated documents – Strategic Transport Assessment The A38 project is, understandably, considered and accounted for in the Strategic Transport Assessment (January 2026) which underpins the emerging plan. Notably, the Assessment undertakes a sensitivity test based on the A38 Junctions project not progressing (as outlined in Section 7 of the Transport Modelling).	

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					Tellingly, the Assessment concludes at paragraphs 7.2.4, 7.2.6, and 7.2.7 respectively: 'The removal of the A38 scheme reduces the effectiveness of the HMA mitigation strategy. At several HMA sites close to the A38 (in Mickleover and Mackworth, for example), development traffic struggles to access the wider highway network, and traffic that is able to get out of the development sites experience increases in congestion and journey times… ' 'The removal of the grade separation on the A38 results in increased congestion at the A38 junctions where the grade separation has been removed. The significant reassignment away from the A38 causes a reduction in congestion at other junctions along the A38 compared to the mitigation scenario, but an associated increase in congestion at several routes either side of the A38 as traffic is forced onto less suitable local roads.' 'Compared to the Do Minimum scenario, the absence of the A38 scheme results in significant increases in congestion at many local junctions across the whole of Derby City, including the Ring Road, the A516 and the A52.' It goes on to conclude at paragraph 7.3.2, that: 'Network statistics for the AOI are provided in Table 25 and Table 26. In both peaks, the removal of the A38 Grade Separation scheme makes congestion worse across the HMA area and reduces the effectiveness of the HMA package to 32% in the AM peak and 29% in the PM peak.'	

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					Then at paragraph 7.4.2: 'The removal of the A38 Grade Separation scheme is expected to significantly influence route choice and congestion across the network.' Summary on transport matters The Transport Assessment is clear; without the A38 junction improvements the plan will result in significant adverse impacts across the network. In turn this undermines the Sustainability Appraisal for the Plan and the policies within the plan. This is a significant issue which must be addressed before the plan is progressed, and on the current evidence the plan is unsound. Summary on A38 matters The plan is predicated on A38 junction improvements which are, at best, uncertain, and in reality are unlikely to be delivered during the plan period. Without this major infrastructure the plan may result in significant adverse impacts which are not accounted for in either the local plan policies or the associated evidence base. The plan is therefore unsound in this regard.	

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Derby Climate Coalition	Policy T2: Strategic Transport Infrastructure	Objects	Yes	No	The policy and para 642 will need updating if the government's proposals to cancel the A38 scheme are confirmed, as we hope. It is disappointing to see the first three headings related to road changes designed to encourage car use, which are is in keeping with the aims of the climate sections of the plan. We support the addition of points h) and i) compared to the Reg 18 draft and would like to see the inclusion of more detailed proposals. Point c) should not be be included in the plan as the works are not in the city.	Remove the word “support” from the second line – the policy would then read that the city council would help to deliver initiatives but would not signify agreement with decisions imposed on the city by outside bodies. Delete point c).
Derbyshire County Council	Policy T2: Strategic Transport Infrastructure	Supports	Yes	Yes	1. A38 Derby Junctions Scheme (Policy T2) Derbyshire County Council supports the inclusion of the A38 Derby Junctions Scheme within Policy T2. However, uncertainty remains regarding the future delivery of the scheme and the Plan places significant reliance upon its implementation to support growth. The Local Plan should demonstrate how planned development could be accommodated should the scheme not be delivered within the Plan period and identify any alternative infrastructure interventions or contingency measures that may be required. This would provide greater confidence that the growth strategy remains deliverable under a range of infrastructure delivery scenarios. The Transport Modelling Works tested a scenario, which assessed the likely impacts on the City’s road network if the A38 Derby Junctions was not implemented, which should provide the evidence for further consideration of this matter by the City Council.	The Plan would be strengthened by: • Requiring major developments to deliver walking, wheeling and cycling infrastructure in accordance with LTN 1/20 (or successor guidance). • Requiring developers to demonstrate how proposals will provide high-quality active travel connections to schools, employment areas, district and local centres, public transport hubs and

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					2. South Derby Integrated Transport Link (Policy T2) Derbyshire County Council supports the inclusion of the South Derby Integrated Transport Link within Policy T2. However, unlike other transport interventions referenced within the policy, its role in delivering sustainable transport infrastructure is not clearly articulated. The policy should explicitly reference provision for walking, wheeling, cycling and public transport to ensure consistency with Policy T1 and Objective 12, and to reinforce the expectation that the scheme will function as a genuinely multi-modal corridor. 3. Cross-Boundary Growth and Connectivity Derbyshire County Council welcomes the Plan's recognition of the wider Derby Urban Area and the importance of cross-boundary planning. However, greater emphasis should be placed on the need for strong sustainable transport connections between Derby's allocations and the substantial strategic growth areas planned in neighbouring authorities, particularly within South Derbyshire. Significant housing growth is proposed both within Derby and immediately beyond the city boundary, including the wider Mickleover growth area. These developments should be planned as connected communities rather than separate development parcels. The Plan should therefore place greater emphasis on delivering direct, safe and attractive walking, wheeling and cycling links between these growth areas and key destinations. Improving cross-boundary permeability will help reduce reliance on private car travel and avoid local journeys	green infrastructure networks. • Using stronger policy wording to require direct, coherent, safe and inclusive routes, • rather than simply encouraging 'improved connectivity'. • Providing clearer expectations for route continuity, site permeability, crossing provision, junction design, accessibility, subjective safety and infrastructure suitable for users of all ages and abilities. • Requiring more comprehensive provision for secure cycle parking, cargo bikes and adapted cycles. • Prioritising delivery of active travel infrastructure in the early phases of development to ensure sustainable travel

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					having to navigate strategic highway infrastructure, including the Findern Interchange corridor. This would support the objectives of Policies GD1, GD7 and T1, whilst helping create a cohesive sustainable transport network across the wider Derby Urban Area. 4. Active Travel Review (Walking, Wheeling and Cycling) Overall, the Plan demonstrates a strong commitment to active travel and is significantly more ambitious than many Local Plans. Active travel is embedded throughout the Vision, Objectives, Placemaking Principles, Health and Wellbeing policies, Green Infrastructure policies and the dedicated Transport and Movement chapter. The Plan recognises Derby's compact form, acknowledges the need to reduce car dependency and seeks to make walking, wheeling and cycling the preferred choice for short journeys. Policy T1 (Active and Sustainable Transport) appropriately places walking and wheeling first in the transport hierarchy, followed by cycling and public transport. Objectives 1, 9 and 12 further reinforce this commitment. However, while these desired outcomes are well expressed, there is less clarity regarding how they will be consistently delivered through the development management process. Much more policy detail is required around exactly how developers and decision-makers must achieve those outcomes.	choices are available from first occupation. • Requiring active travel audits and connectivity assessments to accompany major planning applications, and that these be realistic and based on conditions 'on the ground', not just on distance. • Strengthening support for cross-boundary walking, wheeling and cycling connections between Derby and adjoining growth areas and neighbouring authorities

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					Several policies encourage improved active travel connectivity but stop short of requiring infrastructure to defined design standards, and there is limited reference to LTN 1/20 or equivalent guidance. As a result, policy interpretation and delivery may vary between developments. 5. Monitoring and Baseline Evidence Before establishing targets for active travel, it is important that the City Council first identifies a robust baseline. The Plan provides some transport-related evidence, including commuting distances and levels of car use, but does not establish a comprehensive baseline for walking, wheeling, cycling, public transport and car mode share. Once a baseline has been established, the monitoring framework should include indicators such as: • Walking, wheeling and cycling mode share. • Changes in mode share over time. • Length of new active travel infrastructure delivered. • Percentage of residents with access to high-quality active travel routes. • Delivery of active travel infrastructure associated with strategic development sites. • Number of developments meeting agreed active travel design standards. Establishing both a baseline and monitoring framework would provide a clearer understanding of whether the Plan is successfully delivering its active travel objectives over the plan period. 6 Sustainable Travel & Highways Conclusion	

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					Derbyshire County Council supports the overall direction of the Local Plan and its commitment to sustainable growth, active travel and cross-boundary working. However, further consideration should be given to the implications of uncertainty surrounding the A38 Derby Junctions Scheme, strengthening active travel delivery requirements, and improving sustainable connectivity between Derby and adjoining growth areas. Addressing these matters would help provide greater confidence that the Plan is deliverable, effective and capable of supporting sustainable growth across the wider Derby Urban Area.	
Policy T4: Protected Routes						
Derby and Sandiacre Canal Trust	Policy T4: Protected Routes	Supports	Yes	Yes	The supported text at 650 does not pay sufficient regard to the Council Plan and Policies in this document.	Whilst welcoming the reference to the canal restoration, it should be expanded to indicate that the restoration would support policies in the emerging plan by encouraging a more vibrant sustainable transport route encouraging visitor attraction, improved blue and green infrastructure with links carried on beyond the city boundary and by mitigating climate change by its environment and ability to assist with flood protection.

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Derby and Sandiacre Canal Trust	Policy T4: Protected Routes	Supports	Yes	Yes	We support this policy, including the minor changes from the Reg 18 draft.	
13. City Centre						
Community Campaigner David Barton	Paragraph 663	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.

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					biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Policy CC1: City Centre Strategy						
Historic England	Policy CC1: City Centre Strategy	Support			Policy CC1 we welcome the reference to the historic environment within this policy.	
Lichfields on behalf of Derbion	Policy CC1: City Centre Strategy	Support		No	Draft Policy CC1 seeks to prioritise the City Centre as the most important and sustainable location for growth, including new housing. The draft Plan supports a coherent strategy for focusing new investment, renewal and regeneration activity to the City Centre, and this emphasis is supported by Derbion.	
Lichfields on behalf of Derby Station Quarter	Policy CC1: City Centre Strategy	Support		Yes	The Derby Station Quarter Board continues to support the Local Plan's focus on directing investment, renewal, and regeneration to the city centre (Policy CC1). We agree that the city centre represents the most sustainable and strategically important location for growth, and support the emphasis on a brownfield-first, city-centre first approach to development. This approach aligns with national policy objectives, according with the NPPF, reflecting the requirements to make efficient use of land, prioritise previously developed land, and to increase the density of development in	

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					sustainable locations, particularly those well served by public transport. Focusing growth within the city centre, and in highly accessible locations such as the Railway Station Quarter, supports the optimisation of previously developed land in sustainable locations and reduces reliance on less sustainable peripheral sites. It is considered that this strategy is consistent national policy and represents a sound basis for accommodating growth within the plan period.	
Policy CC2, Defining the City Centre						
Lichfields on behalf of Derbion	Policy CC2, Defining the City Centre				Policy CC2 identifies the spatial areas to which policies relating to the City Centre will relate. Derbion supports the extent of the area identified. While Policy CC2 defines the boundary of the City Centre, the hierarchy of centres is set out separately in Policy E9, which also establishes the context for the Central Activities Area (CAA). Policy CC8, in turn, defines the Primary Shopping Area (PSA). Together, these policies are important in determining the type of development that will be encouraged in different City Centre locations. Further comments are provided, including on the extent of the PSA and CAA boundaries, in individual policy responses.	

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Lichfields on behalf of Derby Station Quarter	Policy CC2, Defining the City Centre	Support		Yes	The Derby Station Quarter Board continues to fully support the City Centre boundary as drawn, incorporating the full Railway Station Quarter, recognising the key role the Station Quarter plays in relation to the railway station and its function as a gateway to the wider City Centre. It is considered that the policy is sound.	
Policy CC3: City Centre Living						
Lichfields on behalf of Derbion	Policy CC3: City Centre Living	Object		No	Derbion does not consider the Policy to be sound. The draft Policy sets out Derby's plan to regenerate the City Centre with at least 5,600 new homes over the plan period. Derby Riverside, which is a wider area that includes Riverside Car Park, is identified as one of three key new/enlarged communities driving that growth, 'providing a minimum of 600 new homes' under Policy CC11. *Policy Consideration* The draft Policy recognises challenges on bringing forward constrained City Centre sites and caps affordable housing with cross-reference to draft Policy H4 to reflect this. This viability position is also reflected in the Local Plan Viability Report (April 2026) and later Addendum (of July 2026) in terms of City Centre development. The Policy needs to retain sufficient flexibility to respond to site-specific circumstances, market conditions and abnormal costs. To reflect this, Policy CC3 should be	*"[…] Recognising the challenges of bringing forward development on constrained sites in the City Centre, the Council will seek up to 5% affordable housing on major sites in the City Centre, in line with Policy H4, unless robust Site-specific evidence can be provided to demonstrate that this is unviable.[…]"*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					amended to expressly allow for site-specific viability assessments on sites supporting City Centre living, which includes Bradshaw Way, the Eagle Quarter (Policy CC4), and Riverside (Policy CC11). *Tests of Soundness* 17. Justified – The Policy does not in itself explicitly allow for site-specific viability assessment, specifically referenced in this Policy, not just in Policy H4. The emerging policy position should continue to be proportionate and pragmatic in recognition of the viability challenges evidenced across the City Centre in the Council's Viability report.	
Lichfields on behalf of Derby Station Quarter	Policy CC3: City Centre Living	Support		Yes	The Derby Station Quarter Board continues to strongly support the strategy for substantial residential development within the city centre, and welcomes the retention of the Railway Station Quarter's contribution of 500 new homes within the plan period. This is the first Local Plan for Derby to actively plan for substantial residential development in the city centre, and this approach is strongly endorsed. As set out in our representations in respect of Policy CC13, the concentration of residential development within the Railway Station Quarter aligns with the NPPF, which emphasises the delivery of homes within walking distance of major public transport interchanges. The Station Quarter clearly meets these criteria and represents a sustainable and appropriate location for city centre living. For the reasons set	

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					out in our representations pursuant to Policy CC13, the land required to deliver 500 homes is within rail industry control, and is suitable, available and deliverable.	
Policy CC4: Residential Led, Mixed Use Site Allocations						
Historic England	Policy CC4: Residential Led, Mixed Use Site Allocations	Object			Policy CC4 we do have some concerns regarding site allocation CC4c. We remain concerned about this site allocation within the Plan, and how development in this area will harm the significance of a number of heritage assets, including their setting and their relationship to one another within the wider historic landscape. For example, the relationship between the Anglican Cathedral and the Catholic Cathedral and important views between will be affected by proposed tall buildings in the Queen Street area. Moreover, a variety of heritage assets could be affected and the evidence base needs to assess the impacts on each grouping of assets and what specific measures can be incorporated into the Plan to overcome this. We consider that assessment is required to understand the harm to heritage assets and how this harm can be overcome. We consider that appropriate mitigation design principles are required in a policy within the Plan, to overcome this harm and that the HIA we have received does not currently address this adequately or include policy wording for the Plan. We are available to work with the Council to ensure appropriate policy wording is prepared. Additional detail will be provided within our HIA comments.	
Lichfields on behalf of Derbion	Policy CC4: Residential Led, Mixed Use Site Allocations	Object		No	Derbion does not consider the current policy drafting to be sound.	The Policy CC4 housing requirement should be drafted in a more flexible form to

					Policy Consideration Draft Policy CC4 identifies residential-led, mixed-use regeneration allocations across the City Centre to meet the quantum set out in Policy CC3. These allocations include Derbion's sites at Bradshaw Way (478 homes) and The Eagle Quarter (674 homes). As drafted the Policy supports the Council's intention to secure the comprehensive and coordinated delivery of these sites, including resisting proposals which would prejudice their development potential. Derbion supports the Council's intention to secure comprehensive redevelopment in the City Centre, however care must be taken to ensure this requirement does not become a barrier to delivery in its own right. Derbion objects to the current policy wording, that comprehensive delivery is contingent upon third-party land, ownership, or the delivery of infrastructure beyond the site boundary. This approach risks impeding the delivery of the allocations rather than facilitating regeneration. In relation to Bradshaw Way, Policy CC4 (d) refers to opportunities to enhance the connectivity of the Site to Nightingale Quarter and Castleward and refers to 'taming' of the inner ring road in this location. Draft Policy CC4 (d) specifically links to Policy T1 seeks to reduce the severance caused by the inner ring road between Derby's City Centre and the surrounding City. Similarly, Policy CC4 (e) identifies Eagle Quarter as an	allow for the proposals to evolve in the future. Policy CC4 should retain sufficient flexibility to allow sites to come forward on a phased or standalone basis, where this would not prejudice the long-term development potential of the wider allocation. The policy should be reworded to ensure that the allocation is not predicated on the delivery of unclear infrastructure, and this is only applied where possible and appropriate. In order to satisfy the tests of soundness, Derbion recommends the changes to the policy set out below: *"In addition to the creation of new and enlarged neighbourhoods at Derby Riverside (see Policy CC11), the Railway Station Quarter (see Policy CC13) and North Castleward (see Policy CC14), there are opportunities to regenerate key brownfield sites in the City Centre for mixed-use development,*

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					opportunity for enhancing the connectivity between Derby Riverside, and North Castleward by providing active ground floor uses. This is also referenced in Policy T1 which states that improvements to connectivity are achievable upon completion of the Eagle Quarter. Terminology used with regards to 'taming' the inner-city ring road is ambiguous and lacks clarity on the specific interventions that are envisaged. The cross-reference to Policy T1 (n) refers to the 'reduction in severance and enhancement of placemaking', 'reducing dominance of the private car' and 'creating a more pleasant and safer environment for pedestrians and other active travel users', but this also provides little clarity. The exact nature of 'taming' the ring road is not clearly defined throughout the Plan and is an aspirational, rather than a deliverable, component of CC4 (d). Without clarity on the scale, cost and delivery mechanism it is not possible to assess the implications for the delivery of the allocations in CC4, particularly for Bradshaw Way. This reference should be removed. Both allocations reference wider connectivity and placemaking benefits that extend beyond the boundaries of the sites themselves, and which rely on land outside of Derbion's control. In this context the individual sites risk	*providing a minimum of 2,000 new dwellings. Whilst the regeneration of these sites will largely be for residential uses, their sustainable location also makes them appropriate for a range of other uses, helping to provide a vibrant mix and activate the street scene. Other uses could include offices / workspace, retail, food and drink, leisure and education, subject to other relevant plan policies. Residential led, mixed use site allocations include:* *[…]* *d) Bradshaw Way – This site provides an opportunity for high density residential development, ~~delivering~~ with ability to accommodate approximately 478 new homes ~~across a series of blocks, stepping up in~~*

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					becoming unnecessarily reliant on wider development or subject to the delivery of infrastructure that will come forward under alternative timescales. Overall, Derbion object to the reliance on specific highway or public realm interventions which relies on third-party land or other applications that are outside of the applicant's control runs the risk of undermining the delivery of regeneration through the CC4 (d) and (e) allocations. The housing figures quoted in Policy CC4 equate to 2,023 homes, an increase from 1,871 in the Regulation 18 draft. The figures are directly driven by the capacities quoted in the outline permissions (24/01738/OUT and 25/01315/OUT). Deriving the allocations directly from the capacities of outline permission which are subject to change does not provide sufficient flexibility for the form of development at Bradshaw Way and Eagle Quarter to evolve. As the schemes progress to Reserved Matters and detailed design stage. The Policy drafting should not preclude amendments; or a whole new planning permission being progressed. Derbion supports an ambitious approach to City Centre housing delivery and recognition of its sites in the Policy. We enclose a letter at Annex A from Derbion which sets out their anticipated timeframes for making the sites available for development.	~~*height*~~*, with the opportunity for a tall building (subject to Policy CC6) on the London Road frontage. There are opportunities to enhance connectivity with the Nightingale Quarter and Castleward* ~~*through 'taming' of the inner ring road in this location (see Policy T1).*~~ *e) The Eagle Quarter – The former Eagle Market site provides an opportunity for high density residential development,* ~~*delivering*~~ *with ability to accommodate approximately 674 new homes, with the opportunity for a tall building to help terminate views along the Morledge (subject to Policy CC6). There are opportunities to enhance connectivity with Derby Riverside, North Castleward, to provide active*

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					It is also important that the Policy drafting acknowledges that the form of development on Bradshaw Way and Eagle Quarter may evolve from that in the outline planning permissions, for example. 1 Positively prepared – The Policy CC4 housing requirement (2,023 homes) is derived directly from outline permission capacities. Derbion object to this as it is not positively prepared and doesn't recognise that development capacity / form may evolve. 2 Justified – The reference to connectivity improvements suggests these are a requirement of delivery, without sufficient detail by way of feasibility and cost evidence and delivery responsibility. There is no evidence to suggest this is viable, which renders the Policy unjustified, in accordance with paragraph 35 of the NPPF. 3 Effective – As currently worded the Policy risks being undeliverable over the plan period, because the allocations rely on third-party land and infrastructure outside of the applicant's control or is not intended to be delivered through the existing permissions. Consistent with national Policy – An overly rigid policy that doesn't allow for phased or standalone delivery, or for schemes to evolve at Reserved Matters stage does not	*ground floor uses and to significantly improve the setting and entrance to Derby Theatre.* *[…]* *The Council will work with partners to ensure that regeneration of these sites is delivered in a comprehensive manner, aligned with ~~policy requirements~~ the Site principles set out in this policy. Proposals that would undermine this approach or prejudice ~~development potential~~ an optimised form of development coming forward on these city centre sites will be resisted. The Council will use compulsory purchase powers if necessary to ensure coordinated and comprehensive delivery where possible and appropriate."*

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					support a flexible, viable and deliverable approach to plan-making.	
Little Ships Housing CIC	Policy CC4: Residential Led, Mixed Use Site Allocations	Object	Yes	No	We support the identification of the Council-owned car parks at Abbey Street (east and west), Darwin Place and Chapel Street for redevelopment. It is the right instinct, and we would like to see it applied across the estate. The Council has indicated publicly that it intends to consolidate City Centre parking in a new multi-storey car park, with Abbey Street identified as the likely location and Chapel Street to be replaced. A replacement car park can be designed from the outset to carry homes above it; that is what has been consented at Ipswich. We ask that the allocations require it, so that these sites contribute to the City Centre housing figure as well as to the parking strategy. Parking need will change over the plan period, and a car park built now should not fix the site for twenty years. The TopHuis system developed by our associated practice builds homes on columns above a car park, so the parking stays in use during construction and afterwards. Applied to a new multi-storey car park, the columns run taller and carry as many parking decks as the Council needs, with the homes above. Because the decks are built to a residential structural grid and floor-to-floor height, they can be fitted out as further homes when parking demand falls, for example as vehicles	Modification 3: the City Centre site allocations for the Council-owned car parks at Abbey Street (east and west), Darwin Place and Chapel Street. Add to the site requirements: "Where public parking is re-provided on the site, the replacement structure should be designed to accommodate residential development above it, and to allow parking decks to be converted to homes as parking demand falls over the plan period. Proposals should demonstrate how this has been provided for."

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					become shared or self-driving: a fit-out rather than a rebuild, with no demolition. Construction is fast and demountable; our Brighton pilot proposes 52 homes above a working car park under a meanwhile-use permission, with the homes capable of being moved elsewhere if the land is later needed for another purpose. The allocations could secure this flexibility now at no cost to the Council's parking strategy.	
Policy CC6: Tall Buildings						
Derwent Valley Mills World Heritage Site	Policy CC6: Tall Buildings	Object			Thank you for consulting the Derwent Valley Mills World Heritage Site (DVMWHS) Partnership at the regulation 19 stage of the draft local Plan. These comments will be taken to the next meeting of the DVMWHS Conservation and Planning Group on the 9th September 2026 for verification by members. We have previously provided comments on the emerging local plan, most recently in June 2026. The following comments therefore reflect our previous advice. With regard to (Policy CC6) Tall Buildings section (f) relating to the historic environment, we advise this should specifically reference the need to avoid harm to the OUV of the DVMWHS. Within section (x) relating to the need for a Heritage Statement, including statement of significance and heritage impact assessment; we advise reference to the UNESCO toolkit in relation to potential impacts on the OUV of the DVMWHS.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Historic England	Policy CC6: Tall Buildings	Object			Policy CC6 we would recommend that the policy relates to the relevant evidence base that has informed the policy wording and proposed locations for development. We welcome clause f and g. G could be amended to ensure the protection of key views and would welcome specific reference to the World Heritage Site.	
Lichfields on behalf of Derbion	Policy CC6: Tall Buildings	Object		No	Derbion does not consider the current policy drafting to be sound. *Policy Consideration* Draft Policy CC6 sets out the criteria against which tall building proposals in Derby City Centre will be assessed. It requires proposals to be located within areas identified as suitable for tall buildings on the Policies Map and outside of this area, clear justification must be demonstrated to allow full assessment of the potential impacts. Part (a) of the Policy requires proposals for tall buildings to be submitted in as much detail as possible, either via a full application, or an outline application submitted with a design code which is supported by Derbion. This amendment from the Regulation 18 draft allowing the submission of outline applications to be submitted is supported. Bradshaw Way and Eagle Quarter are identified as areas with the potential for tall buildings in Figure 55 and this	The Policy should be amended to include Derbion's Riverside Car Park Site and the accompanying Figure 55 should also be updated. This will help realise the Site's potential for a tall building and maximise. To increase the scope for buildings located outside of identified tall buildings areas, Derbion also suggests the amended wording below: *b) Are located within reasonable proximity areas of the City Centre identified as having potential for tall development on the Policies Map and Figure 55. Proposals*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					recognition is supported. Derbion considers that Riverside Car Park should also be included as a potential tall building location and for this reason object to Policy CC6. The Tall Buildings Study includes Cluster CL3 which is directly adjacent to Derbion's Riverside Car Park site. At the time of the Tall Buildings Study (2021), the Car Park was in operational use and not identified as within a potential regeneration area. Since then, the car park has become vacant, significant design and technical work has been undertaken and culminated in the submission of a Screening Opinion (24/01664/EIA) for development of up to 18 storeys. There is a clear opportunity for the Riverside Car Park site to be part of the regeneration area and even facilitate a tall building as part of Cluster CL. *Tests of Soundness* 1 Justified – The Policy is underpinned by an evidence base which does not account for new land which has become available since the publishing of the Tall Buildings Study in 2021.	*outside of these identified areas will ~~generally be resisted unless~~ require clear rationale and justification for the location can be demonstrated and potential impacts on heritage assets and skyline have been thoroughly assessed, with harm avoided or minimised;*
Lichfields on behalf of Derby Station Quarter	Policy CC6: Tall Buildings	Support		Yes	Policy CC6 sets out the Council's approach to tall buildings in the city centre, including two locations within the Station Quarter identified as having potential for such development, in broad accordance with the IPG. The Derby Station Quarter Board supports the principle that tall buildings have an important role to play in accommodating growth and	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					supporting the legibility and vibrancy of the city centre. Our Regulation 18 representations raised concern that Policy CC6, as then drafted, required all tall building proposals to be submitted as full planning applications, with a prescriptive set of validation requirements applied uniformly to all proposals. We considered this was not justified or effective, since large-scale masterplan developments are often more appropriately brought forward through an outline application, which reduces risk for developers, supports investment, and allows the Council to retain control over height and design matters at reserved matters stage. The Derby Station Quarter Board welcomes the changes made to Policy CC6 since the Regulation 18 Draft, which directly address the concerns raised in our previous representations. In particular, we strongly welcome the introduction of the ability for tall building proposals to be submitted in outline, provided they are accompanied by a comprehensive design code, in place of the previous blanket requirement for full applications. This is a significant and positive change which will reduce delivery risk for comprehensive, masterplan-led regeneration schemes, including those within the Station Quarter, and we consider it addresses the soundness concern raised in our Regulation 18 representations regarding the effectiveness of the policy. We also welcome the revised approach to validation requirements, which now makes clear that additional	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					supporting information will be applied flexibly and proportionately, having regard to the specifics of individual sites and proposals, rather than as a rigid, universal checklist. This is consistent with both our previous representations and the direction of travel under the 2026 NPPF (DM2) regarding proportionate information requirements. We previously suggested that the definition of a tall building, set at twice the prevailing context height, could be more ambitious for the key locations identified as suitable for such development. This has not been amended. The Board is concerned that this 'low bar' for defining tall buildings, together with criterion b) which highlights only two very specific locations within the Station Quarter where tall buildings would be acceptable, means that many of the buildings shown within the IPG master plan are contrary to Policy CC6 as currently drafted. We would reiterate our previous requests to consider a more ambitious definition of tall buildings, or alternatively, revisit criterion b) and the associated figure 55, to provide a more flexible indication of where tall buildings are likely to be acceptable. It is considered that these changes are required to ensure that CC6 is positive and effective.	
Policy CC7: Business, Creativity and Learning						
Lichfields on behalf of Derbion	Policy CC7: Business, Creativity and Learning	Object		No	Derbion continues to support the Plan's support for the growth of office space and creative industries to the City Centre. A strengthened office market will play an important role in growing Derby's economic prospects and assist in attracting a diverse workforce to the city, which in turn	The CAA boundary should be extended to include Derbion's Riverside Car Park site, as the Site has potential to deliver office and creative space that

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					brings footfall which is welcomed by Derbion. Similarly, attracting new businesses, creativity and learning hubs to areas within the City Centre will also be an important part of the mix of securing Derby's successful regeneration. While Derbion support the overall aims of the policy, Derbion objects to the current CAA boundary which underpins the policy. The CAA currently excludes Derbion's key Sites which could significantly contribute towards meeting the Council's needs for office and creative floorspace. *Tests of Soundness* 1 Positively prepared – The policy does not include Derbion's sites at Bradshaw Way and Riverside within the CAA (as defined by Figure 56) despite the Site's representing key regeneration opportunities within the City Centre that are capable of supporting the aims of the policy. 2 Positively prepared – The provision of proportionate office/creative space supporting a wider mixed-use scheme should be recognised as acceptable regardless of the identified CAA boundary. This will support the principle of introducing a more varied range of uses within workspaces in the City Centre in line with part (c) of the policy.	would directly contribute towards City Centre regeneration. Similarly, while Bradshaw Way benefits from an existing permission, its inclusion within the CAA would provide flexibility to explore alternative uses should market conditions change, for example as was included on the previous ref. 23/00087/OUT.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Lichfields on behalf of Derby Station Quarter	Policy CC7: Business, Creativity and Learning	Support		Yes	Policy CC7 seeks to encourage a more vibrant and diverse office market within the city centre and to strengthen the role of the creative industries sector, including by directing new office floorspace associated with the rail industry to the Railway Station Quarter. The Derby Station Quarter Board supports this approach, and in our Regulation 18 representations we highlighted the significance of Midland House, within the Station Quarter, as a potential anchor asset in this respect.	
CC8 Shopping, Eating and Drinking						
Lichfields on behalf of Derbion	CC8 Shopping, Eating and Drinking	Object		No	Derbion does not consider the current drafting of the policy to be sound. Derbion supports the inclusion of Derbion into the PSA (Figure 57) as this recognises the role of these established retail, leisure and evening-economy sites. However, Derbion objects to the current policy drafting given the presence of other sites within their ownership that represent commercial, high-footfall locations with potential to deliver significant regeneration benefits. The sites at Bradshaw Way and Riverside currently fall outside of the CAA, but are entirely suitable locations for commercial activities and have the potential to integrate new leisure, food, drink and entertainment uses. This point is addressed in more detail in the response to Policy CC7. An overly rigid approach which directs applications for ancillary commercial uses to the CAA	Incorporating Derbion's sites within the CAA would resolve the and prevent inappropriate restrictions that could undermine their contribution to the vitality and economic success of the City Centre. The Policy should be amended to remove reference to 12:30am opening hours in order to be found sound: *'New leisure uses, including food, drink and entertainment*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					would risk impeding wider regeneration benefits associated with mixed-use redevelopment and stifling the regeneration of the City Centre. A blanket restriction on late-night opening hours to 12:30am for all development outside the CAA is a disproportionate and inflexible approach. In addition, the control of opening hours through planning policy runs the risk of duplicating or conflicting with separate regulations under the Licensing Act 2003. Therefore, the Policy should not include a blanket restriction to late night opening hours so applications only consider impacts with regard to residential amenity and character, with any specific opening hour restrictions secured via condition on a Site-by-Site basis. *Tests of Soundness* 1 Positively prepared – The policy is not favourable to ancillary new leisure uses in Derby's City Centre which have the potential to maximise regeneration, especially where these are delivered through mixed-use redevelopment. This can be achieved by including Derbion's sites at Bradshaw Way and Riverside within the CAA (Figure 56). 2 Consistent with national policy – The policy is not consistent with policy as it detracts from addressing genuine planning considerations, such as residential amenity and character. Rather, the current wording	*will be supported across the City Centre, as defined by Policy CC1, but will be encouraged to locate within the Central Activity Area (CAA), in the first instance, helping support key regeneration activities. In areas of the City Centre outside of the CAA, ~~late night opening hours will generally be restricted to 12:30am to respect the~~ development must respect residential amenity and character of these areas.*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					applies a blanket approach to opening hours which duplicates the role of licensing rules.	
Policy CC9 Active and Inclusive Frontages						
Lichfields on behalf of Derbion	Policy CC9 Active and Inclusive Frontages	Object		No	Derbion itself benefits from an open Class E consent, confirmed by CLEUD ref. 24/01654/CLE. However, for other units in the City Centre and new commercial units that come forward, such restrictions would significantly reduce flexibility. This would make it more difficult to re-occupy vacant units, at a time when expediting reoccupation of vacant units should be a key priority. Class E was introduced nationally to provide precisely this flexibility and support centres in responding to changing economic conditions. The Policy places further restrictions on City Centres which risks undermining efforts to revitalise Derby City Centre. *Tests of Soundness* 1 Justified – The restriction is not justified as it conflicts with the rational for Class E uses, which is intended to provide flexibility for City Centre units to respond to rapidly changing economic conditions and encouragement long-term occupancy of commercial units.	Derbion recommends that this restriction is removed to provide greater flexibility in the types of commercial uses that could come forward and contribute towards the regeneration of the City Centre. The Policy should retain Class E flexibility in order to aid reoccupation of units in the future *"The streets where active and inclusive ground floor frontages should be maintained are identified on the Policies Map and Figure 58. Within these frontages, the Council will seek to resist proposals that would introduce 'dead' frontage during the daytime either*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						through the nature of the use or the opening hours. Uses within these areas should be, where practicable, open to the public and maintain a shop front and / or display of visual interest. *The Council will also ~~seek to resist~~ support proposals that maintain active frontage and will resist proposals within these frontages that would introduce uses that cannot be accessed by all of Derby's communities during the daytime unless it can demonstrated that an active/inclusive use is not reasonably achievable, or that the proposed use would not materially harm the vibrancy or street scene of the frontage:* *[…]* *Where open ended E use class proposals are submitted, the*

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						~~*Council will seek to impose conditions where appropriate to restrict uses within the use class,*~~ *the design of proposals should seek to ensure that the potential for dead frontage is minimised."*
Policy CC11: Derby Riverside						
Derby and Sandiacre Canal Trust	Policy CC11: Derby Riverside	Object	Yes	No	The policy and supporting text does not represent sufficiently the Council Plan and other policies in this emerging document	An additional paragraph in the Supporting Text should make reference to new water based riverside facilities and the potential for the extension of use of the river from Darley Abbey Mills through the City Centre to Wilmorton Park. This would comply with the Vibrancy aims of the Council Plan and policies in this emerging document in relation to sustainable travel, visitor attraction and enhancement of blue and Green Corridors.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Derwent Valley Mills World Heritage Site	Policy CC11: Derby Riverside	Object			Thank you for consulting the Derwent Valley Mills World Heritage Site (DVMWHS) Partnership at the regulation 19 stage of the draft local Plan. These comments will be taken to the next meeting of the DVMWHS Conservation and Planning Group on the 9th September 2026 for verification by members. We have previously provided comments on the emerging local plan, most recently in June 2026. The following comments therefore reflect our previous advice. The City Council proposes high density development at Derby Riverside (Policy CC11) and North Castleward (Policy CC14). In each case, development would include tall buildings, and the draft local plan acknowledges a potential impact upon the OUV of the DVMWHS. We continue to advise that Heritage Impact Assessments (HIAs) should be prepared for these site allocations prior to adoption of the local plan. As far as we are aware these have not been undertaken. Historic England advises that site allocations should be subject to a Heritage Impact Assessment (HIA); it has published an advice note to that effect (HEAN3). UNESCO has published a "Guidance and Toolkit for Impact Assessments in a World Heritage Context" (2022). World Heritage Centre - Guidance and Toolkit for Impact Assessments in a World Heritage Context The *Derby City Digital Twin* may be used to model (e.g.)	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					the effects of tall buildings upon views from the World Heritage Site. If the OUV of the DVMWHS would be harmed by (e.g.) tall buildings, for either site allocation it may be necessary to amend the development accordingly. This may affect the deliverability of these sites.	
Historic England	Policy CC11: Derby Riverside	Object			Policy C11, clause k, we welcome the inclusion a reference to the historic environment. However, we would recommend amending the wording in the clause to ensure that it is the significance of heritage assets, including their setting and key views that are protected, as well as the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. Any mitigation and avoidance measures identified within the Heritage Impact Assessment for this area should also be incorporated into policy. Any harm that may arise should be avoided or minimised in the first instance and only as a last resort would it relate to the need for clear and convincing justification.	
Lichfields on behalf of Derbion	Policy CC11: Derby Riverside	Object		No	Derbion object to the current wording of the policy. Currently, the policy wording does not ensure development is provided of a scale that optimises housing delivery and recognises the potential of the area as a sustainable location. Draft Policy H2 seeks minimum densities of 80 dph, whilst the Council's Tall Buildings Study identifies achievable densities ranging from 80–150 dph for 3–4 storey development, up to 280 dph at 5 storeys and 450 dph at 8 storeys[1]. The densities sought at Bradshaw Way and The Eagle Quarter also	Criterion (n) should be amended to recognise that sites may not come forward with a mix of house types and full range of tenures. The Policy should recognise support for proposals that will meet identified local needs and this should be considered

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					significantly exceed the minimum considered in the Sustainability Appraisal and Policy H2, demonstrating the potential to optimise development in highly sustainable in the locality through the integration of tall buildings (subject to Policy CC6). On this basis, Policy CC11 is not ambitious enough in terms of the quantum of homes sought at Derby Riverside and does not reflect the tall building potential discussed in relation to Policy CC6. Derbion would welcome the opportunity to discuss the development potential of the Riverside Car Park with the Council to ensure that regeneration across the Riverside allocation area is maximised. Criterion (g) seeks to ensure a new primary school is delivered as part of the regeneration of Derby Riverside. The Policy is not clear on the mechanism through which the school would be delivered and whether this be sought through planning obligations on sites within the Riverside Area. This is important for viability considerations. Criterion (o) seeks to ensure that the creation of Class E uses does not directly compete with the PSA and CAA. Further clarity is needed on how 'direct competition' will be considered, particularly as the Policy also supports development coming forward through mixed-use regeneration. Criterion (o) should allow for flexibility,	on a site-by-site basis. Criterion (o) should either be amended to include a clearly defined methodology for assessing 'direct competition' with the CAA, or removed from the Policy entirely. This would provide greater certainty as to where a broad mix of Class E uses will be supported across the City Centre, rather than leaving this constrained by an undefined and untested competition test. Criteria (q) and (r) should be amended to allow for Site-specific circumstances to be taken into consideration with regards to public realm and landscaping to be delivered on Site. Criterion (s) should be removed as it lacks clarity on the types of uses that would need to be relocated. The Policy should be removed as

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					recognising that City Centre developments, for example at Riverside Car Park, could come forward with a broad range of uses. This does not necessarily mean such developments will directly compete with the CAA, but instead reflects how the City Centre may evolve over the plan period. Criteria (q) and (r) are unclear on whether such improvements are expected on site, or via planning contributions. Individual sites within the City Centre can be constrained, or due to the configuration of development, find it difficult to provide 'significant contributions' to greening for example. The Policy drafting needs to be careful as to not create onerous expectations for developments which is at odds with part (j) which seeks to optimise the development potential. Criterion (s) is not clear on the types of development where it would be appropriate for new development to provide for the relocation of existing uses. It is currently unclear how this would work in practice. The application of this policy appears to require all applications to relocate existing uses, but this wouldn't allow for the City Centre to evolve and improve over time. Finally, the Policy's requirement for comprehensive redevelopment must ensure this does not become a barrier for development. Derbion's Riverside Car Park site should be	it does not recognise that the City Centre will evolve over time and will change in response to changing needs caused by regeneration. The removal of this criterion would more effectively support the regeneration of Derby Riverside. The policy should be amended in accordance with these recommendations in order to be sound: *"n) provide homes across a mix of types and tenures where this is appropriate for meeting local need;* *o) not detract from the vitality and viability of the wider City Centre, particularly the Primary Shopping Area (PSA) and Central Activity Area (CAA) ~~through the creation of E use class floorspace that will directly compete~~;* *q) provide enhancements to the public realm network*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					capable of being delivered individually, ahead of the other sites in the wider Riverside Allocation. As long as principles of the wider regeneration area are established, the applications should be capable of coming forward without relying on land outside of an applicants' control. *Tests of Soundness* 1 Positively prepared – When compared against the findings of the Council's Tall Buildings Study and comparable City Centre schemes (Bradshaw Way, Eagle Quarter) the Riverside allocation should seek to maximise the development potential and seek to deliver more than 600 homes. The Policy should recognise that higher densities can be supported within appropriate locations, such as Riverside Car Park. 2 Consistent with national policy – Policies should be underpinned by robust viability evidence and that policies avoid placing unjustified or unviable burdens on development. As currently drafted the policy criteria imposes undefined and onerous requirements without any evidence that these have been viability tested or can be practically delivered. Criteria (o), (q), (r), and (s) risk being too rigid and conflict with criterion (j), making the application of the policy ambiguous for a decision maker.	*unless robust Site-specific evidence can be provided to demonstrate that this is unviable;* *r) make a significant contribution to the greening of the City Centre, through landscaping, and tree planting as part of the development of building plots, including through the provision of amenity green space, but also enhancements to public realm, unless robust Site-specific evidence can be provided to demonstrate that this is unviable;* *s) ~~where appropriate, make provision for the incorporation or relocation of existing uses, including existing residential uses;"~~*

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
Policy CC12: University of Derby, City Centre Hub						
Historic England	Policy CC12: University of Derby, City Centre Hub	Objects			Policy CC12, page 248, it seems the allocation site includes the block of buildings between Agard Street and Friargate and it is not clear how this boundary has been arrived at in respect of the historic environment. The block of buildings fronting Friargate include a number of listed buildings which have special qualities themselves. They provide a striking frontage reflecting the growth of Georgian development to the west of the city, away from the polluted and crowded environment of Derby's core at the time. As well as reflecting a period of growth in their own right they contribute to the significance of the Friargate Conservation Area (CA) too. The important group of buildings on Friargate includes listed buildings at GI, GII* and GII as well unlisted buildings which make a positive contribution to the character of the CA. In particular, it is necessary to understand that the significance of these buildings and the CA depends upon the complex of rear ranges and garden and yard spaces as well as the polite frontages. Also, the relation of those structures and spaces and related archaeological remains to the form of new buildings on Agard St is key to the effective management of the CA. The draft Plan does not set out why the block of buildings are included in the site allocation and the supporting text for the Policy does not address either. The draft Heritage Impact Assessment we have received does not consider this either. We recommend that this part of the allocation is removed from the site allocation. We also recommend that any avoidance and mitigation measures required for the rest of the site allocation are incorporated into the policy wording and as such we remain concerned about this site allocation. Additional comments will be	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					available within our HIA feedback. We are available to work with the Council to ensure appropriate policy wording is prepared.	
Policy CC13: Railway Station Quarter						
Historic England	Policy CC13: Railway Station Quarter	Supports			Policy CC13, we welcome the reference to heritage and heritage led regeneration. Clause k, we welcome the inclusion a reference to the historic environment. However, we would recommend amending the wording in the clause to ensure that it is the significance of heritage assets, including their setting and key views that are protected, as well as the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. Any mitigation and avoidance measures identified within the Heritage Impact Assessment for this area should also be incorporated into policy. Any harm that may arise should be avoided or minimised in the first instance and only as a last resort would it relate to the need for clear and convincing justification.	
Lichfields on behalf of Derby Station Quarter	Policy CC13: Railway Station Quarter				The Derby Station Quarter Board notes the renumbering of this policy from CC14 to CC13, and confirms our continued strong support for the Council's broad strategy to secure the residential-led regeneration of the Railway Station Quarter. As set out in detail in our Regulation 18 representations, the Board confirms that, in respect of land within rail industry control, the proposed allocation is suitable, available and deliverable within the plan period. Suitability The principle of residential-led redevelopment within the Railway Station Quarter is established	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					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 CC13 anticipates delivery of up to 500 homes in the immediate phase of regeneration across the Station Quarter, to be delivered within the plan period, with longer-term aspirations for circa 1,500 homes in total. 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	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					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 2026 NPPF towards residential and mixed-use development within a reasonable walking distance of railway stations that provide a high level of connectivity to jobs and services. The Railway Station Quarter clearly meets this criterion, benefiting from immediate proximity to Derby Railway Station, which provides frequent services and strong links to the wider city centre and employment areas. Policy CC13 therefore aligns closely with the overarching direction of travel established by the 2026 NPPF. Accordingly, Sub-Area B is suitable for the delivery of a consolidated car park and multimodal transport hub, and Sub-Area A is suitable for residential-led redevelopment at the anticipated quantum of circa 500 units. Availability Network Rail and East Midlands Railway respectively own the freehold and leasehold of the Zone 1, Zone 2 and Zone 3 car	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					parks. An ownership plan showing the extent of this land is included at Annex 1. Train Operating Companies in Great Britain are being brought under public ownership and transitioning to Great British Railways (GBR) as contracts expire. It is currently anticipated that EMR will be nationalised in December 2026. It is anticipated that this move will simplify rail industry landownership structures across the Station Quarter. The rail industry therefore controls the land identified in the IPG for the proposed multi-storey car park, which will in turn allows for the release of the surface-level parking within Sub-Area A. Platform 4 also controls the majority of Sub-Area A itself, identified as the earliest residential phase, capable of delivering up to 530 dwellings. Together with the forthcoming simplification of rail ownership structures through GBR, this consolidated ownership strengthens the availability of land needed to deliver both the residential component and its enabling infrastructure. A small parcel within Sub-Area A, adjacent to the Zone 3 car park, is in separate private ownership. This does not act as a ransom strip, as a feasible development layout can be delivered without it. Development solely on rail industry controlled within this Sub-Area could deliver up to 403 dwellings, with control of the remaining parcel intended to be secured in due course. Platform 4 supports comprehensive regeneration of the Railway Station Quarter and will not pursue piecemeal	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					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. Platform 4's intention is to secure planning permission for, and construct, the MMTH at the earliest possible stage. Platform 4 confirms that funding from the Combined Authority is in place to progress a planning application for the MMTH, and that it intends to submit this application in 2026, before the emerging Local Plan is submitted for examination. This facility will enable the immediate release of Sub-Area A	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					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 in 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.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					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. Furthermore, Platform4 are now in pre-application discussions with Derby City Council in respect of emerging proposals at Sub-Areas A and B and are committed to submitting planning applications for the development of both sites at the earliest opportunity. Comments on Criterions h), n), r) and s) The Derby Station Quarter Board wish to raise a number of points of detail, including matters arising from changes made since the Regulation 18 Draft. The addition of Criterion h) is welcomed; requiring the integration and prioritisation of sustainable travel connections, which we consider to be a positive addition consistent with the Board's ambitions for the Station Quarter as a sustainable, well-connected place to live. In respect of criterion n), which requires that development does “not detract from the vitality and viability of the wider City Centre, particularly the Primary Shopping Area (PSA) and Central Activity Area (CAA) through the creation of E use class	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					floorspace that will directly compete", the Board supports this approach which is consistent with national policy. However, as set out in the IPG, it is considered that some small-scale ancillary commercial uses (for example coffee shops, fitness studios, small-scale convenience retail) would be appropriate to support the delivery of high density housing and regeneration of the area, including for example within the red brick building adjacent the railway sidings Sub-Area, within the proposed commercial building to the east of the station, and/or within the ground floor of a proposed residential building, to allow for the comprehensive regeneration of the area, improve the offering at Pride Park, and bring vitality and interest to the residential-led development at Sub-Area A. We would welcome some acknowledgement in the policy or supporting text that such uses could be carefully considered on a case-by-case basis, provided it is demonstrated that the vitality and viability of the PSA and CAA are preserved. The Derby Station Quarter Board considers that further detail is required regarding Criterion r), which requires financial contributions to primary and secondary school capacity "where appropriate…to be kept under review." Given that development within the Station Quarter is anticipated to comprise predominantly, if not exclusively, apartments, which typically generate a lower proportion of school-age children than family housing, particularly given the location, we consider it important that any contributions sought are calculated on a basis that reflects the likely demographic profile of the development, and we would welcome this being made explicit either within the policy or its supporting text, to ensure the policy is justified and effective.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					The Derby Station Quarter Board notes the new criterion s), requiring development to "improve surface water management through the provision of high-quality SuDS." This objective is supported in principle. However, SuDS solutions can often be difficult to achieve on tightly constrained, previously developed urban sites of the type found within the Station Quarter. It is therefore suggested that this criterion is amended to include the caveat "where feasible and appropriate, in accordance with the drainage hierarchy," to ensure the policy remains effective and deliverable across the range of site conditions found within the allocation. Conclusions on Policy CC13 The Derby Station Quarter Board supports the Council's regeneration strategy for the Railway Station Quarter and the comprehensive approach embedded within the draft allocation. Sub-Area A is suitable for residential-led redevelopment of up to 530 dwellings in this highly sustainable location, and the land required to deliver both the residential development and the associated enabling multi-storey car park is substantially consolidated within rail industry control. The replacement parking infrastructure is supported by a clear funding and delivery pathway, and residential development can realistically be delivered within a ten year time frame. However, as set out above, we consider that minor modifications to criterions n), r) and s) to ensure the policy is effective, and sufficiently flexible so to ensure the	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					comprehensive regeneration of the Station Quarter is achievable. As a point of detail, noting the change in Policy Numbering from CC14 to CC13, there are some instances in the draft plan where the references to these policies still needs to be updated to reflect this change. The Derby Station Quarter Board welcomes continued engagement with the Derby City Council Planning Policy Team and broader partners to secure coordinated and high-quality regeneration of this strategic gateway location.	
Policy CC14: North Castleward						
Derwent Valley Mills World Heritage Site	Policy CC14: North Castleward	Object			Thank you for consulting the Derwent Valley Mills World Heritage Site (DVMWHS) Partnership at the regulation 19 stage of the draft local Plan. These comments will be taken to the next meeting of the DVMWHS Conservation and Planning Group on the 9th September 2026 for verification by members. We have previously provided comments on the emerging local plan, most recently in June 2026. The following comments therefore reflect our previous advice. The City Council proposes high density development at Derby Riverside (Policy CC11) and North Castleward (Policy CC14). In each case, development would include tall buildings, and the draft local plan acknowledges a potential impact upon the OUV of the DVMWHS.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					We continue to advise that Heritage Impact Assessments (HIAs) should be prepared for these site allocations prior to adoption of the local plan. As far as we are aware these have not been undertaken. Historic England advises that site allocations should be subject to a Heritage Impact Assessment (HIA); it has published an advice note to that effect (HEAN3). UNESCO has published a "Guidance and Toolkit for Impact Assessments in a World Heritage Context" (2022). World Heritage Centre - Guidance and Toolkit for Impact Assessments in a World Heritage Context The *Derby City Digital Twin* may be used to model (e.g.) the effects of tall buildings upon views from the World Heritage Site. If the OUV of the DVMWHS would be harmed by (e.g.) tall buildings, for either site allocation it may be necessary to amend the development accordingly. This may affect the deliverability of these sites.	
Historic England	Policy CC14: North Castleward	Supports			Policy CC14, clause i) we welcome the inclusion a reference to the historic environment. However, we would recommend amending the wording in the clause to ensure that it is the significance of heritage assets, including their setting and key views that are protected, as well as the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. Any mitigation and avoidance measures identified within the Heritage Impact Assessment for this area should also be incorporated into policy. Any harm that may arise should be avoided or minimised in the first instance and only as a last	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					resort would it relate to the need for clear and convincing justification.	
14. Monitoring and Review						
Community Campaigner David Barton	Paragraph 750	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	
Policy MH1: Monitoring and Review						
Home Builders Federation*	Policy MH1: Monitoring and Review	Object		No	*Policy M1 and the Monitoring Framework is not considered to be sound as it is not justified, not effective and not consistent with national policy for the following reasons:* Monitoring is essential to see if the Plan is delivery housing as was expected. The current monitoring indicators are inadequate as they fail to set any targets against which performance would be judged. The Plan should instead include a comprehensive Monitoring Framework which sets out the targets for housing (and other matters) that will be monitored and the triggers for action being taken, and what that action will be. HBF do not support the inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy does nothing to address the housing crisis or undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council to address housing under deliver, much more quickly than would be possible through the production of another plan, or plan review.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					Derby City should also monitor the delivery of any unmet need being provided by neighbouring authorities and actively participate in local plan consultation and examination to ensure the need for other authorities to meet their need is robustly supported in neighbouring Local Plans. The Plan needs to set out how and when monitoring will be undertaken, and more information is needed on what action(s) will be taken when if monitoring shows under delivery of housing. Not doing so means the plan will be ineffective and therefore unsound.	
Little Ships Housing CIC	Policy MH1: Monitoring and Review	Object	Yes	No		Modification 1: Policy H1 supporting text (new paragraph after paragraph 77) and Policy MH1. "The Council will assess the capacity of land and buildings in the ownership of the Council and other public bodies within the city, including surface car parks, depots and the airspace above existing and replacement public buildings and car parks, to accommodate new homes without displacing existing uses. The assessment will be completed within 12 months of

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						adoption, reported through the Authority Monitoring Report, reflected in the Brownfield Land Register and the housing land supply, and used to inform any review of the Plan." Add a corresponding indicator to Appendix 1: homes permitted on or above land in public ownership.
Councillor Tim Prosser	Policy MH1: Monitoring and Review	Objects		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including: • New criteria under Policy M1 (Monitoring and Review), including a new trigger for plan review where the Council fails “to maintain a rolling 5-year supply of deliverable housing sites,” and a new mechanism for a “stepped trajectory” reduction to the housing requirement in the latter part of the plan period. Para 752 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council.	

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.	
Fisher German on behalf of Bloor Homes	Paragraph 752	Objects		No	Part F of the reasoned justification at 752 of the Plan states "Should delivery in the first part of the plan period significantly exceed the annualised housing requirement, and capacity constraints remain evident, the Council will seek to make an equivalent reduction to the housing requirement in the latter part of the plan period through a stepped trajectory, to be introduced at review". Whilst noted this is the reasoned justification, not within the Policy, it is pertinent to note as set out above that any new Plan would need to have due regard for an updated LHN, and that would include housing delivery. As such, this part of the reasoned justification should be deleted for clarity and to comply with National Policy	
15. Appendix 1: Monitoring Indicators						
Community Campaigner David Barton	Monitoring Indicators	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.
17. Appendix 3: Table of Strategic and Non-Strategic Policies						
Community Campaigner David Barton	Paragraph 753	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
					figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.	through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.
18. Appendix 4: Parking Standards						
Community Campaigner David Barton	Paragraph 762	Object	Yes	No	Free Car Parking should be provided en masse with all prohibitions and associated restrictions removed to provide the best possible opportunity for everyone including residents and outsiders to support the area.	Entirety of Document- Free Car Parking en masse and the removal of prohibitions and associated restrictions will

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						unlock newfound economic opportunities for everyone.
Councillor Tim Proser	Appendix 4: Parking Standards	Object		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including: • A wholly new appendix of cycle parking standards, based on DfT guidance note LTN 1/20, setting quantified minimum cycle parking ratios by land use type. Page 278 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.	
19. Appendix 5: Table of Strategic and Non-Strategic Policies						
Community Campaigner David Barton	Open Space Standards	Object	Yes	No	Space is too restrictive	Entirety of Document- Quality spacious surroundings are

Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications
						required that cannot solely rely upon quotas and targets.
George Fletcher*	Open Space Standards	Object	No	No	Destroying Wilmorton Park will be detrimental to these objectives for the residents of Wilmorton.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.
20. Appendix 6: List of Wildlife Sites and Locally Important Geological Sites — List of Wildlife Sites and Locally Important Geological Sites						
Community Campaigner David Barton	List of Wildlife Sites and Locally Important Geological Sites	Object	Yes	No	Housing Targets conflict with Natural sites and so must be reconsidered utilising TA to ensure that these are as ecologically and environmentally accommodating whilst economially strong.	Entirety of Document- Traditional Architecture will strengthen each theme and so must be encouraged.
21. Appendix 7: Superseded Policies						
Community Campaigner David Barton	Paragraph 763	Support	Yes	Yes	No text submitted	No text submitted
22. Glossary						
Community Campaigner David Barton	Paragraph 765	Support	Yes	Yes	No text submitted	No text submitted

The following representations commented on the evidence base published to support the Draft Local Plan for Derby.

Infrastructure Delivery Plan						
NHS Property Services	Infrastructure Delivery Plan	Supports	Yes	Yes	The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to the level of growth proposed by the Plan, and to ensure that both planning obligations and the capital allocation process for the Community Infrastructure Levy (CIL) effectively support and result in capital funding towards delivery of the required infrastructure. The Draft Infrastructure Delivery Plan (IDP) includes a dedicated health chapter (chapter 8) which demonstrates clear engagement with NHS Derby and Derbyshire Integrated Care Board (ICB), as the local health commissioners. NHSPS supports the Council's engagement with the ICB in drafting the IDP to identify the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. We request that the Council continue its engagement with the NHS to further refine the identified healthcare needs and proposed solutions to support the level of growth proposed by the Local Plan, as identified in the draft IDP.	
National Highways	Infrastructure Delivery Plan	Objects			We also note that the Infrastructure Delivery Plan identifies the A38 Derby Junctions Grade Separation Scheme and the South Derby Integrated Transport Link (Phases 1 and 2, including the A50 junction) as required infrastructure to support the Plan. The IDP however records indicative cost, delivery timeframe and funding source as "to be confirmed" for these	

					schemes. We recognise the IDP remains a live document and as significant growth is dependent on this infrastructure we would highlight the risk to delivery should delivery of this strategic infrastructure be delayed.	
Lucy White Planning Limited on behalf of National Grid	Infrastructure Delivery Plan	Objects			The Infrastructure Delivery Plan accompanying Policy GD9 includes limited information regarding reinforcement of the electricity infrastructure network. Derby City Council has engaged with NGED and discussions are ongoing. The IDP is a live document which should be kept up to date through regular engagement with infrastructure providers, including NGED. It is important that the Infrastructure Development Plan reflects current NGED Network Development Plans. The IDP should follow the attached guidance to ensure appropriate coordination across the LPA's and NGED's strategic plans. The LPA must engage through the Distributed Future Energy Scenarios process outlined above to ensure local plan proposals are included in NGED's plans.	
Sport England	Infrastructure Delivery Plan	Support	Yes	Yes	Sport England welcomes sections 9 (social and community infrastructure), and 10 (green and blue infrastructure) which references the need for infrastructure contributions towards provision of indoor and outdoor sports facilities including playing fields to meet the needs of the planned housing growth. Sport England would recommend that reference is added to the development of a technical note to further detail how contributions to meet the needs for sport are to be provided to be consistent with the amendments made in policy GD9 and the associated justification.	

					Sport England welcomes the commitment from the Council to work with Sport England on the content of a technical note for the calculation of developer contributions for sport. In respect of developing an up to date and robust evidence base to help inform the application of this policy to ensure major development proposals meet their needs for sport, we welcome that the Council have commissioned a new Playing Pitch and Outdoor Sports Strategy which should be completed and adopted in accordance with Sport England's Guidance. The drafting of the IDP priorities should therefore be reviewed and updated on the completion of this strategy in due course.	
Local Plan Viability Assessment (Residential)						
NHS Property Services	Local Plan Viability Assessment (Residential)	Supports	Yes	Yes	The draft policy requirements identified in the Plan are supported by the Local Plan Viability Assessment (Residential) (April 2026) and Viability Assessment Addendum (July 2026). Having reviewed the report, we note that where contributions towards healthcare have been identified in the policy requirements for site-specific testing, the assessment includes a specific allowance for contributions towards healthcare. The report tests a lump sum for S106 contributions of £1,000 per dwelling to cover site specific mitigation for health. NHSPS welcomes a specific allowance for healthcare contributions within the viability assessment (for applications proposing 75 dwellings or more). A separate cost input for health means that developers are adequately informed in advance, in accordance with ICB's estate strategy and the development's location and size, that they may be required to make on-site provision or	

					off-site financial contributions to mitigate the impact on healthcare infrastructure resulting from their development. This also supports the effective implementation of Draft Policy GD9 in situations when a viability assessment demonstrates that development proposals are unable to fund the full range of infrastructure requirements. However, we would raise concern that the lump sum figure of £1,000 per dwelling for health, as identified in the Local Plan Viabiltiy Assessment and the Planning Obligations SPD (2018) is low. Without prejudice to any future representations the NHS or its partners may make on specific planning applications or applications for CIL funding, in our view the S106 headroom identified as part of the site-specific testing is not sufficient to enable financial contributions to be secured for healthcare. As noted in our general comments above, healthcare facilities are currently experiencing significant strain. Furthermore, if appropriate mitigation is not secured, the growth strategy outlined in the Plan is expected to exacerbate this situation. We would recommend that the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected. This would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. We would welcome further engagement with the Council to on this issue to determine a reasonable cost assumption that could be used in future viability assessments.	

Sustainability Appraisal						
Fisher German on behalf of Bloor Homes	Sustainability Appraisal	Objects			The reasons why the Locko Road site were excluded are set out in the SA and summarised in the Council's Sites Assessment Rationale Overview (2026) document. These can be generally summarised as per the below, with BHL response. Green Belt The SA suggests the site did not meet the definition of Grey Belt thus did provide some important Green Belt functions. As set out above this conclusion is based on a flawed methodology and inconsistent assessment in the DGBA. For reasons articulated above and in the Define GBA the site should have been assessed as Grey Belt. Regardless, the Framework is clear that where Grey Belt land has been fully utilised, non-Grey Belt Green Belt land should be used. The site scored marginally worse than Stoney Lane, and even if not Grey Belt it is not critically important Green Belt. Thus regardless of ultimate conclusion on Grey Belt, Green Belt is not sufficient cause to exclude the site from allocation. Detached from the urban form on the eastern side This argument, which is also raised in the SHLAA assessment of the site, is that the site is disconnected from the urban form on the eastern side of Locko Road. This separation is due to the presence of allotments and Spondon Cricket Club. These uses, whilst mostly 'green', are clearly urbanised due to the presence of fencing, a pavilion, nets, sheds and other paraphernalia. Moreover, these are uses which are regularly located within settlements, and it is not considered the position in a post development scenario this arrangement would be unusual, incongruous or mean that development is not	

					well related to the existing urban area. Furthermore, active travel improvements are proposed to ensure links between new development and the existing urban area are available including along Lousie Greaves Lane (which is adopted highway) and on existing public rights of way. These links could form part of any policy requirement for the allocation of the Locko Road site. Connectivity of Site from services and facilities The SA and SHLAA challenge the sustainability of the site. However, the sustainability of this area has already been explored at appeal. Whilst admittedly of a differing scale, the West of Royal Hill Road, Derby application for 90 dwellings (23/01631/OUT) (as shown at Appendix 3) is located physically very close to the application site, being located only a couple of hundred meters south west of the Locko Road land. Whist the Royal Hill Road site is acknowledged to be slightly closer to some of Spondon's schools, particularly Springfield Primary and West Park Secondary, it is however further away from a direct bus service into Derby for example. In overall terms, accepting differing quantum of development, BHL would assert it would be reasonable to state they were similar in terms of spatial sustainability. Whilst ultimately refused locally, the Committee report pertaining to the application sets out: "the main benefits would be the provision of a large number of new homes in a sustainable location, adjacent to, and therefore forming a new part of the built area of Spondon, and a quantum of affordable housing units, which would be provided in the context of a very significant housing need, resulting from increased dwelling numbers required in the standard method" [our emphasis].	

					Paragraph 25 of the appeal decision (Appeal ref: 33564765), which allowed the scheme, states: "Recent bus service improvements have facilitated new/extended services from bus stops that include those sited on Locko Road adjacent to its junction with Royal Hill Road. Whilst it is my understanding that long-term funding has yet to be secured for these service improvements, it cannot be reasonably asserted that future occupiers of the development would necessarily not have the realistic option to choose bus travel as a sustainable alternative to private car use". Locko Road has good connections to existing bus routes, following the precedent set by the Royal Hill Road appeal decision, a similar improvement to bus services is proposed as part of the application and there would be no objection to this being required in policy as part of the Site's allocation. Looking to the east, the Inspector of the Erewash Core Strategy Review raised no fundamental concerns in relation to the sustainability credentials of the Dale Road, Spondon proposals (Erewash Core Strategy Review Strategic Policy 1.4 – North of Spondon, Planning Application Ref: App ref: 0923/0024 – again shown at Appendix 3), only technicalities relating to the provision of education contributions. Again, it would be reasonable to assert that the Dale Road proposals were of a similar level of sustainability of this application site and would be difficult to argue one was acceptable whilst the other was not and it is clear the Inspector of the Erewash Core Strategy Review had no issue with the sustainability of the site.	

					Furthermore, the Council's own Plan proposes circa 400 dwellings to the east of Spondon. Again, this urban extension is considered to have a similar level of sustainability as the application site and the aforementioned approved sites. The Council's assertion that the Locko Road site was unsustainable, whilst accepting that Stoney Lane, Royal Hill Road (both of which the Council concluded through the application and proposed allocation to be sustainable) and Dale Road Proposals were all sustainable, is contrived and indefensible. Furthermore, in the context of Derby City's unmet needs, a site being located slightly beyond optimal walking distances from a complete set of services and facilities does not amount to reason to preclude development. Impact on "potentially sensitive landscape and setting of Locko Park historic estate" Evidence produced in support of the application and appended to these Regulation 19 response (Appendix 4) confirms that whilst the site plays some role in the wider setting of Locko Park, any impacts on the park are limited, on the lower end of the less than substantial spectrum of harm. Views from the parkland, house and gatehouses to the site are limited, and where can be seen are in the context of the existing built form of Spondon. The SA acknowledges that harm arising is only of a minor negative in respect of townscape and landscape and neutral against historic environment. Harm is, by the Council's own assessment, low. This is reflected in the evidence collated in support of this document and appended to these representations. As such, impacts on Locko Park or wider Landscape reasons clearly do not constitute a reason to preclude an allocation.	

					Spatial Strategy The SA concludes in relation to the Locko Road site that "due to green belt sensitivity and these other constraints, as well as the spatial strategy of seeking to maximise use of brownfield land to meet need wherever possible during the allocations process, and only then turning to allocate Green Wedge or Green Belt sites if need could not be accommodated elsewhere, the site was not selected for allocation in the Regulation 19 plan". This is another contrived position and again highlights a fundamental misunderstanding of the NPPF by the Council. BHL accept that there should be a hierarchical approach to development, utilising brownfield and Grey Belt first, however, in the context of 6,500 homes unmet need, it is clear that the Council's spatial strategy cannot maximise its supply without Green Belt. Paragraph 148 is clear that "plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations" [our emphasis], where those needs cannot be met in sequentially preferable locations, Green Belt land should be used. Conclusions on SA It is telling when comparing Locko Road and Stoney Lane, that both receive the same Significant Negative in respect of geology and soils. Whilst Stoney Lane does admittedly score better on some matters, the two sites are broadly comparable. If this Plan was meeting needs in full, and if the according to a sound spatial hierarchy Spondon needed only one site to meet its requirement, then it would be difficult to argue that the Stoney Lane site being allocated was unsound. However, that is not the case,	

					Derby City is declaring unmet needs and is required to maximise its housing delivery prior to exporting it to the wider HMA. As explored above, there is nothing within the SA assessment that suggests Locko Road should be excluded and its potential housing delivery exported elsewhere, which may require Green Belt release in Amber Valley to meet. The Council's decision is evidentially based on Green Belt rationale, and as set out above and in the appended Define GBA, this position is unsound.	
Johnson Mowat on behalf of Harworth Group	Sustainability Appraisal	Supports			Harworth Group note that the site assessment of the HA7 site allocation (Stoney Lane, Spondon) contained within Appendix E of the Sustainability Appraisal Regulation 19 SA Report (items SA12 and SA13) indicates the site to be in Flood Zone 3 and within 50m of flood defences. Our review of the published 'flood maps for planning' and preceding advice of environmental consultants acting for Harworth Group indicates the site to be in Flood Zone 1 and with no areas at surface water flood risk other than the ditch/watercourse to the east boundary. It is requested that this aspect of the Sustainability Appraisal report is reviewed and any corrections made as necessary.	
Transport Modelling						
National Highways	Transport Modelling				Following our Regulation 18 representation, National Highways confirmed in correspondence with the Council in April 2026 that we considered the Derby	

					HMA transport modelling to be an appropriate and proportionate basis on which to assess the cumulative impact of the Plan's growth on the SRN, in place of requiring individual site-specific assessments for every allocation. This position was agreed on the understanding that the HMA modelling reflected, in full, the pattern of growth ultimately proposed through the Plan. In July 2026, in assisting the Council with preparation of the Infrastructure Delivery Plan, National Highways undertook an independent review comparing the development assumptions in the Derby HMA transport modelling against the site allocations proposed in this Regulation 19 Submission Draft Plan. This review found that the HMA modelling understates the scale of development proposed outside the City Centre by approximately 800 dwellings, the most significant element being the complete omission of the Stoney Lane allocation (Policy HA7, minimum 400 dwellings). This site was identified at Regulation 18 consultation as likely to impact the A52 Spondon Roundabout.	

The following people created accounts in the online software but did not submit any representations:

Andrew Birchall

Serhii Zinkevych

The following representations were received after the stated deadline:

Aliasgar Gulamhussein	Policies E1 and E2

Photograph submitted by Emma Banks to support the representations for Policy HA7: Stoney Lane, Spondon



Photographs submitted by Sharon Cooper to support the representations for Policy HA7: Stoney Lane, Spondon







Photograph submitted by Georgie Cox to support the representations for Policy HA7: Stoney Lane, Spondon



Photographs submitted by Emma Davis to support the representations for Policy HA7: Stoney Lane, Spondon







Photograph submitted by Stephen Peat to support the representations for Policy HA7: Stoney Lane, Spondon



Photographs submitted by Stuart Pickles to support the representations for Policy HA7: Stoney Lane, Spondon







Photographs submitted by Samantha Shaw to support the representations for Policy HA7: Stoney Lane, Spondon





Photograph submitted by Thomas Sweeny to support the representations for Policy HA7: Stoney Lane, Spondon

