Regulation 22 Consultation Statement

Part 1: Regulation 18 Stage

Derby City Council

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1. Introduction

1.1. Purpose of Document

1. The purpose of this consultation statement is to provide an overview of Derby City Council's (hereinafter referred to as 'the Council') consultation process for the scoping priorities and Regulation 18 Local Plan for Derby (LPD) Submission Document and its associated supporting documents. This statement aims to demonstrate accordance with the consultation engagement required by Regulations 18 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2. **This document constitutes a Part 1 of the Regulation 22 Consultation Statement, please see Part 2 for details of the following process undertaken during the Regulation 19 Consultation.**

3. This Regulation 22 Consultation Statement has been produced to respond to the therefore fulfil the requirements set out in the Regulations, specifically regarding Regulation 22(1) part (c), as set out below:

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

4. Pursuant to the Regulations set out above, this document establishes the details of representations made for consistency with Regulation 20, a summary of the main issues raised in those representations, and how the Council has responded to issues raised to inform the preparation of the Regulation 19 LPD Draft Submission Plan.

1.2. Background

5. The Local Plan for Derby (LPD) will replace the adopted Derby City Local Plan Core Strategy – Part 1 (2017) (DCLP1) and the saved policies of the City of Derby Local Plan Review (2006) (CDLPR), which currently comprise the development framework for the city. Once adopted, the LPD will look ahead to

2043 and play a key role in managing future growth and informing planning decisions across the city.

6. The Council has undertaken multiple stages of consultation in the preparation of the LPD. These cases of community participation and stakeholder engagement have shaped the plan-making process, ensuring that policies and allocations have been informed by a range of local priorities, evidence and consultation feedback.

7. This Part 1 of the Regulation 22 Statement details the background to the production of the LPD through the Local Plan Priorities Consultation. It also reflects on the responses received during the Regulation 18 consultation period running from 12th January 2026 to 9th March 2026. These consults present fulfilment of stages 1-2 of Local Plan preparation in alignment with the Statement of Community Involvement (SCI).

8. The following Part 2 Regulation 22 statement provides the full details of the Council's engagement with statutory bodies, organisations, businesses, residents, and other interested parties during the 6-week consultation period from 12am 27th July 2026 to 5pm 8th September 2026 on the Regulation 19 LPD 2023-2043 Submission Draft Plan and its supporting documents. As such, this document specifies compliance with stage 3 (Pre-Submission Local Plan) of the Council's SCI.

2. Statement of Community Involvement

9. The Council's Statement of Community Involvement (SCI) was adopted in 2023. This document outlines the standard for engagement with the community and stakeholders to guide the preparation of the Local Plan, as well as part of the Development Management process.

10. The SCI lists a number of consultation approaches that may be utilised to increase community and stakeholder outreach during the preparation of the Local Plan. The consultations conducted to inform the Local Plan process meet the requirements set out in the SCI, as demonstrated by **Appendix C**.

3. Local Plan Priorities Consultation

11. The Local Plan Priorities survey was a consultation undertaken in 2024 to help inform the early stages of preparing the next Local Plan for Derby. It helped develop the Council's understanding of what the Local Plan ought to contain.

12. The survey was originally developed as part of the work on a proposed "Part 2" of the adopted Derby City Local Plan Part 1 Core Strategy. However, following a change in political direction and review of plans across the wider Housing Market Area (HMA), that approach was not taken forward. Instead, it was considered appropriate to revisit and refine the evidence base, drawing on the foundations of established through the Part 2 work to inform the preparation of a new, up-to-date plan.

13. The Local Plan Priorities consultation provided an important opportunity to engage with stakeholders and the Derby community to inform the scope and direction of the emerging Local Plan. The survey was primarily conducted online, with paper copies, different versions and translations available on request. Respondents were also given the opportunity to write in or email their response to a specific address. The survey was open for 6 weeks, closing on Monday 25th March 2024.

14. The survey was comprised of both open and closed questions to identify key planning issues that the emerging Local Plan should address. The questions are summarised responses can be viewed here:

    Local Plan Priorities Survey Consultation Results

15. A total of 550 responses were received. A summary of responses was included at the beginning of each chapter of the Regulation 18 Local Plan, as well as a summarised response of how the Plan responded to the priorities and concerns raised. The summarises emerging from the Local Plan Priorities survey are included in this report for completeness.

4. Local Plan Priorities Consultation Response

4.1. General Development Principles

16. This chapter provides the foundation for ensuring that all new proposals contribute positively to Derby's built environment and the communities they serve. The policies set expectations that development must respect local character and context; support high standards of amenity; and create accessible, safe and healthy spaces.

17. The principles also guide well-reasoned placemaking, resilience and comprehensive growth, whilst also ensuring that infrastructure and developer contributions are secured to support the communities impacted by development. Together, these principles establish a consistent framework against which proposals can be assessed and enforced to deliver sustainable, well-designed and inclusive development across the city

"You Told Us", Consultation responses on this topic in the Local Plan Priorities Consultation

18. The Local Plan Priorities Consultation revealed the diverse themes covered in the General Development Principles chapter were given variable weight.

19. Significant importance was placed on the role of design in shaping the urban environment. This was made particularly evident by 448 respondents emphasising that new housing development must respect the character and context of adjoining areas of the city. 22.4% of respondents (125) highlighted that a key priority of the Local Plan should be to encourage higher-quality design that fosters places that are attractive, safe, and well-connected. These respondents stressed the need for care and creativity in the design of future developments. This included calls for greater attention to the quality and variation of materials, as well as, for design approaches that are sympathetic to the local context and character.

20. The intersection between design and safety also emerged strongly; 315 respondents supported a focus on creating living environments that are both attractive and safe. Several respondents further suggested that the plan should address how design can help reduce or prevent anti-social behaviour.

21. Some respondents encouraged stronger provision for health and wellbeing within the plan. This was often framed in terms of fostering community cohesion and supporting intergenerational living, both of which were seen as vital for creating inclusive neighbourhoods.

How We Used These Responses to Develop the Regulation 19 Draft Plan

22. We worked through the National Design Guide, the National Planning Policy framework, and our existing design policy and guidance to emphasise the importance of this policy in all applications and make it more accessible to both applicants and decision makers. In doing this, the consultation messages above were given high priority. These principles will apply across the local authority area, wherever development occurs in Derby.

4.2. Housing

23. As Derby continues to grow and evolve, providing the right type of housing in the right locations is essential for meeting the needs of current and future residents. This includes addressing the challenges of affordability, ensuring a mix of housing type and tenures, and supporting both an ageing population and younger households entering the housing market. Diverse objectives such as economic growth, social inclusion, health and wellbeing and environmental sustainability are dependent on a well-planned housing strategy for accommodating growth.

24. This chapter sets out the approach for meeting the city's housing needs over the plan period, ensuring that growth is managed sustainably and delivers high-quality places for people to live. The chapter outlines specific policies in relation to affordable housing, specialist housing, Houses in Multiple Occupation (HMOs) and gypsy and traveller sites to ensure an adequate and diverse supply of homes is achieved. It also highlights the importance of ensuring that new housing and extensions to pre-existing housing is well designed and integrated into their context. These concepts have been informed by the following key points raised during the consultation.

"You Told Us", Consultation responses on this topic in the Local Plan Priorities Consultation

25. The Local Plan Priorities Consultation indicated that housing is a key consideration for the emerging Local Plan and that the issue cuts across most of the chapters within this plan.

26. The consultation placed significant emphasis on the typology of housing and the need for a balanced approach to provision. Affordable housing emerged as a key priority, with 28% (156) of respondents identifying it as a central focus on the Local Plan. More broadly, 452 respondents expressed support, to varying degrees, for the delivery of affordable homes. There was also strong recognition of the importance of meeting the needs of specific groups within the housing stock. 470 respondents agreed that care homes and extra care housing should be supported by the Council. In addition, 446 respondents emphasised the need

for family homes. These sentiments highlight the importance of ensuring that new development responds to the diverse housing requirements of the city's population.

27. Conversely, 235 respondents expressed opposition to increasing the supply of Houses in Multiple Occupation (HMOs). Opinions were more divided regarding the provision of gypsy and traveller sites; 156 respondents agreed that such sites should be supported by the Council, 226 disagreed, and 165 remained neutral.

28. Regarding the preferred location of new housing, a clear majority of respondents supported a regeneration-led approach, 83.5% (467) of respondents agreed that new development should be concentrated in areas requiring renewal, such as the City Centre and brownfield sites. Most (77.1% 431) respondents opposed strategies which prioritised the release of greenfield land (including green wedge and green belt) for new homes. Some respondents, however, noted that the limited release of green wedge land could be acceptable if the principle of the wedges was maintained and if a significant housing need was clearly demonstrated.

29. The quality, accessibility and sustainability of housing was recognised as a strong priority for the plan. 82.3% of respondents agreed that new homes should be designed to be accessible and adaptable for wheelchair users and people with mobility impairments. 89.1% of respondents agreed that all new homes should have liveable room sizes and adequate floorspace to ensure a good quality-built environment. This emphasis on quality aligned with the strong support for the reuse and refurbishment of derelict and underused buildings, with 88.6% of respondents favouring the conversion of existing 38 buildings into new homes, particularly for upper floors in the City Centre. A notable number of respondents expressed further support for more high-rise housing in the City Centre to meet the housing needs of younger people and support the city's growing business community.

How We Used These Responses to Develop the Regulation 19 Draft Plan

30. Given the City's housing need, as set out in the Government's standard method calculation, it is clear we are not going to be able to accommodate the full need within the City's boundaries within the plan period. To do so would mean losing many of the City's key green spaces. To avoid this, we have worked with our neighbouring councils to develop a Housing Market Area based strategy for the delivery of housing, which will see housing delivered in South Derbyshire and Amber Valley local authority areas to meet need, as part of carefully planned urban extensions.

31. In meeting our own housing requirement, we have reflected on the outcomes of the Local Plan Priorities Consultation and national government policy and guidance and focussed our housing delivery search first on previously developed land, particularly within the City Centre, and then looked at the most sustainable locations for greenfield (undeveloped) land to meet need which could not be met within brownfield sites.

32. We have also carefully considered the need for a range of housing types, and scales of development. National policy requires plans to make provision for 'housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build.' As well as: "specialised housing for those with support or care needs". In the policies in this chapter, we have sought to meet these requirements, making provision for accessible housing, housing for older people and setting priorities and principles for determining applications related to houses in multiple occupation. We have also sought to address the area's need for gypsy and traveller accommodation within the plan period.

33. The Plan's residential allocations are split between City Centre and Non-City Centre locations, with the City Centre allocations being set out in that chapter.

34. We have also sought to address the area's need for Gypsy and Traveller accommodation within the plan period. The council along with other Derbyshire councils and East Staffordshire commissioned a need assessment for Gypsy and Traveller Pitches in accordance with government guidance. This was published in April 2023.

35. During the development of the Draft Local Plan a call for sites was made. No privately owned sites were submitted for Gypsy and Traveler use. Given this lack of promotion and therefore uncertain supply, it was considered that there needed to be a Council owned site to guarantee deliverability. A long list of nearly 90 Council owned sites was narrowed down to nine that were potentially available, and which would be large enough to meet the need over plan period.

36. The nine short listed sites were considered in relation to several factors using a proforma such that all sites were considered equally against the same criteria.

37. The criteria against which the sites were considered included:

- Physical: availability for use/ future potential, accessibility, potential contamination, site location and place shaping
- Environmental: whether in Green Belt or Green Wedge, Wildlife site, flood zone
- Social: access to social facilities e.g. schools, shops, medical etc., the road network, and whether other Gypsy and Traveller sites are close by.

4.3. Economy

38. A strong and resilient economy is fundamental to Derby's success, shaping opportunities for businesses, residents, and future generations. The economy is shaped by multiple intersecting local and national challenges and prospects; from adapting to new patterns of work and consumer culture, to responding to technological changes and the need for sustainable growth.

39. This chapter specifies the policies for guiding economic development, including the provision and protection of high-quality employment land and office space, defining areas for retail and promoting the food, drink and evening economy. In addition, it recognises the vital role of culture and tourism alongside the need to cultivate local skills for an inclusive economy. Together, these policies aim to secure a balanced economy that is adaptable, competitive and capable of delivering sustainable long-term benefits across the city.

"You Told Us", Consultation responses on this topic in the Local Plan Priorities Consultation

40. The Local Plan Priorities Consultation illustrated the value given to employment opportunities and locations for the emerging plan.
41. 91 respondents emphasised that jobs and training opportunities should be a key priority of the Local Plan, particularly with respect to employing local people.
42. In regard to employment land allocations, 88.2% (476) of respondents agreed that the right approach was to protect the existing allocations from the last Local Plan. However, there were mixed opinions on the preferrable location for new office development within the city. A significant 77.1% (417) of respondents agreed that new office development should be directed towards the City Centre. Some respondents expanded on this view, stating that offices would bring more vibrancy to the City Centre. However, amongst the 22.9% (124) of respondents who opposed further office development in the City Centre, several concerns were raised. These included the potential for additional offices to exacerbate existing traffic congestion, insufficient parking provision to accommodate office workers, and a preference for directing new office development closer to where people live, particularly within suburbs.
43. A recurrent topic in the consultation was whether the rise of home working has made further office development redundant. Some respondents highlighted that remote working has contributed to lower traffic levels across the city, reduced car-dependency, and left many existing office spaces underused or vacant. Respondents suggested that underused offices, as well as other unoccupied spaces across the city, should be repurposed for alternative uses to help stimulate the local economy.
44. Shopping was deemed a key priority for the Local Plan by only 47 respondents. However, when prompted further, many respondents emphasised that they felt that the number of empty shops had reduced the City Centre's function as a destination for shopping. 129 respondents identified culture and tourism as priorities for the Local Plan. Their comments highlighted concerns that culture is currently neglected in the city and emphasised the need for a greater range of activities to attract and engage visitors.

How We Used These Responses to Develop the Regulation 19 Draft Plan

45. The policies in the economy chapter seek to ensure that sufficient new employment land will be available during the plan period to meet potential future needs, whilst also providing a range of land options to suit different types of requirements. The employment 90 land strategy carries forward existing allocations and reflects committed development projects, taking account the findings of the most recent Employment Land Review (ELR).
46. The strategy also seeks to protect important areas of existing employment land, particularly where it is fundamental to the operation of the local and regional economy. This includes areas that are currently home to our biggest and most important employers such as Rolls-Royce and Alstom. In encouraging the use of Local Labour Agreements, we hope to ensure that more people have an opportunity to gain valuable skills and experience, enabling them to positively contribute to the economy.
47. The policies seek to direct new office development into the City Centre in the first instance, specifically the 'Central Activity Area' (CAA), helping to drive footfall and regenerate the more northern parts of the City Centre. However, it is recognised that it may not be suitable for all forms of office development to be located in this area and therefore flexibilities are included in our approach.
48. The approach to retail development largely carries forward the existing strategy, whilst acknowledging the complicating factors introduced by the new E use class. The retail strategy seeks to direct investment in new retail floorspace into the City Centre in the first instance, in this case the newly defined Primary Shopping Area (PSA).

4.4. Environment

49. Derby's natural and historic environments are pivotal to its unique character, identity and sustainability. This chapter sets out the planning policies for protecting, enhancing and managing these vital assets across the city.
50. The natural environment refers to green spaces, biodiversity, and ecosystems that are of particular importance for retaining local distinctiveness and connections to nature within the urban environment. Likewise, the historic environment relates to man-made built forms (such as listed buildings) and designated areas of significance (such as the Derwent Valley Mills World Heritage Site and the city's conservation areas) that reflect Derby's cultural legacy.
51. This chapter recognises the interconnectedness of natural and historic environments for contributing to the local distinctiveness and environmental quality of Derby. Although this chapter provides focussed policies on these assets, it is important to acknowledge that their significance and relevance are integrated throughout the entire Local Plan.

"You Told Us", Consultation responses on this topic in the Local Plan Priorities Consultation

52. The Local Plan Priorities Consultation highlighted the significance regarded to these assets by the Derby community.

53. The natural environment was considered the greatest focus for the emerging Local Plan by 371 out of 559 respondents. There was overwhelming support for the protection and enhancement of green spaces and biodiversity; the importance of open space and the need for its maintenance was agreed upon by 97.5% (545) of respondents. Likewise, 90.5% (505) of respondents agreed that all open space should promote nature conservation and biodiversity.

54. The strong value accredited to Derby's Green Wedges reflects this consensus on the importance of open space. 91.8% (507) of respondents supported the role of Green Wedges to define and separate neighbourhoods and to allow the countryside to permeate into the city. However, the consultation also revealed further Green Wedge functions which accentuate their value, such as use for accessing parks and open space, connecting with nature, informal exercise, and improving health and well-being. Considering these uses, a significant proportion of respondents therefore agreed that Green Wedges should be protected from inappropriate development (95.3%, 532).

55. The outcomes of the consultation have shown that there are mixed opinions on reviewing Derby's Green Wedge boundaries in the next Local Plan. 65.3% (365) of respondents were against reviewing the boundaries at all, whilst 30.3% (169) agreed that a review was needed only if meaningful Green Wedges were retained. Many respondents argued that it is important to protect green assets in the city, but these assets are of varying quality.

56. The consultation also accentuated the significance placed on conserving Derby's historic environment. Many respondents emphasised the need to ensure that development fits the character of the area it is within, and the need to protect historic assets through repurposing. Of the 559 responses, 460 agreed that the re-use of listed buildings and other heritage assets would benefit from specific design guidance; likewise, 372 respondents agreed that design guidance would be useful for development within Conservation Areas.

How We Used These Responses to Develop the Regulation 19 Draft Plan

57. This chapter seeks to protect and enhance the built and natural environment. Many policies relating to the historic environment, designated wildlife sites and Green Belt reflect national planning policy but others such as Green Wedges, Green Gaps and open space are specific to the city.

58. Since the current Local Plan was prepared, concepts such as Local Nature Recovery Strategies, Biodiversity Net Gain and Urban Greening have emerged and policies within this chapter aim to reflect these new concepts.

59. In preparing this Local Plan the Council has commissioned consultants to undertake an assessment of the city's Green Belt and Green Wedges.

4.5. Climate Change

60. Addressing climate change is a key priority when considering Derby's future growth and development. Although a global issue, the impacts of climate change have already begun to be felt within Derby through the increasing frequency and intensity of extreme flooding and extreme temperature events. These events put increased pressure on infrastructure and public services, leading to a disproportionate effect on the most vulnerable within our society.

61. Derby City Council declared a climate emergency in 2019. The second Climate Change Action Plan 2025-2027 was adopted in November 2024, setting 35 interventions the Council aims to accomplish to achieve the ambitious target of reaching net zero by 2035. Adopting a suite of Local Plan policies aimed at reducing carbon emissions, mitigating against climate change impacts and promoting green solutions supports Action 31 of this strategy.

62. Climate change is a diverse and interconnected issue that encompasses a wide range of environmental, economic and social challenges. It includes not only rising global temperatures and carbon emissions, but also related impacts such as air pollution, increased flooding and storm events, biodiversity loss, food security and energy use. This breadth emphasises how climate change is not a single issue but a complex network of interdependent factors that must be addressed holistically.

63. This chapter sets out the planning policy approach to support the city's response to climate change by managing flood risk, encouraging sustainable design and construction, and promoting the use of renewable and low carbon energy. It should be recognised that various other aspects of climate change are explored in greater detail throughout different chapters of the Local Plan; therefore, the document should be read as a whole to fully understand the integrated approach.

"You Told Us", Consultation responses on this topic in the Local Plan Priorities Consultation

64. The Local Plan Priorities Consultation highlighted that the Derby community holds significant and growing concerns about the impacts of climate change and its implications for the city's future.

65. Addressing climate change and requiring new developments to achieve net-zero was identified as the second highest priority for the emerging Local Plan, with 180 of 559 respondents ranking it amongst their top three priorities. A notable 165 respondents also emphasised that adaptation and mitigation of climate change to achieve net-zero targets should be a key focus of the Local Plan.

66. An overwhelming 92.8% (519) of respondents agreed that ensuring an integrated and sustainable approach to water management, flood risk, biodiversity and green infrastructure is important when considering new housing development within the plan period. This reflects the strong community recognition that sustainable drainage and reducing flood risk are the third highest ranked priority for the emerging Local Plan for 176 respondents. 93.4% (522) of respondents agreed that new buildings should be built to higher energy efficiency standards and as well as more emphasis placed on encouraging the re-use of buildings and recycling of building materials. Together, these responses underscore a clear

desire for the emerging Local Plan to encourage new developments to adopt holistic, low-carbon and climate-resilient approaches.

67. A notable number of responses emphasised that the emerging Local Plan must account for the accelerated pace of climate change, with impacts expected to be more pronounced during this plan period than under the previous Local Plan. Respondents stressed the importance of setting more ambitious climate policies, emphasising the need to adapt to changes already underway as well as exhibit greater urgency for enhancing resilience and preparedness for future climate-related challenges.

68. The consultation revealed a deep and widespread concern within the community about issues closely related to climate change, including sustainable transport, green and blue infrastructure, and biodiversity. While these issues are integral to the overall strategy surrounding climate change, the comments on these cross-cutting issues are addressed in greater detail within their respective chapters. It is therefore recommended that the Local Plan is read as a whole to fully understand the interconnected and holistic nature of the policies for collectively supporting action against climate change.

How We Used These Responses to Develop the Regulation 19 Draft Plan

69. Since the current Local Plan was adopted, the climate change crisis has become more and more important. Consequently, policies in this chapter reflect the need to address the impact and causes of climate change.

70. Consequently, this chapter includes policies on flooding and water efficiency, sustainable design and construction for new and existing buildings, including historic buildings, and a policy which supports the development of renewable energy infrastructure.

4.6. Infrastructure and Community Facilities

71. Infrastructure and community facilities constitute social, recreational and cultural services and spaces to meet the needs of a community. These include schools, healthcare centres, libraries, leisure facilities, places of worship, and essential services to support daily life. Such facilities are not only critical to the functioning of any urban area, but also to its vitality, identity and inclusivity. Ensuring that infrastructure develops to keep pace with growth is vital to creating a resilient city, and supporting the quality of life for residents and visitors alike.

72. This chapter considers the diversity of services that communities rely upon throughout their lifespan, including social, educational and healthcare facilities as well as cemetery provision. It also highlights the critical role of modern communication infrastructure in supporting these services and enabling economic opportunities for Derby.

"You Told Us", Consultation responses on this topic in the Local Plan Priorities Consultation

73. The Local Plan Priorities Consultation calls attention to the great significance placed on infrastructure delivery to support existing and emerging communities across the city.

74. Making sure we work with developers and infrastructure providers to ensure new development is supported by the right infrastructure was the highest ranked priority that the Local Plan should require for new development, as specified by 292 respondents. This emphasis was further reflected by the importance given to issues regarding infrastructure delivery, when respondents were prompted to consider issues for new housing development. 83.7% (468) of respondents deemed access to school places to be significant. 92.8% (519) of respondents regarded access to health facilities (such as GP surgeries) to be a critical consideration. And 86.8% (485) of the overall respondents determined having enough onsite or nearby facilities (such as shops) to meet everyday needs without having to travel by car to be a significant issue.

75. Numerous responses referred to the importance of community facilities such as schools, health facilities and meeting places for supporting the sustainable growth of communities and maintaining a high quality of life. Respondents emphasised that new development must be properly supported to reduce pressure on existing services and adapt to the changing health and wellbeing needs of an ageing population. 86 participants stated that community buildings with opportunities for local activities should be focused on to foster social cohesion.

How We Used These Responses to Develop the Regulation 19 Draft Plan

76. It is imperative that the necessary community facilities are provided to support Derby's growth. Reflecting this, the policies within this chapter have been carried forward and updated from the current Local Plan.

77. Policy ICI1 ensures that a wide range of cultural, health, education and community facilities are provided through housing development, and the policy concludes by seeking to ensure that existing facilities aren't lost.

78. There is a need to create a new cemetery within the city to meet future demand, and Policy IC2 allocates an agreed site and provides criteria to ensure that it doesn't have an adverse impact on the Green Wedge.

79. Subsequent policies deal with education provision; from all levels of schools to ensuring the continued growth and development of higher and further education establishments within Derby.

4.7. Transport and Movement

80. Different modes of transportation and movement are central to the way that Derby functions and grows. A well-connected city underpins opportunities for economic prosperity, access to services, social inclusion, and the achievement of environmental ambitions. However, Derby, like many other cities across the UK, faces significant challenges such as traffic congestion and air pollution.
81. To address these challenges, there is an urgent need to shift towards an alternative and sustainable transport system. Traditional approaches that depend on expanding car centric infrastructure only serve to perpetuate car dependency, congestion, environmental and health harms and vulnerability to transport poverty; whereas sustainable transport solutions and making daily needs more accessible can help to break this cycle.
82. This chapter considers the role of different modes of transport for enabling movement across the city, such as active travel, public transport, and private vehicles. It addresses opportunities to support growth through the delivery of infrastructure on new developments to encourage a more adaptable, accessible and sustainable transport system. The chapter also recognises Derby's strategic role as part of the wider transport network.

"You Told Us", Consultation responses on this topic in the Local Plan Priorities Consultation

83. The Local Plan Priorities Consultation accentuated the mixed opinions in relation to the transport strategy for the emerging Local Plan.
84. Many respondents expressed a desire to reduce their reliance on private cars for travel, but highlighted that barriers within the transport network currently limit their ability to do so. 489 respondents felt that having a choice of travel options for new developments to prevent car reliance was a key issue when considering new housing development within and around the city.
85. Some respondents reflected on shortfalls in bus frequency and route options that prevented convenient connectivity across the outer city, and therefore made cars necessary for travel. Others highlighted a need for a transport modal shift to encourage active walking, wheeling and cycling as practical and sustainable alternatives to cars, emphasising that more walkable cities are more desirable to live in. Some responses emphasised the need to design out the need for cars, particularly in relation to encouraging sustainable communities for new developments, and prioritising parking for the elderly and disabled.
86. 37.4% (209) of respondents identified encouraging less reliance on cars and more high quality safe routes for walking, wheeling and cycling as a crucial focus for the Local Plan. Likewise, supporting and enhancing access to frequent and reliable public transit was favoured by 34.9% (195) of respondents; and 34% (190) respondents encouraged to make the best use of existing transport networks to reduce pollution and improve air quality.
87. However, some respondents submitted views contrary to these sentiments, proposing that there is not enough car parking in the City Centre, and that more parking is needed to encourage visitors into the city. These juxtaposing viewpoints emphasise the complexity of addressing competing priorities for sustainability and convenience within Derby's transport network.

88. 68.9% (385) of respondents agreed, to varying extents, that new housing should be equipped with sufficient electric car charging points to meet future demand. This aligns with the broader majority view, expressed by 494 respondents, that sustainable transport options should be accessible to all. Additionally, several respondents emphasised the need to address congestion and air pollution in Derby through the active encouragement of alternative modes of transportation.

89. Whilst objections were raised in regard to the A38 expansion project, it should be noted that this scheme falls under the responsibility of National Highways and therefore lies outside the remit of the Local Plan.

How We Used These Responses to Develop the Regulation 19 Draft Plan

90. Transport modelling, commissioned by the HMA authorities will explore the impact new development, in and adjacent to the city, will have on the local road network. The results will help to inform future mitigation measures that will be included in Policy T2 and the Infrastructure Delivery Plan which will be published alongside the Submission Local Plan.

91. Reflecting the submitted responses, Policy T1 has set a transport hierarchy which should be followed in all new developments. The hierarchy puts active travel such as walking, wheeling, cycling and public transport at the top while private vehicles are discouraged.

92. To assist in the transition to more sustainable forms of transport, the Local Plan has introduced the concept of mobility hubs. These hubs can be different sizes, located in various locations and can provide a suite of facilities.

93. To help facilitate the transition to electric vehicles, Policy T5 sets out standards for the provision of EV charging points for non-residential development. The requirement to provide charging points in residential development is already contained within Building regulations, Part S.

94. The policy stance over City Centre parking will evolve between this document and the Submission Local Plan which will be available for consultation in 2026 following the publication of the Council's parking Strategy.

4.8. City Centre

95. The City Centre sits at the heart of Derby's identity, economy and cultural life. As a key destination for employment, shopping, leisure and learning, it plays a vital role in how the city is experienced by residents and visitors. However, the City Centre faces a number of challenges, including the changing nature of retail, anti-social behaviour and the need to create a more inclusive and attractive environment. The City Centre must respond to the competition of other destinations across the region by dismantling barriers to visitation and utilising its unique character.

96. This chapter sets out the approach to planning for the future of the City Centre to ensure balanced and cohesive growth. It addresses the need to deliver more

City Centre homes, as well as the equally important demand for a stronger retail, food and drink offer and a diverse range of business spaces to make the centre more vibrant and competitive. The focus on components such as active frontages, high-quality streets and spaces and a well designed public realm emphasises the pursuit of a safe, welcoming and inclusive environment. Attention is also given to the role of tall buildings, cultural and creatives uses and opportunities for learning, alongside the creation of quiet zones. Together, these considerations aim to create a City Centre that is a thriving place to live, work, study and visit.

"You Told Us", Consultation responses on this topic in the Local Plan Priorities Consultation

97. The Local Plan Priorities Consultation stressed the great significance afforded to the City Centre by the Derby community.

98. 83.5% (467) of respondents emphasised that the City Centre, alongside other areas of brownfield land, should be the primary focus of new development for regeneration. This view was consistent with the 58.9% (329) of respondents who supported higher-density development in the City Centre as a way of protecting greenfield land from release.

99. When asked about the key messages the Local Plan should address for the City Centre, several themes emerged. 72 respondents reflected on the built environment, with comments ranging from the importance of conserving and complementing the historic character of the City Centre to concerns about unattractive modern buildings and the number of unkempt and vacant shop units. 67 respondents focused on transport and accessibility, stressing the need for better public transport links and stronger support for active travel. Whilst many called for a reduced reliance on cars, some respondents highlighted that parking provision must still accommodate for the needs of less-mobile visitors. Concerns about safety also featured strongly as 42 respondents raised issues around anti-social behaviour. These concerns highlighted that the Local Plan should support initiatives to make residents and visitors, particularly families and vulnerable groups, feel safer in the City Centre.

100. Finally, many respondents drew attention to the public realm, expressing a desire for more vibrant and welcoming spaces. Suggestions included creating a stronger café culture, increasing outdoor seating and providing a wider range of attractions to encourage visitors to explore beyond the Derbion shopping centre.

101. Prior to the Local Plan Priorities Consultation, the Council also consulted on a document called 'Towards a New Vision for Derby City Centre – Ambition' in 2022. The 'Ambition' document identified many ideas and potential interventions to radically transform the City Centre to make it 'people centred' and fit for the 21st century. Key messages from the consultation feedback indicated a clear desire for transformational change that is properly managed and curated. There was also strong support for diversifying the 'offer' in the City Centre, recognition of the importance of enhancing the public realm network and the need to put

culture at the fore front of our regeneration activities. A summary of the feedback can be read on the Let's Talk Derby consultation platform.

How We Used These Responses to Develop the Regulation 19 Draft Plan

102. The Council recognises that the City Centre needs to be prioritised as the single most important location within the administrative area for investment, renewal and regeneration. The draft plan contains a chapter dedicated to the City Centre containing 15 policies aimed at transforming the City Centre, making it fit for the 21st century and building on many of the ideas contained in the Council's Ambition document published in 2022.
103. It identifies a range of residential allocations, with the City Centre anticipated to accommodate over 40% of the plan requirement in terms of housing numbers. However, it recognises that residential development alone cannot transform the City Centre and identifies locations for non-residential led regeneration, including the Market Place and supporting the University's aspirations around the Agard Street area.
104. In addition, the City Centre chapter identifies locations most suitable for tall developments, whilst also providing strategies for directing new retail, office and leisure use, maintaining active and inclusive ground floor frontages on key streets, public realm renewal and managing late night uses.
105. The holistic and joined up approach is designed to provide greater certainty and confidence, significantly simplifying the approach taken in the current plan.
106. It is acknowledged that further work is needed to support the strategy set out in the draft plan, with further evidence and strategies currently being developed, such as the City Centre Parking Strategy, Public Realm Strategy, whilst there is also a need for more detailed master-planning of sites and continued support for ongoing regeneration activities.

5. Draft Local Plan for Derby Consultation (Regulation18)

107. The Draft Local Plan for Derby Regulation 18 consultation marked the first opportunity for the public to review and provide comments on the proposed policies and spatial strategy. The consultation ran for an eight-week period from 12 January 2026 until 9 March 2026.

108. Derby City Council produced the following documents as part of Regulation 18 consultation:

- Regulation 18 Draft Local Plan for Derby
- Sustainability Appraisal Regulation 18 Interim Report
- Equalities Impact Assessment
- Green Wedge Map Pack
- Habitats Regulations Assessment

109. The Regulation 18 Draft Local Plan for Derby sets out the overarching spatial vision and strategy for the city. It establishes the proposed policies that will guide future development and identifies the Council's preferred locations for strategic housing and employment growth over the plan period from 2023 to 2043. The document also draws on the previous Local Plan Priorities consultation, including a summary of the responses received and demonstrates how this feedback has informed the development of the draft plan.

110. The Sustainability Appraisal (SA) Interim Report was prepared by SLR Consulting Limited and published to accompany the Regulation 18 Draft Plan consultation. The report's purpose is to appraise the social, environmental and economic effects of the proposed plan to ensure that decisions made contribute towards achieving sustainable development.

111. The Equalities Impact Assessment is a document produced to highlight the likely impact of the Local Plan for Derby on several identified characteristic groups. The document also identifies the actions required, where necessary, to improve the policies. The Equalities Impact Assessment was produced to ensure the Council complies with the Equalities Act 2010 and the Public Sector Equality Duty (PSED).

112. The Green Wedge Map Pack is a document detailing the proposed changes to Derby's Green Wedges in response to the 2025 Green Wedge Review conducted by Land Use Consultants (LUC). The document details the boundary amendments proposed.

113. The Habitats Regulations Assessment was prepared by SLR Consulting Limited to test whether the Local Plan for Derby could harm the designated features of listed and proposed European and Ramsar sites. The screening concluded that no sites would be impacted by the Local Plan.

114. This consultation report from here on outlines the consultation and engagement activities that were undertaken for the Regulation 18 Draft Local Plan stage of Derby City Council's emerging Local Plan. This report covers the eight-week public consultation between Monday 12 January 2026 to Monday 9 March 2026.

5.1. Consultation Design and Implementation

115. In advance of the Regulation 18 Draft Local Plan consultation, a newsletter was circulated to all subscribers to the Local Plan mailing list in mid-December. This mailing list contains the contact details of specific consultation bodies, businesses (as listed in **Appendix A**) as well as members of the local community who requested to be included in this database from the link on the 'Let's Talk Derby' and Derby City Council websites. This early communication was intended to raise awareness of the forthcoming consultation period, allowing interested parties sufficient time to prepare to engage with the draft plan following the holiday period. Another email was sent to this mailing list to mark the commencement of the consultation period on Monday 12th January 2026.

116. Multiple modes of consultation response were promoted within this consultation to ensure participation was inclusive and accessible to the needs of Derby's diverse communities. Central to this approach was the use of an interactive online consultation platform, which enabled respondents to review the Draft Local Plan in detail and provide comments directly against individual policies and site allocations. A link to this software was included on all engagement material, as well as on the 'Lets Talk Derby' website.

117. Nonetheless, it was recognised that not all interested parties are able or willing to engage digitally or utilise this policy-specific format of response; as such, alternative methods of response were made available to address the digital divide and promote an inclusive consultation. The advertising material produced for this consultation stated that participants were able to submit comments via an email address. Additionally, written representations were accepted via post either as a letter format or by participants filling in the consultation form.

118. The following is a brief description of the methods used to engage with the public and stakeholders during the Regulation 18 Local Plan for Derby consultation:

5.2. Methodology of Consultation

119. Alongside the emails to the Local Plan mailing list, the consultation was advertised to interested parties. These included statutory bodies, councillors, neighbouring authorities, and the general public. The list of the stakeholders notified is available in **Appendix A**.

5.2.1. Physical Engagement Material

120. Posters advertising the consultation were set to local libraries and distributed amongst Neighbourhood Managers to distribute amongst their networks and to cover all wards within the city.

121. Local libraries and Neighbourhood Managers were also sent a printed pack of the consultation documents, including the physical Local Plan document, the FAQ sheet, and the summary document. These materials were also made available in the Council House reception and were available on request to members of the public.

5.2.2. Online Engagement

122. The consultation documents were made available to view on the Emerging Local Plan for Derby (LPD) webpage. A link to the 'Let's Talk Derby' consultation page included further detail on the Local Plan for Derby consultation and a link to the consultation software to submit online responses for the duration of the consultation.

123. The Council's Communications Team produced social media posts to advertise the consultation to a wider online audience. Posts signposting people to submit their responses were made public on Derby City Council's Facebook pages.

124. Ward councillors also circulated social media posts and postal material to their constituents to raise awareness of the consultation in progress.

125. A follow up email was sent to members of the Local Plan mailing list in intervals throughout the consultation to remind interested parties to submit their responses.

126. The contents of the Local Plan and its consultation were covered in a number of news articles, including from Derbyshire Live.

5.2.3. Internal Engagement

127. Attention was given to ensuring that all council employees were made aware of the consultation to support wider promotion of the consultation through everyday interactions with the public and to give further opportunities for feedback on policies.

- Emails were sent council-wide to senior leadership teams, department heads, and councillors to inform them that the consultation had started.
- The consultation was also publicised via the MiNews platform, a weekly email sent to employees across the council to highlight key events.
- The internal-facing AV screens around the Council House included a communications graphic throughout the duration of the consultation period.
- The lockscreens for every employee laptop were updated to display a graphic promoting the consultation, serving as a continual reminder throughout the consultation period.

128. All employees across the planning department also included set text within their email signatures to raise awareness of the Local Plan consultation during its duration.

5.2.4. Events

129. Two drop-in events were held during the consultation at the Ordish Room within the Market Hall. These events were on Saturday 31st January 2026 and Saturday 21 February 2026, between 9.30am and 3.30pm. This gave members of the public an opportunity to discuss any questions they might have about the emerging Local Plan, the consultation or process for adopting the plan with officers.

130. Exhibition Boards were presented within the room, including maps for each major housing site allocation, as well as key information for the policies within each chapter of the Local Plan.

131. Two banners advertising the event were printed, one was placed within the main area of the Market Hall to advertise the event, and one was placed outside the room the event was taking place within.

132. Printed copies of key documents were available for people to view and take with them during the event. These documents included the FAQ sheet, Local Plan Summary booklet and a QR code paper slip directing people to the consultation software if scanned. Copies of the physical Local Plan were also included at the event for viewing.

133. Two specific events were held to engage with young people across Derby.

134. The Local Plan Team attended a Voices in Action (a youth council for young people aged 11 to 19) event to discuss the Local Plan and encourage the youth council to share their opinions on the proposals. The attendees were organised into groups and prompted to rank the importance of different chapters within the Local Plan. The participants debated the priorities for development in Derby for the future. The Voices in Action members were then given a map of the entire city and prompted to indicate where they would consider appropriate locations to accommodate new housing sites to meet Derby's housing need.

135. Likewise, the Local Plan Team attended a Young Star Voices event. This group is an advocacy and community engagement initiative that brings together students from local Special Educational Needs and Disabilities (SEND) schools. The attendees were prompted to order the chapters of the Local Plan based on their importance and discuss the impact of each chapter.

136. Leader of the Council, Nadine Peatfield, signposted the Local Plan consultation at a public Q&A she attended as part of the Marketing Derby Annual Business Event.

Material and photographs evidencing the consultation can be found in Appendix B.

6. Regulation 18 Draft Local Plan Summary of Responses

137. This section contains a brief summary of the responses received through the consultation, either through the submission of comments digitally or physically, or verbal comments from numerus engagement events.

138. The summary of comments set out in this report reflects the wide range of views expressed through the consultation in relation to planning policy matters, including heritage protection, design quality, housing and employment land use, and other issues directly relevant to the preparation of the Local Plan.

139. While many responses focused on matters that fall within the remit of the planning system, others raised broader issues, including concerns about funding, service delivery, operational council activities, and the conduct of developers. These points have been recorded to ensure a comprehensive account of the feedback received.

140. It is important to note that the inclusion of a matter within this summary does not necessarily indicate that it can be addressed through the Local Plan or its associated policies. The Local Plan is required to operate within a defined statutory framework and therefore can only respond to issues that relate to land use planning and development management. Where comments fall outside this scope, they have still been acknowledged as part of the consultation process but may need to be considered through other council functions or decision-making processes.

141. This section is intended to present an overview of the main points of representation. The full set of representations received during the Regulation 18 consultation is available to view separately at:

    Emerging Local Plan for Derby (LPD) - Derby City Council

142. Whilst care has been taken to reflect the main themes expressed through the consultation responses, not every viewpoint or representation can be contained in a summary. Therefore, please refer to the full representations as required.

6.1. Vision, Objectives, and Strategy

6.1.1. Public Responses

City Centre Vision

143. Some respondents considered the city centre vision to be ambitious and aspirational, recognising that significant challenges would need to be overcome to achieve it.

144. Others regarded the vision as unrealistic, citing changing retail patterns, wider social issues and other factors beyond the scope of the Local Plan, and highlighted the contrast between the vision and current city centre conditions.

145. Several responses suggested that the vision should place greater emphasis on creating a welcoming city centre with more spaces and activities for young people.

146. Some respondents questioned whether Derby should seek to compete directly with larger regional cities, instead advocating a distinctive role and identity.

147. A number of respondents called for greater emphasis on the River Derwent as a destination and focal point for recreation, leisure and placemaking.

Vision for Outside of the City Centre

148. Respondents generally viewed the vision as positive but questioned whether it could be achieved if Green Wedges continue to be reduced for residential development and tall buildings become more prominent.

149. Several responses identified a perceived contradiction between the vision's commitment to enhancing biodiversity and access to nature and proposals that could narrow or erode Green Wedges. Thus, some respondents considered that the vision should place greater emphasis on protecting Green Wedges and the natural environment for future generations.

150. Concerns were raised that the vision does not adequately recognise existing infrastructure constraints, particularly in relation to transport, healthcare and other community services.

151. A number of respondents identified political decision-making and changing priorities as potential barriers to successfully delivering the vision.

Plan Objectives

152. Respondents generally supported the proposed objectives, noting that they largely build upon those in the current Local Plan.

153. Several responses acknowledged that delivery of the objectives will be influenced by external factors and called for appropriate risk management and mitigation measures to support implementation.

154. Some respondents highlighted the need for clear funding mechanisms to ensure the objectives can be successfully delivered.

155. While many supported the transport objectives, some considered that the Plan should continue to accommodate private car use and provide a balanced range of travel options for residents, visitors and businesses.

156. Strong support was expressed for Objective 8, particularly its commitment to protecting and enhancing Derby's Green Wedges and Green Gaps.

Spatial Strategy & Portrait

157. Broad agreement that the spatial portrait and vision provide an accurate overview of Derby's current characteristics, strengths and challenges.

158. Many respondents supported the overall ambition of the strategy while recognising that successful delivery will require coordinated action across planning, infrastructure and public services.

159. Strong support for prioritising brownfield and city centre regeneration ahead of development on greenfield land. However, some respondents stated that the reliance on the city centre is unrealistic and questioned whether existing evidence fully reflects infrastructure capacity and local needs.

160. Widespread support for retaining and enhancing Green Wedges, Green Belt, parks and green infrastructure, recognising their role in biodiversity, flood mitigation, climate resilience, landscape character and community wellbeing.

161. Many respondents emphasised the importance of protecting specific areas, including the North Oakwood Green Wedge and Chaddesden Wood, from future development.

162. Strong support for improving city centre vitality, with suggestions to increase residential development, reuse vacant and derelict buildings, and diversify economic activity beyond retail. However, some respondents questioned the emphasis o reducing private car use.

163. Concerns that new housing should only be supported where transport, healthcare, schools, utilities and other infrastructure are provided alongside development.

164. A number of responses raised concerns about reliance on external developers and commercial operators to deliver housing and supporting infrastructure, with calls for stronger mechanisms to ensure timely provision and developer accountability.

6.1.2. Stakeholder Responses

165. The East Midlands Combined County Authority supports the plan’s vision, objectives and spatial strategy, noting its alignment with its wider Trent Arc ambition.

166. Ockbrook and Borrowash Parish Council expressed overall support for the Draft Local Plan.

167. Natural England welcomed the overall vision, objectives and spatial strategy, while recommending stronger recognition of the role of green infrastructure and nature-based solutions in delivering health benefits, climate resilience,

biodiversity enhancement, flood management and improved access to greenspace.

Derby Vision

168. Strong support was expressed by the University of Derby for the Local Plan vision, especially its recognition of higher education's role in economic growth, skills development and cultural vitality, alongside its focus on advanced manufacturing, rail, aerospace and knowledge-based industries, inclusive growth, health improvement, sustainability and green infrastructure, and the prioritisation of the city centre for regeneration and innovation, all of which align with its Estate Strategy 2025–2030.

169. The Home Builders Federation (HBF) recommended that the vision for Derby be amended to refer explicitly to meeting the full range of housing needs, including market housing, retirement accommodation and family homes.

170. Peveril Homes suggests that the vision statement be amended to reflect the full range of proposed changes to the Green Wedge, including areas of narrowing, deletion and addition.

Plan Objectives

171. The County Council also noted that Green Belt is absent from the Plan's overarching objectives and recommended that an additional objective be included to recognise its continued strategic importance.

172. The Derby and Derbyshire Local Access Forum specifically supports Objectives 7, 8, 9, 13 and 14, which seek to improve travel connections and enhance networks of accessible green and blue infrastructure and open spaces.

Spatial Strategy

173. Derbyshire County Council emphasised the importance of existing joint working arrangements between itself and Derby City Council, Amber Valley Borough Council and South Derbyshire District Council, highlighting the cooperative work undertaken across all authorities.

174. Amber Valley Borough Council's representation made clear that the Council will seek to address any unmet housing need within the Derby Housing Market Area (HMA) and will continue positive engagement and collaboration with Derby City Council.

175. South Derbyshire District Council supports the proposed growth within the city boundary but recommends that the figure of 12,500 homes be treated as a minimum requirement rather than a capped level of development.

176. Several developers (JGP, Redrow Homes, Wain Estates, Richborough, Seabridge Developments Limited, The Strategic Land Group, and Ainscough Strategic Land) questioned whether the Council has sufficiently evidenced and justified the proposed housing land capacity of 12,500 dwellings, requesting transparency on the underpinning capacity work for site-specific assessment.

177. Concern was raised about the uncertainty surrounding the distribution of Derby's unmet housing need to neighbouring authorities, particularly given differing plan

timetables, changes to the standard method for assessing housing need, and increasing housing requirements.

178. The Civic Society supports the Council's aim to deliver 12,500 new homes by 2043, particularly the emphasis on directing a significant proportion of growth to the city centre, although it recommends additional wording to ensure development respects Derby's historic street pattern and urban grain, protects key views of Derby Cathedral and the Derwent Valley, and conserves and enhances conservation area and heritage asset character.

179. The HBF suggested that the overarching spatial strategy section of the HMA be revisited to reflect the emerging role of Spatial Development Strategies. The HBF also cautioned that a "brownfield first" approach should not evolve into a "brownfield only" approach, in order to ensure the delivery of a balanced range of housing types.

180. Caddick Land considers the identification of specific sites within the wider HMA to meet Derby's unmet housing need to be an unsound and premature approach, particularly given concerns about reliance on unadopted allocations in South Derbyshire for delivery and infrastructure requirements associated with Policy HA (The Hollow).

181. Seabridge Developments Limited and The Strategic Land Group question the soundness of the plan period, emphasising that adoption by 2028 would be required. The developers deem there to be not enough time to complete examination and therefore argued that the proposed plan period does not provide sufficient flexibility and should be extended to at least 2045.

6.1.3. Regulation 19 Response

182. *In response to the comments and issues raised by stakeholders and members of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*

183. Text within the vision has been amended to include further reference to nature and transport connectivity. The City Centre vision now reflects that some reliance on private car travel would remain but improved active travel and public transport services aims to widen the choices available for people to access the city centre.

184. The 12,500 homes to be delivered within the Derby city boundaries has been changed to reference that this will be a minimum instead of a cap, in order to reflect the evidence base of housing delivery during the plan period.

6.2. General Development Principles

6.2.1. Public Responses

185. Many respondents recognised the important relationship between the physical environment and both mental and physical health outcomes particularly in relation to access to greenspace. Members of the public were generally supportive of the new policy for Health and Wellbeing (GD6), especially its consideration for ensuring housing developments provide access to the natural environment.

186. Support was given towards Policy GD7 (Comprehensive and Coordinated Development) and the principle of improved cross-boundary coordination for ensuring sufficient infrastructure is obtained across multiple sites. However, some respondents note that effective implementation is required for this policy to be actualised.

187. Respondents generally supported accessibility principles within the chapter (Policy GD4 Accessible Places) to increase the inclusiveness of places. However, it was recognised that there is a need to balance accessibility requirements with affordability and demographic projections.

188. Support was expressed for Policy GD5 (Resilient Places and Community Safety), recognising the need for community safety initiatives to enhance feelings of safety within the city centre in particular. However, although design measures were acknowledged for having some impact on feelings of safety, some respondents stated that most safety-generating initiatives are implemented beyond the remit of the planning authority.

189. Members of the public supported Policy EN21 (Shopfronts), specifically measures intended to improve quality and appearance of the street scene. However, some respondents pushed for a stronger approach to shopfront design requiring uniform signage to improve consistency between shopfronts.

190. Many respondents expressed support for Policy EN20 (Advertisements) for ensuring digital displays do not distract drivers or detract from heritage assets.

191. In regard to objections and calls for amendments, respondents were primarily concerned with policy delivery, enforcement, and requests for additional policy wording.

192. Respondents felt that greater emphasis should be placed on mental health within the chapter, as well as the impact of health inequalities and social disadvantage on long-term health outcomes.

193. Comments highlighted the need for wider legislative changes on a national level to strengthen and enforce the requirements set out in Policies GD1 (Placemaking Principles), GD2 (Character and Context) and GD3 (Amenity). Respondents also requested that clearer guidance be published to help raise development standards amongst local developers.

194. Concerns were expressed regarding the strength and effectiveness of Policy GD9 (Infrastructure and Developer Contributions) in securing developer contributions where viability arguments are used to dispute obligations. Some

respondents questioned whether developments could realistically be refused and successfully defended at appeal, where contributions are not agreed. Assurances were also requested tat Council Tax would not be increased or used to mitigate the impacts of new development.

195. Although respondents supported Policy EN21 (Shopfronts) in principle, many noted that its success would depend on robust enforcement and monitoring. Likewise, several comments highlighted the need for increased Council resources for planning enforcement and monitoring to ensure policy compliance.

196. Some members of the public expressed concern that requirements for coordinated development could delay decision-making.

197. Comments on GD5 (Resilient Places and Community Safety) highlighted the need to ensure anti-terror infrastructure and security measures do not restrict access for emergency services.

198. Many concerns were raised about community safety in regard to the proposed Gypsy and Traveller site allocation. These objections emerged in relation to hazards of parking pressure and social disturbances.

6.2.2. Stakeholder Responses

199. Some developers (such as Catesby Estates, Miller Homes, William Davis and Miller Gadsby) emphasised that many of the policies within the chapter are likely to be superseded by the emerging National Decision-making Policies.

<u>Placemaking Principles and Character/ Context (Policies GD1-2)</u>

200. Support was expressed for the inclusion of green infrastructure within Policy GD1 (Placemaking Principles), with Natural England recommending greater emphasis on considering green infrastructure from the earliest stages of development design, supported by its Green Infrastructure Planning and Design Guide (2023). Likewise, Sport England recommend the policy be amended to reflect their Active Design Guidance.

201. Historic England expressed concern regarding the breadth of the criteria within Policy GD1, the relationship between the various design principles, and the weight that should be afforded to the emerging Design Guide. Historic England also recommended that Policy GD2 (Character and Context) be strengthened through additional reference to the conservation and enhancement of heritage assets.

202. The Civic Society supported the overall objectives of the design policies but considered them insufficiently detailed, recommending mandatory independent design review for major developments, the preparation of an adopted Design Code, and the inclusion of a dedicated Tall Buildings Policy.

203. Multiple developers (including Catesby Estates, Miller Homes, William Davis and Miller Gadsby) raised concerns about GD1 and GD2's expectations for compact forms and minimum densities, citing a need for flexibility in edge-of-city locations.

204. The Home Builders Federation raised concerns regarding the expectation that all proposals demonstrate compliance with every criterion within Policy GD1, questioned the city centre minimum density requirement of 80 dwellings per

hectare, and challenged the requirement for applicants to utilise the Council's 3D model. Similarly, Derbion sought further clarification on the use of the Council's 3D model

205. The Home Builders Federation also considered that references to supplementary guidance, including the City Centre Design Guide and Supplementary Planning Documents, should be contained within supporting text rather than policy wording.

206. The Derby and Derbyshire Local Access Forum support Policies GD4 (Accessible Places), GD6 (Heath and Wellbeing) and GD9 (Infrastructure and Developer Contributions), highlighting the importance of all development proposals including a comprehensive and permeable network of active travel routes. It was encouraged for horse riders to also be given consideration in appropriate locations.

207. The Derby and Derbyshire Local Access Forum recommend that Policy GD3 (Amenity) be expanded to include routes for accessible walking, wheeling and cycling.

208. Derbion objected to Policy EN20 (Advertisements) on the grounds that vinyl provides an effective method for screening back-of-house areas to produce tidy frontages; therefore, Derbion requested the discouragement of vinyl be removed from the policy.

209. Derbion also objected to Policy EN21 (Shopfronts) requiring signage be accommodated only within the fascia, citing the policy as overly prescriptive.

Other General Development Policies (Policies GD3-GD6)

210. Sport England recommend additional supportive text be added to Policy GD3 (Amenity) to clarify how existing sports facilities can generate noise impacts that fall within the scope of 'agent of change'.

211. Natural England suggested that Policy GD4 (Accessible Places) should include explicit reference to access to parks, landscapes and other accessible green spaces.

212. Derbyshire Constabulary supported the way community safety considerations have been embedded throughout the Local Plan but questioned whether Policy GD5 (Community Safety and Resilient Places) fully replaces the scope of the saved Community Safety policy, particularly in relation to counter-terrorism measures. Derbyshire Constabulary also recommended replacing references to anti-shatter film within Policies GD5 and CC6 with laminated glazing, which is considered more appropriate for new development from a counter-terrorism perspective.

213. NHS Property Services and Natural England expressed strong support for the inclusion of a standalone health policy within the Local Plan.

214. The NHS Property Service endorsed the requirement for Health Impact Assessments for major developments that have the potential to give rise to significant health impacts.

215. Natural England recommended that the Natural England Green Infrastructure Map be referenced within the supporting text of Policy GD6 (Health and Wellbeing) to identify areas deficient in accessible green space.

216. Sport England submitted their support for Policy GD6, only recommending that specific word changes and cross reference to Policy GD1.

217. Some developers (including Catebsy Estates, Miller Homes, William Davis, Miller Gadsby and Infinity Park Derby LLP) objected to the Policy GD6 requirement for Health Impact Assessments.

Comprehensive Development and Contributions (Policies GD7-9)

218. Derby Energy Network Limited recommended that Policy GD7 (Comprehensive and Coordinated Development) be amended to support bespoke infrastructure projects, such as district heating energy centres, where no specific site allocation exists, together with policy support for demonstrating an appropriate site selection process.

219. National Highways is supportive of Policy GD9 (Infrastructure and Developer Contributions) for requiring infrastructure contributions from allocations, and expect proportionate transport evidence base to support these allocations.

220. NHS Property Services welcomed the recognition within Policy GD9 of developer contributions towards healthcare infrastructure to mitigate the impacts of new housing development. The service emphasised the importance of delivering primary healthcare infrastructure alongside new housing to accommodate population growth. It was highlighted that the Local Plan must better recognise the cumulative impacts of smaller-scale housing developments on health infrastructure.

221. NHS Property Services recommended that the Local Plan include a dedicated section explaining the process for determining developer contributions towards healthcare infrastructure, ensuring that infrastructure assessments are robust and that mitigation aligns with NHS requirements.

222. It was further recommended that the Council continues to engage closely with the Integrated Care Board (ICB) and expands the supporting text to explain how healthcare contributions will be identified and secured.

223. The Home Builders Federation sought clarification on the operation of viability provisions within Policy GD9 (Infrastructure and Developer Contributions), including whether reduced policy requirements may be accepted where justified through independently assessed viability evidence, alongside the proposed claw-back mechanism.

224. Some developers (including Catesby Estates, Miller Homes, William Davis, Miller Gadsby and Infinity Park Derby LLP) emphasised that there must be justification for additional developer contributions in lines with the CIL tests. The Haworth Group emphasised that CIL and Section 106 contributions must operate in parallel to prevent the double counting of developer contributions.

225. Sport England supported Policy GD9 (Infrastructure and Developer Contributions) but recommended that it explicitly refer to both indoor and outdoor sports facilities, including playing fields, and provide greater clarity on the methodology and timing for securing developer contributions.

226. Sport England also recommended that the Council prepare an up-to-date Playing Pitch and Outdoor Sports Strategy to inform developer contributions and infrastructure planning, warning that the absence of a robust evidence base could result in objections to the soundness of the Local Plan.

6.2.3. Regulation 19 Response

227. *In response to the comments and issues raised by stakeholders and members of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*
228. Policy GD1 (Placemaking Principles) has been amended to clarify that not every development proposal will be expected to respond to every placemaking principle. Clarification has also been added regarding the circumstances in which Design and Access statements are required.
229. Additional wording was been provided in Policy GD1 to explain when applicants should make use of the Council's 3D model during the design process. Additional wording has also been added to reference the Council's Design Optimisation Service.
230. Policy GD1 now emphasises that green infrastructure should be considered from the earliest stages of the design process. Sport England's Active Design principles are also referenced.
231. No changes have been made in response to requests for further references to design review panels or a Council Design Code. This is because the policy already addresses design reviews, and the Council does not currently have an adopted Design Code.
232. Policy GD2 (Character and Context) has been strengthened through the inclusion of specific wording regarding the conservation of the significance of heritage assets.
233. Policy GD3 (Amenity) has been amended to acknowledge that a degree of construction noise is inevitable during development and to confirm that Construction Management Plans will be sought where appropriate to mitigate impacts.
234. Additional reference has been included within Policy GD4 (Accessible Places) to recognise the importance of access to green spaces and the natural environment in supporting residents' health and wellbeing.
235. Policy GD5 has been renamed to 'Community Safety and Resilient Places' and broadened to align with the previous saved Local Plan policy, including the addition of a requirement to provide access for emergency vehicles were appropriate.
236. The requirement for Health Impact Assessments within Policy GD6 (Health and Wellbeing) has been retained despite objections from some developers; however, greater flexibility has been introduced through the use of a screening assessment to determine whether a full HIA is required.
237. Supporting text has been added to Policy GD7 (Comprehensive and Coordinated Development) to reinforce the importance of comprehensive master-planning. This policy was also amended to clarify that developer

contribution should be secured in accordance with the adopted Planning Obligations Supplementary Planning Document, unless otherwise specified within the Local Plan.

238. No amendment has been made to Policy GD9 (Infrastructure and Developer Contributions) in response to requests for explicit wording preventing the duplication of developer contributions should the Community Infrastructure Levy be introduced. Existing planning regulations already prohibit double counting. The policy now clarifies that contributions can be sought for both indoor and outdoor sports facilities, and that technical notes may be developed to further detail how contributions should be provided during the lifetime of the plan; for example, once the Playing Pitch and Outdoor Sports Strategy is updated.

239. Policies EN20 (Advertisements) and EN21 (Shopfronts) have been relocated to the General Development Principles chapter to become GD10 and GD11.

240. Policy GD10 (Advertisements) has been rationalised by consolidating all heritage-related requirements into a single section.

241. No change has been made to GD10 in response to objections regarding the policy's approach to vinyl sticker son shopfront windows; the policy already states that such stickers will only be "generally discouraged" rather than prohibited. Clarification has been added to GD11 (Shopfronts) regarding the appropriate positioning of signage and additional heritage considerations.

6.3. Housing

6.3.1. Public Responses

General Housing Policies

242. Whilst some respondents recognised the need for housing as a key priority, other respondents objected to the principle of the Council being required to meet a Government-set housing target.

243. Respondents largely supported a brownfield-first approach to development, emphasising that previously developed land should be prioritised for housing before greenfield sites are considered. Some respondents objected to all proposed housing development on greenfield land.

244. Some respondents considered that higher-density, high-rise development within the City Centre should be prioritised to reduce the need for development on greenfield land.

245. Concerns were expressed about whether Policy H1 (Housing Delivery) and associated housing policies will effectively secure affordable, social, and specialist housing, given perceptions that market-led development priorities profit over housing needs.

246. Some respondents sought stronger requirements within Policy H2 (Residential Development – General Criteria), including a minimum density of 50 dwellings per hectare, a preference for three-storey development where appropriate, mandatory climate change mitigation measures in all new housing, and a more robust approach to refusing planning applications where viability is cited to justify non-compliance with policy requirements.

247. Respondents were generally supportive of Policy H4 (Affordable Housing); however, some expressed concern that the requirement for 40% affordable housing on Green Belt sites appeared to presume that development on Green Belt land would be acceptable. Some respondents also called for an increased affordable housing requirement within the City Centre.

248. Concerns were raised that Policy H5 (Looked After Children) should be strengthened to address issues relating to provider competence and licensing arrangements.

249. Whilst there was general support for Policy H7 (Accommodation for Older People and People with Disabilities), which was formerly Policy H6, some respondents raised concerns that the policy does not adequately address the contractual operation and management of such facilities.

250. Concerns were raised regarding the living standards associated with Houses in Multiple Occupation (HMOs), alongside the view that a shortage of affordable housing is contributing to an increased demand for this type of accommodation.

251. Some respondents questioned whether Policy H8 (formerly H7) provides sufficient mitigation in circumstances where proposed HHMOs exceed policy thresholds, particularly in relation to proposals involving the creation of new HMOs.

252. Calls were made for parking considerations to be given greater weight when assessing applications for HMOs. It was also suggested that the HMO thresholds set out in Policy H8 should be applied consistently across the entirety of Derby.

Policy HA1: Rykneld Road

253. Some respondents expressed support for the housing allocation at Rykneld Road, but requested that Policy HA1 to explicitly recognise and mitigate for the potential impacts of air pollution and noise arising from the site's proximity to the A38.

254. Respondents recognised the site as suitable due to its proximity to amenities and other housing. However, some respondents noted that infrastructure and facility improvements should be built and paid for by the developers and completed at the same time as the development.

255. Support was expressed for the inclusion of improved bus services within the policy wording of HA1 to promote sustainable travel.

256. Concerns were raised regarding existing road congestion and highway safety, particularly during peak travel periods, and the potential for the proposed development to exacerbate these issues.

Policy HA2: Brook Farm

257. Some respondents questioned the suitability of the site for development due to its step topography.

258. Concerns were also raised about the visual impact of the proposed development o the surrounding Green Wedge.

Policy HA3: Moorway Lane

259. Many respondents objected to the proposed reduction of Green Wedge land to facilitate the housing allocation east of Moorway Lane, arguing that the site makes an important contribution to the wider green infrastructure network and that development would result in habitat loss and fragmentation.

260. Particular concern was expressed that development at Moorway Lane would fragment Millenium Wood from the surrounding ecological network, reducing its value and connectivity.

261. Respondents also emphasised that the allocation should be considered alongside proposed housing growth in South Derbyshire, arguing that the cumulative impact of development would further undermine the function of the Green Wedge.

262. Concerns were raised regarding the capacity of the surrounding road network to accommodate additional traffic generated by the proposed development.

263. Some respondents considered that local schools, healthcare facilities and other community services are already under significant pressure and argued that further housing in Littleover would exacerbate these issues.

264. Questions were raised about the relationship between the proposed allocation and the current planning application for the site with respondents expressing concern about the potential implications for decision-making.

265. The sustainability of the allocation due to its distance from public transport options emerged as a key issue.

Policy HA4: Royal Hill Road

266. Some respondents submitted objections to the Planning Inspector's decision to allow development at Royal Hill Road on appeal contrary to the Council's original decision to refuse planning permission.

Policy HA5: The Hollow

267. Some respondents stated that Policy HA5 should be updated to reflect the grant of planning permission for 96 dwellings within the allocation in December 2025.

268. Concerns were raised about the sustainability of developing the remaining parcels of land within the allocation due to their distance from existing public transport services. It was suggested that the scale of cross-boundary development proposed in this location could make the provision of a new bus service viable.

269. Respondents emphasised the need for the allocation to be comprehensively master-planned alongside South Derbyshire's proposed allocation to the South of Mickleover.

HA6: Manor Kingsway/ Kingsway Boulevard

270. Respondents supported the allocation of this site due to its proximity to services and amenities.

Policy HA7: Stoney Lane

271. Many respondents objected to Policy HA7 (Stoney Lane) due to considering that Spondon has already experienced significant housing growth. It was argued that this growth has resulted in increased pressure on local infrastructure and traffic congestion, and that further development would exacerbate these issues and cause ongoing disruption to residents.

272. Some respondents objected to the proposed single point of access to the site, including its location, citing concerns about its potential impact on the operation and safety of the A52.

273. Concerns were also raised about the capacity of local healthcare facilities, schools, and childcare provision to accommodate further housing growth, with respondents highlighting difficulties in obtaining GP appointments and the absence of an NHS dental practice in the area.

274. Several respondents highlighted the need for improved public transport, including the reinstatement of the Spondon Flyer bus service, to reduce reliance on private cars.

275. Many respondents objected to the allocation at Stoney Lane due to concerns about the potential impact of development on wildlife, biodiversity, green space, and residents' wellbeing.

276. A significant number of respondents opposed the loss of Green Belt land to facilitate this allocation, disputing the site's designation as Grey Belt. These responses argued that the site contributes to preventing urban sprawl, protects the open countryside, and has not been supported by sufficient justification for its removal from the Green belt. One respondents argued that the site remains in productive agricultural use and therefore should not be classified as Grey Belt.

277. Flood risk and the need for enhanced drainage infrastructure were also identified as key concerns.

278. Respondents emphasised the cumulative impact of proposed housing development across Spondon, including at Dale Road, Royal Hill Fram, and Locko Road. These responses argued that approximately 1,180 new dwellings would place unacceptable pressure on the local road network and should thus be supported by a comprehensive infrastructure strategy.

279. Some respondents also highlight the cumulative impact of this allocation alongside proposed housing development within Erewash Borough Council between the Derby City boundary and Borrowash village, expressing concern that the combined proposals would reduce the separation between settlements and contribute to urban sprawl.

280. Objections were raised on the basis that the site is widely used by local residents for walking and informal recreation.

281. Concerns were raised regarding the proximity of the allocation to the A52 and the potential implications for air quality and noise pollution. Likewise, some respondents considered that the proposed development could adversely affect the amenity of neighbouring residents through increased noise, overlooking, and loss of privacy.

282. Questions were raised regarding the Council's change in position on the suitability of the site for development, with respondents seeking justification for why the site is now considered appropriate.

283. Respondents sought reassurance that the existing Public Right of Way between Stoney Lane and Octbrook would be retained and that any associated footway improvements would provide a safe route for users.

284. The need for substantial upgrades to utility infrastructure, including water, sewerage and electricity services, was also highlighted.

<u>Policy HA12: North of Sinfin Moor Lane</u>

285. Some respondents expressed concern that the site is susceptible to flooding and questioned its suitability for development.

286. Concerns were also raised about the existing traffic congestion during peak periods, with respondents arguing that additional development would exacerbate pressure on the local road network.

Policy HA14: Kitchener Avenue/ Browning Street

287. One respondent expressed support for the Kitchener Avenue housing allocation (Policy HA14, formerly HA15), recognising the site's suitability for meeting housing needs, provided sufficient green space is retained for the school, existing trees are protected and investment is made in supporting local infrastructure.

288. Some respondents objected to Policy HA14 (formerly HA15), citing concerns that existing local infrastructure and the highway network would be unable to accommodate additional housing development, resulting in increased traffic congestion.

289. Some respondents objected to this housing allocation to argue that the site should be retained for community use and instead developed to deliver economic and employment benefits.

The following relate to comments received on housing proposals on sites not allocated within the Local Plan:

290. Some respondents objected to the planning application for residential development at Locko Road, arguing that the site forms part of the Green Belt, meets NPPF tests for Green Belt designation, and was identified as functioning Green Belt in the Council's Green Belt Review. This site was not proposed as an allocation in the Local Plan.

291. Objections were submitted to proposed housing development at Lime Lane, citing concerns relating to flood risk, traffic congestion, road safety, car dependency, and pressure on local services. This site was not proposed as an allocation in the Local Plan.

292. A few respondents objected to proposed housing development at Acorn Way due to concern regarding flood risk, traffic impacts, the capacity of local services, and effects on biodiversity. This site was not proposed as an allocation in the Local Plan.

Policy H10 and Policy HA16: Gypsy and Traveller Site Allocation

293. Some respondents objected to the principle of allocating a Gypsy and Traveller (G&T) site within the Local Plan.

294. Many respondents objected to the proposed G&T site at Wilmorton on the grounds that it would result in the loss of valued open green space used for walking, recreation and informal leisure, with associated impacts on community wellbeing. Objections were also raised in relation to the loss of habitat and biodiversity to result from this allocation.

295. A petition against the allocation of the Wilmorton G&T site was submitted, however the petition was not accepted due to not according with the Council's petition standards.

296. Concerns were also raised that the fencing, hardstanding and other infrastructure required to accommodate the site would fragment the remaining open space.

297. Multiple respondents highlighted existing pressures on local services and infrastructure, including overflowing bins and other perceived social issues, arguing that this G&T site would exacerbate these problems.

298. Some respondents requested that alternative locations be considered, arguing that the Council had not adequately demonstrated why the proposed site represented the most appropriate option. It was suggested that sites further from existing residential areas should be explored.

299. Concerns were expressed regarding the potential impacts of the site on community safety, together with fears relating to crime, antisocial behaviour, site management and cleanliness.

300. Some respondents considered that the proposed allocation could have a negative effect on nearby property values.

301. Questions were raised about the methodology used to consult local residents on the proposed G&T site.

302. Respondents also expressed concern about the impact of additional traffic generated by the site, citing implications for highway safety, congestion and noise. This was alongside potential disturbance arising from daily activities and gathering on the site.

303. One respondent asserted that the proposed site is located on a former landfill site and raised concerns about potential environmental hazards.

304. Concerns were also raised regarding the cumulative impact of the development on on-street parking in an area already characterised by narrow streets and existing parking pressures.

6.3.2. Stakeholder Responses

General Housing Policies

305. Amber Valley Borough Council raised concerns regarding the evidence base underpinning Policy H1 (Housing Delivery), noting inconsistencies between the Local Housing Needs Assessment, which covers the period 2023–2039, and the Local Plan period of 2023–2043, together with questions regarding the revised windfall allowance.

306. Amber Valley Borough Council also recommended that references to "Derby City's unmet need" be amended to "unmet Housing Market Area housing need" to reflect the agreed Statement of Common Ground.

307. Derbyshire County Council expressed support for Policy H1 (Housing Delivery), considering the proposed minimum provision of 12,500 dwellings to be robust, well evidenced and aligned with the Government's standard method.

308. Caddick Land, Redrow Homes, Wain Estates, Ainscough Strategic Land and Richborough state that Policy HA1 in unsound due to predicating the type and location of sites within South Derbyshire and Amber Valley to meet unmet need. It is argued that Derby should not identify sites outside its own plan area, nor should South Derbyshire specify allocations for the purpose of addressing Derby’s unmet need.

309. Redrow Homes, Wain Estates, Ainscough Strategic Land and Richborough challenges the proposed windfall housing allowance, arguing that it exceeds historic delivery rates and is not supported by sufficiently robust evidence.

310. Concern is also raised that the plan start date of 2023 and inclusion of completions from 2023–2025 is inconsistent with national planning practice guidance and does not properly align with the calculation of local housing need.

311. Seabridge Developments Limited and The Strategic Land Group Ltd note that the plan does not provide a 5% buffer in supply. They also argue that Derby's housing supply is overstated and there remains a shortfall against local housing need

312. Derbyshire County Council supported the proposed minimum density requirements, accessible homes standards and expectation that new dwellings should meet the Nationally Described Space Standards. However, the Home Builders Federation objected to the requirement within Policy H2 (Residential Development – General Criteria) for all development to comply with the Nationally Described Space Standards, arguing that this may not always be achievable for conversion schemes.

313. The Home Builders Federation also questioned the requirement for adaptable and accessible homes under Part M4(2) and the expectation that all affordable housing should meet M4(3)b standards, citing concerns regarding consistency with national policy and development viability.

314. Miller Homes, William Davis and Miller Gadsby also objected to Policy H2 requirement for Part M4(2) dwellings, particularly the requirement for a 10% 'Wheelchair Accessible' standard.

315. Derbyshire County Council recommended that a higher affordable housing requirement should be sought within the city centre as part of Policy H4 (Affordable Housing), whilst recognising that viability constraints may limit delivery.

316. The Home Builders Federation requested that Policy H4 (Affordable Housing) specify a single affordable housing target rather than a percentage range and highlighted potential overlap with Policy GD9 regarding viability and developer contributions.

317. Stakeholders (including the Derby Station Quarter Board) submitted their support for a lower affordable housing threshold for the city centre in Policy H4 to reflect flexibility for viability.

318. Peveril Homes, Miller Homes, William Davis and Miller Gadsby support the flexible approach in Policy H4, allowing reduced affordable housing provision where viability evidence demonstrates the full policy requirement cannot be achieved. They note that HA5 (The Hollow) may not be viable for full affordable housing provision.

319. Harworth Group highlight an inconsistency between Policy H4, which sets "up to 40% affordable housing", and Draft Allocation HA7, which requires a "minimum of 40%" at Land at Stoney Lane, Spondon.

320. Harworth Group also raise concern regarding the requirement for 80% of affordable housing to be social rent, as this could result in disproportionately high provision on Green Belt release sites compared to other sites. It is instead suggested applying the 80% requirement only up to a 25% affordable housing threshold.

321. Anchor Hanover supported Policy H6 (Accommodation for Older People and People with Disabilities), recognising the increasing need for specialist accommodation, whilst recommending the inclusion of a numerical delivery target, references to retirement and sheltered housing, and specific site allocations for specialist housing. Anchor Hanover also supported a flexible approach to housing mix and tenure to maximise the delivery and viability of accommodation for older people.

322. Derbyshire County Council similarly supported Policy H6, particularly the emphasis on locating extra care accommodation close to centres, services and public transport.

323. The University of Derby supported the conclusion that existing Purpose Built Student Accommodation capacity is currently sufficient but requested greater flexibility within Policy H8 (Student Accommodation) to allow additional provision should future student numbers increase or new programmes emerge.

324. The Home Builders Federation requested that Policy H9 (Self-build, Custom-build and Community-build Homes) include a mechanism allowing unsold self-build plots to revert to market housing after a defined period without requiring a further planning application.

Housing Allocations

325. The Environment Agency advised that new housing should be directed towards Flood Zone 1 wherever possible and reiterated that residential development is not appropriate within Flood Zone 3b (functional floodplain).

326. The Environment Agency also identified flood risk considerations affecting several proposed housing allocations and recommended that these are appropriately addressed through the allocation policies.

327. Historic England expressed concern that the Sustainability Appraisal does not clearly identify which heritage assets have been assessed and noted that the individual housing allocation policies contain little reference to the historic environment.

328. Derbyshire County Council recognised the majority of the proposed housing allocations as sustainable locations but highlighted the need for cross-boundary infrastructure planning, particularly in relation to Rykneld Road (Policy HA1) and Stoney Lane (Policy HA7), including highways, education and environmental infrastructure.

329. Natural England emphasised that green infrastructure should be connected throughout built-up areas and BNG should be considered at the outset of development.

330. The Derby and Derbyshire Local Access Forum recommend that the requirements for housing development be strengthened to include provision for high-quality active travel connectivity and strategic links.

Policy HA1: Rykneld Road

331. South Derbyshire District Council recommended that the policy should require, rather than encourage, high-quality pedestrian and cycle links between the

Rykneld Road allocation and the adjoining Highfields Farm allocation within South Derbyshire.

332. National Highways advised that the cumulative transport impacts of the proposed allocation, together with planned development south of Mickleover in South Derbyshire, should be assessed to determine whether mitigation is required at the A38/Rykneld Road (Findern Interchange) Strategic Road Network junction.

333. The developer consortium of Miller Homes, William Davis and Miller Gadsby support the continued allocation of Rykneld Road for 800 homes, however, they request this be referenced as a maximum of homes on the site due to constraints.

334. The consortium agrees to the criterion requiring the provision of a primary school on-site and financial contributions for secondary school extensions, however it is requested that the requirement for the expansion of the Heatherton Local Centre be made more flexible to allow for housing in this location.

Policy HA2: Brook Farm

335. Persimmon Homes North Midlands submitted a representation demonstrating the deliverability of the site and their support for the site allocation policy.

336. Persimmon Homes request criterion (e) be amended to ensure any financial contributions are CIL compliant and justified by the Local Education Authority.

337. Persimmon stated their intention to submit a planning application for the site around Autumn 2026, and their anticipated build-out rate.

Policy HA3: East of Moorway Lane

338. The Civic Society emphasised that the allocation should incorporate a walkable neighbourhood centre, green infrastructure and landscape buffers to avoid creating a car-dependent development.

339. Derbyshire County Council highlighted the need to consider potential increases in traffic through Findern and Willington, and recommended improved active travel links to Bakeacre Lane, the Trent and Mersey Canal and the wider strategic cycling network.

340. National Highways specified that development of the site is likely to impact the Strategic Road Network, particularly the A38/Rykneld Road (Findern Interchange) and the A50, and that these impacts should be appropriately assessed and mitigated.

341. Ainscough Strategic Land are supportive of the Moorway Lane housing allocation, but request that the policy wording be changed to only require travel connection improvements where achievable and remove the requirement for financial contributions towards education.

Policy HA5: The Hollow

342. Derbyshire County Council recommended that opportunities to provide a bus service should be explored jointly with South Derbyshire's adjoining allocation south of Mickleover, alongside high-quality walking and cycling connections across the A38 and A516.

343. National Highways highlighted existing pedestrian safety concerns at the A516 slip roads near Littleover Community School and Brookfield Primary School, advising that the proposed housing allocation could increase pedestrian demand to cross at this location. National Highways advised that mitigation measures are being developed to address these safety concerns, including the potential installation of fencing along the A516, although delivery timescales have yet to be confirmed.

344. The Civic Society also highlighted the need for housing growth in Mickleover to be accompanied by improved public transport, local services, employment opportunities and enhancements to the local centre.

345. Peveril Homes supports the policy text referring to a “minimum of 150” homes, however, the developer objects to the policy requirement for comprehensive master-planning with the adjacent South Derbyshire allocation. Peveril also raises concerns over the differing timeframes of the cross-boundary sites, and thus objects to any reference to expected infrastructure connections cross-boundary.

346. Caddick Land raised concerns that the site is only deliverable if the corresponding allocation in South Derbyshire is delivered, due to infrastructure requirements. As such, it is argued that Policy HA5 predicates on a site not yet allocated in South Derbyshire, which is considered a premature and unsound approach. Caddick Land argues that the overall deliverability is uncertain and therefore the allocation should be deleted. The residual housing numbers should be added to the unmet need.

Policy HA6: Manor Kingsway/ Kingsway Boulevard

347. Homes England supported the allocation and recommended that the policy be updated to reflect the current live planning application capacity of up to 135 dwellings.

Policy HA7: Stoney Lane

348. Derbyshire County Council considered the proposed release of land from the Green Belt at Stoney Lane to be well justified, particularly if classified as Grey Belt and subject to the associated "golden rules", whilst acknowledging that this area remains important in preventing coalescence between Derby and Nottingham.

349. The Civic Society emphasised that the historic village character of Spondon should be protected through the provision of landscape buffers separating new development from surrounding settlements.

350. National Highways noted that the transport evidence should assess the impact of the proposed allocation on the Strategic Road Network, particularly the A52/Spondon Roundabout, the A52 eastbound junction at Stoney Lane and the Victoria Avenue junction, including the potential for increased queueing and delays.

351. National Highways also recommended that opportunities be explored to improve active travel infrastructure in the area, particularly by providing accessible crossing facilities for pedestrians, cyclists and wheelchair users across the A52.

352. Harworth Group submitted a representation stating the deliverability and acceptability of the Stoney Lane site towards contributing to Derby's housing need. Harworth Group supports most of the policy criteria within HA7.

Smaller Housing Allocations

353. Rolls Royce has confirmed their intention to relocation their operations from Elton Road and therefore support Policy HA10.

354. Network Rail seeks clarification regarding Policy HA10 whether a connection is intended to the existing northern boundary footpath and associated railway footbridge crossing, and requests confirmation that development design will include appropriate mitigation of railway noise impacts. Network Rail requires the inclusion of policy wording for a 1.8m trespass-proof fence along the railway boundary.

355. Natural England support Policy HA11 (Former Shaftesbury Leisure Centre) that the deciduous trees on-site should be retained.

356. Natural England also emphasise that an area of open space, or green infrastructure link improvements, be emphasised for Cotton Lane (Policy HA8), North of Sinfin Moor Lane (HA12), Bembridge Drive (HA13), Beaufort Business Centre (HA14), Kitchner Avenue (HA15), and Ivy House School (HA16).

357. Support for omission sites is included in the representations in full, but is summarised in the Regulation 19 Submission Plan Sustainability Appraisal of Allocations and Alternatives.

Policy H10 and HA17: Gyspy and Traveller Site Allocation

358. Derbyshire County Council welcomed the proposed approach to Gypsy and Traveller provision and considered the allocation in Policy HA17 to be an appropriate means of meeting identified accommodation needs.

6.3.3. Councillor Responses

359. Councillor John Wright raised concerns about the housing allocations proposed in wards with lacking infrastructure for new housing development, such as in Chaddesden and Spondon. The Councillor emphasised that Local Government Reorganisation should open opportunities for a less spatially constrained plan.

360. Councillors Matthew Holmes, Alison Holmes, and Miles Pattison emphasised that they felt that Mickleover has already accommodated disproportionate housing development with little supporting infrastructure. They state that this goes against the principles of sustainable development within the NPPF, which they view as resulting in a fundamentally flawed plan. They raise objection to the proposed allocation of The Hollow (Policy HA5) and emphasise disagreement with the 96-home scheme on the site which already has planning permission.

361. Councillor Kirk Kus raised concerns for the allocation of a Gypsy and Traveller site in Wilmorton. The concerns focus around the existing strain on local services and infrastructure in Alvaston, issues of attaining a safe access to the site, and the loss of open space that would result from the site development. Concern was

also raised about the transparency of the selection process to allocate Wilmorton, calling for the Council to identify alternate sites.

362. Councillor Jonathan Smale objects to the allocation of Stoney Lane in Policy HA7. This objection is stated on the grounds of the site not having a safe and deliverable access, the cumulative impact on the road network, insufficient local infrastructure in Spondon, the loss of greenfield land, habitat fragmentation, surface water run-off concerns, and the erosion of the settlement identity, amongst others. The Councillor offers alternate locations for growth, including around Kedleston Road, Alvaston, and brownfield land within Chaddesden.

363. The Darley Abbey Ward Labour Party Councillors submitted a joint response emphasising that new residential units within the City Centre should be of a high design quality and include provision for affordable or social housing.

364. Councillor Alan Graves objects to the allocation of a Gypsy and Traveller site within Wilmorton. Grounds for objection were focussed on community consent, local infrastructure pressure, and the specific planning language used. The Councillor called for the removal of any commitment to allocating any Gypsy and Traveller site within the Plan, the publication of all site assessment undertaken, and the need to introduce a requirement of explicit community consent.

6.3.4. Regulation 19 Response

365. *In response to the comments and issues raised by stakeholders and embers of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*

366. Policy H1 (Housing Delivery) has been amended to include the most up-to-date Standard Method housing need at the time of writing. This represents a change from 917 to 953 net new dwellings needed per year, as well as an overall 20-year housing need of 19,060. An addendum to the Local Housing Needs Assessment work is being prepared, which will be added to the evidence base.

367. The supportive text of Policy H1 (Housing Delivery) has been amended to reflect “minimum of 12,500”

368. The table presenting the housing delivery position in Policy H1 (Housing Delivery) has been updated to reflect the updated numbers after the housing supply was calculated in March 2026.

369. The policy stance on a minimum average density of 35 dwellings per hectare has been retained despite objections within Policy H2 (Residential Development – General Criteria). Further text has been added to emphasise that higher densities should not compromise amenities such as daylight, internal space, outdoor space, and access to green infrastructure.

370. The requirement for 10% of affordable homes to be constructed as Building Regulations Part M4(3)b ‘Wheelchair Accessible’ dwellings has been removed due to concerns on viability and delivery. An updated viability appraisal is being prepared as part of the plan’s evidence base.

371. A new policy on ‘Communal Living Accommodation’ has been added to the Local Plan to provide comment on non-C3 accommodation uses which are not traditional Houses in Multiple Occupation.

372. Additional text in Policy H7 (formerly H6) on ‘Accommodation for Older People and People with Disabilities’ emphasises the need for this specialist housing to be located in sustainable locations with access to services to support sociality and independent living.

373. A new policy (H9) has been added to the Local Plan to assist with determining applications for the intensification of existing houses in multiple occupation. This policy emerges as part of cross-party discussions with members.

374. No changes have been made to Policy H11 (Gypsies, Travellers and Travelling Showpeople) as the policy fulfil statutory requirements and heritage considerations are included in separate policies within the plan. The Plan should be read as a whole.

375. No changes are proposed to Policy HA1 (Rykneld Road) as the site has been appraised for heritage issues, consideration of active travel is already included, and HMA transport work has been undertaken.

376. It is noted that some representations comment that the allocation within HA3 (Moorway Lane) reflects a planning application. Further text has been added to refer to the need for a landscape buffer.

377. The Council’s strategy for cross-boundary master-planning for The Hollow (Policy HA5) remains the same.

378. Policy HA6 has been renamed to ‘Kingsway Boulevard (formerly Manor Kingsway).

379. Policy HA7 (Stoney Lane) has been amended to include opportunities for alternate active travel and bus routes (particularly into Spondon district centre). It should also be noted that the site has been independently assessed as Grey Belt and the landscape buffer will therefore be the remaining Green Belt beyond the site.

380. The minimum number of dwellings within Policy HA12 (North of Sinfin Moor Lane) has been amended to reflect the planning permission subject to Section 106.

381. Policy HA13 (Bembridge Drive) has been removed from the Plan due to the need to relocate the playing pitch which is on-site, and lack of a plan to do so, leading to deliverability concerns. The remaining policies have been renumbered accordingly.

382. The minimum number of dwellings within Policy HA13 (Former Beaufort Business Centre) has been amended to reflect the emerging housing scheme.

383. The minimum number of dwellings within Policy HA15 (Former Ivy House School) has been amended to reflect the emerging housing scheme.

384. Policy HA16 (Gypsy and Traveller Site Allocation) has been retained as is. It is a statutory requirement for a Local Plan to identify and update annually a supply of specific deliverable sites sufficient to meet 5-years of Gypsy and Traveller accommodation needs. The Council conducted a Call for Sites for potential allocation sites and received no responses. As such, the site needed to be on Council-owned land to ensure deliverability. An assessment of sites

was undertaken, and the councillor members of Cross Party Working Group determined that the Wilmorton site posed the most suitable site available to fulfil the need for a Gypsy and Traveller site. Provision for Gypsy and Traveller needs through one or more available and deliverable allocations is a critical test of soundness for the plan.

385. While some consultees commented on them - Locko Road, Lime Lane, and Acorn Way are not housing allocations proposed within the Local Plan. They have been evaluated through the housing sites selection process are deemed as omission sites. They have also been evaluated through the sustainability appraisal.

6.4. Economy

6.4.1. Public Responses

386. Respondents generally considered the policies within the Economy chapter as appropriate in light of changes since the previous Local Plan, expressing that the overall objectives and reasoning were viewed as sound and justified by evidence.

387. Many respondents expressed support for encouraging investment into Derby and retaining the existing employment allocations.

388. Some respondents raised concerns about the City Centre economy as increasingly dominated by fast food and gambling uses.

389. Some respondents objected to the City Centre as the presumed sustainable location for office accommodation due to the absence of adequate car parking.

390. Some respondents raised concerns about the insufficiency of transport connections to certain employment allocations, namely SmartParc and Infinity Park. Optimising existing employment locations were also noted before building new.

6.4.2. Stakeholder Responses:

General Employment Policies

391. Rolls-Royce requested that the existing policy for the Sinfin Aerospace Campus (Policy AC16 in the adopted Local Plan) be expanded to include the Raynesway campus and incorporated into the emerging Local Plan.

392. The Chamber of Commerce highlighted the importance of small and medium-sized enterprises (SMEs), including businesses within the supply chains of Derby's major employers. Concerns were also raised by the Chamber of Commerce regarding skills shortages, with employers reporting increasing difficulties in recruiting suitably skilled workers.

393. The Chamber also noted a shortage of Grade A office accommodation within Derby, which was identified as a constraint on business growth and inward investment.

394. It was recommended that the Local Plan include reference to the Local Skills Improvement Plan and the Department for Work and Pensions' Job Guarantee Service to support skills development and reduce the number of young people not in education, employment or training (NEET).

395. Infinity Park Derby LLP raised concerns regarding criterion (e) of Policy E1 (New Employment Locations), arguing that the employment evidence underestimates the need for logistics land (Use Class B8) and that an apparent oversupply of employment land should not automatically constrain future employment growth. Infinity Park Derby LLP therefore recommended that the policy be amended to provide greater flexibility when assessing proposals for new employment development.

396. Jack Lunn (Properties) Ltd supported the continued designation of West Raynesway as an existing employment area under Policy E2 (Existing Employment Areas) but requested clarification regarding the extent of the allocated boundary.

397. The University of Derby supported Policy E3 (Local Labour Agreements) but recommended that higher education institutions be explicitly recognised alongside schools and colleges as key delivery partners.

398. Infinity Park Derby LLP also supported the objectives of Policy E3 (Local Labour Agreements) but recommended that the policy include greater flexibility to recognise circumstances where such agreements may not be appropriate or achievable.

399. Jack Lunn (Properties) Ltd objected to Policy E11 on the grounds that the proposed 800-metre exclusion zone around schools is inconsistent with national planning policy, arguing that walking distances should instead be assessed on a site-by-site basis.

Employment Site Allocations

400. The University of Derby welcomed the identification of strategic employment sites but recommended that the Local Plan explicitly recognise the role of higher education in supporting these employment locations.

401. Wheeldon Brothers Ltd submitted a representation to promote land to the east of Sir Frank Whittle Road for commercial employment use.

Policy E5: Infinity Park

402. East Midlands Combined County Authority (EMCCA) strongly supported Policy E5, particularly the limitation of B8 floorspace to 50% of the site in order to safeguard higher-value employment uses consistent with the East Midlands Investment Zone designation.

403. However, Rolls-Royce expressed concern regarding the restriction limiting Use Class B8 development to 50% of the total floorspace at Infinity Park, arguing that the limitation does not reflect market demand and could unnecessarily constrain future growth. Rolls-Royce also emphasised that logistics (Use Class B8) plays an important supporting role for advanced manufacturing and other employment uses located within Infinity Park.

404. Infinity Park Derby LLP also strongly objected to the 50% cap on B8 floorspace within Policy E5, contending that the policy is insufficiently flexible and fails to recognise the functional relationship between manufacturing and logistics operations. Infinity Park Derby LLP further argued that the site's strategic location makes it well suited to accommodating logistics uses and cited the employment evidence base in support of a less restrictive approach.

405. Natural England supported Policy E5, particularly the expectations placed on development to protect and enhance biodiversity and public rights of way.

406. The Environment Agency advised that much of the Infinity Park allocation lies within Flood Zones 2 and 3 and is also affected by reservoir flood risk, noting that

these constraints may significantly limit further development due to flood storage requirements and the potential for increased flood risk elsewhere.

Policy E6: SmartParc, Spondon

407. SmartParc SEGRO Spondon Limited are supportive of Policy E6, but requested amendments to policy wording to reflect the approved outline permission on the site.

408. Derby Energy Network Limited supported Policy E6 (SmartParc, Spondon), particularly its support for energy generation and decentralised low-carbon energy production uses. They felt however that more references to the energy network should be spread throughout the plan.

409. Natural England recommended that development at SmartParc should contribute to strengthening the wider green infrastructure network, including improved ecological connections to the River Derwent.

410. The Environment Agency highlighted that large areas of the SmartParc allocation fall within Flood Zones 2 and 3 and are also subject to reservoir flood risk, advising that these constraints may restrict further development where compensatory flood storage cannot be achieved.

Policy E7: Indurent

411. The Environment Agency noted that approximately half of the Indurent Park allocation lies within Flood Zone 2, with a smaller area affected by Flood Zone 3 and reservoir flood risk, and advised that these constraints should be carefully considered through future development proposals.

412. Natural England highlighted the proximity of Indurent Park to the River Derwent Local Wildlife Site and an adjacent Local Nature Reserve, emphasising the importance of protecting these designated sites and enhancing ecological connectivity.

Regulation 19 Response:

413. *In response to the comments and issues raised by stakeholders and embers of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*

414. A new policy focussed on Rolls-Royce Operations has been included in the Regulation 19 Plan to support investment and growth.

415. A criterion in E1 (New Employment Locations) was removed that new business will be permitted provided that it would not lead to a significant oversupply of employment land.

416. A reference to the role of higher education, as well as to the DWP Job Guarantee service and Local Skills Improvement Plan, has been added to Policy E3 (Local Labour Agreements) supporting text.

417. The Cathedral Quarter ad St Peters Quarter have been explicitly referenced as key areas for new office development within the supporting text of E4 (Office Development).

418. A criterion has been added to Policy E5 (Infinity Park) to support a network of active travel routes linking the existing community with the wider South Derby Growth Zone.

419. It was determined to retain the restriction of B8 uses at Infinity Park in Policy E5.

420. Policy E6 (SmartParc, Spondon) has been amended to reflect the approved permission.

421. The threshold for retail and leisure proposals requiring a retail impact assessment has been lowered from 1,000 square metres of floorspace to 280 squares metres of net floorspace in Policy E10 (formerly E9) Main Town Centre Uses Outside Centres.

422. Policy E11 (formerly E10) on Tourism and Culture has been expanded to seek opportunities for heritage-led tourism

6.5. Environment

6.5.1. Public Responses

General Environment

423. Respondents were generally supportive of Policy EN1 (Green and Blue Infrastructure) and encouraged stronger requirements for habitat creation and enhancement within new developments.

424. A few respondents requested amendments to emphasise the importance of riverside walking as part of the green and blue infrastructure network. Other respondents also requested a policy criterion to support the restoration of blue infrastructure assets, such as the Derby and Sandiacre Canal route.

425. Some respondents emphasised the importance of protecting agricultural land for food production and long-term food security.

426. Calls were made for all suitable new homes to incorporate integrated swift boxes as part of biodiversity enhancements. Some respondents also advocated for the installation of roof-mounted wind turbines on new buildings were appropriate.

427. Policy EN2 (Dark Infrastructure) received support for its overall approach, particularly regarding downward-facing lighting and part-night lighting, however, some respondents considered that it could address excessive and uncontrolled light sources from vehicle headlights, security lighting and domestic garden lights on bat roosts and foraging areas.

428. Whilst respondents generally supported Policy EN4 (Allotments and Community Gardens), some called for stronger policy protection to prevent the loss of any allotments and community gardens in all circumstances.

429. Concerns were raised that Policy EN8 (Biodiversity and Geodiversity) does not fully reflect the protections set out in the NPPF. It was argued that, instead of the policy listing circumstances in which development may be permitted, it should list circumstances that harm should not be permitted.

430. Respondents were generally supportive of Policy EN9 (Trees and Hedgerows), recognising the importance of increasing tree cover across Derby and also emphasising the need for ongoing trees management.

431. Support was expressed for Policy EN10 (Biodiversity Net Gain), although respondents emphasised that off-site biodiversity compensation should only be a last resort.

Green Belt, Wedges, and Gaps

432. Strong support was expressed for Policy EN5 (Green Belt), with many respondents calling for no loss of Green Belt land under any circumstances and requesting that the policy also resist the development of solar energy installations.

433. The consultation highlighted strong support for the continued designation of Green Wedges as a key aspect of Derby's urban structure, particularly in relation to their role in bringing the open countryside into the city and separating distinct

suburbs. A majority of the support for continued Green Wedges was in relation to the proposed retention of the North Oakwood Green Wedge and its connection to the preservation of the Chaddesden Wood ancient woodland.

434. Concerns were also raised regarding the allowance within Policy EN6 for public utilities, renewable energy infrastructure and climate change mitigation measures within Green Wedges.

435. Some respondents raised objections to the proposed realignment of Green Wedge boundaries to facilitate housing development, emphasising the Green Wedge's roles for ecosystem services, biodiversity, flood prevention, health, and well-being.

436. Respondents objected to the removal of the Lees Brook Green Wedge, citing the importance of green space for health and wellbeing and arguing that brownfield land should be prioritised for development instead.

437. Some respondents identified potential inconsistencies between Policy EN6 (Green Wedges) and other policies within the Local Plan, noting that certain proposed housing allocations appear to conflict with the policy's stated objectives.

438. General support was expressed for Policy EN7 (Green Gaps). However, particular objections were raised to the proposed redesignation of the Littleover-Mickleover Green Wedge as a Green Gao, with respondents arguing that, although its function may have diminished, further development would only weaken its role rather than restore it.

6.5.2. Stakeholder Responses:

General Environment

439. Derbyshire County Council considered the Environment chapter to provide a comprehensive suite of policies for protecting and enhancing Derby's landscape, green infrastructure and natural environment.

440. The Home Builders Federation questioned the necessity of a number of environmental policies in light of the proposed changes consulted upon through the December 2025 National Planning Policy Framework consultation.

441. Historic England recommended that Policy EN1 (Green and Blue Infrastructure) include additional reference to the historic environment and its contribution to green infrastructure.

442. The inclusion of the Urban Greening Factor approach was queried by the Home Builders Federation and developers (including Miller Homes, William Davis and Miller Gadsby), who sought clarification on the evidence required to demonstrate compliance and how the requirement would interact with Biodiversity Net Gain.

443. Natural England welcomed Policy EN1 and recommended it make greater reference to Natural England's Green Infrastructure Framework; they also supported the inclusion of the Urban Greening Factor and reference to the Local Nature Recovery Strategy. It was recommended that green infrastructure targets be set and requirement included for all major development proposals to submit a GBI Strategy. Natural England were also supportive of Policy EN2.

444. Some developers (including Miller Homes, William Davis and Miller Gadsby) request that EN1 be reworded to introduce more flexibility, including text to be more consistent with Policies EN9 (Trees and Hedgerows).

445. Historic England also recommended that Policy EN2 (Dark Infrastructure) include greater consideration of the historic environment within the policy wording.

446. Natural England supports Policy's EN3 (Open Space, Sport and Recreation Buildings) and EN4 (Allotments and Community Gardens), only advising the introduction of the Accessible Greenspace Standard.

447. The Environment Agency recommended that Policy EN8 be expanded to recognise the importance of protecting geological features within watercourses and include reference to the Water Framework Directive and River Basin Management Plans.

448. The Forestry Commission recommended that Policy EN9 include a minimum tree canopy cover target for new development, supported by a range of planting approaches. The Forestry Commission also suggested that references to retaining trees "where possible" should be strengthened to establish an expectation that all trees are retained unless exceptional circumstances justify their removal.

449. South Derbyshire District Council welcomed the inclusion of references to the Heartwood Community Forest within Policy EN9.

450. The Environment Agency welcomed the inclusion of Policy EN23 (Land Contamination) and recommended that it reference the Environment Agency's Land Contamination Risk Management guidance and groundwater protection principles. Further amendments were suggested to require investigations of aquifers proportionate to the sensitivity of the site and proposed use, together with the submission and approval of Verification Reports prior to occupation to demonstrate that remediation has been successfully completed.

451. Peveril Homes request the rewording of EN23 (Land Contamination) to recognise where remediation measures can be dealt appropriately through planning conditions.

452. The Environment Agency generally supported Policy EN24 (Pollution) but recommended that it include a requirement for development to avoid deterioration in the status of water bodies in accordance with the Water Framework Directive.

453. The Environment Agency also advised that the policy should require applicants to demonstrate that proposed development will not contribute to pollution by connecting to foul sewer networks operating at or close to capacity.

454. Multiple stakeholders (The Derby Station Quarter Board, Derbion) are supportive of policies to increase urban greening, but raise concerns that these policies should include a reasonable degree of flexibility to not constrain viability.

455. The University of Derby supports the Plan's environmental objectives and encourages greater collaboration through education and research partnerships to monitor biodiversity, ecological health and flooding, while supporting low-carbon innovation.

456. The Trustees of the Sisters of the Holy Name emphasised that the Local Plan does not include any assessment of the role or function of the designated Wildlife Sites on the Convent of the Holy Name site in Oakwood. They highlight that there is no associated mapping of the site. The Trustees emphasise that the majority of the site should be considered as mown amenity grassland and are of a small scale.

Green Belt, Wedges, and Gaps

457. Derbyshire County Council expressed strong support for Policy EN5 (Green Belt), recognising its role in protecting the city's landscape setting.

458. The Derwent Valley Mills World Heritage Site Partnership similarly supported Policy EN5 9as well as Policy EN6 – Green Wedges), noting that restrictions on inappropriate development help sustain the Outstanding Universal Value of the World Heritage Site, and recommended that this benefit be explicitly recognised within the Local Plan.

459. Derbyshire County Council supported the continued designation of Green Wedges in Policy EN6 and strongly endorsed the policy objective of enhancing and reinforcing their strategic function.

460. Natural England recommend Policy EN6 be amended to include nature conservation and BNG enhancements as acceptable within Green Wedges and Green Gaps (Policy EN7).

461. Derby Energy Network Limited supported Policy EN6's acceptance of renewable energy and climate change mitigation measures within Green Wedges but recommended removing the requirement that such developments be small-scale and ancillary.

462. Network Rail requests the amendment of the Green Wedge around Chaddesden Sidings to enable rail-related employment development.

463. The Civic Society expressed concern that the introduction of Green Gaps could weaken existing landscape protection and recommended that Policy EN7 be strengthened to ensure development is permitted only where the visual separation of settlements, landscape character and the prevention of urban coalescence are maintained.

464. JGP Properties supports the strategic role of Derby's Green Wedges but considers their protection should be balanced against the need to meet the city's housing requirements. JGP argues that development within Green Wedges should be explored where key functions can be retained.

6.5.3. Councillor Responses

465. Councillor John Wright emphasised that a moratorium on development in green spaces, Green Wedges, and Green Belt should be put in place to protect greenfield land, only allowing development in the most compelling of cases.

466. Councillor Jonathan Smale submitted support for the retention of land at Locko Road as designated Green Belt. Support was also submitted for retaining Acorn Way as designated Green Wedge within the Plan. However, the Councillor

asserts that Stoney Land should be removed as a housing allocation and retained as Green Belt land.

467. Councillors Trewhella, Eyre, and Mulhall submitted their explicit support for the North Oakwood Green Wedge remaining as designated Green Wedge within the Local Plan.

6.5.4. Regulation 19 Response

468. *In response to the comments and issues raised by stakeholders and embers of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*
469. As originally proposed at Regulation 18, the Local Plan will retain the North Oakwood Green Wedge in recognition of its importance as a wildlife corridor, and its role for flood mitigation, landscape character, well-being, and the long-term protection of the Chaddesden Wood as part of the wider ecosystem.
470. A criterion has been added to Policy EN1 (Green and Blue Infrastructure) to ensure development protects watercourses and their associated habitats from harm where possible.
471. Additional text has been added to Policy EN1 to signpost to guidance for development to support biodiversity. Clarity has also been added about how the urban green factor is considered to contribute towards 10% BNG on-site.
472. References to the Local Nature Recovery Strategy have been strengthened across the chapter.
473. Policy EN2 (Dark Infrastructure) now includes a requirement for a lighting strategy where lighting schemes or development may impact heritage assets and their setting.
474. The recognition of proposals for environmental improvements and creation of sites for BNG has been added to Policy EN5 (Green Belt), Policy EN6 (Green Wedge) and Policy EN7 (Green Gaps). Additionally, the role of the Green Belt and Upper Derwent Valley Green Wedge for the setting of the Derwent Valley Mills World Heritage Site has been recognised.
475. Policy EN7 (Green Gap) now includes additional wording to ensure development preserves the separation of settlements and landscape character.
476. Requirements for accordance with the Water Framework Directive have ben added to Policy EN8 (Biodiversity and Geodiversity).
477. The expectation for swift bricks as part of developments where appropriate has been retained within the plan.
478. Policy EN23 (now EN12) on Air Quality has been amended to reference Groundwater Protection position statements and location sensitivity to aquifers.
479. A requirement for a Verification Report to be submitted and approved to the Local Planning Authority has been added to Policy EN12.

6.6. Historic Environment

6.6.1. Public Responses

480. Many comments express broad support for the policies relating to the historic environment, particularly recognising the interconnections between heritage protection and civic pride, tourism, regeneration, sustainability, and the identity of Derby.

481. A number of respondents gave strong support for the presumption towards restoration and reuse of historic buildings, rather than their demolition. These comments recognised the need for historically significant buildings to be sensitively retrofitted in order to meet present and future standards, ensuring their continued viable use as a means of preventing vacancy and deterioration. Respondents acknowledged the importance of balancing modern requirements, such as energy efficiency and accessibility, with the preservation of heritage status.

482. However, respondents repeated criticism of existing heritage protections and expressed concern that the proposed policies would continue current patterns of decline unless supported by stronger enforcement powers, adequate resourcing, and earlier intervention at first signs of building deterioration.

483. A number of responses called for stronger heritage protections, such as allowing no development at all on historic parks, gardens, or designated landscapes; designated new conservation areas; as well as not allowing the demolition of any historic buildings dated prior to 1950.

484. Some respondents advocated for the recreation and reconstruction of era-style buildings through traditional forms and materials.

485. Many comments identified that the principles set out within the heritage policies should not be confined solely to heritage assets, but should apply more widely across other areas of Derby. This was particularly noted in relation to protecting Locally Listed Heritage assets, and ensuring consistent design quality as a city-wide ambition.

6.6.2. Stakeholder Responses

486. Multiple respondents welcomed the positive approach taken to the historic environment, recognising the importance of Derby's heritage within the Plan.

487. Historic England supports the requirement for Heritage Statements to accompany planning applications affecting heritage assets, together with the requirement that demolition should not take place until replacement development is secured and any loss of significance is appropriately recorded.

488. The Derwent Valley Mills World Heritage Site Partnership, CHAC and Derbyshire County Council recommend that the historic environment policies be separated from the natural environment chapter to provide greater clarity.

489. Historic England also recommends stronger policy wording to ensure that development causing harm to heritage assets is resisted where appropriate, with mitigation sought in the first instance and greater emphasis placed on conserving

the significance of heritage assets, including the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site.

490. Several respondents seek greater alignment with the terminology used in the National Planning Policy Framework, particularly in relation to the definition of heritage assets, recognition that the historic environment extends beyond built form, and clearer guidance on the different heritage assessments required.

491. Some respondents consider that parts of the chapter repeat national policy, although it is also recognised that the Plan adds value in several areas through locally specific guidance.

492. Historic England and several development sector respondents request greater clarity on the distinction between a Heritage Statement of Significance and a Heritage Impact Assessment, with Historic England advocating the latter as the appropriate assessment of significance; this approach is also supported by the Civic Society.

493. Historic England recommends that Policy EN19 be retitled "Registered Parks and Gardens" to better reflect its purpose.

494. The Civic Society welcomes the Plan's emphasis on heritage but considers Policy HE1 (Conserving and Enhancing the Historic Environment) insufficiently robust, recommending stronger wording requiring a clear understanding of significance, avoidance of harm wherever possible, and limiting demolition to exceptional circumstances where assets cannot be viably repaired and public benefits clearly outweigh the loss.

495. Derbyshire County Council welcomes the commitment in Policy HE1 to prepare, monitor and review conservation area appraisals and management plans, but recommends that the policy also commit to their implementation.

496. The Derby and Derbyshire Local Access Forum recommends that the Derwent Valley Trail be identified as a strategic route to support a future bid for National River Walk status.

6.6.3. Councillor Response

497. The Darley Abbey Ward Labour Party Councillors submitted a joint response requesting further emphasis on the need for a strengthened commitment to the replacement of the Darley Abbey footbridge

Regulation 19 Response

498. *In response to the comments and issues raised by stakeholders and embers of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*

499. The heritage policies have been removed from the environment chapter to form their own separate chapter, to reflect the importance of these policies. The policies have also been reordered to reflect their national significance.

500. The sites allocated were pre-screened by internal heritage and County archaeology colleagues through the site selection process, but on request of Historic England, further independent work has been commissioned to further

detail the heritage sensitivity of sites (The Screening and Scoping report). Planning applications will also need to set out how heritage sensitivity and constraints will be addressed through their proposals.

501. Terminology is relation to heritage was updated throughout the plan to align with the NPPF and in collaboration with Historic England, reflecting their guidance. Policies have also been amended to reflect clearer assertions that harm to heritage will be resisted and mitigation sought to reduce harm.

502. Criteria (m) of HE1 (Conserving and Enhancing the Historic Environment) was reworded to strengthen the commitment to preparing, monitoring, and reviewing conservation area appraisals and management plans for existing and potential conservation areas, as well as implementing the management plans (where resources allow).

503. Criteria surrounding the use of Council resources have been expanded on to reference ambitions to produce updated design guidance for the conversion of upper floors to residential uses, and shopfronts and advertisements guidance.

504. A new criterion has been introduced to reflect Council ambitions to produce a heritage at risk strategy alongside Derbyshire Historic Buildings Trust.

505. Text has been added to Policy HE2 (Derwent Valley Mills World Heritage Site) to emphasise the need for proposals to strengthen walking, cycling and public transport links along the World Heritage Site.

506. Text has been added across the policies to encourage applicants to encourage with the Council's pre-application service to ensure the suitability of their proposals and to ensure proposals are in keeping with the recommendations of the Heritage Impact Assessment Screening and Scoping work (HE1 (h)).

507. Policy EN4 (Listed Buildings and Locally Listed Buildings) has been reworded to not duplicate the NPPF, and to set out a hierarchical approach to avoid harm in the first instance, the to minimise and mitigate harm.

508. Policy HE5 (Conservation Areas) has been amended to ensure compatibility with other heritage policies, and now includes a full list of Conservation Areas.

509. Policy EN16 (Heritage Statements of Significance) Policy has been removed from the Plan.

510. Policy EN17 (Uses Within Buildings of Architectural or Historic Importance) has been subsumed into Policy HE4 on listed buildings and reworded to reflect the repair and reinstatement of architectural features.

511. Policy EN6 (Archaeology and Scheduled Monuments) has been amended to include additional detail on resisting harm to these heritage assets.

6.7. Climate Change

6.7.1. Public Responses

512. The Regulation 18 consultation highlighted a strong and reoccurring support for policies aimed at addressing climate change and promoting sustainable development. Many respondents supported the inclusion of policies to improve energy efficiency and reduce flood risk.

Flood Risk

513. Flood risk was identified as a major concern by many members of the public. A number of respondents expressed support for the proactive approach towards managing flood risk, welcoming the inclusion of policies intended to strengthen resilience and support the implementation of related environmental and climate policies.

514. Support was also expressed specifically for Phase 1 of the OCOR proposals, with respondents recognising its potential benefits in delivering environmental improvements and climate resilience measures. Nonetheless, one representation highlighted the importance of considering impacts on fish habitats and movement within the design of flood defence infrastructure.

515. However, some respondents raised concerns regarding flood risk at specific locations including the Stoney Lane allocation site and Lime Lane omission site, and questioned whether sufficient consideration had been given to existing drainage constraints and the potential impact of development on local flooding issues.

516. Comments were also received regarding the proposed Gypsy and Traveller site, with respondents suggesting that the site could play an important role as green space contributing towards flood alleviation and wider surface water management objectives, were it not used as a Gypsy and Traveller site.

517. Some members of the public questioned how surface water flooding issues would be identified and managed through the development process, requesting clearer guidance for householders in appropriately managing land and drainage within private property boundaries.

518. Several participants sought further acknowledgment of the important role trees play in reducing flood risk, as well as greater policy support for the provision of more dedicated flood storage areas across the city.

Renewable/ Low Carbon Energy

519. Strong support was expressed for the increased use of green energy technologies in new housing developments, with respondents advocating for further requirements/ standards for all new homes to incorporate measures such as heat pumps, solar panels, and other low-carbon technologies from the outset. Several comments similarly advocated for the development of district heat networks across new and existing developments.

Sustainable Construction and Embodied Carbon

520. Although respondents were generally supportive of most of the Climate Change policies, concerns were also raised regarding the non-prescriptive nature of certain policies, particularly Policy CL5 relating to embodied carbon. Respondents questioned whether the policy contained sufficiently robust requirements or implementation mechanisms to ensure that its ambitions would be effectively realised in practice. Nonetheless, respondents expressed support for embodied carbon measures focused on retaining existing buildings, reconfiguring internal layouts were necessary, and upgrading properties through the installation of energy-efficient systems. Some respondents commented on the embodied carbon implications of the future of the Assembly Rooms.

6.7.2. Stakeholder Responses

521. Many stakeholders indicated support for the policies within the Climate Change chapter. Natural England particularly voiced their support for the chapter's recognition of climate change as a complex and interconnected issue and how this theme runs throughout the plan as a whole. Nonetheless, some stakeholders raised comments regarding amendments to specific policy wording and approaches. A general outline of these comments is summarised below:

Flood Risk

522. Rolls-Royce recognise the risk of flooding for their operations at the Raynesway campus and thus support Policy CL2 (Our City Our River) for its provisions to expand flood protection across the city.

523. Natural England indicated their support for Policy CL2 (Our City Our River) due to its ambition to secure opportunities to provide environmental enhancements along the River Derwent to link with the existing green network. Whilst Natural England support the reference to SuDS (Sustainable Urban Drainage Systems) within Policy CL1 (Flood Risk and Water Management), they request further support for a multi-functional approach to SuDS as part of the blue and green infrastructure network. They also signpost towards the concept of Sponge Cities, where urban areas can be designed to absorb and store water to slow surface water flow into drains and reduce storm flooding and increase capacity for storage.

524. The Severn Trent recommended that new policy wording be included within the plan to ensure a drainage hierarchy for the discharge of surface water, as well as further requirements for SuDS in major development and maintenance details.

525. The EA provided detailed comments on specific policy wording and required additional policy provisions in relation to flood risk. Firstly, the EA requested stronger wording in relation to not considering development in areas of high flood risk (flood zone 3) as acceptable unless safe and with no increase in flood risk elsewhere. The EA also recommended that policy wording be added in regard to 10 metre buffers between development and the top bank of a river/ around flood defences for maintenance, climate change uplift, and biodiversity enhancement. They also suggested stronger policy wording countering the enclosure of watercourses and encouraging the removal of culverts.

526. Carney Sweeny and Peveril Homes asserted that Policy CL1 is not consistent with PPG updates in regard to the sequential test and therefore needs reviewing.

527. Multiple developers/ stakeholders (including Catesby Estates, Miller Homes, Wiliam Davis, Miller Gadsby, and the Home Builders Federation) stated that Policy CL1 includes a requirement that proposals should demonstrate there is adequate wastewater infrastructure and water supply capacity to serve the development and mitigate any deficiencies; this requirement is deemed outside the remit of planning as determining acceptable land use and therefore should be covered by other regulatory regimes.

528. Historic England recommend that Policy CL2 (Our City Our River) be tied to Policy EN18 (Archaeology) due to overlap of the Archaeological Alert Area.

529. The Derby and Derbyshire Local Access Forum recommended that Policy CL2 (Our City Our River) be strengthened to ensure safe pedestrian and cycle access and egress from areas protected by flood defences during flood events, including when floodgates are closed.

Sustainable Construction and Embodied Carbon

530. Derby Energy Network Limited supports the overall objective of Policy CL3 (Sustainable Design and Construction), however, they request that the wording regarding implementing the Energy Hierarchy within the supporting text be moved into the policy wording. This stakeholder also seeks changes to policy wording in regard to excluding energy-related development from the requirements of the policy for 'all development'.

531. Multiple developers/ stakeholders (including Catesby Estates, Miller Homes, Wiliam Davis, Miller Gadsby, and the Derby Station Quarter Board) objected against the requirement for all residential or mixed-use development of over 10 dwellings to meet the BREEAM Communities 'Excellent' rating, indicating that this would harm viability to the point of impacting deliverability. These developers also object against the requirement for all developments to provide a Sustainability Statement in relation to Policy CL3 and Policy CL5 (Embodied Carbon), citing the impact of this upon smaller development proposals.

532. The above developers indicate their support the Policy CL5 (Embodied Carbon), but request further flexibility to respond to site-specific circumstances and viability testing.

533. The Civic Society emphasise that the retrofit of historic buildings should be recognised as climate solutions due to the embodied carbon benefits of conservation.

534. The Home Builders Federation raises concern about Policy CL5 (Embodied Carbon) adding complexity beyond national legislation that may undermine housing delivery.

Renewable/ Low Carbon Energy

535. Derby Energy Network Limited have requested a new policy be introduced to the Local Plan in support of Low Carbon Energy Centres and establishing a Heating

Hierarchy to encourage connection to heat energy networks for new developments.

536. Derby Energy Network Limited also request for additional wording within Policy CL4 (Renewable and Low Carbon Energy) to provide directly supportive wording for the delivery of heat networks.

537. Soterion Limited promoted a site at Meadow Lane/ Chequers Road for use as a strategic low-carbon energy and infrastructure allocation.

6.7.3. Regulation 19 Response

538. *In response to the comments and issues raised by stakeholders and embers of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*

539. Policy CL1 has been amended to include a requirement, where feasible, for development to be set back 10 metres from watercourses, providing a buffer to support biodiversity enhancement, as well as allowing for access and maintenance, alongside an equivalent requirement that development should not, where feasible, encroach within 10 metres of flood defences in order to safeguard operational access and accommodate climate change allowance uplifts.

540. Support has been added to Policy CL1 for the creation of flood resilience schemes within areas of open space, provided that the primary function and usability of the open space is retained. The policy has also been updated to include explicit reference to the multi-functional benefits of Sustainable Drainage Systems (SuDS), recognising their role in delivering drainage and biodiversity benefits.

541. A drainage hierarchy has been incorporated into Policy CL1 to ensure that surface water is managed in accordance with established best practice principles, prioritising sustainable infiltration and attenuation methods.

542. However, the requirement for development proposals to demonstrate adequate wastewater infrastructure and water supply capacity has been removed from Policy CL1, deferring to the role of other regulatory regimes to ensure this is secured.

543. Policy CL1 now includes a new clause relating to the de-culverting of watercourses, encouraging the opening up of existing culverts where appropriate, unless doing so would result in unacceptable flood risk or other environmental harm.

544. Policy CL2 (Our City Our River) has been amended to include a requirement to explore opportunities for integrating active travel infrastructure within OCOR schemes and to maximise the wider benefits of investment in flood resilience measures.

545. The council is currently working with the EA through the Strategic Flood Risk Assessment Level 2 evidence base work and will publish a topic paper at submission covering flooding and water issues (including the sequential test).

546. It is already considered that the wording within Policy CL3 (Sustainable Design & Construction) provides sufficient support for the Energy Hierarchy, and therefore detail should remain within the supporting text.

547. The requirement for developments to achieve BREEAM Communities certification has been removed, with reliance instead placed on compliance with Building Regulations, the Future Homes Standard, and any subsequent updates to national technical standards. This change is detailed in the viability evidence provided in support of the regulation 19 Submission Plan.

548. Although Derby Energy Network Limited sought explicit reference to their heat network proposals within the policy text of CL4 (Renewable and Low Carbon Energy), it is considered that the reference to their project within the supporting text is sufficient to be effective, particularly in the context of uncertain delivery timescales and plans at the time of writing.

549. A new policy relating to Low Carbon Energy Centres has been added to the Climate Change chapter, supporting the principle of this form of development and the information required for proposed applications. A clause has been added acknowledging the challenges of this development type and encouraging early engagement.

6.8. Infrastructure and Community Facilities

6.8.1. Public Responses

550. Members of the public were generally supportive of the policies relating to the support for new infrastructure and community facilities, as well as criteria to prevent their loss.

551. Many of the objections to the proposed housing and gypsy and traveller allocations referred to existing pressures on educational, healthcare and community infrastructure, with concerns that further development would risk worsening this strained service provision. Some comments questioned the effectiveness of financial contributions for mitigating these impacts, highlighting constraints such as limited physical space, staffing shortages, and wider operational pressures, which may restrict the extent to which develop contributions can improve access to services.

Cemetery

552. Some respondents supported Policy IC2 (Cemetery) as a pragmatic response to future needs, although concerns were also raised regarding accessibility and transport links to the new crematorium site. A respondent also requested that specific policy wording be included to provide safe access for funeral processions.

Education

553. The principles underpinning Policy IC3 (Education Provision) were largely supported by members of the public, particularly regarding meeting needs of growing communities. Support was given for ensuring that schools are located within walking and cycling distance of housing.

554. Support was also expressed for Policy IC4's (Higher and Further Education) approach to encourage staff and students to use public transport and active transport modes.

555. However, an objection was raised against Policy IC4 in relation to concerns regarding the 'assumption' that purpose-built student accommodation would release housing stock back to families through conversion.

556. Although support was expressed for encouraging public transport use associated with university development (Policy IC4), respondents emphasised that adequate parking provision would still be required for those who remain dependent on private cars.

Communication Infrastructure

557. Respondents supported the inclusion of a "dig once" approach to communications infrastructure and its ambition for reduced disruption from repeated street works.

558. One respondent raised concerns about the impact of wayleave arrangements preventing the sharing of infrastructure without stronger central coordination.

6.8.2. Stakeholder Responses

559. NHS Property Services (NHSPS) objected to Policy IC1 (Social and Community Infrastructure) on the basis that the current policy fails to consider the approach towards the loss of existing community facilities. This stance emerges from viewing the policy aimed at preventing facility loss as restricting NHSPS's ability to ensure delivery of services to communities by reducing flexibility (particularly in relation to the disposal of redundant or unsuitable sites).

560. Carney Sweeney and Peveril Homes question the effectiveness of Policy IC1 (Social and Community Infrastructure) on the basis that, whilst established mechanisms exist for assessing capacity impacts on services such as education and healthcare, there is no clear or consistent methodology for applicants or the Council to assess capacity and need in relation to broader community facilities such as cultural buildings and places of worship.

561. Multiple developers, including Catesby Estates, Miller Homes, Wiliam Davis and Miller Gadsby bring attention to the recent government announcement that Council's can no longer adopt SPDs after June 2026, since the Council's Planning Obligations SPD or successor document is referenced within Policy IC1 (Social and Community Facilities).

562. Derby Energy Network Limited commented that Policy IC4 (Higher and Further Education) could go further in identifying tangible measures to support objectives for sustainability and achieving net zero. The presentation suggests that the policy should explicitly support the provision of energy centres and heat networks, including the use of university land for these where appropriate.

563. The University of Derby support Policy IC4 (Higher ad Further Education) protection of higher education functions from inappropriate development. They recommend the strengthening of policy text to recognise the University's economic role acknowledge future space and infrastructure needs of the City Centre Hub, and encourage collaboration on spatial planning.

6.8.3. Regulation 19 Response

564. *In response to the comments and issues raised by stakeholders and members of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*

565. A clause has been added to Policy IC1 (Social and Community Facilities) to give flexibility for the loss of healthcare facilities in response to the NHSPS's response, but only in relation to where they are formally declared surplus.

566. Further emphasis has been added to Policy IC4 for emphasising sustainable travel modes for linking the University campuses at Kedleston Road and the City Centre.

567. The supporting text of Policy GD9 details the Council's intention to use technical notes to supplement the Planning Obligations SPD and give guidance on how Plan Policies are implemented.

568. Supporting text added to encourage engagement with the EA fin relation to flood risk arising from Markeaton Brook.

6.9. Transport and Movement

6.9.1. Public Responses

569. Many respondents raised concerns about existing traffic congestion, arguing that current levels of development have already placed significant pressure on the highway network.

570. Additional concerns were expressed regarding the cumulative traffic impacts of proposed housing allocations, particularly at Stoney Lane, Moorway Lane, and the Wilmorton G&T site.

571. Some respondents highlighted the need for improved bus services, particularly during the evening, to improve access to employment, leisure and the city's evening economy.

572. Calls were made for Policy T1 (Active and Sustainable Transport) to better recognise the differing needs and abilities of users, including those relating to age, disability and mobility, when promoting active travel.

573. Some respondents questioned the effectiveness of the transport ambitions set out in Policy T1, noting that responsibility for many public transport services lies with external organisations and companies rather than the Council.

574. One respondent objected to Policy T1 on the grounds that sufficient city centre car parking is required to support office development and maintain competitiveness with locations such as Pride Park.

575. There was general support for the inclusion of a transport hierarchy in Policy T1.

576. One respondent requested that the reference in Policy T1 to development being within 400m of a bus stop be replaced with wording referring to locations that are well-served by frequent bus services, to better align with the adopted Policy CP23.

577. Respondents also requested that the Local Cycling and Walking Infrastructure Plan (LCWIP) be updated to reflect the implications of the Local Plan and that Policy T2 (Transport Infrastructure) include a requirement for the responsible body to be notified of relevant changes.

578. Concerns were raised regarding National Highways A38 Derby Junctions Grade Separation scheme, with respondents emphasising the disruption to traffic flows during construction. Other respondents argued that the scheme does not adequately demonstrate that the long-term benefits outweigh the potential impacts. Some respondents objected to Policy T2 due to concerns about the A38 scheme and argued that investment would be better spent on local public transport.

579. A respondent sought amendments to Policy T3 (Servicing, Accessibility and Parking) to require road widths capable of safely accommodating larger vehicles alongside on-street parking.

580. Concerns were raised regarding the approach to electric vehicle charging set out in Policy T5, with one respondent arguing for emphasis on strategic public charging infrastructure rather on on-street residential charging provision. Another

respondent objected to Policy T5 on the basis of wanting support for petrol-powered vehicles.

6.9.2. Stakeholder Responses

581. National Highways emphasise that any proposed allocations or sites affecting the Strategic Road Network (SRN) must be supported by clear, site-specific evidence of impacts on key junctions, including a full assessment of cumulative effects from all planned development in accordance with the Department for Transport Circular 01/2022, with mitigation measures identified and secured where necessary.

582. Derbyshire County Council recommended that Policy T1(Active and Sustainable Transport) place greater emphasis on improving permeability not only within individual development sites but also between adjoining allocations, including enhanced walking, cycling and public transport links between the Land South of Mickleover and Rykneld Road developments.

583. The Derby and Derbyshire Local Access Forum support Policy T1, but recommend provision for horse riding be included as part of the transport hierarchy.

584. Derbyshire County Council also suggested that the Department for Transport's Connectivity Tool be used to assess the sustainability of development sites and identify interventions required to support sustainable travel behaviour.

585. The University of Derby supported the Local Plan's emphasis on walking, wheeling, cycling, increased public transport use, mobility hubs and improved pedestrian permeability into the city centre.

586. The University also encouraged closer collaboration with the Council on the design of active travel routes, including improvements to safety, lighting, wayfinding and accessibility.

587. The University further recommended that the City Centre–Kedleston Road corridor be identified as a priority movement and public realm corridor, with the retention and enhancement of the Green Wedge to support active travel, biodiversity and city living.

588. Natural England recommended that Policies T1 (Active and Sustainable Transport) and T4 (Protected Routes) place greater emphasis on integrating green infrastructure into active travel routes and improving access to natural green spaces, including Allestree Park and the wider countryside.

589. Natural England also suggested that opportunities to improve strategic active travel links, including a route along the Derwent Valley towards the Peak District, should be explored.

590. Derbyshire County Council recommended that Policy T2 (Transport Infrastructure) explicitly reference both Phase 1 and Phase 2 of the South Derby Integrated Transport Link.

591. Derbyshire County Council supported Policy T4 (Protected Routes) but recommended that greater consideration be given to integrating new routes with existing cross-boundary walking and cycling networks.

592. The Derby and Derbyshire Local Access Forum also supported Policy T4, but recommended clearer wayfinding of different routes be included.

593. Derbyshire County Council supported the principle of Policy T6 (Mobility Hubs) but recommended amendments to strengthen references to cross-boundary connectivity and the role of mobility hubs as community focal points. It was also recommended that mobility hubs be located in close proximity to higher-density development to maximise accessibility and encourage sustainable travel.

594. National Highways also acknowledge support within Policy T2 for the A38 Derby Junctions Grade Separation Scheme and indicate that they intend to publish delivery timescales for the scheme later in the year.

595. Miller Homes, William Davis and Miller Gadsby emphasise that the parking standard in Appendix 3 for 1 cycle parking space per bedroom will have significant implications for design of development.

Site-Specific Transport Infrastructure

596. Derbyshire County Council highlighted deficiencies in existing active travel infrastructure at the Findern Interchange, noting that current walking and cycling provision does not meet modern design standards and recommending comprehensive improvements along the A38 corridor.

597. The County Council also recommended the provision of a new active travel crossing of the A38 to improve connectivity between the Land South of Mickleover and The Hollow housing allocations and provide continuous, safe walking and cycling routes into Derby.

598. In addition, Derbyshire County Council suggested that the existing Derby–Burton bus service (Trentbarton V3) be reviewed to include stops within the proposed development area to improve public transport accessibility and encourage sustainable travel choices.

6.9.3. Regulation 19 Response

599. *In response to the comments and issues raised by stakeholders and members of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*

600. Policy T1 (Active and Sustainable Travel) has been amended to include a criterion for embedding green infrastructure into all new sustainable travel routes

601. Criterion (h) of Policy T1 has been amended to replace the 400m requirement with a more flexible ‘within walking distance’ of a bus stop.

602. Reference has been included within Policy T2 (Strategic Transport Infrastructure) to the creation of an active travel link between the University City Centre Hub and Kedleston Road Campus. This policy has also been amended to include provisions for cross-boundary cycling and walking networks.

603. Policy T4 (Protected Routes) now includes text not permitting development that would sever or prejudice the re-use of former railway lines or canals.

Likewise, reference is made to the function of and support for the future restoration of the former Derby Canal.

604. Repetition of Building Regulations has been removed from Policy T5 (Electric Vehicle Charging Facilities).

605. Policy T6 (Mobility Hubs) was amended to include explicit reference to the cross-boundary potential of mobility hubs, as well as possibilities for the inclusion of community facilities and small-scale retail.

6.10.City Centre

6.10.1. Public Responses

606. Respondents were generally supportive of increasing residential development within the city centre, recognising its sustainable location and supporting an approach to increase vitality and footfall.

607. Some respondents recommended that suitable city centre sites should be prioritised for higher-density and multi-storey residential development to reduce pressure for housing on greenfield land elsewhere.

608. Concerns were raised regarding Policy CC1 (City Centre Strategy), with respondents questioning whether aspirations can be achieved without wider regulatory changes. Respondents suggested that focus should be placed on reducing the influence of large commercial operators and promoting the evening economy.

609. Concerns were raised that the local Plan places unrealistic reliance on the city centre to deliver housing numbers, given the uncertainties around infrastructure delivery, funding and the viability of different housing typologies.

610. Some respondents also questioned whether Policy CC4 (Residential-led Mixed Use Site Allocations) places too much emphasis on development density at the expense of the quality of the living environment.

611. A number of respondents highlighted the need for additional community facilities and green spaces to support an increasing residential population within the city centre.

612. Concerns were raised about the architectural quality of some city centre developments, particularly where contemporary buildings were considered contrasting to the historic character of the area.

613. Some respondents expressed concern that Policy CC5 (Non-Residential Regeneration Opportunities) appears inconsistent with the current Council regeneration programmes and requested further explanation of how existing initiatives support the policy's objectives.

614. Some respondents objected to the Tall Buildings Study and Policy CC6 (Tall Buildings) on the basis that tall buildings lack architectural merit. They objected against the principle of further tall buildings and argued they are not justified by Derby's housing needs.

615. Conversely, support was expressed for Policy CC6 (Tall Buildings), particularly due to the detailed criteria new proposals must satisfy.

616. Respondents highlighted the need to make the city centre more inclusive, accessible and welcoming for people of all ages and abilities, including improvements to pavement quality, public safety and facilities for young people.

617. Safety was highlighted as a key issue within the city centre.

618. Some respondents called for stronger planning controls to prevent further uses that could undermine public health objectives, with a particular emphasis on additional fast-food outlets. Respondents similarly advocated for a greater

emphasis on high-quality and independent cafes and restaurants to replace fast food outlets.

619. One respondent considered that tourism and culture had been given insufficient emphasis within the city centre strategy.

620. Concerns were raised that Policy CC8 (Shopping, Eating and Drinking) may overestimate demand for retail and leisure uses and could inadvertently encourage further fast food and gambling premises.

621. Support was expressed for Policy CC11 (City Centre Quiet Zone), recognising the importance of protecting residents' sleep and amenity; though, some respondents questioned the proposed 12:30am threshold and sought clarity on the operation of late-night venues.

622. Respondents were generally supportive of the allocation at Policy CC12 (Riverside).

623. Some respondents highlighted the need for improved public transport connections to the Railway Station in response to Policy CC14 (Railway Station Quarter). One comment expressed concern about bus services either side of the station entrances and its impact on passenger convenience.

624. Concerns were raised regarding the availability of funding, resources and supporting information necessary to deliver the proposed city centre housing allocations.

6.10.2. Stakeholder Responses

General City Centre Policies

625. East Midlands Combined County Authority (EMCCA) expressed strong support for the Local Plan's overall approach to the city centre, including the proposed residential-led site allocations.

626. The Chamber of Commerce emphasised that retail alone can no longer be relied upon to drive city centre vitality, highlighting the increasing importance of culture, events and the wider visitor economy, whilst recognising that commercial viability remains a significant challenge.

627. The Chamber also identified perceptions of safety within the city centre as a barrier to business growth, investment and employee recruitment.

628. Marketing Derby, in consultation with the Derby Economic Development Advisory Committee (DEDAC), identified safety, visitor experience and wayfinding as key priorities for the City Centre chapter and considered the emerging Public Realm Strategy to be fundamental to delivering these objectives. However, they considered that proposals within the emerging Public Realm Strategy, particularly the reintroduction of two-way traffic on Wardwick, could weaken connectivity between Becketwell and the Cathedral Quarter and conflict with the objectives of Policy CC5 relating to Museum Square.

629. DEDAC supported Policy CC1 (City Centre Strategy), particularly its recognition of heritage as a catalyst for regeneration, whilst emphasising the need for effective enforcement to prevent the deterioration of heritage assets.

630. Derbion seeks to amend the boundary of the Central Activity Area to include the Derbion Centre, the Eagle Quarter and Bradshaw Way.

631. The Civic Society supported the objective of increasing the residential population within the city centre but recommended that residential block design should be varied and that Policy CC1 should require active ground floor uses to support a vibrant street environment.

632. The University of Derby strongly supported the city centre regeneration strategy but recommended that greater recognition be given to the needs of younger people, particularly through strengthening the evening and night-time economy.

633. The Environment Agency advised that development proposed under Policy CC3 (City Centre Living) should apply the Sequential and Exception Tests where necessary, avoid development within Flood Zone 3 where possible, and ensure that any proposals do not increase flood risk or result in the unacceptable loss of flood storage.

634. Marketing Derby and DEDAC supported Policy CC7, particularly the ambition to increase Grade A office accommodation through the conversion of existing buildings. Concerns were, however, raised that the policy wording implies a preference for rail-related businesses to locate within the Railway Station Quarter rather than recognising the wider city centre as an attractive business location.

635. Marketing Derby and DEDAC supported Policy CC9 (Active and Inclusive Frontages) but recommended that greater emphasis be placed on managing the cumulative impact of lower quality uses, such as vape shops, charity shops and premises with inactive frontages, through a more curated approach to key streets.

636. Contrastingly, Derbion objected to Policy CC9 limitations on E Use Class restrictions via conditions.

637. Concerns where raised about the impacts of the proposed pedestrianisation of The Strand on the businesses occupying the street.

<u>Tall Buildings (Policy CC6)</u>

638. The Derby Station Quarter Board supports Policy CC6 (Tall Buildings) on the role of tall buildings in enabling city centre growth, legibility and regeneration, including the Station Quarter opportunity areas identified in Figure 47. They seek a more ambitious and clearer approach to defining “tall buildings” and how prevailing heights are calculated, and raises concern that a blanket requirement for full planning applications may hinder delivery of major masterplan-led regeneration.

639. The Board requests greater flexibility and proportionality in validation requirements for tall buildings, aligned with emerging national policy, to ensure site-specific application and avoid unnecessary constraints on development.

640. Derbion supports the principle of CC6, but considers the policy too conservative, noting the “twice prevailing height” definition is modest for city centre locations and should better reflect higher landmark ranges identified in the Tall Buildings Study (including local/district landmarks). Derbion seeks clarification on how prevailing heights are defined and objects to the requirement for full applications

only, supporting instead the use of outline applications for major schemes to improve deliverability on complex brownfield sites while retaining control at reserved matters stage.

City Centre Allocations

641. The Environment Agency identified flood risk considerations affecting the Derby Riverside, Railway Station Quarter and North Castleward allocations and recommended that these constraints are fully addressed through site-specific design and flood risk mitigation.

642. The Derwent Valley Mills World Heritage Site Partnership and Derbyshire County Council recommended that all city centre site allocations should be supported by Heritage Impact Assessments. These organisations also advised that proposals for tall buildings within Policies CC12 (Derby Riverside) and CC15 (North Castleward) should be subject to Heritage Impact Assessment and assessment using the Derby Digital Twin to ensure that the Outstanding Universal Value of the World Heritage Site is not adversely affected, with development numbers reduced where necessary.

643. The Civic Society emphasised the strategic civic and cultural importance of the Assembly Rooms, advocating refurbishment and reuse as a multi-purpose civic and cultural venue and recommending the inclusion of a dedicated site allocation to safeguard its future.

644. St James Securities objected to the requirement for the remaining land at Becketwell to deliver a minimum of 150 new homes, instead requesting Policy CC4 (Residential ed, Mixed-Use Site Allocations) be amended to provide further flexibility.

645. Derbion supports the Eagle Quarter and Bradshaw Way site as residential-led, mixed-use site allocations within Policy CC4, however, request updated capacity figures to reflect approved outline permissions.

Policy CC12: Derby Riverside

646. The Civic Society recommended that Policy CC12 (Derby Riverside) be strengthened to ensure that new development preserves and enhances the historic relationship between the city and the River Derwent.

647. The Environment Agency advised that development within the Derby Riverside allocation should appropriately address flood risk, including providing safe refuge, raised finished floor levels where necessary and compensatory floodplain storage where required.

648. Natural England are supportive of this policy and its provisions for creating new green spaces and nature conservation along the river.

Policy CC13: University of Derby City Centre Hub

649. Derby Energy Network Limited supported the policy's aspiration to integrate with decentralised energy networks but recommended stronger wording requiring connection to existing heat networks where available and viable, unless a demonstrably better low-carbon alternative can be provided.

650. The University of Derby expressed strong support for Policy CC13 as drafted.

Policy CC14: Railway Station Quarter

651. The Environment Agency noted that the Railway Station Quarter is partly located within Flood Zone 2 and areas at risk from reservoir flooding, and recommended that these constraints are appropriately addressed through future development proposals.

652. The Derby Station Quarter Board strongly supports Policy CC14 and has submitted a representation outlining the suitability, availability and deliverability of the site allocation within a ten-year time frame.

653. Network Rail objects to Policy CC14 on the basis of its approach to station car parking, arguing that future rail passenger growth will require an increase in parking provision rather than replacement on a like-for-like basis. Network Rail advised that additional station parking capacity should be safeguarded through a phased approach and that sufficient long-term provision should be secured before the release of any existing station car parking. As such, Network Rail requested policy amendment and clarification.

Policy CC15: North Castleward

654. Further comments noted that although North Castleward is not immediately adjacent to the World Heritage Site, Policy CC15 should acknowledge the potential impact of development on views from Darley Abbey Park.

6.10.3. Councillor Responses

655. Councillor John Wright supported the focus on residential-led city centre regeneration.

6.10.4. Regulation 19 Response

656. *In response to the comments and issues raised by stakeholders and members of the public, a summary of the amendments incorporated into the Regulation 19 Local Plan is set out below:*

657. It is noted that active ground-floor uses are discussed elsewhere in the Plan and therefore no changes are proposed to amend Policy CC1 to reflect this.

658. Text has been added to Policy CC1 to give emphasis to meeting the needs of younger people.

659. The City Centre Housing Supply Position table within Policy CC3 (City Centre Living) has been updated to reflect the changes as of April 2026.

660. Policy CC4 (Residential Led, Mixed-Use Site Allocations) has been amended to reflect the request for flexibility in development typology, as well as updates to residential figures to mirror approved planning permissions.

661. Work has been commissioned in relation to further screening and scoping for heritage impacts across the allocations (see Heritage chapter).

662. Policy CC6 (Tall Buildings) has been amended to remove the requirement for tall building applications to be submitted in full, instead now allowing for outline applications where comprehensive design codes can be secured via condition. Emphasis has been placed that the validation list will be utilised on a site-by-site basis.

663. Policy CC7 (Business, Creativity and Learning) has been amended to encourage investment in office floorspace for the rail industry to be located in the Railway Station Quarter. The supporting text now refers directly to the Central Activity Area (including the Cathedral and St Peters Quarters) as the main area to direct new office space.

664. The Central Activity Area (CAA) boundary has been extended southwards to include the Derbion

665. The Quiet Zone designation wording has been incorporated into Policy CC8.

666. Policy CC9 (Active and Inclusive Frontages) has been amended to clarify that conditions to restrict Use Class E will be imposed where appropriate. Supportive text has been added to refer to the nature of specific uses, such as vape shops and off licenses.

667. Policy CC10 has been amended to ensure flexibility for major development providing public realm improvements. Text has also been added to emphasise that contributions for public realm improvements will be sought in lieu of on-site public open space where appropriate.

668. Policy CC12 (Derby Riverside) now includes additional aims for the rationalisation of surface level parking, provision of a multi-modal hub, and inclusion of SuDS.

669. Amendments to Policy CC14 (Railway Station Quarter) include provisions for additional public parking spaces to be provided where justified and supported by sustainable travel opportunities.

6.11. Habitat Regulations Assessment Screening

670. A summary of responses to the Habitat Regulations Assessment Screening is covered in depth in the Sustainability Appraisal.

Appendix A: List of Consultees

The following table lists the organisations and statutory bodies who received email correspondence informing of the Regulation 18 consultation.

Individuals signed up to the Local Plan mailing list also received notification of the Regulation 18 consultation commencement.

Active Travel England	Define Planning & Design	Findern Parish Council
Age UK	Derbion	Forestry Commission
Ainscough Strategic Land	Derby and Derbyshire Integrated Care Board (NHS)	Gladman
Amber Valley Borough Council	Derby BID Company	The Guinness Partnership
Aston-on-Trent Parish Council	Derby Canal Trust	Gypsy & Traveller Orgs
Avant Homes	Derby Cathedral	Hallam Land
Avison Young	Derby College	Harris Lamb
Barrett Homes	Derby Theatre	Harworth Group
Barrow-on-Trent Parish Council	Derbyshire County Council	Hawksmoor
Barton Wilmore	Derbyshire Fire Service	Heaton Planning
Bellway	Derbyshire Police	Henry Boot Developments
Bidwells	Derbyshire Wildlife Trust	Highways England
Bloor Homes	Derwent Valley Mills	Historic England
Boxall Brown & Jones Estate Agent	DPDS Consultants	Home Builders Federation
Breadsall OC	Duffield Parish Council	Homes England
Broadgrove planning & Development Ltd	East Midlands Ambulance Service	Ion Developments
Burnaston Parish Council	East Midlands Chamber	IM Land
Cadent Gas	East Midlands Combined Authority	Indurent
Canal and Rivers Trust	East Midlands Development Agency	Infinitas Design
Carney Sweeney	ELG Planning	Infinity Tech UK
Carter Jonas	Elvaston Parish Council	Johnson Mowat
Clowes Developments	Emery Planning	Keepmoat
Colliers	Environment Agency	Knight Frank
Compendium Living	Erewash District Council	Lathan Architects
Crystal Stream	Estates at HNS	Lichfields
Dale Abbey Parish Councils	Euro Fund Group	Lidl UK
Dandara Northern Homes Counties	Evolve Planning & Design	Little Eaton Parish Council
David Wilson Homes	Fisher German	Longhurst Group

Lucy White Planning	Quarndon Parish Council	Staton Young
Mackworth Parish Council	Quod	Stainton Planning
Masson8 Properties	Rapleys	Stenson Fields Parish Council
Marketing Derby	Radbourne Parish Council	St James Securities
Marrons	Raybould Estate Agent	Tetlow King
Miller Homes	Redrow Homes	Thornton Planning
Morley Parish Council	Rg+p Ltd	Toyota
National Trust	Rigby & Co	Traveller Movement
Natural England	RNIB	Turleys
Network Rail	RO-Land Group	Twyford & Stenson Parish Council
Nineteen 47	Rolls Royce	University of Derby
Nottingham City Council	Roscom	Urban Investments
Nottinghamshire County Council	RSPB	Urban Town Planning
Ockbrook Parish Council	Rural Solutions	Vinci Developments
Oxalis	Salloway Property Consultants	Wain Estates
Pacific Shelf	Savills	Walton & Co
Panorama Planning	Severn Trent	Wathalls Funeral Director
Peacock and Smith	Severn Trent Green Power	Wavensmere
Pegasus Planning	Simon Foote Architects	Weston-on-Trent Parish Council
Persimmon Homes	SJ Foster Planning	Wheeldon Homes
The Planning Bureau Ltd	South Derbyshire District Council	Wilson Bowden
Planning Design Group	Sport England	The Woodland Trust
Platform4	Spring Planning	WSP
Planware Ltd	SSA Planning	12Property
Prior Partners		

Appendix B: Proof of Consultation



Derby City Council

A new Local Plan for Derby

Information for Stakeholders

Winter 2025

WELCOME TO OUR LOCAL PLAN NEWSLETTER

Since we published our previous newsletter last autumn, a lot has changed: we now have Cabinet approval to do a consultation on the draft Local Plan for Derby. The next round of public consultation on the Local Plan for Derby will commence in January and will run for eight weeks.

WE ARE PRODUCING A NEW LOCAL PLAN FOR DERBY

The Local Plan presents our planning policies for the city, which guide key decisions regarding new developments in Derby between 2023 and 2043. The Council is working on preparing a new Local Plan for Derby, which will replace the Derby City Local Plan – part 1 Core Strategy (2017) and Saved Policies of the City of Derby Local Plan Review (2006).

LOCAL PLAN TIMELINE

Evidence gathering & initial Local Plan consultation	Draft Local Plan Consultation Reg 18	Submission Local Plan Consultation Reg 19	Examination in Public	Inspector's Binding Report	Adoption by the Council
	We are at this stage	Summer 2026	Spring 2027		Summer 2027

The Council's Cabinet met to discuss the draft Local Plan on Wednesday 12 November 2025 and agreed that it is now ready for residents, businesses and organisations to comment on as the first full draft of the plan. The plan will then undergo public consultation again prior to submission to the Planning Inspectorate for its Examination in Public.

1

Appendix 1: Pre-consultation Winter Newsletter, December 2025 (page 1)

SUMMARY OF EACH CHAPTER

The following section will outline the key focus areas of each chapter within the Local Plan, defining their key ambitions and aims, as well as the benefits they will generate for those living, working and visiting the City of Derby.

General Development Principles:
Provides the foundational policies centred around providing high standards of amenity, and accessible, safe spaces, which respect the local character and context of Derby's built environment and communities. This chapter recognises the need to provide increased opportunities to form stronger employment and residential connections within Derby.

Housing:
Policies concerned with providing a diverse range of high quality, suitable housing in the right locations to meet the needs of both current and future generations, including affordable housing, specialist housing, Housing in Multiple Occupation, and a Gypsy and Traveller site. This chapter outlines the key housing targets for Derby, and how this is planned to be achieved.

Economy:
Policies are focused upon creating a strong, resilient and sustainable economy which boasts various opportunities for businesses, residents, and future generations. This will be achieved through the provision of high-quality employment, retail, food, drink and evening economy spaces, which support the vital role of culture and tourism in Derby.

Environment:
Policies supporting the protection and enhancement of Derby's natural and historic environments, and their vital assets, to uphold the City's unique character, identity, sustainability, and its connections to nature within the urban environment. This chapter provides an overview of the key actions which can be taken to ensure a resilient future for Derby is achieved.

Climate Change:
Policies addressing several key ways that climate change can be managed: flood risk management, sustainable design and construction, and the use of renewable and low-carbon energies. This chapter outlines both the local and national climate change targets for Derby.

Infrastructure and Community:
Policies centred around creating inclusive social, recreational and cultural services and spaces to meet the needs of Derby's communities, to maintain the identity of Derby and ensure a good quality of life for residents and visitors.

Transport and Movement:
Policies focused on creating a well-connected city with opportunities for economic prosperity, social inclusion, and environmental ambitions, whilst acknowledging Derby's strategic role as part of the wider transport network. This chapter provides an overview of the ways that improved connectivity will support the Council's key ambitions.

City Centre:
Policies concerned with the role of Derby's City Centre as the heart of identity, economy and cultural life, and the ways that provisions for shopping, employment, leisure, and learning services can create a thriving, vibrant, and competitive space to live, work, study and visit. This chapter outlines how development can generate new growth prospects for the City Centre.

Appendix 2: Pre-consultation Winter Newsletter, December 2025 (page 2)

NEXT STEPS

The eight-week consultation period will begin in January 2026. If you have asked to be informed, you will receive a notification that the consultation period has begun.

Additionally, if you are not already on our local plan consultation list and would like to receive updates regarding the new Local Plan's progress, please email planningpolicy@derby.gov.uk.

During this period the Planning Policy team will be running two consultation events, in Derby Market Hall on **Saturday 31 January** and **Saturday 21 February 2026**.

If you would like to promote a site in the city for housing or another type of use through the Local Plan, you can complete our 'Call for Sites' form.

CONTACTS

Planning Policy Team:
PlanningPolicy@derby.gov.uk

Website:
derby.gov.uk/environment-and-planning/planning/local-plan/emerging/

Let's Talk Derby:
letstalk.derby.gov.uk/local-plan



Appendix 3: Pre-consultation Winter Newsletter, December 2025 (page 3)

Derby City Council

Local Plan for Derby

Help shape what happens next



Consultation open: 12 January 2026 - 9 March 2026

Drop-in sessions will be held at Derby Market Hall on:

Saturday 31 January 2026
9.30am – 3pm

Saturday 21 February 2026
9.30am – 3pm

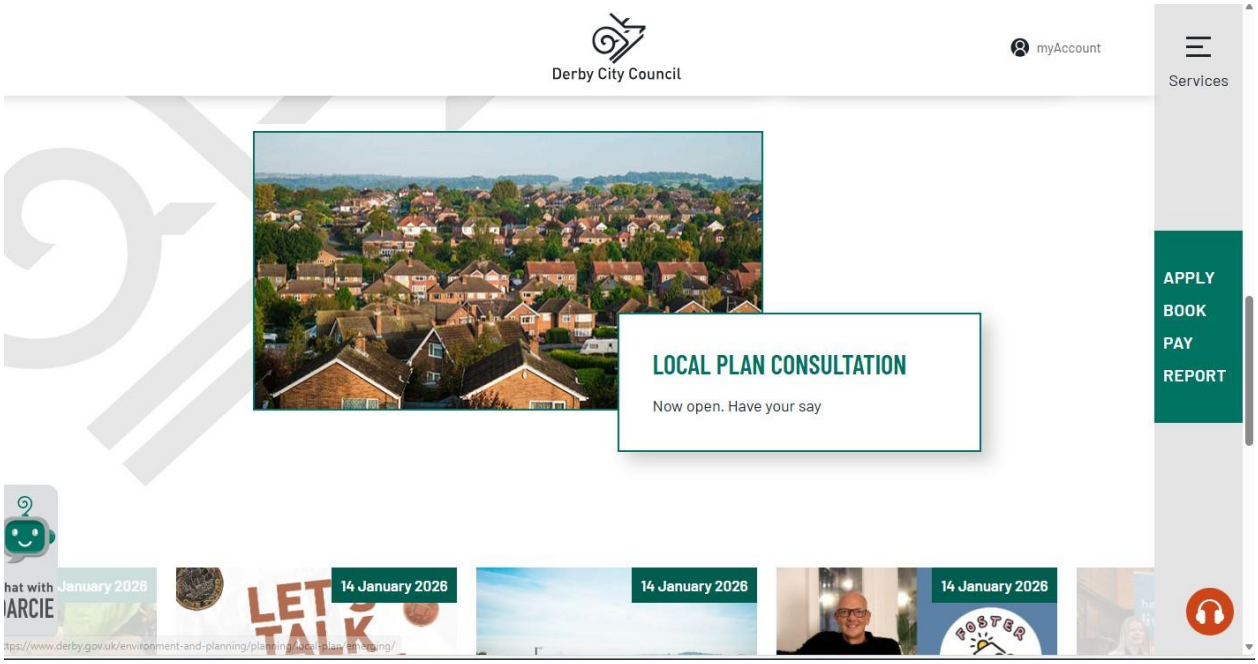
Printed copies of the Local Plan are available in the Council House and at libraries across the city during usual opening hours.

If you cannot provide comments online, please contact the Policy Planning Team at **01332 640807** or **PlanningPolicy@derby.gov.uk** to request a response form.

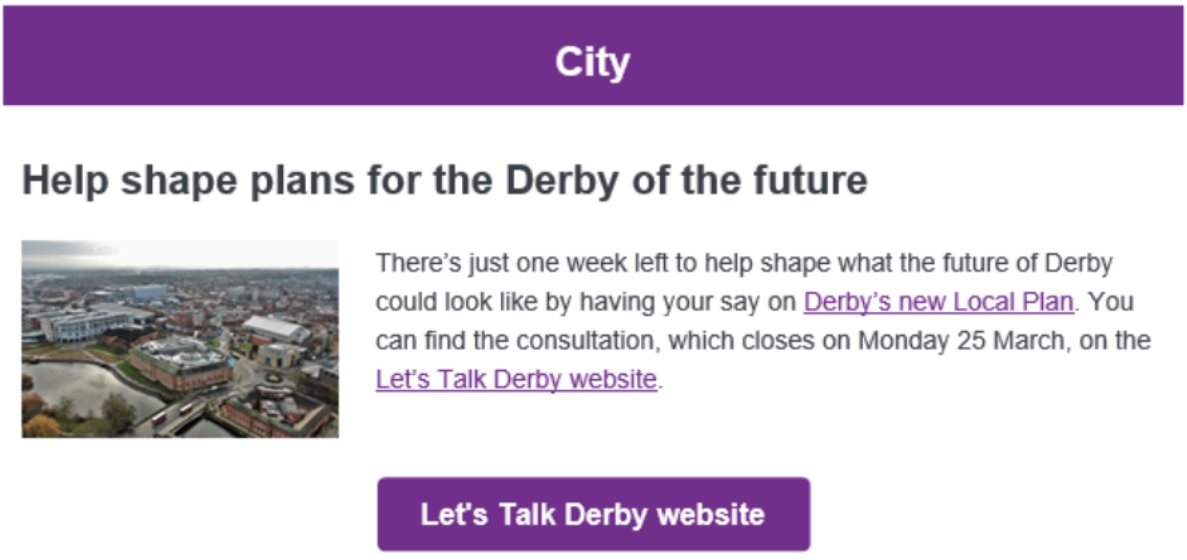
To find out more and respond to the consultation, scan the QR code or go to **derby.gov.uk** and search for **'Local Plan'**

Derby City Council

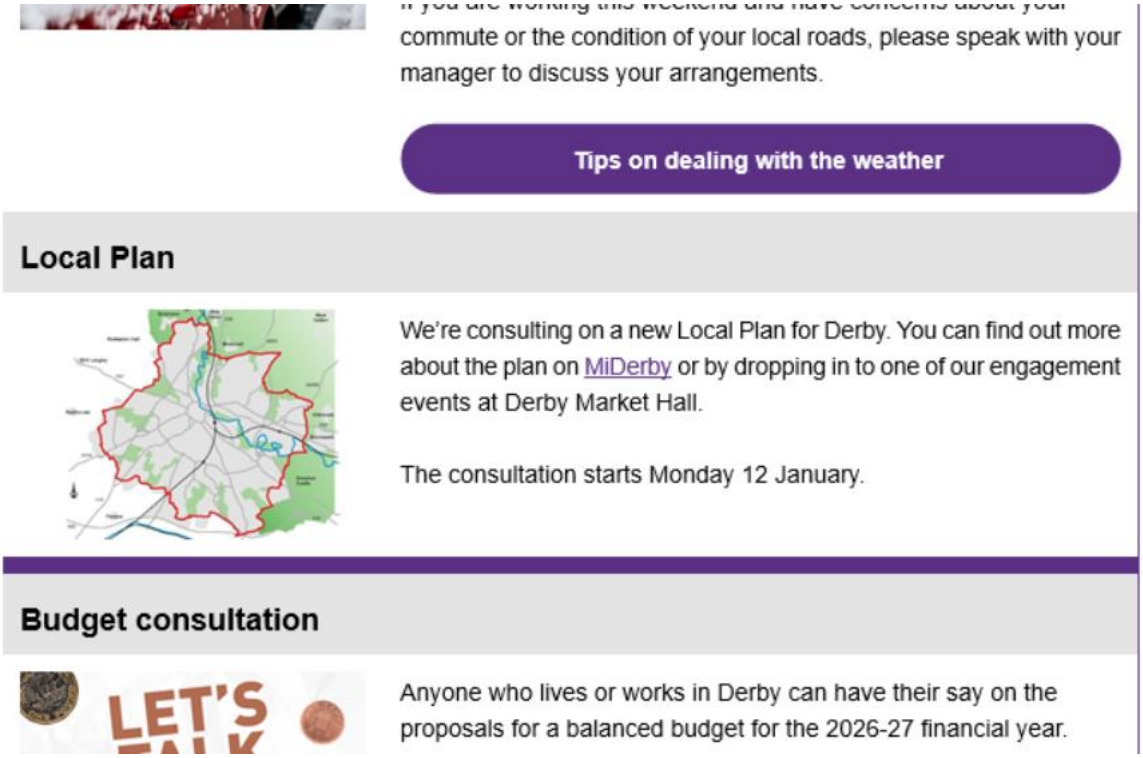
Appendix 4: Consultation Poster



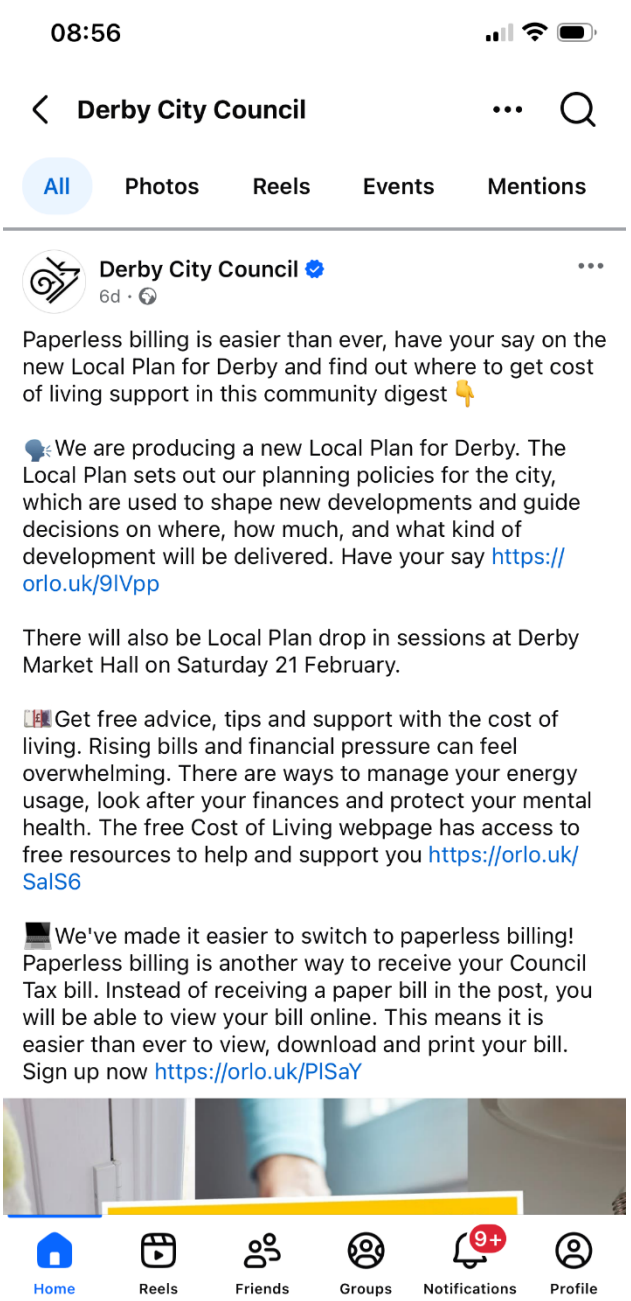
Appendix 5: Consultation banner on the Derby City Council website home page

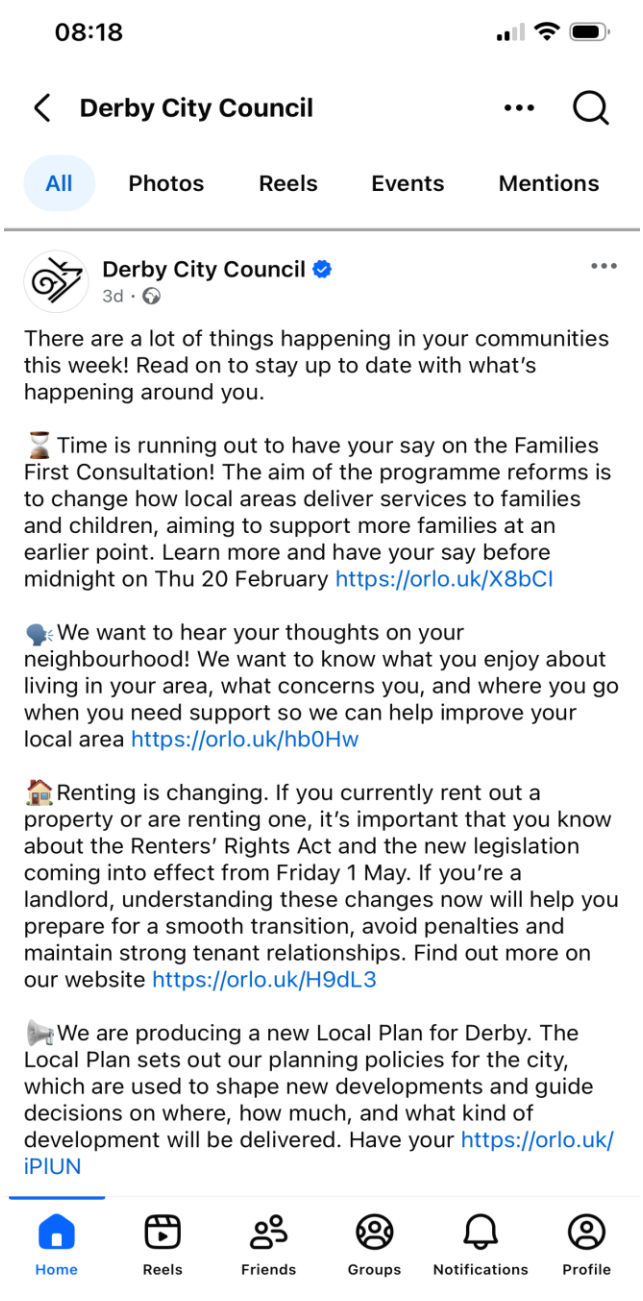


Appendix 6: Signpost to consultation in MiNews, dated 15th March 2026

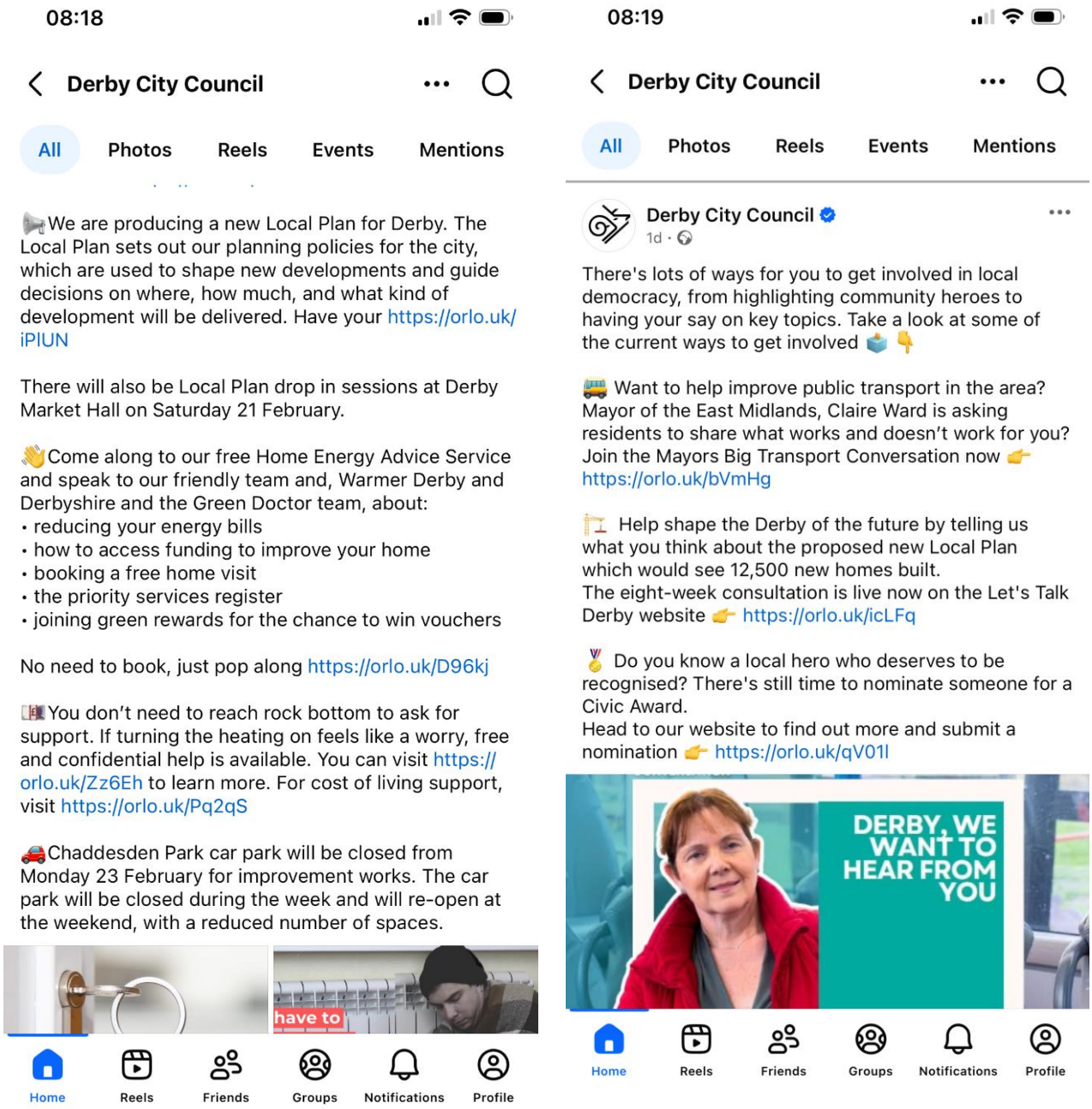


Appendix 7: Signpost to consultation in MiNews, dated 9th January 2026





Appendix 8: Signpost to consultation on Derby City Council's Facebook Page

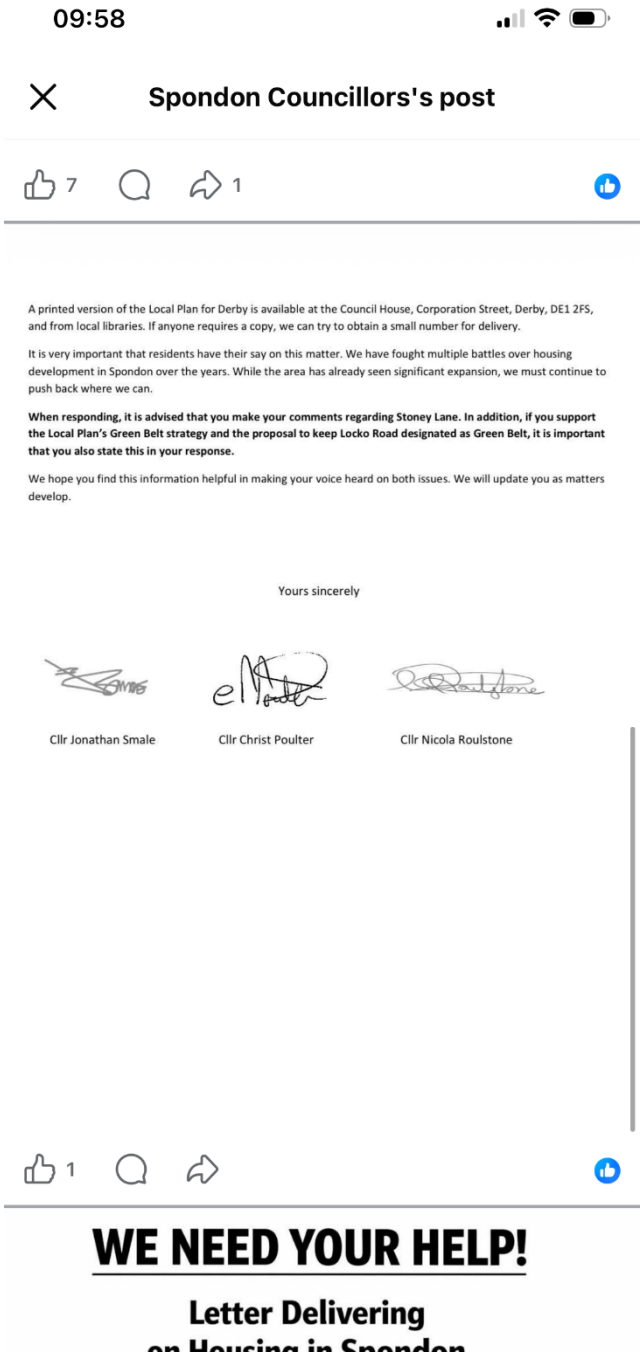


Appendix 9: Signpost to consultation on Derby City Council's Facebook Page



Appendix 10: Signpost to consultation on Derby City Council's Facebook Page

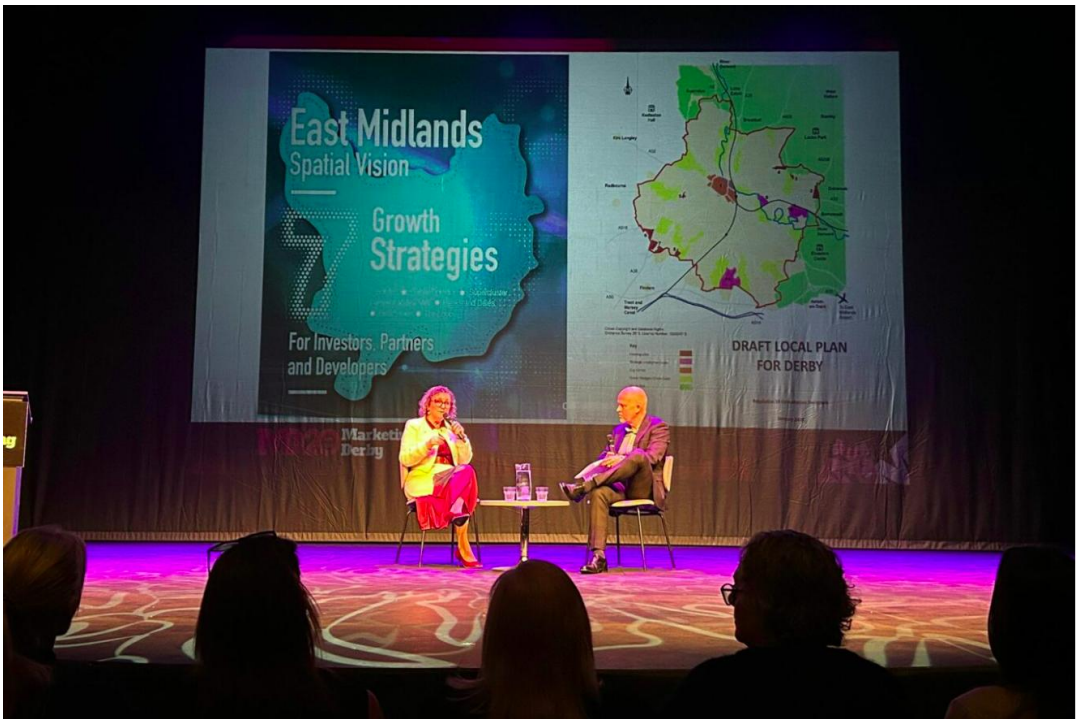




Appendix 11: Signpost to consultation on posted on the Spondon Councillor's Facebook Page



Appendix 12: Physical Copies of the Local Plan documents in the Council House reception



Appendix 13: Nadine Peatfield at the Annual Business Event (4th February 2026)

Appendix C: Statement of Community Involvement Compliance Table

The following table illustrates the compliance of both the Regulation 18 and Regulation 19 consultations with the methodology stated by the Statement of Community Involvement (SCI).

Methods of Consultation	Development Plan Preparation Stages	
	Regulation 18	Regulation 19
Provide the contact details for the Planning Policy Team	✓	✓
Place information and documents on the Council's website	✓	✓
Send stakeholder notifications by letter or email	✓	✓
Make information and documents available for inspection at the Council House and other publicly accessible locations where practicable	✓	✓
Place adverts or statutory notice in the Derby Telegraph	✗	✓
Put posters in public buildings	✓	✓
Publish articles in the Derby Newsroom	✓	✓
Hold exhibitions or drop-in events in publicly accessible buildings	✓	✗
Hold workshops and meetings with community groups and other stakeholders	✓	✗
Hold face-to-face meetings	✓	✓
Use the Council's internal communications network	✓	✓
Use online consultation platforms such a Let's Talk Derby	✓	✓
Engage with groups we need to reach out to	✓	✓
Internal consultation within Derby City Council	✓	✓
Publicise through the Council's external partners	✓	✓
Use social media such as Facebook and Twitter/ Instagram	✓	✓