



Derby City Council Local Plan

Regulation 19 SA Report – Appendix F: Consultation Comments

Derby City Council

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Basis of Report

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Table F-1 sets out the consultation comments received from Statutory Consultees on the SA Scoping Report. The table sets out how these comments were addressed.

Table F-1: Scoping Consultation Comments

ID	Consultee	Comment	Action Required?	In reference to	Response
1	Natural England	Thank you for consulting Natural England on the above document by your email of 19th September. Natural England welcomes the Sustainability Appraisal Scoping report for the new Derby City Local Plan and considers that the methodology used in the report meets the requirements of the relevant legislation and guidance. We have the following comments:	No	Scoping Report	General comment - no action required.
2	Natural England	2.3 Draft Objectives Natural England welcomes the draft objectives OBJ 7, 8, 9 & 14 as these will support the vision of a Greener City with connected Green Infrastructure, access to nature and greenspaces, protection of green wedges and the River Derwent corridor.	No	Scoping Report	General comment - no action required.
3	Natural England	5.2. Human Health We suggest that access to green space is an important aspect of improving health and well-being and should be considered within this section. The benefits to health that the provision of quality green infrastructure is included within Natural England's Green Infrastructure Framework Green Infrastructure Home. We would also highlight the "Green in 15" target set out in the Environmental Improvement Plan which encourages provision of green space within 15 minutes walking distance. The Green Infrastructure Mapping Tool (within the Green Infrastructure Framework) shows where green and blue infrastructure is accessible at different scales, such as doorstep, local and neighbourhood scales using Access to Greenspace Standards (AGSt) Assessment. This can be used to identify communities that do not have access to greenspace at these different scales. We would suggest utilising this tool to assess Green Infrastructure provision to ensure it is accessible and inclusive at different scales and in line with government targets. For additional information on health and green space see Natural England's Review of Nature Exposure and Human Health and Wellbeing, the Natural and Sustainable Environments chapter of Spatial Planning for Health, and The Nature Connection Handbook.	Yes	Scoping Report - Section 5.2	SLR have updated Section 5.2 to consider access to green space and the effects this can have upon health and wellbeing. This will link to Section 5.6 where leisure and recreational facilities have been considered, including open space.
4	Natural England	5.7 Biodiversity & Natural Capital Natural England welcomes this section and the identification of designated sites and other areas of importance for nature. We are pleased to note that the Derbyshire Nature Recovery Strategy has been referenced in this section and this has now been finalised Homepage - Derbyshire's Nature Recovery Strategy. We also support the Issues & Opportunities that have been identified.	No	Scoping Report	General comment - no action required.
5	Natural England	5.8 Landscape & Townscape Natural England are pleased to note the reference to National Character Areas within this section. To ensure good design which is compatible with the local landscape and townscape reference should be made to Natural England's GI Planning and Design Guide which provides details of what good GI design looks like linked to the ten characteristics of well-designed places as set out in the National Model Design Code - GOV.UK (www.gov.uk) and the National design guide - GOV.UK (www.gov.uk). Consideration of the use of the Green Infrastructure Standards set out in the GI Framework would also be helpful to reinforce a distinctive sense of place. The five Headline Green Infrastructure Standards are: S1: Green Infrastructure Strategy Standard S2: Accessible Greenspace Standard S3: Urban Nature Recovery Standard S4: Urban Greening Factor Standard S5: Urban Tree Canopy Cover Standard	Yes	Scoping Report - Section 5.8	SLR will consider this comment within the assessment and reporting stages of the Local Plan SA. Natural England's guidance will be considered and utilised within proposed mitigation measures, where appropriate, to aid in minimising negative effects arising from the Local Plan upon Landscape and Townscape.
6	Natural England	5.11 Water Environment We welcome the water issues that have been identified. Our water remit focusses on ensuring that habitats and designated sites are protected from water-related development impacts. Adequate policy protection should be provided and we would recommend the undertaking of a water cycle study.	Yes	Scoping Report - Section 5.11	SLR will consider the effects of the Local Plan policies upon the water environment. DCC will consider undertaking a water cycle study.



ID	Consultee	Comment	Action Required?	In reference to	Response
7	Natural England	5.12 Climate Change & Greenhouse gases We are pleased to note that Green Infrastructure has been included in this section and its role in climate change mitigation. Natural England is keen to promote nature-based solutions for climate change, particularly through the implementation of local plan policies. These measures include the installation of green roofs and walls in new buildings; the provision of Sustainable Urban Drainage Systems (SuDs) and wetlands; planting of street trees; habitat creation and enhancement to providing increased connectivity between fragmented areas of habitat to build up resilience to climate change and contribute to the Nature Recovery Network. Natural England has published a report on Climate Change Adaptation Climate Change Adaptation Manual - NE751 for nature conservation and a. Nature Networks Evidence Handbook - NERR081 which may be useful references.	Yes	Scoping Report - Section 5.12	SLR will consider the inclusion of nature based solutions within the assessment and reporting stages of the Local Plan SA. The inclusion of nature based solutions will be assessed within the SA and will be considered and utilised within proposed mitigation measures, where appropriate.
8	Natural England	6. SA Framework Natural England welcomes the SA Framework and considers that our interests in the natural environment are considered.	No	Scoping Report	General comment - no action required.
9	Natural England	Appendix A: Review of recent Plans, Policies, Plans and Programmes We suggest that Natural England's Green Infrastructure Strategy: Principles & Standards for England Green Infrastructure Home should be included with the review. The GIF provides a useful resource for local authorities in the formulation of their local plan policies. Ideally the Standards and Targets set out in the GIF should be used in developing and writing policy.	Yes	Scoping Report - Appendix A	SLR will consider this guidance document within their assessment of the Local Plan and, if appropriate, will utilise measures from this guidance within the mitigation and recommendations for the Local Plan.
10	Historic England	Thank you for the opportunity to engage with the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the plan making process.	No	Scoping Report	General comment - no action required.
11	Historic England	Section 5.9 - Historic Environment - We welcome the inclusion of the Historic Environment as a baseline data review topic, and the key sustainability issues and opportunities set out in the paragraphs under subsection 5.9.3.	No	Scoping Report - Section 5.9.3	General comment - no action required.
12	Historic England	However, we find the second paragraph of p.72 about funding and advice response time quite an odd sweeping statement. For the avoidance of doubt, Historic England has its own business process which requires statutory advice to be submitted within specific timescales to meet with Local Authority requirements. In addition, there are many sources of funding for heritage projects and we would expect the SA to explore that further if it is considered to be of importance to the Plan process.	Yes	Scoping Report - Section 5.9.2	SLR have reviewed this statement and removed this from the SA Scoping Report. Any additional funding opportunities, if of relevance, will be explored within the next stages of the SA Assessment and Reporting.
13	Historic England	There seems to be a focus on heritage at risk in subsection 5.9.2 but that does not translate through into the key sustainability issues and opportunities set out in subsection 5.9.3. We would expect an emerging Plan to address the needs of Heritage at Risk through relevant policy wording.	Yes	Scoping Report - Section 5.9.3	SLR have updated the key sustainability issues and opportunities under section 5.9.3 to further consider the heritage at risk detailed in 5.9.2.
14	Historic England	In terms of Plans, Policies and Programmes you may wish to note the Buildings at Risk project that has been taking place in the city since April 2025. Further information is available on the external stakeholder weblinks below: < https://www.derby.gov.uk/news/2025/july/how-derby-cc-is-bringing-historic-buildings-back-to-life/ > < https://www.derbyshirehistoricbuildingstrust.org.uk/post/the-buildings-at-risk-project-launches-in-derby-city-april-2025 >	Yes	Scoping Report - Appendix A	SLR have reviewed Derby's Building at Risk Project. As this is a project, rather than a plan, policy or programme, this has not been included within Appendix A. However, this will be considered within the assessment of the Local Plan.
15	Historic England	Subsection 5.9.3 sets out issues but does not identify any real opportunities for the historic environment which is unfortunate. We would expect the scope of the SA to extend and further work be undertaken so that potential opportunities for conserving or enhancing can be identified and built into the draft Plan at its earliest stages. Particularly where there are opportunities for synergy with other SA topics.	Yes	Scoping Report - Section 5.9.3	SLR have considered opportunities for the historic environment and included those that are applicable to the Local Plan area. The SA will also consider opportunities for enhancement within the assessment of the Local Plan, which will also extend to enhancing potential effects on the historic environment, if appropriate.



ID	Consultee	Comment	Action Required?	In reference to	Response
15	Historic England	We note the supporting questions set out for SA11 Historic Environment in Table 6.1 which are welcomed.	No	Scoping Report - Section 6, table 6	General comment - no action required.
17	Historic England	In relation to Plans, Policies and Programmes, we refer you to Historic England's Good Practice Advice (GPA) and Advice Notes (HEAN) as well as the invaluable information relating to heritage and other SA topics in our Heritage Counts information. The latter may assist with the SA work as it progresses: < https://historicengland.org.uk/advice/planning/planning-system/ > < https://historicengland.org.uk/research/heritage-counts/ >	Yes	Scoping Report - Appendix A	SLR will consider this guidance document within their assessment of the Local Plan and, if appropriate, will utilise measures from this guidance within the mitigation and recommendations for the Local Plan.



Table F-2 sets out the consultation comments received on the Interim SA Report during Regulation 18 consultation and how they were addressed.

Table F-2: Regulation 18 Interim SA Report Consultation Comments

ID	Consultee	Comment	Action Required?	In reference to	Response
1	Environment Agency	No comments on the SA.	No	SA	No action on the SA is required in direct response to the Environment Agency. The Environment Agency have provided comments in response to the policies and sites included within the draft Local Plan. These comments will be considered within the updated plan and therefore assessed as part of the Regulation 19 SA Report.
2	Historic England	We note at present that there is no Heritage Impact Assessment information available for the proposed site allocations. The Sustainability Appraisal does highlight where there are heritage assets in the vicinity of a proposed site allocation, albeit extremely limited detail with reference to 'a listed building' and no detail about which heritage asset and how the significance of the heritage asset may be affected by the proposed development. Interestingly, the judgement within the Sustainability Appraisal for the most part lists development as a 'minor positive' and requiring a 'lighting strategy'. We consider that additional information is required to make appropriate judgements and that it is more likely that harm will occur to heritage assets, albeit there may be opportunities to avoid and minimise harm through carefully considered design principles. The majority of the assessment relates only to listed buildings and it is not clear if the Sustainability Appraisal has fully considered all heritage asset types. We are unclear about the mitigation measure suggested each time of a lighting strategy and would require additional detail from the Council regarding this issue.	Yes	Local Plan Site Allocations Assessment	During the process of allocating sites, DCC utilised advice from an in-house Conservation Officer and County Archaeologist to highlight potential issues and 'showstoppers' with regard to site location and heritage assets. In conjunction with HE, DCC have now identified a refined list of sites that require further screening and where appropriate, heritage impact assessment. This work will be completed by external consultants by early September 2026. DCC have also included a requirement into the overarching heritage policy to say that proposals on allocated sites should have regard to the findings of this emerging work. The Heritage Impact Assessment and lighting strategy is currently being undertaken by DCC to support the development of the Local Plan. This will be completed following Regulation 19 consultation. SLR have considered a list of heritage assets that can be found in Appendix B to the SA Report. The mitigation measure proposed to incorporate a lighting strategy within individual scheme design is proposed to ensure that development design considers heritage assets and their settings during design. This has been reviewed where proposed and where appropriate has been included as an enhancement measure for potential minor positive effects. SLR have undertaken additional assessments of sites during Regulation 19, and have considered policies within the Local Plan that support the conservation of heritage assets within the assessment of sites.
3	Historic England	Sustainability Appraisal comments per site: - HA1 No issues - HA2 Brook Farm Chaddesden - 100m to a listed building and setting could be impacted – SA consider could be an opportunity to enhance setting. Need for lighting strategy. - HA3 No issues - HA4 Royal Hill Road, Spondon – site within 250m of a listed building and setting could be impacted – SA consider could be an opportunity to enhance setting. Need for lighting strategy. - HA5 The Hollow, Mickleover site within 250m of a listed building and setting could be impacted – SA consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. - HA6 Former Manor/Kingsway Hospital site within 100m of a listed building and setting could be impacted – SA consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. - HA7 No issues - HA8 No issues	Yes	Local Plan Site Allocations	SLR have reviewed the assessment of sites during Regulation 19 and have considered the most up to date evidence base with respect to lighting and heritage assets. This has resulted in amendments to scores as appropriate. The mitigation measure to incorporate a lighting strategy within individual scheme design has been proposed to ensure that development design considers heritage assets and their settings during the design phase. This has been included as an enhancement measure for potential minor positive effects. .



ID	Consultee	Comment	Action Required?	In reference to	Response
		- HA9 Bramblebrook House/Humbleton View, Littleover site within 250m of a listed building and setting could be impacted – they consider this as a minor positive and could be an opportunity to enhance setting. - HA10 No issues - HA11 Former Shaftesbury Leisure Centre site within 100m of a listed building and setting could be impacted – they consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. - HA12 No issues - HA13 No issues - HA14 No issues - HA15 Kitchener Avenue/Browning Street site within 250m of a listed building and setting could be impacted – they consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. - HA16 Former Ivy House School site within 100m of a listed building and setting could be impacted – they consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. - HA17 Gypsy and Traveller Site Allocation site within 100m of a listed building and setting could be impacted – they consider this as a minor negative and could be an opportunity to enhance setting. Need for lighting strategy.			
4	Historic England	The Council shared an updated spreadsheet in February 2026 which set out which of the site allocations already had planning consent and which site allocations had no planning information recorded at that time. We would request that for any proposed site allocation not yet with planning consent, that has the potential to impact on the historic environment; we are provided with a proportionate heritage assessment in order to be able to assess the suitability of the site from a heritage perspective and if avoidance/ minimisation measures are possible. We would recommend the Council consulting our Site Allocations in Local Plans Historic Environment Advice Note. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ It is worth stating that currently there is no reference to the historic environment/ heritage assets within any of the site-specific housing policies.	Yes	Local Plan Site Allocations	DCC have reviewed this comment and are preparing a heritage impact assessment to support the development of the Local Plan.
5	Historic England	Where there is the potential for harm to heritage assets, as outlined through the Sustainability Appraisal and where heritage assets are in the vicinity of proposed site allocations; these sites will require a Heritage Impact Assessment in order to fully understand the potential impacts and whether there are avoidance and minimisation opportunities. For all sites where there is no impact on the historic environment or where the proposed site is already the subject of planning permission, we will not require sight of a Heritage Impact Assessment.	Yes	Local Plan Site Allocations	DCC have reviewed this comment and are preparing a heritage impact assessment to support the development of the Local Plan.



ID	Consultee	Comment	Action Required?	In reference to	Response
6	Historic England	We understand that a number of the sites identified within this policy have already gained planning permission (CC a,b,d,e,h). We would require site of a Heritage Impact Assessment for any sites which do not qualify from any planning involvement and will have an impact on the historic environment. The Sustainability Appraisal for these sites often lists the effects as uncertain. We do not consider that this is an appropriate way forward and instead the assessment should consider what impacts there can be for the historic environment, based on the available information and the proposals within the Plan. The Sustainability Appraisal highlights a number of heritage assets which could be affected but does not then go further in saying how this harm could be avoided or minimised or whether these development sites are appropriate locations. CC4c Northern Gateway – a number of heritage assets could be affected by this proposed development including listed buildings, Conservation Area, the DVMWHS views into and out of, locally listed buildings, new development could affect the character of the area. We would request site of a Heritage Impact Assessment and then we will be able to provide a judgement regarding this site. We support the retention of heritage assets and are keen to understand what the archaeological potential of the site is. CC4f we note this location is considered suitable for a tall building; has this been informed by the Tall Buildings Study and if so, we would recommend a link to the Study or the area in the study which highlights the suitability of this area. CC4g unclear from the Sustainability Appraisal about the potential impacts for this site. If there are any implications for heritage these will need to be assessed.	Yes	Policy CC4	SLR have reviewed the assessment of Policy CC4 in line with updates to the Regulation 19 version of the plan, taking into account any new information available. Further details can be found in Appendix D to the SA Report.
7	Historic England	The Sustainability Appraisal says that there are potential effects for the historic environment and cites these as 'minor positive'. We are unclear based on the information provided if this is accurate. We cannot read the whole text within the Sustainability Appraisal which has also made understanding the assessment difficult. We will require sight of the Heritage Impact Assessment, especially for site a where there is the potential for harmful effects for the historic environment. We are keen to ensure that appropriate development comes forward and there may be avoidance/ minimisation opportunities that can be included within the policy text. Clause b enhancements for the historic environment are welcomed; will development in this area achieve this and what specific wording can safeguard the potential of this.	Yes	Policy CC5	SLR have reviewed the assessment of Policy CC5 in line with updates to the Regulation 19 version of the plan and have ensured that the whole text can be read within the assessment. Further details can be found in Appendix D to the SA Report.
8	Historic England	It is unclear from the information provided currently what type of development and where development will be sited within the Derby Riverside boundary. We welcome clause j relating to the historic environment and would request some wording amendments to strengthen the policy. The first sentence should relate to the need to avoid harm and minimise harm to the significance of heritage assets, including their setting. The policy should also consider the need to respect the character and local distinctiveness of the area and assess if proposals can better reveal the significance of heritage assets and seek any opportunities to enhance heritage assets and their relationships with each other. Protecting key views and reflecting the evidence of the Skyline Study should also be included here. Further, given the potential for archaeological remains in this area and for any proposed works to impact on archaeological remains we would welcome adding a reference to archaeology in clause j. There could also be a tie in to Policy 18 Archaeology. Clause k we recommend rewording to state that heritage assets will be retained within developments, harm will be minimised and opportunities sought for their appropriate reuse and repair, if required.	Yes	Policy CC12	SLR have reviewed the Regulation 19 version of this policy and have updated the assessment where appropriate to detail the potential effects. Further details can be found in Appendix D to the SA Report.



ID	Consultee	Comment	Action Required?	In reference to	Response
		We would require site of a Heritage Impact Assessment that provides some information about what development may come forward and what harm may occur. This information will then allow the policy to be refined to include any relevant mitigation measures. The Sustainability Appraisal currently states effects are uncertain as it is not clear what the policy is proposing. We consider that the Sustainability Appraisal needs to make judgements about the potential effects and then seek opportunities to avoid negative effects. There are a significant number of heritage assets that could be affected as a result of this policy.			
9	Historic England	The Sustainability Appraisal identified effects as uncertain but that there were a number of heritage assets that could be affected. We consider that the Sustainability Appraisal needs to make judgements about the potential effects and then seek opportunities to avoid negative effects. We consider that a Heritage Impact Assessment will also be required that considers what heritage assets are likely to be affected and how harm to the significance of heritage assets can be avoided/ minimised. Clause j can then be re-worded to take consideration of any recommendations in the Heritage Impact Assessment and provide more specific wording. We note that clause h requires a Masterplan to be prepared and Historic England would be keen to be a consultee on any future Masterplans linked to the Local Plan allocations.	Yes	Policy CC13	SLR have reviewed the Regulation 19 version of this policy and have updated the assessment where appropriate to detail the potential effects. Further details can be found in Appendix D to the SA Report.
10	Historic England	We have concerns regarding this policy and the potential development in this area and how heritage assets may be harmed through development in this area. The Sustainability Appraisal states that the effects will be 'minor positive' but we question this as there is limited detail available and what we do know could cause harm which will need to be avoided/ minimised. We would require a Heritage Impact Assessment to understand what implications there may be for the historic environment and if there are opportunities to avoid harm. We support the opening paragraph of the policy. We are supportive of the principle of the second paragraph and consider that heritage led regeneration could be a positive tool for the area, building on the benefits that the historic environment can bring for an area. We have some concerns regarding clause b and what is meant by a multi modal hub? The Interim Planning Guidance sets out aspirations for a multi storey car park but we would require additional information about how this could come forward as it would potentially harm heritage assets, particularly Grade II* Roundhouse and block key views between assets in this area. We are unclear about the intentions of clause c and the redevelopment referenced. There are a number of important heritage assets in this vicinity including the Railway Terraces, and we want to ensure their retention, repair and appropriate reuse. We would welcome clarification on the approach. We require additional detail about what is proposed in clause i. The wording needs clarification on how it can both be respectful of the character of the area and encourage an increase in density of development. The policy should be informed by evidence from the Tall Buildings Study and the Skyline Study to set out what may be appropriate in this context and what issues prospective developers will have to take into consideration. We recommend a re-wording of clause j. The sentence should relate to the need to conserve the significance of heritage assets including their setting, such as but not limited to the	Yes	Policy CC14	SLR have reviewed the Regulation 19 version of this policy and have updated the assessment where appropriate to detail the potential effects. Further details can be found in Appendix D to the SA Report.



ID	Consultee	Comment	Action Required?	In reference to	Response
		Railway Station Conservation Area and a variety of listed buildings and non designated buildings. How can new development be brought forward in this area whilst respecting the character and local distinctiveness of the Conservation Area, individual heritage assets and their relationship with each other, including consideration of views to and from notable heritage assets in the landscape. Any harm should be avoided or minimised in the first instance. What is the status of the Interim Planning Guidance and what consultation has it been subject to? How will the Council's draft/ emerging Design Code reflect the proposed ate/ area development policies? Update paragraph 766 once the policy wording has been assessed.			
11	Historic England	The Sustainability Appraisal sets out that the effects are uncertain for the historic environment, even though the area could potentially affect the DVMWHS and its buffer zone, the Railway Station Conservation Area and a number of listed buildings. We would require a Heritage Impact Assessment to understand what implications there may be for the historic environment and if there are opportunities to avoid harm. Clause f, is the landmark intending to be a tall building or a large building? And how has this been informed by the Tall Buildings Study and the Skyline Study, if applicable. Clause I will need amending based on the results of the heritage assessment. Additionally, the clause needs re-wording to ensure that it is referencing the need to conserve the significance of the DVMWHS, including its OUV and the significance of other heritage assets including their setting. There could be opportunities to better reveal the significance of the Conservation Area and for new design to respect the character and local distinctiveness of the area.	Yes	Policy CC15	SLR have reviewed the Regulation 19 version of this policy and have updated the assessment where appropriate to detail the potential effects. Further details can be found in Appendix D to the SA Report.



ID	Consultee	Comment	Action Required?	In reference to	Response
12	Historic England	Glossary: Designated Heritage Asset definition – we consider that this should refer to designated as such under the relevant legislation or UNESCO Convention. Same edit for Heritage Asset. Heritage Impact Assessment definition – we consider this should now refer to ‘avoid/minimise’ rather than ‘mitigate’. We would welcome a meeting with the Council to discuss our representation and in particular to discuss the key areas of our representation that relate to proposed site allocations which could impact on the significance of heritage assets and their setting. There is very limited detail in the Plan regarding archaeology and referencing archaeological assets that may be affected. Additionally, within the Sustainability Appraisal there is very limited detail relating to archaeology. We would welcome the Council ensuring that the assessments are fully reflective of the potential impacts on archaeology and inclusive of any necessary avoidance and minimisation requirements. We are keen to understand how the emerging Design Code relates to the Local Plan and has informed the approach. As a general point we are keen to understand the status of the Tall Building Strategy and the Skyline Study and how the evidence has informed the selection of sites and design considerations.	Yes	Local Plan Assessment	SLR have reviewed the updated definition of designated heritage assets and heritage impact assessments within the Regulation 19 version of the Local Plan and have referred to archaeological assets where appropriate.
13	Natural England	Natural England generally welcomes this SA interim Report and acknowledges that it follows accepted methodology and legislation. We note that the SA has included an assessment of plan alternatives which consider the objectives and the geographical scope of the plan and have been satisfactorily described and evaluated. We also consider that the objectives and appraisal criteria that have been used in the SEA/SA framework are appropriate and cover Natural England's interests in the natural environment. We note that at paragraph 1.7.4 a data gap is acknowledged regarding the Derbyshire Local Nature Recovery Strategy (LNRS). This document has now been completed Homepage - Derbyshire's Nature Recovery Strategy. We look forward to seeing the added detail regarding sites and opportunities for Biodiversity Net Gain in the next iteration of the SA.	Yes	SA Report	SLR have included reference to Derbyshire's Local Nature Recovery Strategy within the SA and removed reference to the data gap.
14	Infinity Park LLP	The Sustainability Appraisal (SA) outlines the spatial options that have been assessed in Section 5 and Appendix A. This identifies six options that have been assessed and identifies Option A as the preferred strategy. The Sustainability Appraisal supporting the Regulation 19 Pre-Submission version of the Local Plan should set out conclusions at the end of the assessment of each set of options and reason the preferred option has been chosen, as this important element of the appraisal is not currently provided.	Yes	SA Report	SLR have included a description of why the preferred spatial option has been chosen within Section 5 of the SA Report. In addition, this has been outlined for preferred policies (Section 6) and preferred sites (Section 7).
15	Infinity Park LLP	All options identify the same scale of employment as being 130 hectares and outlines that “New employment land is to be contained on three strategic employment sites and the city centre. Both Smart Parc and Indurent Park are on previously developed land. Infinity Park is greenfield.” No alternatives relating to the scale of employment have been assessed as part of the SA, which is a fundamental flaw of the SA and therefore it is not known whether the preferred option is justified. This is set against the context of an evidence base, which is also flawed.	Yes	SA Report	As part of the development of the Local Plan, DCC commissioned independent consultants to undertake an Employment Land Review (ELR). The ELR assesses different approaches to forecasting future needs for new employment land, including the ‘labour demand’ approach, utilising data from Oxford Economics, Cambridge Econometrics and Experian, the ‘resident workforce’ approach and ‘past take up’. Whilst acknowledging the shortcomings of all forecasts / projections, the ELR recommends the use of past take up rates. The approach recommended in the ELR has been used to calculate employment land needs within the plan period. The approach to meeting needs (as set out in the Regulation 19 document) is to allocate 133 ha of new land to meet projected needs of 88.5ha over the Plan period. The supply figure is therefore in excess of



ID	Consultee	Comment	Action Required?	In reference to	Response
					projected needs. The strategy has been to allocate all sites considered suitable for employment use, where not appropriate for residential development. It is a supply led strategy, as opposed to being constrained by quantitative need considerations. Only three employment omission sites have been identified, all of which are relatively small and have technical reasons for not being allocated, such as Green Wedge impacts, lack of access or flood risk. It is also important to note that Derby is already largely built to its administrative boundary. As the ELR has identified the most deliverable proportion of employment land to be delivered within Derby, there is not considered to be any other 'reasonable alternatives' to the proportion of employment land to be delivered within Derby, based on previous needs and delivery rates. The SEA Regulations require the assessment of reasonable alternatives, however, if options are not considered reasonable or developable, then these do not need to be considered within the SA. The ELR has assessed alternative options for employment land need and has identified that there is not a greater need for employment land. As no other reasonable alternative employment land options have been identified through the ELR, this has not been assessed within the SA. In this context, if higher levels of need were assessed in the SA, it would not result in more sites being allocated in the Plan.
16	Public Response (received from multiple members of the public)	4. Inadequate Evidence Base and Failure to Consider Alternatives The draft plan provides no robust, site-specific justification for choosing this particular green space over other potential locations. The council's Gypsy and Traveller Accommodation Assessment (GTAA) identifies a need, but does not demonstrate why this sensitive site is the only or best option. Brownfield sites, underused employment land near Pride Park, or locations with better separation from existing housing should have been prioritised. The Sustainability Appraisal and site assessment process appear superficial, with no proper consideration of the cumulative impacts on Wilmorton residents or compliance with green space protection policies.	Yes	SA Report	The assessment of sites has assessed sites to a consistent level across the Local Plan and has considered the cumulative effects of the development of the Local Plan policies, as well as other developments, within Section 8 of the SA Report. The SA has also considered reasonable alternatives throughout the assessment, in line with the SEA Regulations, which includes alternative sites. The Regulation 19 assessment and reporting have reviewed and updated sites and policies assessments in line with updates to the Local Plan. The Regulation 19 SA report has included a rationale for selecting the preferred sites, including gypsy and traveller accommodation. This has been set out in Section 7 of the SA Report.





Making Sustainability Happen