



Derby City Council Local Plan Sustainability Appraisal

Regulation 19 Sustainability Appraisal Report

Derby City Council

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Basis of Report

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1.0 Introduction

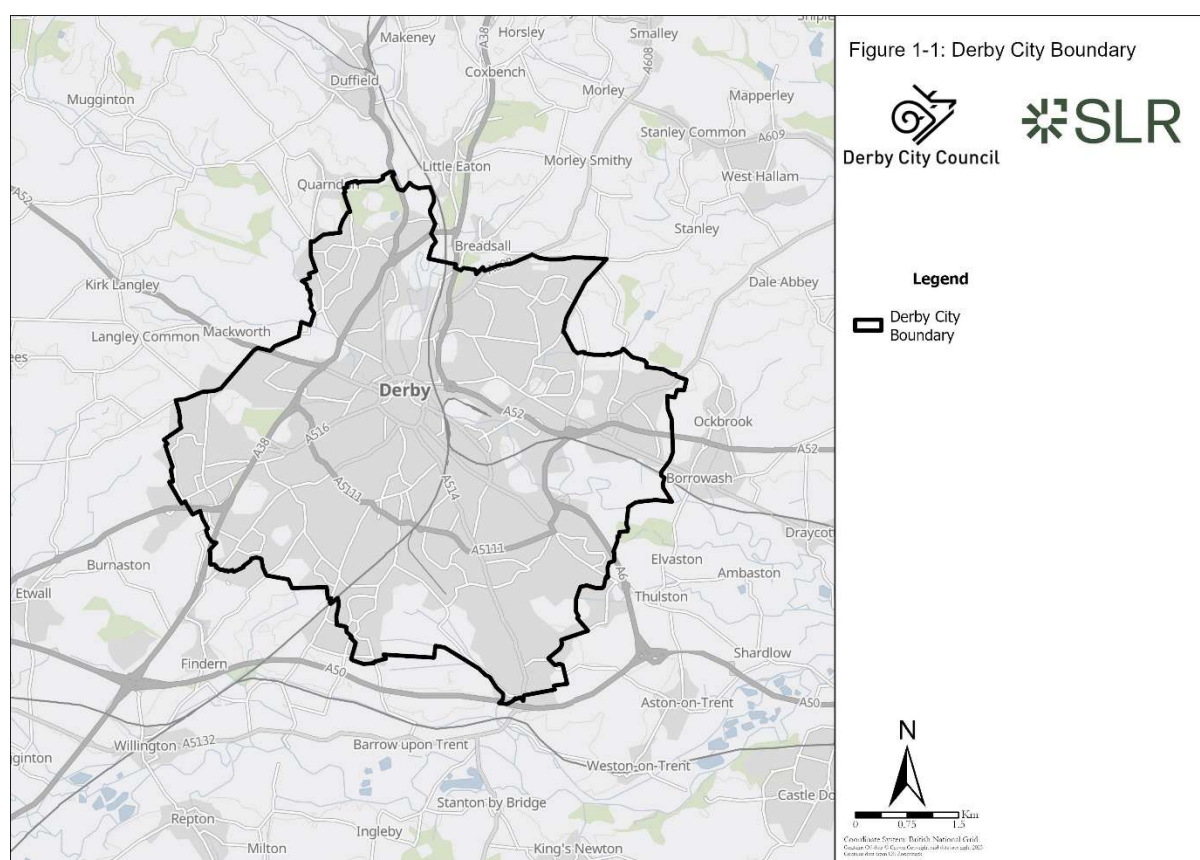
1.1 Overview

Derby City Council (DCC) are in the process of developing their new Local Plan. The new Local Plan will set out how development will be planned and managed across the City from 2023 to 2043.

The new Local Plan will set a vision for the City's future, identifying where new homes and jobs should go, which areas need protecting and the planning policies that will guide decisions. The Local Plan aims to help to make Derby a vibrant, prosperous and sustainable place to live and work for years to come.

The City boundary and the spatial extent of the new Local Plan is set out in **Figure 1-1**.

Figure 1-1: Derby City Boundary



1.2 Local Plans

Section 3 of the National Planning Policy Framework (NPPF)¹ requires that each local planning authority should prepare a local plan for its area which guides decisions on future development proposals and addresses the needs and opportunities of the area.

Topics that local plans usually cover include housing, employment and shops and they also identify where development should take place and areas where development should be

¹ UK Government (2025) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>



restricted. Once in place, local plans become part of the statutory development plan, which is the starting point for determining local planning applications.

Paragraph 15 of the NPPF states that the *'planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area and a framework for addressing housing needs and other economic, social and environmental priorities'*.

Part 2 of the Town and Country Planning Regulations 2012² makes provision in relation to the local plan and supplementary planning documents. Parts 4 and 5 of these regulations prescribe the form and content of local plans and supplementary planning documents (to be prepared by local planning authorities) and prescribes which documents are to be local plans.

1.3 Sustainability Appraisal

Strategic Environmental Assessment (SEA) in England is mandated by the SEA Regulations³. The SEA Regulations aim at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

A Sustainability Appraisal (SA) of Development Plan Documents (DPDs) is required under Section 19 of the Planning and Compulsory Purchase Act 2004⁴ which applies to this Local Plan. The SA must incorporate the requirements of the SEA Regulations. The SEA Regulations transpose the SEA Directive (2001/42/EC) into English law and applies to a range of plans and programmes, including DPDs. The purpose of the SEA Regulations is to ensure a high level of environmental protection and to integrate the consideration of the environment into the preparation and adoption of plans, with a view to promoting sustainable development. Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA into a single assessment process as set out in the NPPG (updated 2024)⁵. An integrated SEA and SA process refers to the fact that the SA adheres to the requirements of the SEA Regulations but also fully reflects relevant social and economic issues.

The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The SA 'testing' of the DPD policies and their reasonable alternatives will help to develop the most sustainable policies and proposals as an integral part of the plan's development.

The Local Plan objectives, policies, development sites and alternatives have been appraised against a set of objectives to identify whether there is the potential for significant effects (either positive or negative) and recommendations will be put forward to mitigate any significant negative effects. Guidance for SA sets out an objectives-led, staged process.

² The Town and Country Planning (Local Planning) (England) Regulations 2012 under which this plan is being prepared. Available at: <https://www.legislation.gov.uk/uksi/2012/767/contents>

³ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents>

⁴ Under which this plan is being prepared.

⁵ National Planning Practice Guidance (NPPG) <https://www.gov.uk/government/collections/planning-practice-guidance>



1.4 Purpose of this Report

This report sets out the third stage of the SA process, which is the assessment of the Regulation 19 Local Plan and preparation of the SA Report. This report includes the following:

- **Section 2:** Context of the Local Plan;
- **Section 3:** SA Methodology;
- **Section 4:** Identification of Sustainability Issues and Opportunities and the SA Framework;
- **Section 5:** Assessment of the Spatial Strategy and Alternatives;
- **Section 6:** Assessment of the Policies and Alternatives;
- **Section 7:** Assessment of the Sites and Alternatives;
- **Section 8:** Assessment of Cumulative Effects;
- **Section 9:** Mitigation, Enhancement and Monitoring Measures; and
- **Section 10:** Next Steps.



2.0 The Derby City Council Local Plan

2.1 Background

The current Local Plan, adopted in January 2017, along with saved policies from the 2006 plan, sets out Derby's growth strategy through to 2028. National planning regulations require councils to review their Local Plans at least every five years, to ensure they remain effective and up to date.

DCC began reviewing the plan in 2022 and concluded a full new Local Plan would be required to effectively address the City's development needs, working with neighbouring councils to consider the entire surrounding area, ensure the plan is in line with significant national policy changes and ensure policies are applicable to the current state of Derby.

The new Local Plan will set the planning framework for Derby and covers the period between 2023 and 2043 17 years. It will address:

- Housing needs: how much, where and what type;
- Employment and economic development;
- The future of Derby City Centre;
- How to conserve and enhance the historic environment;
- Transport, infrastructure, and community facilities;
- Environmental protection and climate resilience; and
- How planning decisions are made and managed.

2.2 Work to Date

In order to develop the new Local Plan, DCC undertook an initial round of public consultation to establish the priorities, issues, options and opportunities for the new Local Plan⁶. This consultation was undertaken in Spring 2024 for 6 weeks and provided an anonymous survey for respondents to feed into. The feedback from this consultation has been taken into account when developing the Local Plan's vision, objectives and policies.

This consultation showed that the issues with the highest levels of support were:

- Parks, open spaces and places for nature;
- Living somewhere that is attractive and feels safe;
- Access to services that are close by (such as GPs and schools);
- Protecting historic environment (including World Heritage Site, listed buildings and Conservation Areas); and
- Less reliance on cars, more high-quality safe routes for walking, wheeling and cycling.

Additionally, consultation showed that the most prominent issues and themes respondents wished to be considered within the new Local Plan's vision and objectives were housing and buildings, Green Wedge / Green Belt, and public transport / active travel.

Following this consultation, SLR, on behalf of DCC, produced an SA Scoping Report, which set out the scope and level of detail of the information that will be included in the SA,

⁶ Let's Talk Derby, Local Plan for Derby (LPD). Available at: <https://letstalk.derby.gov.uk/local-plan>



including the baseline of relevant topics and a review of relevant plans, policies and programmes (see **Appendix A**). This marked the first stage (Stage A) of the SA process (see **Section 3**). The SA Scoping Report was consulted on with statutory consultees (Natural England, Historic England and the Environment Agency) from September – October 2025. Consultation comments on the Scoping Report were considered, changes were made to the scoping information and a final Scoping Report was issued in October 2025.

The next stage of the Local Plan process involved the development of the Regulation 18 Local Plan. The Regulation 18 draft Local Plan was assessed by SLR against the SA Framework from November to January 2025. The Regulation 18 draft Local Plan and the Interim SA Report were consulted on from January to April 2025.

Following consultation on the Regulation 18 draft Local Plan, DCC reviewed responses and updated the Local Plan to form the current Regulation 19 Local Plan. Similarly, consultation comments on the Interim SA Report were reviewed and considered. **Appendix F** details consultation comments on the SA process thus far and responses to these comments.

2.3 Local Plan Vision and Objectives

The draft Spatial Vision describes how Derby will maintain vibrancy and health whilst strengthening its offer to residents and those coming to live and work here by the end of the Plan period.

The draft Vision for Derby is split into the City Centre and parts of the City outside the City Centre. The overarching draft vision is:

“By 2043, Derby will be an attractive, thriving, healthy, lively City of growth, opportunity and innovation for all. It will be recognised nationally and internationally as one of the UK’s foremost high-tech cities underpinned by its portfolio of high value engineering, advanced manufacturing and knowledge-based employment. It will also be recognised as a regional centre for tourism led by an international reputation for creativity in technology and the arts, and world class heritage.”

The Local Plan’s draft Objectives are:

- **OBJ1:** To enhance Derby as an attractive, vibrant and compact liveable City fully accessible by active travel, which has a strong City Centre of regional importance, regenerated urban areas and locally distinct neighbourhoods.
- **OBJ2:** To develop stronger, safer and more cohesive communities through the provision of quality housing, employment opportunities, education, health care, open space, sport, recreation, leisure and community facilities to help ensure that everyone has equal life opportunities, feel they belong to their communities and are less likely to take part in anti-social behaviour or commit crime or be in fear of crime.
- **OBJ3:** To reduce Derby’s impact on climate change by promoting more sustainable forms of development, especially through the location and design of new development, the promotion of low carbon technologies, renewable forms of energy, recycling, the careful use of resources and minimising waste.
- **OBJ4:** To strengthen Derby’s economy by making the City an attractive location for major employers and inward investment, especially high tech and creative industries, by supporting businesses to start up, survive and grow, delivering new communications infrastructure and retaining wealth by ensuring people have the opportunity to obtain the skills necessary to match jobs available.



- **OBJ5:** To make the best use of previously developed land and vacant or under used buildings in urban or other sustainable locations, including bring empty homes back into use and developing tall buildings in appropriate locations.
- **OBJ6:** To support the development of balanced communities by ensuring that new, well designed, sustainable residential development helps to meet the City's housing needs sustainably and continue to work with neighbouring authorities to make the best provision for unmet need.
- **OBJ7:** To protect and improve Derby's natural environment by developing a network of green infrastructure based around our parks and other green open spaces, wildlife sites and open corridors such as the River Derwent, the cycleways and walkways. These will improve biodiversity.
- **OBJ8:** To enhance and strengthen the role of Derby's Green Belt, Green Wedges and Green Gaps by reviewing them, recognising and protecting them in terms of their contribution towards creating a network of Green Infrastructure that improves access to open spaces and the countryside, brings the countryside into the City, defines the character of our neighbourhoods and providing opportunities for supporting education, sport, recreation, healthy lifestyles, biodiversity and adapting to climate change.
- **OBJ9:** To increase the opportunity for people to socialise, play, be physically active and lead healthy lifestyles through a network of high quality, safe and accessible green infrastructure, sporting facilities, walking and cycling and wheeling routes to help Derby become one of the most active cities in the country and tackle health challenges. The planning system will work towards improving the health of communities and improving health outcomes.
- **OBJ10:** To protect and enhance Derby's character and heritage, assets, public realm, inner-City neighbourhoods and established suburbs. All new development will be of the highest quality, accessible, have regard to local context and be appropriate in terms of scale, density and design, to avoid and minimise harm to the significance of heritage assets and their settings.
- **OBJ11:** To promote equality and community cohesion, healthy and active lifestyles and support improvements in community safety, particularly for children and young people.
- **OBJ13:** To enhance transport links and accessibility between key land uses including housing, employment, shopping, education, and leisure ensuring that walkability and public transport accessibility are central, as well as access to green and blue spaces for all within easy walking distance. Priority will be given to delivering practical and attractive active travel routes, while reducing the necessity for private car use, particularly for commuting.
- **OBJ14:** To enhance the River Derwent corridor as the City's key environmental, cultural, ecological and historic asset, creating a more attractive and welcoming riverside area for Derby residents and visitors, recognising and enhancing the biodiversity value of the River to the City and working in partnership with the Environment Agency to implement the 'Our City, Our River' Programme to improve overall flood protection to surrounding areas.
- **OBJ15:** To ensure a vibrant, accessible and attractive City Centre of regional importance: Derby will have a thriving daytime and evening economy, which supports the vitality of the St Peters and Cathedral Quarters and provides improved links to the railway station and new commercial and residential areas.



- **OBJ16:** To strengthen the range and quality of Derby's cultural and learning opportunities and facilities by celebrating diversity, ensuring that the role of culture in the economy is better understood.

2.4 Local Plan Policies

In total, the Local Plan outlines 77 policies across nine groups. The groups and policies have been outlined in **Table 2-1** below.

Table 2-1: Local Plan Policies

Policy Group	Policy
General Development Principles	GD1: Placemaking Principles
	GD2: Character and Context
	GD3: Amenity
	GD4: Accessible Places
	GD5: Community Safety and Resilient Places
	GD6: Health and Wellbeing
	GD7: Comprehensive and Coordinated Development
	GD8: Enforcement
	GD9: Infrastructure and Developer Contribution
	GD10: Advertisements
	GD11: Shopfronts
Housing	H1: Housing Delivery
	H2: Residential Development - General Criteria
	H3: House Extensions
	H4: Affordable Housing
	H5: Looked After Children
	H6: Communal Living Accommodation
	H7: Accommodation for Older People and People with Disabilities
	H8: Proposals Which Would Create a New House in Multiple Occupation
	H9: Intensification of Existing Houses in Multiple Occupation
	H10: Student Accommodation
	H11: Self-Build, Custom Build and Community Build Homes
	H12: Gypsies, Travellers and Travelling Showpeople
Economy	E1: New Employment Locations
	E2: Existing Employment Locations
	E3: Local Labour Agreements
	E4: Office Development
	E9: Defined Centres
	E10: Main Town Centre Uses Outside of Centres



Policy Group	Policy
	E11: Tourism and Culture
	E12: Managing the Proliferation of Specific In-Centre Uses
Natural Environment	EN1: Green and Blue Infrastructure
	EN2: Dark Infrastructure
	EN3: Open Space, Sport and Recreation Buildings
	EN4: Allotments and Community Gardens
	EN5: Green Belt
	EN6: Green Wedges
	EN7: Green Gaps
	EN8: Biodiversity and Geodiversity
	EN9: Trees and Hedgerows
	EN10: Biodiversity Net Gain
	EN11: Air Quality
	EN12: Land Contamination
	EN13: Pollution
Historic Environment	HE1: Conserving and Enhancing the Historic Environment
	HE2: Derwent Valley Mills World Heritage Site
	HE3: Darley Abbey Mills Complex
	HE4: Conservation Areas
	HE5: Listed Buildings and Locally Listed Buildings
	HE6: Archaeology and Scheduled Monuments
	HE7: Historic Parks, Gardens and Designed Landscapes
Climate Change	CL1: Flood Risk and Water Management
	CL2: Our City Our River (OCOR)
	CL3: Sustainable Design and Construction
	CL4: Renewable and Low Carbon Energy
	CL5: Low Carbon Energy Centres
	CL6: Embodied Carbon
Infrastructure and Community	IC1: Social and Community Facilities
	IC2: Cemetery
	IC3: Education Provision
	IC4: Higher and Further Education
	IC5: Communication Infrastructure
Transport and Movement	T1: Active and Sustainable Transport
	T2: Transport Infrastructure
	T3: Servicing, Accessibility and Parking



Policy Group	Policy
	T4: Protected Routes
	T5: Electric Vehicle Charging Facilities
	T6: Mobility Hubs
	T7: Safeguarded Areas around Aerodromes (East Midlands Airport)
City Centre	CC1: City Centre Strategy
	CC2: Defining the City Centre
	CC3: City Centre Living
	CC6: Tall Buildings
	CC7: Businesses, Creativity and Learning
	CC8: Shopping, Eating and Drinking
	CC9: Active and Inclusive Frontages
	CC10: Streets and Spaces

2.5 Local Plan Site Allocations

A key part of the local planning process is to identify and allocate key sites for development. The Local Plan proposes 26 site allocations, which are set out in **Figure 2-1**.

All proposed development sites underwent an initial sifting process by DCC which identified potential key constraints and identified the sites that were developable.

It should be noted that some of the proposed site allocations may be subject to further viability testing.





3.0 Methodology

3.1 Sustainability Appraisal

The SA process is a systematic process that must be carried out during the preparation of plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

3.2 SA Process and Requirements

The SA process ensures that sustainability issues are considered in a clear and transparent manner. In particular, the SA process ensures a structured and systematic consideration of sustainability issues through its focus on testing and comparing the merits of different plan alternatives as well as consultation with key stakeholders.

The SA has five key stages:

- **Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope;
- **Stage B:** Developing and refining alternatives and assessing effects;
- **Stage C:** Preparing the SA Report (incorporating the Environmental Report) (**the current stage**);
- **Stage D:** Consultation and decision-making (**the current stage**); and
- **Stage E:** Monitoring implementation of the plan or programme.

The SA process is shown in **Figure 3-1** and **Table 3-1** sets out how the SA has met the requirements of the SEA Regulations.



Figure 3-1: The SA Process

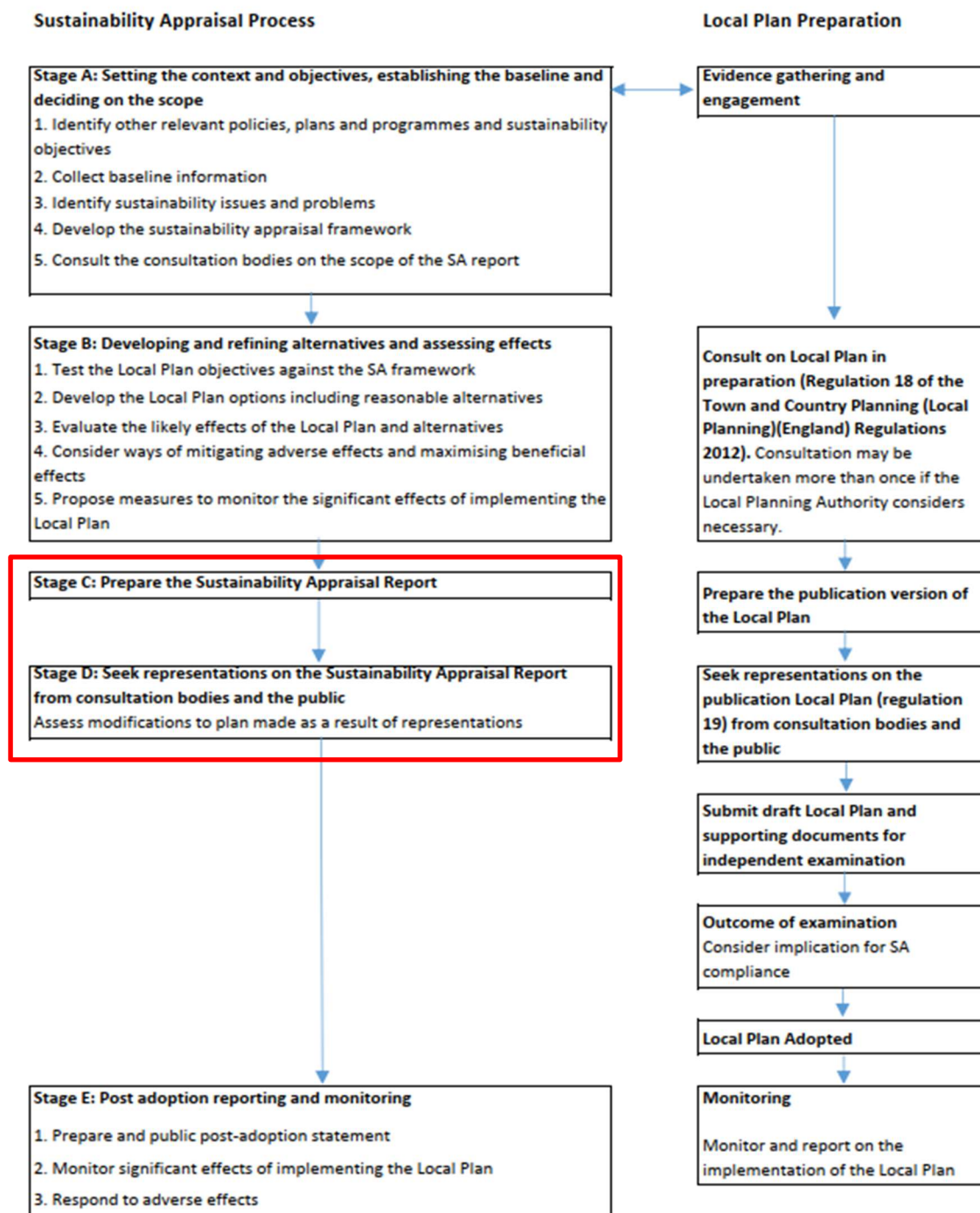


Table 3-1: Fulfilling the Requirement of the SEA Regulations

What the regulations say ⁷	How this is addressed
An outline of the contents, main objectives of the plan or programme.	Set out in Section 2 of this document.
An outline of the relationship with other relevant plans and programmes.	Set out in Section 4 of this document and in Appendix A .
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Set out in Section 4 of this document and in Appendix A .
The environmental characteristics of areas likely to be significantly affected.	Section 4 of this document outlines the characteristics of the plan area in general and outlines those areas likely to be significantly affected. These characteristics and potential interactions have been informed by information contained within the SA baseline data Appendix A .
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 4 of this document provides a summary of baseline data and outlines key sustainability issues related to each SA topic. Sites designated pursuant to Directives 79/409/EEC and 92/43/EEC which could be affected by the Derby City Local Plan are identified within Section 9.2 and the standalone HRA Report .
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 4 and Appendix A outline relevant environmental protection objectives. The environmental objectives have been taken into account through integrating them within the SA Framework.
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. The identification of the above effects should consider secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Sections 5, 6 and 7 sets out the potential significant effects of the Local Plan and discuss the significant effects of reasonable alternatives. Details of the nature of effects are provided within Appendices C, D and E . This includes indirect (secondary), cumulative (cumulative and synergistic), duration (short/medium/long term), permanent or temporary and negative or positive effects. Intra and Inter Plan cumulative effects are discussed in Section 8 .

⁷ Please see Schedule 2 of the SEA regulations: *Information for Environmental Reports*.



What the regulations say ⁷	How this is addressed
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 9 sets out mitigation measures for potential significant negative effects and uncertain effects.
An outline of the reasons for selecting the alternatives dealt with	Sections 5, 6.3 and 7.3 provides a summary of the relative performance of the reasonable alternatives identified and assessed as well as the information provided within Appendix E which details the sites options assessments, Appendix C details the spatial alternatives.
A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 3 outlines the methodology for all stages of the SA and Section 3.5 specifically describes any technical difficulties, assumptions and limitations that were relevant to the assessment. Appendix A outlines data gaps.
A description of measures envisaged concerning monitoring.	Discussed in Section 9.2 of this document.
A non-technical summary of the information provided under the above headings.	The non-technical summary is provided separately. This summarises all details outlined in this report and appendices.
The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.	The whole SA Report addresses this.
Consultation: Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).	The Scoping Report was consulted on with statutory consultees for a five week period from September to October 2025. The Regulation 18 draft Local Plan and the Interim SA Report were published for consultation from January to April 2025 and issued to key stakeholders and the public. The Regulation 19 Local Plan and SA Report will be published for consultation from 27 th July to 8 th September and issued to key stakeholders and the public.
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their	The Interim SA Report was consulted on between January – April 2025 and has been amended following consultation where appropriate.



What the regulations say ⁷	How this is addressed
opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.	The Regulation 19 Local Plan and SA Report will be published for consultation from 27th July to 8th September and issued to key stakeholders and the public.
Identify where the implementation of the plan or programme is likely to have significant effects on the environment of a Member State.	Sections 5, 6, 7 and 8 presents the potential significant effects of the Local Plan. The assessment has not identified any potential effects on member states.
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8). Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed: The plan or programme as adopted. A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with. The measures decided concerning monitoring.	This will be set out in the SA Adoption Statement.
Monitoring of the significant environmental effects of the plan's or programme's implementation.	Proposed monitoring arrangements are discussed in Section 9.2 .



3.3 Habitats Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2017 (as amended) which requires an assessment of any plans which are likely to have a significant effect on any protected Habitat Sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

An HRA screening exercise was undertaken as part of the Regulation 18 draft Local Plan to determine if the sites and preferred policies (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of European or Ramsar sites, in terms of their conservation objectives and qualifying interests. Natural England have been consulted on the findings of the screening exercise.

Following consultation on the screening exercise, the Regulation 19 Local Plan has been reviewed, and the HRA screening findings have been updated. The findings of the HRA to date can be found in a separate HRA Screening Report. The HRA Screening has identified no potential impact pathways which could lead to likely significant effects on European and Ramsar sites.

3.4 SA Report Methodology

Stage C (the current stage) comprises the assessment of the Regulation 19 Local Plan against the SA Framework objectives identified within the final Scoping Report.

The SEA Regulations require an assessment of the plan and its “reasonable alternatives”, in addition to those proposed within the draft plan. Reasonable alternatives are the different options considered by the plan-maker in meeting the objectives of the plan. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic. For example, Derby is significantly constrained by its boundaries and level of existing development and therefore the range of reasonable and realistic SA alternatives are limited.

This SA Report covers the assessment of:

- Spatial strategy and reasonable alternatives;
- Local Plan draft policies and reasonable alternative policies; and
- Site allocations and reasonable alternatives.

The reasonable alternatives spatial options, policies and sites have been assessed to the same level of detail.

3.4.1 Assessment of Effects

The assessment of the spatial strategy, policies, sites and alternatives have all been undertaken using a consistent approach. This approach has considered the following:

- Overall potential effect significance (negative, positive, uncertain, potential for both negative and positive effect or negligible);
- Nature of effect (direct, indirect);
- Spatial Extent (local, regional, national);
- Reversibility of effect:
 - Reversible: The receptor can return to baseline condition without significant intervention; or



- Irreversible: The receptor would require significant intervention to return to baseline condition
- Duration (short, medium or long term): Short term: 0-5 years, Medium term: 5-10 years (up to the end of the plan period) Long term: 10+ years (beyond the plan period).

The assessment of effects has considered the application of Local Plan policies that may mitigate potential effects, which has been taken into account when determining significance. Policies that provide mitigation have been highlighted in **Appendices C, D and E** where appropriate.

Table 3-2 sets out the key to the assessment, whilst the detailed assessment criteria are set out in **Appendices C, D and E**.

Table 3-2: Key to Assessment

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	
Uncertain effects	?
Neutral	0

It should be noted that where uncertain and neutral effects have been identified, it has not been possible to determine the nature of effect, the spatial extent, the reversibility or the duration of effect. This is because either insufficient information is available to reliably characterise the effect, or no discernible effect is anticipated. In these circumstances, further categorisation would be speculative; therefore, these cells have been marked N/A.

3.4.2 Assessment of Spatial Strategy

DCC have identified a preferred spatial strategy, alongside a number of high-level spatial strategy alternatives for the scale and distribution of housing, employment and gypsy and traveller land. **Section 5** of this report, as well as **Appendix C**, present further information on the spatial strategy options and their performance in the assessments.

3.4.3 Assessment of Policies and Alternatives

The assessment has been undertaken in across 11 policy groups (as outlined in Table 2-1), allowing related policies to be assessed together. The assessments identify the outcome of the application of the groups of policies. The findings of the draft policy assessments can be found in **Section 6** and **Appendix D**.

Reasonable policy alternatives have been identified by DCC officers for some policies and these have assessed to the same level of detail and method as the preferred policies. The findings of the policy alternatives can be found in **Section 6.3**.

3.4.4 Assessment of Sites and Alternatives

An initial red, amber, green (RAG) assessment for both the site allocations was undertaken using spatial indicators in order to inform the assessment against the SA Framework objectives.



It should be noted that the RAG assessment highlights the potential sensitivity of different indicators, however it does not necessarily mean that indicators are positive or negative. For instance, an area of overall deprivation could be more highly sensitive to change and was therefore awarded a red rating, however development of the site could in turn reduce levels of deprivation. Due to this, professional expertise has been used to review and validate this initial RAG rating to provide the final assessment against the SA Framework.

Sites have been assessed individually, using the RAG ratings derived from GIS spatial data and informed by the draft site allocation policies and other policies within the Local Plan which provide mitigation for potential negative effects.

The findings of the sites assessments can be found in **Appendix E** and **Section 7.3**.

No reasonable site alternatives have been identified due to constraints within Derby City. A discussion of reasonable site alternatives has been provided within **Section 7.3**.

3.4.5 Cumulative Effects

The SEA Regulations require that potential cumulative effects are recorded when identifying likely significant effects. Therefore, a number of plans and policies (local, regional and national) have been reviewed for potential cumulative effects in addition to potential cumulative effects that could occur through the combination of site allocations and policies within the draft Local Plan itself.

In addition, the assessment of sites has considered potential cumulative effects of neighbouring development sites, including those beyond the City boundary.

The assessment has assumed that cumulative effects could be cumulative, secondary and synergistic. Potential transboundary effects have also been considered within this assessment.

Potential cumulative effects have been identified in **Section 8** of this report.

3.4.6 Mitigation, Enhancement and Monitoring Measures

The SEA Regulations require that mitigation measures are put forward to prevent, reduce or offset any significant negative effects on the environment as a result of implementing the plan. The measures are known as 'mitigation' measures.

Mitigation measures have been identified in relation to the assessment of policies and site allocations. These include both proactive avoidance of negative and uncertain effects and actions taken after potential effects have been identified. These are set out in **Section 9.1** of this report.

Section 9.1 also includes enhancement measures, which aim to optimise positive impacts and enhance sustainability. The mechanism for delivery will ensure the promotion, prevention, reduction and offset of any significant negative effects or enhancement opportunities.

The SEA Regulations also require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information. Proposed monitoring measures can be found in **Section 9.2** of this report.



3.5 Assumptions and limitations

The SEA Regulations require a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of data) encountered in compiling the required information.

Baseline data has been available for Derby, however there are cases where data gaps have been identified. These have been listed for each topic area in **Appendix A**.

The preparation of the Local Plan alongside the SA allows for an iterative process of assessment and refinement in the narrative, policies, allocations and alternatives considered in developing the plan.

The assessment has been undertaken as a desk-based exercise using GIS and the baseline information presented within the Scoping Report (**Appendix A**). No site visits have been undertaken specifically for the purposes of the SA.

SLR have made every effort to ensure that effects are predicted accurately; however, this is inherently challenging given the limited understanding of precisely how the plan will be implemented. Given uncertainties, there is inevitably a need to make assumptions. Assumptions are made cautiously and explained within the assessment text.

In some instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan and its alternatives in more general terms.

It is also the case that some mitigation is already built into the policies / allocations, due to national policy, and existing planning constraints and protections. Where there is scope for additional mitigation or opportunities for enhancement of sustainability performance, this will and has been thus far identified through the SA process.



4.0 Identification of Sustainability Issues and Opportunities and the SA Framework

4.1 Introduction

This section sets out the baseline sustainability issues and opportunities for the Local Plan and the SA Framework, against which the Local Plan has been assessed.

Appendix A sets out the Scoping Report baseline and review of plans, policies and programmes.

4.2 Review of plans policies and programmes

A plan may be influenced in various ways by other plans, policies or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. These relationships enable DCC to take advantage of potential synergies and to deal with any inconsistencies and constraints.

As part of the Scoping stage, an initial review of policies, plans, programmes, strategies and initiatives that may have an impact on the preparation of relevant policies being reviewed as part of Local Plan preparation was undertaken. This review has informed the development of the SA Framework.

A detailed outline of the policy documents, the objectives and targets is set out in **Appendix A**.

4.3 Sustainability Issues

The detailed baseline data is contained within **Appendix A. Table 4-1** provides a summary of the key baseline sustainability issues, presented by SA topic. The information in this section and in **Appendix A** was updated following consultation on the SA Scoping Report between September and October 2025.



Table 4-1: Sustainability Issues and Opportunities

SA Topic	Issues and Opportunities
Population and Equality	- The City's population is projected to increase overall, including a sharp increase in older age groups (especially 75+), leading to higher care, housing, and health needs, and a greater proportion of non-working dependents. Planning of infrastructure to meet the needs of an elderly population, such as accessible housing and an elderly care workforce will become more important if this trend continues; - The number of children and young people is decreasing; however, some areas may still face localised school pressures, particularly in primary school places where demand is expected to rise until 2029; - Educational attainment is below the national average, with a high proportion of residents having no qualifications; this is particularly acute in Derby South; - Deprivation is significant, especially in Derby South, where children are disproportionately affected by income deprivation; - Education, income, and employment deprivation levels are high, with large disparities across the City; - There is a need for accessible, well-designed developments to meet the needs of an ageing population and diverse communities, ensuring equitable access to services; and - The City is becoming increasingly ethnically diverse, and this will require culturally inclusive services and engagement approaches.
Human Health	- Air pollution, particularly from PM2.5, presents the greatest environmental risk to health in Derby. Vulnerable groups such as children, older people, and those with pre-existing health conditions are most affected; - Obesity is a significant issue for both adults and children in the City, with Year 6 obesity rates (40.4%) and adult obesity rates (33%) both higher than national and regional averages. Low physical activity levels, particularly among children, increase risks of chronic health conditions such as diabetes; - Around 1 in 5 residents identify as disabled, with rates of disability higher than the East Midlands and England averages. This signifies a need to continue to provide housing (new and existing) that are built to regulation accessible and adaptable standards so that, where appropriate, people with disabilities can live comfortably and independently; - Disability employment rates remain below national and regional averages, despite significant improvement over the last decade; - Life expectancy for both males and females is lower than regional and national averages, reflecting persistent health inequalities; - Mental health indicators have worsened in recent years, with rates of suicide and self-harm higher than the national and regional averages; - Health inequalities are closely linked to deprivation hotspots in the south of the City, where poorer health outcomes are concentrated; and - There is a need to improve opportunities for physical activity and access to open space, particularly in deprived areas, to support better mental and physical health outcomes.
Economy and Employment	- In 2024, average weekly earnings for men in Derby were £103.10 higher for men than for women in full-time roles; - The unemployment rate in Derby is above the East Midlands and England averages, with female unemployment nearly double the national figure; - The rate of economic activity in Derby is below regional and national averages; 35% of this group want a job, which is a higher proportion compared to regional and national figures; - Employment in professional occupations is below the national average. Employment in admin and skilled trades is also below average, suggesting a gap in mid-level skills. Employment in service and sales roles is significantly higher than the regional and national averages; - The majority of enterprises in Derby employ fewer than 10 staff, creating vulnerability to business closure and associated job losses. Small business dominance means resilience is dependent on improving business survival rates, particularly in volatile economic conditions; - There is a significant reliance on a small number of large employers; - There is a disparity between earnings of residents of the City and those of City employees, higher earners don't always live within the City; - High vacancy rates, driven by competition from Derbion, Wyvern, Kingsway Retail Parks and the Meteor Centre, and online retail trends, suggest a need for City Centre regeneration and diversification; - Strategic sites such as Infinity Park Derby and Derby Commercial Park offer major opportunities for job creation, skills development, and sector diversification, especially in advanced manufacturing, green industries, and logistics; - Nearly half of Derby's workforce commute to work by private car or van, contributing to congestion and emissions; and - Nearly a quarter of residents work mainly from home, indicating a need for strong broadband infrastructure to support hybrid working.
Crime and Safety	- Derby's crime rate is significantly higher than regional and national averages; - Violence and sexual offences are the most common crimes, followed by anti-social behaviour and shoplifting; - Drug offences have risen sharply, indicating growing concerns around supply and misuse; - Sexual offences and shoplifting have increased, while other theft offences have declined; and - Anti-social behaviour remains a persistent issue across communities. There are opportunities for the Local Plan to positively influence design, to reduce fear of crime and anti-social behaviour.
Housing	The number of households in Derby is projected to grow by 3.76% from 2018 to 2028, significantly below regional and national averages;



SA Topic	Issues and Opportunities
	- There has been a decrease in home ownership and a rise in private renting, suggesting affordability pressures, especially for younger residents; - There has been significant growth of people on the waiting list for affordable housing over the past decade, and affordable housing demand, especially for social rented properties are high; - Property prices in Derby rose by 6.7% from 2024 to 2025, with flats seeing the highest increase, though overall prices remain below regional trends; - Derby remains more affordable than the East Midlands and national averages, particularly for first-time buyers and lower-income households. Rental prices are moderate, with one-bedroom properties averaging £510/month and four-bedroom homes at £1,137/month; - Over 2,200 households sought homelessness support in the past year, with more than 500 individuals identified as sleeping rough. Homelessness among refugees has surged by 70%, placing additional strain on local support services; - Fuel poverty affects 17% of households in Derby, higher than both regional (15.1%) and national (13.1%) averages; - The City faces overcrowding pressures, with a high proportion of over-occupied homes and limited supply of larger properties; and - There is a shortfall in Gypsy and Traveller accommodation, with 28 permanent pitches needed to meet current and future demand. Derby's only permanent Traveller site (Imari Park) does not meet assessed needs, prompting consultation on new site options.
Leisure and Recreation	- Physical inactivity levels in Derby are significantly higher than regional and national averages, with 31.5% of residents classified as inactive. A relatively small proportion of the population is moderately active; - Despite the presence of high-quality sports facilities, overall activity levels remain low, suggesting barriers to access or participation; and - Over half of Derby's public green spaces are rated only average in quality, which may limit their appeal and effectiveness in promoting active lifestyles.
Biodiversity and Natural Capital	- There are a range of nature conservation sites (statutory and non-statutory) within the City which require protection from development; - There is a need to ensure development includes habitat creation and enhancement with consideration of the wider landscape and ecological corridors; - There is a need to ensure that the minimum target of 10% BNG is met in developments; - Potential effects on European designated Habitats Sites need to be considered; - There is need to ensure favourable management of protected sites within the City; - There is a need to increase resilience of nature in light of climate change. Green spaces should be joined up, and water resources protected from damage; and - There is a need to prioritise nature recovery across the City, in line with the emerging Derbyshire LNRS.
Landscape and Townscape	- National Character Areas in the City are at risk of degradation from the pressures of new development. Planning policy needs to guide development to ensure it is contextually responsive and reinforces local character; - The City has areas of multiple environmental sensitivity and development should respect its landscape and townscape setting and make a positive contribution to the relationship of rural and urban areas, as well as avoiding encroachment on Green Wedges; - Development has the potential to cause direct and indirect impacts on designated landscapes and townscapes, affecting the character and sense of place; and - Future growth could risk compromising landscape and townscape character and features. However, design that incorporates public realm and green infrastructure principles could play a key role in the enhancement of the natural environment, visual amenity and physical and mental health of the City's people.
Historic Environment	- There are a number of locally, nationally and internationally important heritage assets within the plan area, particularly within the City Centre. These will need to be conserved and enhanced by future development; - Development pressure is likely to be one of the most significant issues for the historic environment, such as housing growth, infrastructure development and climate change (retrofitting); - Designated and non-designated heritage assets in the City could be negatively affected by new development which can erode the quality of the built environment and heritage features or sterilise or lead to the loss of existing heritage assets; - The Derwent Valley Mills World Heritage Site (DVMWHS) and buffer zone are located within the City. This will need to be conserved by future development in order to protect its Outstanding Universal Value. An integrated and sustainable approach will need to be developed in order to meet and promote the transportation and accessibility needs of the DVMWHS and its users; UNESCO maintains vigilance regarding concern about the conservation of the WHS into the future; - Future development within the City will need to respect the setting of local heritage assets; - There are opportunities for enhancing the setting of heritage assets through the development of schemes to reduce traffic noise and enhance accessibility through active forms of transport; and - There are opportunities to preserve and enhance heritage assets, including addressing the needs of heritage at risk.
Air, Noise and Light Pollution	- There is significant reliance on the petrol or diesel-fuelled private cars as the main modes of transport within the City; - The City has one Air Quality Management Area (AQMA) and air pollution levels could be improved; - Air quality issues may be exacerbating inequalities related to air pollution health issues; - There is the potential for negative effects on health if new development is located near a major source of noise and air pollution, including any existing or new major roads; - There is a need to reduce light pollution and restrict further intensification of light pollution from new developments; and



SA Topic	Issues and Opportunities
	Air, noise and light pollution could be generated through construction works that occur as a result of growth proposed in the Local Plan.
Water Environment	- Only one of the waterbodies within the City is currently achieving 'Good' overall status. There is subsequently a need to improve water quality; - There is potential for groundwater and surface water pollution as a result of development within the City; - Upgrading existing infrastructure provides the opportunity to improve pollution control for waterbodies, improving water quality; - Increased development near a watercourse (including transport, housing and other infrastructure) can increase flood risk on a local and catchment scale; - Population growth will increase demand on already stressed water resources and waste treatment infrastructure. Sustainable urban drainage systems (SuDS) and water-efficient development are needed to manage future demand and climate change impacts; - Fluvial and surface flooding present the greatest risks in the City; - Where possible, development should be designed to reduce the impacts of flood risk; - SuDS should be used throughout the design process of new developments to limit the risk of flood events causing a detrimental impact to the area; - The physical and chemical quality of water resources is an important aspect of the natural environment and can be negatively affected by pollution associated with surface water runoff from new or existing transport infrastructure, as well as by changes to waterbodies which can affect their quality as a habitat; and - Climate change is likely to increase the occurrence of flooding from all sources and hence raise the flood risk in Derby City, in addition to existing residual flood risk in the event of a breach or failure of the flood defences.
Climate Change and Greenhouse Gases	- It is important to become more resilient to the wider effects of climate change through adaptation measures. New developments need to minimise vulnerability and provide resilience to climate change, including implementing adaptation measures in respect of rising temperatures, water scarcity and extreme weather events, particularly heavy rainfall/flooding and heat waves; - Green Infrastructure presents opportunities to address multiple climate change issues through multifunctional spaces; - New development will need to incorporate SuDS to sustainably reduce flood risk, particularly due to climate change exacerbations of flood events; - New developments will need to incorporate low-carbon and renewable energy to minimise carbon emissions; - Transport and domestic emissions are the main contributors of CO₂ in the City; and - There is a need to work with communities to build resilience to the effects of climate change; - There has been an increase in renewable energy supplies across the City; - There has been changes in household energy demand due to seasonal temperature changes; - The Local Plan should facilitate renewable energy generation and reduce demand for energy use through energy efficiency; - Policies should ensure that developments are designed to be net zero, or net zero enabled, to aid in achieving net zero targets; - The Local Plan should facilitate the adaptation of existing buildings for higher summer temperatures, increased weather intensity, and improved energy performance; and - There is an expected switch towards electric transport and heating.
Transport and Accessibility	- There is a significant reliance on the petrol or diesel-fuelled private car as the main mode of transport within the City; - The proportion of workers using sustainable transport to get to work is currently low and can be improved; - The number of Electric Vehicle (EV) charging points is not currently sufficient to meet the needs of residents; - Uncertain growth in private car ownership could contribute to further air pollution, and associated impacts on climate, human health and biodiversity; and - There is a need to encourage more walking and cycling, including making improvements to safe and direct cycling routes across the City, to reduce high levels of private car use and existing congestion issues.
Geology and Soils	- The growing population and associated need for development is likely to increase the use of mineral resources; - Non-recycled materials are a finite resource, and materials will be required for new housing developments to meet the demands of a growing population; and - There is a need to protect Green Belt and Green Wedge land from development, prioritising brownfield land.
Waste	- Local Authority Collected Waste (LAWC) is currently managed through landfill, recycling, composting, and incineration; - Recycling rates for DCC are above the national average; - The quantity of household waste produced has increased in recent years; and - In order to implement the circular economy, new developments need to ensure that there is adequate space for waste separation.



4.4 SA Framework

The review of relevant plans, policies and programmes, collation of baseline information and identification of issues has been used to inform the SA Framework, which is set out in **Table 4-2**. The SA Framework is used to test the sustainability of the Local Plan and its alternatives. The SA Framework has been updated in light of comments received during consultation on the SA Scoping Report.



Table 4-2: SA Framework

SA Topic	SA Objective	Supporting questions
Population and Equality	SA1: To build inclusive communities by reducing social exclusion, reducing deprivation, promoting equity, equality and respecting diversity, improving local accessibility to healthcare, education, employment, retail facilities and recreational resources (including open spaces and sports facilities).	Will the policy or proposal: • Help to reduce deprivation and the inequality gap? • Ensure all residents have equitable access to health services? • Consider the needs of an aging population? • Ensure new housing is well located, close to a range of services such as shops, schools and employment opportunities? • Improve opportunities for active travel including walking and cycling? • Ensure everyone has access to high quality open space and recreation facilities? • Protect community facilities and improve access to important local services for the most deprived?
Human Health	SA2: To improve health and wellbeing and reduce health inequalities, improving quality of life for all.	Will the policy or proposal: • Help to improve health and reduce health inequalities? • Contribute to healthy lifestyles? • Encourage walking, cycling and a reduction in private car use? • Help to ensure health services are provided alongside development? • Protect existing services?
Economy	SA3: To deliver economic growth and support the creation of new and retention of existing businesses.	Will the policy or proposal: • Support the growth of higher skilled economic sectors? • Provide new employment premises which meet identified local needs in the area? • Improve business infrastructure, such as broadband and provide attractive sites for modern businesses? • Support the City's retail sector, especially the City Centre and other retail centres?
Employment	SA4: To create greater employment opportunities, higher value jobs and access to training.	Will the policy or proposal: • Increase job availability? • Increase the quality and choice of local employment? • Improve access to employment centres? • Meet the skills needs and future demand for labour?
Crime and Safety	SA5: To reduce crime and the fear of crime for all residents inclusively, improving safety.	Will the policy or proposal: • Help to create streets where people feel safe, particularly after dark? • Make a positive contribution to community cohesion? • Support designing out crime principals? • Reduce levels of crime derivation? • Improve road safety and reduce the number of people killed or seriously injured (KSI) on the roads, particularly children from deprived backgrounds? • Create spaces where women and girls feel safe and included?
Housing	SA6: To provide everybody with access to an affordable home which is resilient to the effects of climate change.	Will the policy or proposal: • Support a range of housing types and sizes, including affordable housing units?? • Ensure that there is an adequate supply of housing development land to meet local needs? • Be sustainably designed and resilient to the effects of climate change and designed to meet all needs, for example "Lifetime Homes" standards?
Leisure and Recreation	SA7: To provide better opportunities for people to participate in cultural, leisure and recreational activities.	Will the policy or proposal: • Help to improve access to formal and informal recreation facilities? • Provide opportunities for engagement in a range of cultural activities?



SA Topic	SA Objective	Supporting questions
		Create new allotments where there is a demand?
Biodiversity and Natural Capital	SA8: To protect and improve biodiversity, geo-diversity, including protect and enhance favourable conditions on SSSI's, SPAs, SACs and other wildlife sites and improve connectivity between, and access to, green spaces and functional habitats.	Will the policy or proposal: - Conserve and enhance habitats in the LNRS? - Conserve and enhance species diversity and in particular avoid harm and increase the ranges of protected species? - Provide opportunities for new habitat creation and lead to a net gain in biodiversity? - Protect geo-diversity? - Improve the ecological quality and character of open spaces? - Maintain and enhance woodland cover and management in appropriate areas (e.g. areas of ash dieback)? - Maintain or enhance tree cover? - Protect and promote effective management of SPAs and SACs in the LP area and its surroundings? - Help to protect and enhance other designated sites e.g., SSSIs, Wildlife Sites, LNRs etc? - Improve climate change adaptation through provision of accessible green space or green and blue infrastructure? - Prevent the fragmentation of habitats, provide links between green spaces or help to deliver/support other ecological networks? - Support the natural capital of the City?
Landscape and Townscape	SA9: To protect and enhance the character and appearance of the landscape and townscape, including landscape and townscape assets, as well as the area's other natural assets and resources.	Will the policy or proposal: - Protect and enhance landscape and townscape quality, character and distinctiveness? - Avoid loss of, and damage to greenbelt / green wedge land? - Make use of previously used / brownfield land and buildings? - Safeguard individual landscape and townscape features such as hedgerows, ponds, public squares, etc?
Historic Environment	SA10: To conserve and enhance the historic environment, heritage assets (including known and unknown archaeological sites) and their settings and maintain and enhance access to cultural heritage for enjoyment and educational purposes.	Will the policy or proposal: - Preserve and enhance the character or appearance of Conservation Areas and their settings? - Preserve or enhance heritage assets and their settings? - Preserve or enhance archaeological features and their settings? - Improve the condition of heritage at risk? - Re-use/retain historic buildings or fabric? - Protect and conserve the Outstanding Universal Value of the DVMWHS?
Air, Noise and Light Pollution	SA11: To maintain good local air quality and to minimise noise and light pollution	Will the policy or proposal: - Maintain or improve local air quality? - Encourage the installation of electric vehicle charging points? - Avoid adverse impacts from noise? - Minimise light pollution?
Water Environment	SA12: To ensure sustainable management of water resources and to minimise the risk of flooding.	Will the policy or proposal: - Minimise contamination of watercourses and improve water quality in watercourses? - Avoid exacerbating flood risk for any source and be designed to be resilient to flood risk for its lifetime? - Support the use of Sustainable Drainage Systems? - Encourage water efficiency and demand management? - Avoid deterioration and enhance the ecological status of water bodies? - Contribute toward achieving Water Framework Directive objectives?
Climate Change	SA13: Adapt to the effects of climate change including flood risk, extreme weather and overheating, and strengthen climate resilience.	Will the policy or proposal: - Minimise flood risk and ensure new development provides sustainable urban drainage? - Ensure new development is designed to withstand future climate change (e.g. overheating and increased storm severity)? - Increase and improve green and blue infrastructure to create a connected network across the City and within the wider area?



SA Topic	SA Objective	Supporting questions
		• Ensure surface and groundwater water resources are used efficiently? • Reduce energy consumption? • Support the delivery of renewable and decentralised energy capacity (including small scale or community energy projects)? • Support energy efficient design?
Greenhouse Gases	SA14: To reduce the contribution towards the emission of greenhouse gases.	Will the policy or proposal: • Reduce greenhouse gas (GHG) emissions? • Support the shift towards low carbon technologies and the usage of electric and ultralow emissions vehicles and appropriate infrastructure to support these? • Provide opportunities to access local services and facilities by low carbon public transport, walking or wheeling? • Promote a low carbon local economy? • Reduce levels of embodied carbon?
Transport and Accessibility	SA15: To reduce the number of journeys made by car, within and to and from the area and improve access to jobs, services and facilities.	Will the policy or proposal: • Utilise and enhance existing infrastructure? • Help to meet local needs locally through low carbon travel options? • Facilitate safe walking and cycling? • Facilitate the use of public transport? • Deliver opportunities to relieve traffic congestion? • Encourage travel planning for businesses? • Help to reduce the distances people have to travel on a regular basis for education, employment and services? • Help to improve access to services and facilities for those living in rural or remote settlements, or experiencing other access constraints? • Help to support homeworking by residents?
Geology and Soils	SA16: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil, and minerals resources.	Will the policy or proposal: • Utilise previously developed land? • Seek to improve or remediate contaminated land or reuse previously developed land which has not been restored? • Protect soil quality and avoid soil pollution? • Protect Best and Most Versatile (BMV) Agricultural Land? • Protect Greenbelt/ Green Wedges land? • Protect sites safeguarded for mineral workings?
Waste	SA17: To minimise the generation of waste and effectively manage waste that is created.	Will the policy or proposal: • Enhance opportunities for waste to be treated in line with circular economy principles (e.g. recycling, re-using, composting)? • Provide adequate waste separation facilities in new and existing developments in order to encourage more recycling? • Encourage the repurposing and refurbishing of buildings, instead of demolition?



5.0 Assessment of Spatial Strategy

5.1 Spatial Strategy Options

As part of Stage B of the SA process, 'Developing and Refining Options' DCC considered a number of high-level options for the scale and distribution of housing and economic growth across Derby City. This allowed some early SA findings to be generated and has helped to inform the Council's decision-making process regarding which of the spatial strategy alternatives to take forward as the preferred strategy. The effects outlined below are pre-mitigation and do not take into account any mitigation measures, including those that may be provided through development management policies.

Six potential spatial strategy options have been identified:

- **Option A (Preferred Option):** Development focused on brownfield, and City Centre sites identified through the allocations process, then the residual need met by sustainable greenfield sites within the Derby administrative boundary and meeting need through exporting contributions to other Derby HMA authorities;
- **Option A1:** Require brownfield allocations to come forward and be given planning permission before greenfield sites;
- **Option B:** Brownfield and greenfield development fully meeting the standard method housing need within the Derby administrative area boundary;
- **Option C:** Export greater proportion of housing needs to Housing Market Area (HMA) neighbouring authorities;
- **Option D:** A new settlement which meets the City's full housing needs outside of the Derby administrative boundary; and
- **Option E:** Allocate sufficient housing to allow the City's full affordable needs to be met within the Derby administrative boundary.

It should be noted that the proportion and spatial distribution of employment land across all six options is the same. There are not considered to be any other reasonable alternatives to the employment land distribution and quantity outlined within Option A (Preferred Option).

As part of the development of the Local Plan, DCC commissioned independent consultants to undertake an Employment Land Review (ELR). The ELR assessed different approaches to forecasting future needs for new employment land, including the 'labour demand' approach, the 'resident workforce' approach and 'past take up'. The ELR recommends the use of past take up rates and the ELR has used this approach 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 hectares (ha) of new land to meet projected needs of 88.5ha over the Plan period. The supply figure is therefore in excess of 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 (see **Section 7.3**). It is also important to note that Derby is already largely built to its administrative boundary. Due to the small quantity of submissions for employment sites, DCC are limited on alternative employment sites.

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, 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.



Table 5-1: Spatial Strategy Options

Option	Scale of Housing and Employment	Option Description
Option A (Preferred Option): Development focused on brownfield, and City Centre sites identified through the allocations process, then the residual need met by sustainable greenfield sites within the Derby administrative boundary and meeting need through exporting contributions to other Derby HMA authorities	Housing Growth – 12,500, capacity. Meeting the Derby HMA target for Derby, but capped below the 18,340 net new homes needed over the plan period (2023- 2043). Due to the agreed capacity cap, the Derby HMA authorities of Amber Valley and South Derbyshire meet the unmet need by 5,840. Employment Land - 133ha	Concentrate growth on brownfield and City Centre land first, with utilisation of greenfield land where necessary. Existing previously developed land in the City Centre is utilised and redeveloped for housing and employment use. Additional housing is located on greenfield land within the Derby City administrative boundary. New employment land is to be contained on four strategic employment sites and the City Centre. Both Smart Parc and Indurent Park are on previously developed land. Infinity Park is greenfield. The Rolls-Royce site is both greenfield and brownfield land.
Option A1: Require brownfield allocations to come forward and be given planning permission before greenfield sites	As option A	As option A, but with a phasing requirement for greenfield allocations, requiring brownfield allocations to come first. Employment land to be delivered as in Option A.
Option B: Brownfield and greenfield development fully meeting the standard method housing need within the Derby administrative area boundary	Housing Growth –18,340 net homes (standard method) Employment Land - 133ha	Housing and/or employment land is developed on all identified deliverable brownfield sites (approx. 4,500 including both permissions and new allocations) the remaining greenfield locations on Green Belt land, regardless of whether they are identified as grey belt, as well as Green Wedge land, regardless of its condition and linkage to the wider area would accommodate the remaining 13,840 units. Employment land to be delivered as in Option A.
Option C: Export greater proportion of housing needs to HMA neighbouring authorities	Approximately 6,300 homes within the City and the rest exported to South Derbyshire and Amber Valley Employment Land - 133ha	4,500 homes would be accommodated within the City Centre as part of regeneration allocations and permissions, and approximately 1,800 would be met through windfalls, but no greenfield allocations would be made within the Derby administrative boundary outside the City Centre. Neighbouring authorities would be requested to meet the remaining 12,040 homes required by the City in the standard method.



Option	Scale of Housing and Employment	Option Description
		Employment land to be delivered as in Option A.
Option D: A new settlement which meets the City's full housing needs outside of the Derby administrative boundary	Housing Growth – 18,340 net homes (standard method) Employment Land - 133ha	All of the City's growth needs would be met through the development of a new settlement. Employment land to be delivered as in Option A.
Option E: Allocate sufficient housing to allow the City's full affordable needs to be met within the Derby administrative boundary	Housing Growth – More than 18,340 net homes (standard method) Employment Land - 133ha	This option would mean that the plan's full affordable need would be met through allocating sufficient development that affordable housing needs could be met in entirety. Housing and/or employment land is developed on all identified deliverable brownfield sites (approx. 4,500 including both permissions and new allocations) the remaining greenfield locations on Green Belt land, regardless of whether they are identified as grey belt, as well as Green Wedge land, regardless of its condition and linkage to the wider area would accommodate the remaining 13,840 plus units. This option is similar to Option B but a greater proportion of homes would be affordable. This may be delivered through higher density development on the same sites as Option B. Employment land to be delivered as in Option A.



5.2 Assessment Summary

Table 5-2 provides an overview of the performance of each of the spatial strategy alternatives against the SA Framework objectives. The full spatial strategy alternatives assessment can be found in **Appendix C**.

Table 5-2: Assessment of Spatial Strategy Options

Spatial Strategy Option	SA Objectives																
	Population and Equality	Human Health	Economy	Employment	Crime and Safety	Housing	Leisure and Recreation	Biodiversity and Natural Capital	Landscape and Townscape	Historic Environment	Air, Noise and Light Pollution	Water Environment	Climate Change	Greenhouse Gases	Transport and Accessibility	Geology and Soils	Waste
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
Option A (Preferred Option)	+	+	++	+	+	+	+	-	-	?	-	-	-	+	+	-	+
Option A1	+	+	-	-	+	?	+	-	-	?	-	-	-	+	+	-	+
Option B	-	-	-	-	?	++	-	-	-	-	-	-	-	-	-	-	-
Option C	-	-	-	-	+	-	?	?	?	?	-	-	?	?	?	?	?
Option D	?	-	-	?	?	?	?	-	-	?	-	-	-	?	?	-	-
Option E	+	-	-	-	?	+	-	-	-	-	-	-	-	-	-	-	-



The different spatial strategy alternatives have performed differently across the SA objectives, with Option A (Preferred Option) resulting in the fewest potential significant negative effects, and the joint highest quantity of potential significant positive effects.

Option A (Preferred Option) has the potential to result in potential significant effects for economy (SA3). This preferred option contributes to achieving the Derby HMA housing number for Derby of 12,500 homes, and also encourages regeneration and investment within the City Centre, providing new space for businesses. However, uncertain effects have been identified for the historic environment (SA10) as there is potential for development to both alter and enhance the setting of heritage assets, but the scale of this is unknown.

The assessment of Option A1 has identified two uncertain effects, for housing (SA6) and the historic environment (SA10) City Centre. This alternative is largely similar to Option A. However, it prioritises the development of brownfield sites before greenfield sites, which could delay the delivery of housing and services across the City, particularly outside the City Centre. Delays may arise from site assembly issues, multiple land ownerships, the need to cease existing uses, or land remediation requirements.

Similarly to Option A, there is also potential for development to both alter and enhance the setting of heritage assets, but the scale of this is unknown. Potential significant negative effects have been identified for water environment (SA12) and climate change (SA13) due to the location of development within flood zones and the potential for increases in hardstanding which could exacerbate flood risk.

Option B has the potential to result in a significant positive effect, as this option would provide the required proportion of homes identified by the standard method (SA6). However, this alternative has the potential to result in several significant negative effects. Significant negative effects have been identified for economy (SA3), leisure and recreation (SA7), biodiversity and natural capital (SA8), landscape and townscape (SA9), historic environment (SA10), water environment (SA12), climate change (SA13), and geology and soils (SA16). Option B utilises Green Belt and Green Wedge land, regardless of grey belt designation, and is therefore anticipated to result in loss of high quality greenfield land. This is in turn anticipated to result in significant losses of biodiversity and landscape character, as well as opportunities for informal recreation. Similarly, due to the quantity of housing proposed within this option, above the capacity of Derby, in order to accommodate this, there is anticipated to be a loss of employment land. This option also has the potential to alter the setting of heritage assets through urban intensification. There is also potential for development within flood zones to increase hard standing and exacerbate flood risk. Additionally, the assessment of this alternative has resulted in uncertain effects for crime and safety (SA5), as these effects are likely to be determined by individual developments that may arise.

Option C has the potential to result in a high amount of uncertainty, which is similar to Option D. These uncertainties have largely been identified where it is likely that development will occur within neighbouring authorities. Therefore, effects are likely to be determined by the location of development sites within these authority areas. This alternative also has the potential to result in significant negative effects on housing (SA6) as the alternative falls short of delivering both the standard method and the Derby HMA identified housing need within Derby of 12,500 homes. This is likely to limit adequate housing provision within Derby City.

Option D has resulted in eight potential significant negative effects. This alternative includes the development of a new settlement to accommodate Derby's full housing need. However, the development of a new settlement is anticipated to result in large scale land take, negatively affecting economy (SA3), biodiversity (SA8), landscape (SA9), air, noise and light pollution (SA11), water (SA12), climate resilience (SA13), soils (SA16) and waste (SA17). Uncertain effects have been identified for population and equality (SA1), employment (SA4), crime and safety (SA5), housing (SA6), leisure and recreation (SA7), historic environment



(SA10), greenhouse gases (SA14) and transport (SA15) as these effects would be determined by the location of development, provision of additional infrastructure, and design of the settlement.

Option E has the potential to result in eight potential significant negative effects. These have been identified for economy (SA3), leisure and recreation (SA7), biodiversity (SA8), landscape (SA9), historic environment (SA10), water environment (SA12), climate change (SA13), and geology and soils (SA16). These potential effects have been identified as this alternative would lead to the loss of employment land and greenfield land to development. This alternative also has the potential to alter the setting of heritage assets through urban intensification. Additionally, the assessment of this alternative has identified uncertain effects for crime and safety (SA5), as these effects are likely to be determined by individual developments that might be delivered through this alternative.



6.0 Assessment of Policies

6.1 Introduction

The assessment of the Local Plan policies is summarised below and presented in full in **Appendix D**. A matrix approach has been used for the assessment which has used the significance criteria identified in **Table 6-1** below, with a detailed criteria presented in **Appendix D**.

Table 6-1: Significance of Effect

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	
Uncertain effects	?
Negligible	0

Policies have been assessed within their groups and references have been made to other policies within the Local Plan which provide mitigation for potential uncertain and negative effects.

For the purposes of the assessment, the policy groups follow those set out in the Regulation 19 Submission Draft Local Plan. The groups assessed are:

- General Development Principles;
- Housing;
- Economy;
- Natural Environment;
- Historic Environment;
- Climate Change;
- Infrastructure and Community;
- Transport and Movement; and
- City Centre.

An overview of the performance of the Local Plan policy groups against each SA objective within the SA Framework and summary of potential significant effects against each SA objective has been presented below. For the purpose of the SA, significant effects are deemed to be the following:

- Significant positive effects;
- Significant negative effects; and
- Uncertain effects.

Whilst the identification of uncertain effects is considered to be significant, due to the strategic, high level of assessment, uncertain effects are likely to be addressed as the local plan evolves, and individual development schemes arise.



Further details on the potential insignificant effects, i.e. minor positive, minor negative and neutral effects, are detailed in **Appendix D**. This appendix also sets out the nature of effects such as magnitude, spatial extent and duration. Details on mitigation measures put forward to address potential negative and uncertain effects are included in **Appendix D**.



6.2 Assessment of Policies

Table 6-2 provides an overview of the performance of proposed policies against each SA objective and **Table 6-3** outlines significant effects based on each SA objective within the SA Framework.

Table 6-2: Overview of Policy Assessment Findings

Policy Grouping	SA Objectives																
	Population and Equality	Human Health	Economy	Employment	Crime and Safety	Housing	Leisure and Recreation	Biodiversity and Natural Capital	Landscape and Townscape	Historic Environment	Air, Noise and Light Pollution	Water Environment	Climate Change	Greenhouse Gases	Transport and Accessibility	Geology and Soils	Waste
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
General Development Principles	++	++	+	0	++	++	++	+	++	++	+	+	++	+	++	+	+
Housing	++	+	0	0	+	++	+	?	++	-	-	0	+	?	?	+	?
Economy	+	+	++	++	+	0	+	?	+	+	0	?	0	?	?	+	?
Natural Environment	++	++	0	0	?	0	++	++	++	+	++	++	++	+	+	?	0
Historic Environment	+	0	+	0	0	+	++	+	++	++	0	0	+	0	+	+	+
Climate Change	+	+	0	0	0	+	0	+	+	+	+	++	++	++	+	0	+



Policy Grouping	SA Objectives																
	Population and Equality	Human Health	Economy	Employment	Crime and Safety	Housing	Leisure and Recreation	Biodiversity and Natural Capital	Landscape and Townscape	Historic Environment	Air, Noise and Light Pollution	Water Environment	Climate Change	Greenhouse Gases	Transport and Accessibility	Geology and Soils	Waste
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
Infrastructure and Community	++	++	+	+	0	+	++	?	+	+	0	+	0	+	+	-	?
Transport and Movement	++	++	+	0	+	0	+	?	+	+	+	0	0	+	++	?	?
City Centre	++	+	++	++	++	++	+	+	++	+	+	+	+	+	+	++	0



Table 6-3: Summary of Policy Significant Effects

SA Objective	Summary of Effects
SA1: Population and Equality	Six of the policy groups have the potential to result in potential significant positive effects on population and equalities. Generally, these policies contribute to providing high quality infrastructure, including housing and transport infrastructure that is accessible to all groups, supporting the needs of current and future generations.
SA2: Human Health	Four of the policy groups, General Development Principles, Natural Environment, Infrastructure and Community, and Transport and Movement, have the potential to result in significant positive effects on health. These policies contribute to encouraging healthy lifestyles, largely through improving active travel and opportunities for physical activity. There is also potential for policies to reduce health inequalities due to providing additional access to services and facilities.
SA3: Economy	Two of the policy groups, Economy and City Centre, have the potential to result in significant positive effects on economy. These policies both contribute to economic growth and investment within Derby, including providing spaces for businesses and employment, as well as supporting retail provision.
SA4: Employment	Two of the policy groups, Economy and City Centre, have the potential to result in significant positive effects on employment. These policies both contribute to economic growth and regeneration and additional employment opportunities within Derby. These policies are also anticipated to improve the diversity of employment opportunities available.
SA5: Crime and Safety	Two policy groups, General Development Principles and City Centre, have the potential to result in significant positive effects on crime and safety. These policy groups contribute to high quality design and public realm improvements that are anticipated to improve feelings of safety as well as reduce crime rates. Uncertain effects have been identified for Natural Environment policies as these policies include the potential for new open space, as well as altering lighting in night time hours. Effects arising from these policies are likely to be determined by individual scheme design.
SA6: Housing	Three policy groups, General Development Principles, Housing and City Centre, have the potential to result in significant positive effects on housing. These policy groups all contribute to improving housing provision within Derby, providing high quality homes across a range of housing types and tenures.
SA7: Leisure and Recreation	Four policy groups, General Development Principles, Natural Environment, Historic Environment, and Infrastructure and Community, have the potential to result in significant positive effects on leisure and recreation. Generally, these policy groups will contribute to enhancing the open space provision within Derby, providing opportunities for informal recreation. These policies should also result in the development of new leisure and recreation facilities.
SA8: Biodiversity and Natural Capital	Natural Environment policies have the potential to result in significant positive effects on biodiversity. The policies within this group should all contribute to protecting and enhancing biodiversity within Derby, and also support the development of green and blue infrastructure.



SA Objective	Summary of Effects
	Uncertain effects have been identified for Housing, Employment, Infrastructure and Community and Transport and Movement policies. These policy groups could lead to development that could result in loss of biodiversity. However, this would be determined by individual developments that may arise from these policies.
SA9: Landscape and Townscape	Five of the policy groups have the potential to result in significant positive effects on landscape and townscape. These policy groups should all contribute to high quality design and enhancement of the public realm and landscape setting within Derby. Policies have also considered existing landscape and townscape character, ensuring design is sensitive to these features.
SA10: Historic Environment	Two policy groups, General Development Principles and Historic Environment, have the potential to result in significant positive effects on the historic environment. These policy groups consider heritage assets within development, and aim to protect and enhance the assets and their settings.
SA11: Air, Noise and Light Pollution	Natural Environment policies have the potential to result in significant positive effects on air, noise and light pollution. These policies should all contribute to reducing pollution within Derby, including during construction and operation of developments.
SA12: Water Environment	Both Natural Environment and Climate Change policy groups have the potential to result in significant positive effects on the water environment. These policies should contribute to improving blue infrastructure, water quality and flood risk mitigation measures within Derby, as well as implementing water efficiency measures within developments. Uncertain effects have been identified for the Economy policy group as there is potential for increases in hardstanding and urban intensification to increase flood risk in the City Centre, which has a large proportion of the area located within a flood zone. Effects are likely to be determined by individual scheme design.
SA13: Climate Change	Three policy groups, General Development Principles, Natural Environment, and Climate Change, have the potential to result in significant positive effects on climate change. These policy groups should contribute to implementing climate resilience measures, including SuDS, as well as measures to minimise overheating and ensure energy efficiency.
SA14: Greenhouse Gases	Climate Change policies have the potential to result in significant positive effects on greenhouse gases due to reducing emissions through requiring the implementation of energy efficiency measures, as well as minimising embodied carbon within developments. These policies should also contribute to meeting Derby's target of being net zero by 2035. Both Housing and Economy policy groups have the potential to result in uncertain effects on greenhouse gases. Effects are likely to be determined by the location of developments that may arise as a result of these policies.
SA15: Transport and Accessibility	Both General Development Principles and Transport and Movement policy groups have the potential to result in significant positive effects on transport and accessibility. These policies support the development of new sustainable transport infrastructure, and encourage a modal shift away from private vehicle use and improving the accessibility of services. Uncertain effects have been identified for Housing and Economy policies as effects upon sustainable transport accessibility are likely to be determined by the location of developments that arise and their proximity to the existing transport network.



SA Objective	Summary of Effects
SA16: Geology and Soils	City Centre policies have the potential to result in significant positive effects on geology and soils. These policies encourage the regeneration of existing buildings, the use of brownfield land and protection of greenfield land within Derby, particularly agricultural land. Uncertain effects have been identified for both the Natural Environment and Transport and Movement policy groups. These have been identified where development has potential to result in loss of green wedge land and greenfield land, but this will be determined by individual development proposals that may arise as a result of the local plan.
SA17: Waste	Uncertain effects have been identified for the Housing, Employment, Infrastructure and Community and Transport and Movement policy groups. These policies may result in developments that are resource intensive and could generate a significant amount of construction waste. Effects will be determined by individual scheme design.



6.3 Assessment of Policy Alternatives

Alternatives have been identified for each of the Local Plan policies. Alternative policies generally fit into three scenarios:

- 1) The application of the existing Local Plan policy;
- 2) The application of the NPPF and/or national policy requirements such as the National Design Guide and the National Development Management Policies (once published); and
- 3) Not including a policy in the Local Plan.

In some cases, there is no reasonable alternative to the policy included within the Local Plan.

As the Local Plan is an iterative process, there are likely to be policy changes and amendments which will emerge throughout the process. This may provide reasonable alternative policies, which would be subject to SA. Any policy changes / alternatives will be considered, as appropriate.

Table 6-4 presents the policy alternatives for each of the draft policies within the Local Plan. Where there is no reasonable alternative, this is also indicated within the table.

The three alternative policy scenarios have been subject to a high level assessment and the findings are presented in **Table 6-5**. The key to potential effects is outlined in **Table 6-1**.

In general, the application of the existing Local Plan policies, the application of the NPPF, and the 'no policy' alternatives could result in fewer potential significant positive effects when compared to the draft Local Plan policies.

Whilst the application of the NPPF would ensure that the Local Plan is sound, the NPPF lacks Derby specific details, which the Local Plan would provide. However, some of the existing Local Plan policies are outdated, and no longer reflect key issues within Derby, such as changing employment needs and City Centre development needs.

The alternatives which would mean not including a policy within the Local Plan could predominantly result in negative effects, including potential significant negative effects. Without Local Plan policies, development would be largely unguided, and additional provisions would be left to developers, which may result in a lack of infrastructure and facilities and potential for harm on designated assets within Derby.



Table 6-4: Outline of Policy Alternatives

Policy Theme	Policy	1) Application of Existing Local Plan Policy	2) Application of NPPF and National Policies	3) Not including a policy in the Local Plan
General Development Principles	Policy GD1: Placemaking Principles	✓	✓	✗
	Policy GD2: Character and Context	✓	✓	✗
	Policy GD3: Amenity	✓	✓	✗
	Policy GD4: Accessible Places	✗	✓	✗
	Policy GD5: Resilient Places and Community Safety	✓	✓	✗
	Policy GD6: Health and Wellbeing	✗	✓	✓
	Policy GD7: Comprehensive and Coordinated Development	✗	✗	✓
	Policy GD8: Enforcement	✗	✗	✓
	Policy GD9: Infrastructure and Developer Contributions	No reasonable alternative.		
	GD10: Advertisements	No reasonable alternative. It would not be a reasonable alternative to fail to include this policy in the plan, because although the NPPF gives guidance on this topic, appropriate adverts are a vital part of the street scene and can help or hinder regeneration and be either visually in keeping or harmful. The policy helps to meet the Council's corporate policy and local plan objectives of City Centre vibrancy and regeneration.		
	GD11: Shopfronts	No reasonable alternative. It would not be a reasonable alternative to fail to include this policy in the plan, because although the NPPF and local and national design guides give guidance on this topic, high quality shop fronts are a vital part of the street scene and can help or hinder regeneration and be either visually in keeping or harmful. The policy helps to meet the Council's corporate policy and local plan objectives of City Centre vibrancy and regeneration.		
Housing	Policy H1: Housing Delivery	No reasonable alternative to having a policy on this topic. Commentary on site selection and spatial strategy is set out in Section 5 and Section 7 of this Report, as well as in Chapter 4 of the draft Local Plan.		
	Policy H2: Residential Development – General Criteria	✓	✗	✗
	Policy H3: House Extensions	No reasonable alternative. This is an essential policy in the local plan as residential extensions are one of the most common application types and require planning policy and guidance, informed by the latest NPPF and National Design Guide, as well as the Draft City Design Guide.		
	Policy H4: Affordable Housing	No reasonable alternative. It would not be a reasonable alternative not to include this policy as the NPPF requires the plan to contain affordable housing requirements. It would not be a reasonable alternative to copy currently adopted Policy into the new plan, as affordable housing requirements and plan wide viability have changed since the adoption of the last plan.		
	Policy H5: Looked After Children	No reasonable alternative. It would not be a reasonable alternative not to include this policy as the NPPF and ministerial statement (2023) make clear that the plan should not be silent on this issue.		
	Policy H6: Communal Living Accommodation	No reasonable alternative.		
	Policy H7: Accommodation for Older People and People with Disabilities	No reasonable alternative. It would not be a reasonable alternative not to include this policy as NPPG makes clear that the plan should not be silent on this issue.		
	Policy H8: Proposals Which Would Create a New House in Multiple Occupation	✗	✗	✓
	Policy H9: Intensification of Existing Houses in Multiple Occupation	No reasonable alternative.		
	Policy H10: Student Accommodation	No reasonable alternative. It would not be a reasonable alternative not to include this policy as NPPG makes clear that the plan should not be silent on this issue.		
	Policy H11: Self-Build, Custom Build and Community Build Homes	No reasonable alternative. It would not be a reasonable alternative not to include this policy as NPPG makes clear that the plan should not be silent on this issue.		
	Policy H12: Gypsies, Travellers and Travelling Showpeople	No reasonable alternative. Making provision for accommodation meeting the housing needs of gypsies, travellers and travelling show people is a requirement in national policy and guidance and there is therefore no reasonable alternative to doing so.		
Economy	Policy E1: New Employment Locations	No reasonable alternative. Commentary on site selection and spatial strategy is set out elsewhere in Section 5 and Section 7 of this Report, as well as in Chapters 4 and 7 of the draft Plan.		



	Policy	1) Application of Existing Local Plan Policy	2) Application of NPPF and National Policies	3) Not including a policy in the Local Plan
	Policy E2: Existing Employment Locations	x	x	✓
	Policy E3: Local Labour Agreements	x	x	✓
	Policy E4: Office Development	✓	x	✓
	Policy E8: Defined Centres	✓	x	x
	Policy E10: Main Town Centre Uses Outside of Centres	✓	x	✓
	Policy E11: Tourism and Culture	✓	x	✓
	Policy E12: Managing the Proliferation of Specific In-Centre Uses	x	x	✓
Natural Environment	Policy EN1: Green and Blue Infrastructure	✓	x	x
	Policy EN2: Dark Infrastructure	x	x	✓
	Policy EN3: Open Space, Sport and Recreation Buildings	No reasonable alternative. It would not be a reasonable alternative not to include this policy, as it would leave critical standards for development open to uncertainty, and fail to protect open space, contrary to the requirements of national policy and guidance. In addition, the loss of the standards would make it difficult for officers to negotiate with developers for both on and off-site open space		
	Policy EN4: Allotments and Community Gardens	x	x	✓
	Policy EN5: Green Belt	x	x	✓
	Policy EN6: Green Wedges	No reasonable alternative. It would not be a reasonable alternative not to include this policy. Green Wedges are an important part of Derby's character and are a long-standing, and successful local planning policy. The retention and protection of functional green wedges is a council corporate and Local Plan strategic objective. As part of the production of the draft Local Plan, the City has conducted a Green Wedge and Green Belt review, which supports the retention of the designation in the majority of cases. The Green Belt and Green Wedge maps have been amended taking into account these recommendations. Not having this policy would be detrimental to the City. Green Wedges provide multiple benefits for the City, however, there is constant pressure to release these greenfield sites for development. Without this policy, it would be difficult for the Council to promote City Centre regeneration and development of brownfield land		
	Policy EN7: Green Gaps	x	x	✓
	Policy EN8: Biodiversity and Geodiversity	No reasonable alternative. This topic as is a National Policy and Guidance requirement.		
	Policy EN9: Trees and Hedgerows	x	x	✓
	Policy EN10: Biodiversity Net Gain	No reasonable alternative. It would not be a reasonable alternative not to include this policy as setting out the policy requirements arising from the environment Act and ensuring biodiversity net gain is required for all qualifying development in the plan is necessary as part of national policy.		
	Policy EN11: Air Quality	No reasonable alternative. It would not be a reasonable alternative to fail to include this policy in the plan, because the NPPF requires plans to sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones.		
	Policy EN12: Land Contamination	x	x	✓
	Policy EN13: Pollution	x	x	✓
Historic Environment	Policy HE1: Historic Environment	No reasonable alternative. This topic as is a National Policy and Guidance requirement.		
	Policy HE2: Derwent Valley Mills World Heritage Site	No reasonable alternative. It would not be reasonable to have no policy on this topic given the significance of the heritage asset to the City. Whilst the NPPF gives guidance, it would be unrealistic not to address it in the Local Plan.		
	Policy HE3: Darley Abbey Mills Complex	No reasonable alternative. It would not be reasonable to have no policy on this topic given the significance of the heritage asset to the City. The Darley Abbey Mills Complex is a key part of the Derwent Valley Mills World Heritage Site, and an area under ongoing transformation. Whilst the NPPF gives guidance, it would be unrealistic not to address it in the Local Plan.		
	Policy HE4: Conversation Areas	No reasonable alternative. It would not be reasonable to have no policy on this topic given the significance of the Conservation Areas to the City and the policy's role in giving direction to development within them. These are unique to the City. In addition, many Conservation Areas are subject to article 4 directions, so policy is needed to determine applications which would		



Policy Theme	Policy	1) Application of Existing Local Plan Policy	2) Application of NPPF and National Policies	3) Not including a policy in the Local Plan
		otherwise be permitted development. Retention of the existing policy would also not have been a reasonable alternative now that it is almost 20 years old, and national policy and guidance on the topic has changed.		
	Policy HE5: Listed Buildings and Locally Listed Buildings	x	x	✓
	Policy HE6: Heritage Statements of Significance	x	x	✓
	Policy HE7: Uses Within Buildings of Architectural or Historic Importance	x	x	✓
	Policy HE8: Archaeology	x	x	✓
	Policy HE9: Historic Parks and Gardens and Designed Landscapes	x	x	✓
Climate Change	Policy CL1: Flood Risk and Water Management	x	x	✓
	Policy CL2: Our City Our River (OCOR)	No reasonable alternative.		
	Policy CL3: Sustainable Design & Construction	No reasonable alternative.		
	Policy CL4: Renewable and Low Carbon Energy	No reasonable alternative.		
	Policy CL5: Low Carbon Energy Centres	No reasonable alternative.		
	Policy CL6: Embodied Carbon	x	x	✓
Infrastructure and Community	Policy IC1: Social and Community Facilities	x	x	✓
	Policy IC2: Cemetery	x	x	✓
	Policy IC3: Education Provision	No reasonable alternative.		
	Policy IC4: Higher and Further Education	No reasonable alternative.		
	Policy IC5: Communication Infrastructure	x	x	✓
Transport and Movement	Policy T1: Active and Sustainable Transport	x	x	✓
	Policy T2: Transport Infrastructure	x	x	✓
	Policy T3: Servicing, Accessibility and Parking	✓	x	✓
	Policy T4: Protected Routes	x	x	✓
	Policy T5: Electric Vehicle Charging Facilities	x	x	✓
	Policy T6: Transport Mobility Hubs	x	x	✓
	Policy T7: Safeguarded Areas around Aerodromes (East Midlands Airport)	No reasonable alternative.		
City Centre	Policy CC1: City Centre Strategy	x	x	✓
	Policy CC2: Defining the City Centre	x	x	✓
	Policy CC3: City Centre Living	x	x	✓
	Policy CC6: Tall Buildings	x	✓	x
	Policy CC7: Business, Creativity and Learning	No reasonable alternative. The NPPF requires the identification of the extent of 'centres' for the purposes of applying the sequential test. The Central Activity Area (CAA) is the extent of the 'centre' for applying the sequential test for office development.		
	Policy CC8: Shopping, Eating and Drinking	No reasonable alternative. The NPPF requires identification of the Primary Shopping Area (PSA), so not including a policy is not a reasonable alternative. Clearly, there numerous iterations related to the extent of the boundary.		
	Policy CC9: Active and Inclusive Frontages	x	✓	✓
	Policy CC10: Streets and Spaces	x	✓	✓



Table 6-5: High Level Assessment of Policy Alternatives

SA Objective	1) Application of Existing Local Plan Policy		2) Application of NPPF and National Policies		3) Not including a Policy in the Local Plan	
	Sig.	Summary	Sig.	Summary	Sig.	Summary
SA1: Population and Equality	+	The application of existing Local Plan policies is anticipated to provide additional services for the local population, including employment, services and facilities, alongside housing.	+	The implementation of the NPPF is anticipated to promote safe, healthy and inclusive communities through ensuring high quality design and aiding in ensuring that development meets accessibility needs, as well as providing adequate housing provision for the community.	-	Not including the outlined policies within the plan is anticipated to result in stretched services due to increased populations, without supporting infrastructure, and a lack of services that meet both current and future population needs. There is potential that development would also not occur in line with Derby's needs, for example, not providing appropriate telecommunication infrastructure to reduce inequalities.
SA2: Human Health	+	Application of the existing Local Plan policies would encourage sustainable transport modes, which may reduce private vehicle use and improve air quality, improving human health. Additionally, providing housing is anticipated to improve health as high quality housing is a key determinant of health.	-	The NPPF alternative options have potential to result in positive effects on health, as this policy promotes achieving healthy communities. The NPPF recognises the potential for harm when hot food takeaways are in certain locations near schools or the potential for such uses to intensify other social harms. However, as health and wellbeing outcomes in the City are sometimes worse in some measures than regional or national equivalents, the absence of a local plan policy may result in increased health inequalities within Derby due to higher levels of inequality within Derby.	-	By not including policies, there is the potential for the over proliferation of uses such as takeaways and betting shops, at the expense of other uses which can be open to all members of the public, especially in the daytime.
SA3: Economy	+	The use of existing Local Plan policies, specifically CP10, CP11 and CP12, would provide additional employment space, including office and retail development. The existing policies are also anticipated to support City and district centre development. These policies are anticipated to provide additional opportunities for investment and employment within Derby. However, the application of existing policies does not reflect the updated City Centre definition, including the Central Activity Area, and reflect changes to district centre needs, for example in providing smaller co-working spaces. Relying on the current definition would not provide the focus and profile needed to regenerate / repopulate more northern areas of the City Centre.	0	The NPPF alternatives are not anticipated to have potential effects upon economy.		Failure to include the proposed policies may result in a failure to safeguard existing employment sites, in favour of other development. This would reduce economic and employment opportunities within Derby. Without proposed policies, there is also potential for a lack of sustainable access to employment sites that may arise. There is also potential for the over-proliferation of uses, without specific guidance on preventing the over-proliferation of uses such as hot food takeaways in certain locations.
SA4: Employment	+	The use of existing Local Plan policies, specifically CP10, CP11 and CP12, would provide additional employment space, including office and retail development. These policies are anticipated to provide additional opportunities for employment within Derby.	0	The NPPF alternatives are not anticipated to have potential effects upon employment.	-	The absence of Local Plan policies may reduce opportunities for social mobility and training within Derby, which may therefore limit skills and employment opportunities.
SA5: Crime and Safety	+	The application of the existing Local Plan policy, specifically E24, is anticipated to improve safety through incorporating crime prevention measures such as design, layout, lighting arrangements, landscaping proposals and the extent to which they encourage lively, attractive and welcoming environments. However, this policy does not contain high levels of detail or reflect an up to date understanding of how different elements of urban design affect safety.	?	The NPPF seeks to promote safe, healthy and inclusive communities. This has potential to include measures that design out crime, however, this is likely to be determined by individual design that may arise. There is potential that developers may not ensure safe design if no specific Local Plan policy requires this.	-	Not including a policy in the plan would risk reducing the safety of new development and increasing the fear of crime within the City.
SA6: Housing	+	The application of existing Local Plan policy, specifically H13, CP8, and CP7, would aid in delivering high quality housing within the City. The existing local plan policy effectively meets the housing needs of gypsies and travellers. However, the application of the existing local plan does not consider updates to the NPPF, including affordable housing needs, and	0	The NPPF alternatives are not anticipated to have potential effects upon housing. This scenario has not been applied to housing policies, and is therefore not likely to contribute to effects.	-	An absence of the proposed HMO policy may lead to uncertainty and inconsistency as to how to determine planning applications for smaller HMOs, which may alter this provision within Derby.

SA Objective	1) Application of Existing Local Plan Policy		2) Application of NPPF and National Policies		3) Not including a Policy in the Local Plan	
	Sig.	Summary	Sig.	Summary	Sig.	Summary
		introduction of Technical Space Standards, ensuring that housing includes wheelchair accessible homes.				
SA7: Leisure and Recreation	-	The existing Local Plan policy, CP14, does not reflect the current tourism demand and culture of Derby. This may limit opportunities for leisure and recreation for the current and future population, and limit opportunities to improve tourism.	0	The NPPF alternatives are not anticipated to have potential effects upon leisure and recreation.	-	Not including the proposed policies would reduce opportunities to promote sustainable tourist destinations and cultural events. It is also unlikely to provide additional leisure and recreational facilities and opportunities.
SA8: Biodiversity and Natural Capital	+	Implementing the existing policies are anticipated to positively contribute to biodiversity and natural capital through the implementation of green infrastructure. However, the application of the existing policy CP16 does not consider the implementation of blue infrastructure, nor does it integrate the aims and objectives of the adopted Local Nature Recovery Strategy for Derbyshire DNRS. There is also no consideration of the requirement of 10% Biodiversity Net Gain.	0	The NPPF alternatives are not anticipated to have potential effects upon biodiversity and natural capital.		The absence of local plan policies may limit enhancements to biodiversity net gain and may not include additional opportunities for habitats, such as allotments. There is also potential that development may result in loss of biodiversity, including within the green belt.
SA9: Landscape and Townscape	+	There are a number of policies within the current plan that contribute to high quality design, including CP3, CP4, GD5. Preserving and enhancing the local landscape and townscape contributes to high quality streetscapes within the City and improves the current condition of the landscape and townscape. However, the existing policies are not reflective of the most recent Draft City Centre Design Guide and Tall buildings study therefore there is potential for design to be not as sensitively developed.	-	The application of the NPPF has potential to result in high quality design, enhancing the City's landscape and townscape. However, the application of the NPPF and the National Design Guide would not reflect the local characteristics of the City. There is also potential that the application of national policies may encourage development that does not enhance the City's landscape and townscape value, for example where tall buildings may not be well located and considered unacceptable in terms of design.		By not including policies, there is potential for development to be located insensitively, and design is not likely to reflect acceptable standards, for example, through tall buildings or over-proliferation of hot food takeaways. Additionally, there is potential that development may result in land take from the green belt, which may permanently result in the loss of green space and negatively affect the landscape setting. There is also likely to be a lack of joined up approaches to development, reducing the likelihood of implementing high quality green, blue and hard infrastructure as part of development.
SA10: Historic Environment	+	The application of existing Local Plan policies has potential to contribute to enhancing the setting of heritage assets through high quality design and improving the landscape and townscape. There is also potential that improvements to air quality may reduce degradation on heritage assets.	-	The application of the NPPF has potential to result in high quality design, enhancing the setting of heritage assets. However, the application of these policies would not reflect the local characteristics of the City. There is also potential that the application of national policies may encourage development that does not enhance the setting of assets by taking into account local character and context.		The absence of proposed policies has potential to cause significant harm to the local historic environment through the potential for loss or damage to assets and insensitive design that does not consider the significance of heritage assets. Without specific policies, it is unlikely that development would contribute to maintaining a vibrant City Centre and protecting and enhancing heritage assets in Derby, particularly the DVMWHS. There is also potential that development could lead to delay or failure to properly record and maintain archeologically significant assets if discovered during development.
SA11: Air, Noise and Light Pollution	+	Application of the existing Local Plan policies encourage sustainable transport modes, which may reduce private vehicle use and improve air quality.	0	The NPPF alternatives are not anticipated to have potential effects upon air, noise and light pollution.		Not including proposed policies to limit pollution may result in increased levels of air, water, noise, light or other forms of pollution.
SA12: Water Environment	0	The existing Local Plan alternatives are not anticipated to have potential effects upon the water environment	0	The NPPF alternatives are not anticipated to have potential effects upon water environment		Absence of pollution policies may result in increased water pollution in Derby, particularly as a result of development. Additionally, not including flood risk and water management policies is anticipated to exacerbate pollution and flood risk within the City.
SA13: Climate Change	?	Existing local plan policies include the development of high quality design and landscapes, as well as green infrastructure improvements. There is potential for this to contribute to improving climate resilience. However, it is unclear whether high quality design would lead to energy efficiency measures.	0	The NPPF alternatives are not anticipated to have potential effects upon climate change.		Without the implementation of policies, the inclusion of climate resilience measures is likely to be determined by individual developers and scheme design. This has potential to result in developments that are not resilient to the effects of climate change, including flood risk. Given the risk of flooding in Derby, this is anticipated to result in potential significant negative effects.

SA Objective	1) Application of Existing Local Plan Policy		2) Application of NPPF and National Policies		3) Not including a Policy in the Local Plan	
	Sig.	Summary	Sig.	Summary	Sig.	Summary
SA14: Greenhouse Gases	+	Application of the existing Local Plan policies could encourage sustainable transport modes, which may reduce private vehicle use and reduce greenhouse gases from transport. However, development that comes forward is anticipated to result in high levels of embodied carbon.	0	The NPPF alternatives are not anticipated to have potential effects upon greenhouse gases.	-	Without policy implementation, the provision of EV infrastructure in non-residential development would be at the behest of the applicant. Additionally, there is potential for development to include high levels of embodied carbon if policies are not implemented, particularly as it might result in less re-use of existing buildings and sustainable materials.
SA15: Transport and Accessibility	+	Policies within the existing Local Plan that would be continued, specifically policies T15, CP24, and CC17, focus on improving sustainable transport within Derby, including linking to the wider area, and alleviating the impact of servicing within the City Centre.	0	The NPPF alternatives are not anticipated to have potential effects upon transport and accessibility.		The application of no policy may create a situation where development is approved which has poor access and creates problems for pedestrians and traffic flow. Additionally, there may be a lack of EV infrastructure implemented within development, because without policy, the provision of EV infrastructure in non-residential development would be at the behest of the applicant. Without policy implementation, there are also likely to be barriers to improving suitable and safe infrastructure across the City to assist modal shift away from private vehicle use.
SA16: Geology and Soils	0	The existing local plan alternatives are not anticipated to have potential effects upon geology and soils.	0	The NPPF alternatives are not anticipated to have potential effects upon geology and soils.		Not including policies may result in development being insensitively located, negatively affecting Green Belt / Green Wedge land, as well as resulting in unsuitable sites being developed, for example, not providing an adequate site for the development of the cemetery. Additionally, not including this policy would be less helpful to applicants seeking to understand the relevant requirements of development on contaminated land and may reduce consistency in decision making and in the quality of applications.
SA17: Waste	-	The existing Local Plan policies may result in proposals that could generate a significant amount of construction waste.	0	The NPPF alternatives are not anticipated to have potential effects upon waste.	-	An absence of proposed policies may limit the redevelopment of existing buildings and sites, resulting in proposals that could generate a significant amount of construction waste.

7.0 Assessment of Site Allocations

7.1 Introduction

The assessment of the Local Plan site allocations is summarised below in **Section 7.2** and presented in full, alongside the RAG assessment, in **Appendix E**. A matrix approach has been used for the assessment which has used the significance criteria shown in **Table 7-1**, with a detailed criteria presented in **Appendix E**.

Table 7-1: Significance of Effect

Effect Significance	Key
Potential for significant positive effects	++
Potential for minor positive effects	+
Potential for minor negative effects	-
Potential for significant negative effects	
Uncertain effects	?
Neutral	0

An overview of the performance of proposed allocation sites against each SA objective in the SA Framework and summary of the potential significant effects based on each SA objective have been presented below.

Further details on the insignificant effects, i.e. minor positive, minor negative, mixed and neutral effects, are detailed in **Appendix E**. This appendix also sets out the nature of effects such as magnitude, spatial extent and duration. Details on mitigation measures put forward to address potential negative and uncertain effects are included in **Appendix E**.

Table 7-2 details the Preferred and Alternative Sites that have been assessed as part of the SA. Further details surrounding the assessment of Preferred Sites can be found in **Section 7.2**, and the assessment of Alternative Sites can be found in **Section 7.3**. Additional details on the rationale for inclusion/exclusion from the Local Plan can be found in **Appendix G**.



Table 7-2: Details of Preferred and Alternative Sites

Site	Headline Rationale for Inclusion/Exclusion within the Local Plan
Preferred Site Allocations	
HA1: Rykneld Road, Littleover	Allocated within Regulation 19 Local Plan - Existing urban extension; developer interest; highway mitigation required
HA2: Brook Farm, Chaddesden	Allocated within Regulation 19 Local Plan - Existing allocation; housebuilder control; deliverable
HA3: East of Moorway Lane, Littleover	Allocated within Regulation 19 Local Plan - Green Wedge mitigation and highway improvements required
HA4: Royal Hill Road, Spondon	Allocated within Regulation 19 Local Plan - Planning permission secured; deliverable
HA5: The Hollow, Mickleover	Allocated within Regulation 19 Local Plan - Strategic housing growth; diminished Green Wedge function
HA6: Kingsway Boulevard	Allocated within Regulation 19 Local Plan - Brownfield regeneration opportunity
HA7: Stoney Lane, Spondon	Allocated within Regulation 19 Local Plan - Grey Belt site; subject to highway mitigation
HA8: Former Police Station, Cotton Lane	Allocated within Regulation 19 Local Plan - Brownfield site with permission
HA9: Bramblebrook House/Humbleton View, Littleover	Allocated within Regulation 19 Local Plan - Council-owned brownfield redevelopment
HA10: Elton Road Works, Osmaston	Allocated within Regulation 19 Local Plan - Brownfield redevelopment opportunity
HA11: Shaftesbury Street	Allocated within Regulation 19 Local Plan - Council-led affordable housing delivery
HA12: North of Sinfin Moor Lane	Allocated within Regulation 19 Local Plan - Established residential principle
HA13: Former Beaufort Business Centre, Chaddesden	Allocated within Regulation 19 Local Plan - Brownfield regeneration; flood mitigation planned
HA14: Kitchener Avenue/Browning Street	Allocated within Regulation 19 Local Plan - Affordable housing opportunity
HA15: Former Ivy House School	Allocated within Regulation 19 Local Plan - Brownfield redevelopment
HA16: Gypsy and Traveller Site Allocation	Allocated within Regulation 19 Local Plan - Meets identified Gypsy & Traveller need
CC4: Residential Led, Mixed Use Site Allocations	Allocated within Regulation 19 Local Plan - Major city-centre regeneration
CC5: Non-Residential Regeneration Opportunities	Allocated within Regulation 19 Local Plan - Strategic city-centre regeneration
CC12: Derby Riverside	Allocated within Regulation 19 Local Plan - Strategic growth area; flood mitigation
CC13: University of Derby, City Centre Hub	Allocated within Regulation 19 Local Plan - Education-led regeneration
CC14: Railway Station Quarter	Allocated within Regulation 19 Local Plan - Strategic regeneration opportunity
CC15: North Castleward	Allocated within Regulation 19 Local Plan - City-centre housing regeneration
E5: Land South of Wilmore Road (Infinity Park)	Allocated within Regulation 19 Local Plan - Strategic employment site
E6: SmartParc, Spondon	Allocated within Regulation 19 Local Plan - Employment-led regeneration
E7: Indurent Park	Allocated within Regulation 19 Local Plan - Established employment delivery
E8: Rolls-Royce Operations	Allocated within Regulation 19 Local Plan - Strategic employment expansion
Alternative Sites Excluded from the Local Plan	
Allenton Market	Excluded from Regulation 19 Local Plan - Unavailable; existing community use
Beaufort Street	Excluded from Regulation 19 Local Plan - Flood risk; insufficient size
Bembridge Drive, Alvaston	Excluded from Regulation 19 Local Plan - Sport and flood objections



Site	Headline Rationale for Inclusion/Exclusion within the Local Plan
Colwell Drive	Excluded from Regulation 19 Local Plan - Open space, power lines, flood risk
Off Greenwich Drive South Mackworth	Excluded from Regulation 19 Local Plan - Green Wedge and access constraints
Osmaston Park off Oaktree Avenue	Excluded from Regulation 19 Local Plan - Loss of allotments and biodiversity
Richmond Park Road	Excluded from Regulation 19 Local Plan - Green Wedge harm and poor access
Woodchester Drive	Excluded from Regulation 19 Local Plan - Open space loss and infrastructure constraints
Bold Lane	Excluded from Regulation 19 Local Plan - Uncertain availability
Former Campion Glass	Excluded from Regulation 19 Local Plan – Flood risk, heritage and deliverability issues
Residual Cultural Heart Sites	Excluded from Regulation 19 Local Plan - Heritage and ownership constraints
Acorn Way	Excluded from Regulation 19 Local Plan - Significant Green Wedge harm
Allestree Telephone Exchange	Excluded from Regulation 19 Local Plan - Small site; access and delivery issues
Asterdale Leisure Centre	Excluded from Regulation 19 Local Plan - Green Belt and sports use constraints
Aston Lane	Excluded from Regulation 19 Local Plan - Trees, Tree Protection Order (TPOs) and access constraints
Beechwood Convent	Excluded from Regulation 19 Local Plan - TPOs, access and delivery issues
Durose Phase 2	Excluded from Regulation 19 Local Plan - Green Wedge, heritage and access constraints
Former Showcase Cinema Car Park	Excluded from Regulation 19 Local Plan - Alternative approved uses
Lees Brook Academy	Excluded from Regulation 19 Local Plan - Small consented site
Lime Lane	Excluded from Regulation 19 Local Plan - Ancient woodland impacts
Locko Road	Excluded from Regulation 19 Local Plan - Green Belt conflict
Megaloughton Lane	Excluded from Regulation 19 Local Plan - Accessibility and deliverability constraints
Mickleover Golf Course	Excluded from Regulation 19 Local Plan - Green Wedge, recreation and access constraints
(Grounds of) Morley Road Convent	Excluded from Regulation 19 Local Plan - Ecology, flooding and access constraints
Osmaston Business Centre	Excluded from Regulation 19 Local Plan - Already developed
Railway Line at Whitehouse Farm	Excluded from Regulation 19 Local Plan - Access, contamination and Green Wedge issues
Rough Heanor Farm	Excluded from Regulation 19 Local Plan - Landlocked and highway constraints
South of Noel Baker School	Excluded from Regulation 19 Local Plan - Green Wedge, flooding and ecological constraints
South of Sinfin Moor Lane	Excluded from Regulation 19 Local Plan - Green Wedge, access and availability issues
Station Road, Mickleover	Excluded from Regulation 19 Local Plan - Small site; access constraints
West of Sinfin Avenue	Excluded from Regulation 19 Local Plan - Green Wedge, flooding and ecology constraints
West of Spondon Bourne	Excluded from Regulation 19 Local Plan – Green Belt, access constraints and small site
Land at Meadow Lane/ Chequers Road (Employment Site Alternative)	Excluded from Regulation 19 Local Plan - Flood risk, access and lack of need
East of Sir Frank Whittle Road (Employment Site Alternative)	Excluded from Regulation 19 Local Plan - Green Wedge, ecology and contamination
Land at Meadow Lane (Employment Site Alternative)	Excluded from Regulation 19 Local Plan - Flood risk and access constraints



7.2 Assessment of Sites

Table 7-3 provides an overview of the performance of proposed site allocations against each SA objective and **Table 7-4** summarises significant effects based on each SA objective.

Table 7-3: Overview of Proposed Site Allocations Assessment Findings

Site	SA Objectives																
	Population and Equality	Human Health	Economy	Employment	Crime and Safety	Housing	Leisure and Recreation	Biodiversity and Natural Capital	Landscape and Townscape	Historic Environment	Air, Noise and Light Pollution	Water Environment	Climate Change	Greenhouse Gases	Transport and Accessibility	Geology and Soils	Waste
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
HA1: Rykneld Road, Littleover	++	++	++	+	+	++	+	+	?	0	-	-	-	-	+		0
HA2: Brook Farm, Chaddesden	+	+	+	-	+	++	++	+	-	?	-	-	-	-	-		0
HA3: East of Moorway Lane, Littleover	++	+	++	+	+	++	++	+	-	0	0	-	-	-	+		0
HA4: Royal Hill Road, Spondon	+	+	+	+	+	+	+	+	-	0	0	-	-	-	+		0
HA5: The Hollow, Mickleover	++	+	+	+	+	++	++	+	-	0	-	-	-	-	-		0
HA6: Kingsway Boulevard	+	+	+	+	+	++	+	+	++	?	-	0	+	-	+	++	0
HA7: Stoney Lane, Spondon	++	+	+	+	+	++	+	+	-	0	0	-	-	-	+		0
HA8: Former Police Station, Cotton Lane	+	+	+	+	+	++	++	+	++	0	0	?	-	-	+	++	0
HA9: Bramblebrook House/Humbleton View, Littleover	+	++	+	+	+	+	++	0	++	0	0	0	?	-	+	++	0
HA10: Elton Road Works, Osmaston	+	+	+	+	+	+	++	+	++	0	0	-	?	-	+	++	0
HA11: Shaftesbury Street	+	+	+	+	+	+	++	+	++	?	-	-	?	-	+	-	0
HA12: North of Sinfin Moor Lane	+	+	+	0	+	+	+	+	+	0	-	-	?	-	+		0
HA13: Former Beaufort Business Centre, Chaddesden	+	+	+	+	+	+	++	+	++	0	-	?	?	-	+	++	0
HA14: Kitchner Avenue/Browning Street	+	+	+	+	+	+	++	+	++	0	-	0	?	-	+	++	0
HA15: Former Ivy School House	+	+	+	+	+	+	++	+	++	?	0	-	?	-	+	++	0
HA16: Gypsy and Traveller Site Allocation	+	-	+	+	+	++	-	+	-	?	0	0	?	-	+	-	0
CC4: Residential Led, Mixed Use Site Allocations	++	+	++	++	+	++	++	+	?	?	0	-	?	-	+	++	0
CC5: Non-Residential Regeneration Opportunities	++	++	++	++	+	0	++	0	++	?	-	?	-	-	+	++	0
CC11: Derby Riverside	++	++	++	++	+	++	++	++	++	?	-	?	?	-	++	++	0
CC12: University of Derby, City Centre Hub	++	+	++	++	+	?	+	+	++	?	0	?	-	-	++	++	0
CC13: Railway Station Quarter	+	+	++	++	+	++	++	+	++	+	-	?	-	+	++	-	0
CC14: North Castleward	+	+	++	++	+	++	++	+	++	0	-	?	-	+	++	++	0
E5: Land South of Wilmore Road (Infinity Park)	+	++	++	++	+	0	0	+	-	0	0	-	-	-	+		0
E6: SmartParc, Spondon	+	+	++	++	+	0	0	+	++	0	0	?	?	-	+	-	0
E7: Indurent Park	+	+	++	+	+	0	0	+	++	0	0	?	?	-	+	-	0



Site	SA Objectives																
	Population and Equality	Human Health	Economy	Employment	Crime and Safety	Housing	Leisure and Recreation	Biodiversity and Natural Capital	Landscape and Townscape	Historic Environment	Air, Noise and Light Pollution	Water Environment	Climate Change	Greenhouse Gases	Transport and Accessibility	Geology and Soils	Waste
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
E8: Rolls-Royce Operations	+	+	++	++	+	0	0	+	-	0	0	?	?	-	+		0



Table 7-4: Summary of Significant Effects of Proposed Sites

SA Objective	Summary of Effects
SA1: Population and Equality	Eight sites have the potential to result in significant positive effects on population and equality. These allocations should provide new facilities, as well as being well located, close to existing community facilities and will likely reduce levels of inequalities, which will help support current and future populations.
SA2: Human Health	Five sites have the potential to result in significant positive effects on health. These allocations should provide improved access to employment opportunities across a range of sectors, improving wellbeing. These allocations should also encourage active travel and recreation opportunities, improving physical health and wellbeing.
SA3: Economy	Twelve sites have the potential to result in significant positive effects on economy as the allocations should provide economic development and support employment growth within the City. These allocations are all anticipated to attract inward investment and support the development of business parks within the area.
SA4: Employment	Nine sites have the potential to result in significant positive effects on employment as these allocations should provide a range of employment opportunities across different sectors, including high skilled sectors, which is likely to increase employment opportunities.
SA5: Crime and Safety	No potential significant effects have been identified for crime and safety.
SA6: Housing	Potential significant positive effects have been identified for 12 sites that will contribute a large quantity of housing (100 homes or more) towards meeting Derby's housing target. Uncertain effects have been identified for one site, CC12: University of Derby, City Centre Hub, as it is currently unclear if this allocation will include the development of additional student accommodation.
SA7: Leisure and Recreation	Potential significant positive effects on leisure and recreation have been identified for 15 sites. These sites will all contribute to providing additional open space for informal recreation, or provide space for formal recreation, within developments.
SA8: Biodiversity and Natural Capital	One site, CC11: Derby Riverside, is anticipated to lead to significant positive effects on biodiversity and natural capital due to development at the site making a significant contribution to the greening of the City Centre, through landscaping and tree planting, as well as the provision of amenity green space.
SA9: Landscape and Townscape	Potential significant positive effects on landscape have been identified for 15 sites. These allocations should all contribute to high quality design that is anticipated to enhance the public realm, and landscape assets. Uncertain effects have been identified for two sites (HA1: Rykneld Road and Littleover, CC4: Residential Led, Mixed Use Site Allocations) as development of these sites has the potential to alter the townscape as they are located on greenfield land, but



SA Objective	Summary of Effects
	not located within an area of green belt or green wedge. The nature of effects is, therefore, likely to be determined by individual scheme design.
SA10: Historic Environment	Uncertain effects on the historic environment have been identified for nine sites. These sites intersect with a number of heritage assets and there is potential for development to alter the setting of these assets both in the short and long term. The nature of effects is likely to be determined by individual scheme design.
SA11: Air, Noise and Light Pollution	No potential significant effects have been identified for air, noise and light pollution.
SA12: Water Environment	Potential uncertain effects on the water environment have been identified for 10 sites. This has been identified where sites are located in close proximity to a water body, as well as being located within flood zone 3 and supporting text does not include specific flood alleviation measures. There is therefore potential for increased flood risk and pollution of nearby water bodies as a result of construction and operational activities at these allocation site. There are no details on flood management on site, however, it is anticipated that the delivery of the Our City Our River (OCOR) Programme alongside Policy CL1 will reduce flood risk, but it will depend upon the implementation and scheme level design. Additionally, development will be undertaken in line with the Level 1 Strategic Flood Risk Assessment (SFRA).
SA13: Climate Change	Uncertain effects have been identified for 13 sites in relation to climate change as these sites are located within an area of flood zone 3 and the implementation of flood risk mitigation measures is currently uncertain.
SA14: Greenhouse Gases	No potential significant effects have been identified with regards to greenhouse gas emissions.
SA15: Transport and Accessibility	Potential significant positive effects have been identified for four sites (CC11: Derby Riverside, CC12: University of Derby, City Centre Hub, CC13: Railway Station Quarter, and CC14: North Castleward) as these sites are all well connected to existing public and active travel routes.
SA16: Geology and Soils	Potential significant negative effects have been identified for nine sites. This has been identified where sites are located on greenfield land and development will result in the permanent loss of this resource. Potential significant positive effects have been identified for 12 sites. These sites are located on brownfield land, encouraging the reuse of previously developed land, which represents an efficient use of land.
SA17: Waste	No potential significant effects have been identified with regards to waste.



7.3 Assessment of Site Alternatives

The SEA Regulations require an assessment of the plan and its “reasonable alternatives”. The assessment of reasonable alternatives does not need include all possible alternatives, but only those that are realistic.

It should be noted that the outcome of the SA is not the only factor that determines whether a site should be allocated. The deliverability and viability of sites are also key considerations for DCC, as to whether a site or policy can be justified for allocation and inclusion in the final plan. As identified through DCC's sites study, there are limited sites within Derby that are deemed to be suitable to develop. When identifying potential allocation sites, DCC undertook a Sites Assessment, establishing ‘showstoppers’ to site deliverability and whether the site was being actively promoted. The sites that have been assessed in **Section 7.2** are those which passed the Site Assessment and are deemed to be the only reasonable site allocation options for development within the City.

2 summarises the list of preferred and omission sites considered as part of DCC's assessment which outlined the ‘showstoppers’ to site deliverability. **2** outlines the reasons for inclusion or exclusion from the Local Plan, including rationale for exclusion and not passing the Site Assessment. The term ‘Omission Sites’ is used by DCC where sites have not passed the Site Assessment and have been excluded from the plan. For the purposes of the SA, the omission sites are considered to be reasonable alternatives. A detailed description of the rationale for inclusion/exclusion within the Local Plan can be found in **Appendix G**.

The assessment of alternative site allocations has been undertaken utilising the same method and level of detail as the preferred site allocations. Findings of the alternatives site assessment have been summarised below in **Table 7-5** and **Table 7-6** and presented in full in **Appendix E**.

Overall, the site alternative options have resulted in fewer significant positive effects, across a range of objectives, including population and equalities, human health, economy, employment, housing, leisure and recreation, and landscape and townscape. There are also a higher proportion of significant negative effects associated with site alternatives, mainly in relation to leisure and recreation, landscape and townscape, and geology and soils. There is also a higher quantity of uncertain effects, due to lack of information surrounding scheme level design.



Table 7-5: Overview of Alternative Site Allocations Assessment Findings

Site	SA Objectives																
	Population and Equality	Human Health	Economy	Employment	Crime and Safety	Housing	Leisure and Recreation	Biodiversity and Natural Capital	Landscape and Townscape	Historic Environment	Air, Noise and Light Pollution	Water Environment	Climate Change	Greenhouse Gases	Transport and Accessibility	Geology and Soils	Waste
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
Allenton Market	0	0	++	+	+	?	0	+	++	0	0	0	?	+	-	++	0
Beaufort Street	+	+	+	-	+	?	++	+	++	0	-	?	?	-	+	++	0
Bembridge Drive, Alvaston	+	-	+	-	+	?		+	-	0	-	-	-	-	+	-	0
Colwell Drive	+	-	+	-	+	?		+	-	0	-		-	-	+	-	0
Off Greenwich Drive South Mackworth	+	+	+	-	+	?		-		0	-	-	-	-	+	-	0
Osmaston Park off Oaktree Avenue	+	+	+	-	+	?	-	-		0	-	0	?	-	+	-	0
Richmond Park Road	+	+	+	-	+	?		-		0	-	-	?	-	-	-	0
Woodchester Drive	+	+	+	-	+	?	-	-		0	-	-	?	-	-	-	0
Bold Lane	-	+	-	-	+	?	+	-		0	-	-	-	-	++	++	0
Former Campion Glass	+	+	+	-	+	+	+	+	+		-	-	-	-	++	++	0
Residual Cultural Heart Sites	+	+	+	-	+	?	-	+	?	0	-	-	?	-	-	++	0
Acorn Way	+	+	+	-	+	+		-		0	-	-	?	-	+		0
Allestree Telephone Exchange	+	+	+	-	+	+	+	-	-	0	0	0	?	-	++	++	0
Asterdale Leisure Centre	+	-	+	+	+	?	?	+	-	0	-	0	?	-	-	-	0
Aston Lane	+	+	+	0	+	+	+	-	-	?	0	0	?	-	-		0
Beechwood Convent	+	+	+	0	+	+	+	+	?	?	-	0	?	-	-	-	0
Durose Phase 2	+	+	+	+	+	+	+	-	-	0	-	-	?	-	+		0
Former Showcase Cinema Car Park	+	+	+	+	+	+	+	+	++	0	-	0	?	-	+	++	0
Lees Brook Academy	+	+	+	-	+	+	+	+	-	0	0	-	?	-	-	-	0
Lime Lane	+	+	+	-	+	+	+		-	0	0	0	?	-	-		0
Locko Road	+	+	+	-	+	++	?	-	-	0	0	-	?	-	-		0
Megaloughton Lane	-	-	+	+	+	?	+	-	?	0	-	-	?	-	+	-	?
Mickleover Golf Course	+	+	+	0	+	+	?	-	-	?	-	-	?	-	-		0
(Grounds of) Morley Road Convent	+	+	+	0	+	?	+	-	?	?	0	-	?	-	-		0
Osmaston Business Centre	+	+	+	+	+	+	+	+	++	?	-	0	?	-	-	++	0
Railway Line at Whitehouse Farm	+	+	+	+	+	?	+	-	-	0	0	-	?	-	+		0
Rough Heanor Farm	+	+	+	-	+	?	+	-	-	?	-	-	?	-		-	0



Site	SA Objectives																
	Population and Equality	Human Health	Economy	Employment	Crime and Safety	Housing	Leisure and Recreation	Biodiversity and Natural Capital	Landscape and Townscape	Historic Environment	Air, Noise and Light Pollution	Water Environment	Climate Change	Greenhouse Gases	Transport and Accessibility	Geology and Soils	Waste
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17
South of Noel Baker School	+	+	+	-	+	?	+			0	0	-	?	-	+		0
South of Sinfin Moor Lane	+	+	?	0	+	?	+	+	-	0	0	-	?	-	+	-	0
Station Road, Mickleover	+	+	-	-	+	+	+	-	-	0	0	-	?	-	-		0
West of Sinfin Avenue	+	+	+	+	+	?	+	+		0	0	-	?	-	+		0
West of Spondon Bourne	+	-	+	+	+	+	+	+	-	0	-	0	?	-	-		0
Land at Meadow Lane/ Chequers Road (Employment Site Alternative)	?	+	?	?	+	0	0	-	?	?	-	-	?	-	+	-	0
East of Sir Frank Whittle Road (Employment Site Alternative)	?	+	?	?	+	0	0	-		?	-	-	?	-	+		0
Land at Meadow Lane (Employment Site Alternative)	+	+	++	+	+	0	0	+	?	?	-	-	?	-	+		0



Table 7-6: Summary of Significant Effects of Alternative Sites

SA Objective	Summary of Effects
SA1: Population and Equality	Two sites have resulted in uncertain effects upon population and equality (Land at Meadow Lane/ Chequers Road and East of Sir Frank Whittle Road) as it is currently unclear which employment sectors would be in place at this site, and therefore the type of opportunities available for the local community.
SA2: Human Health	No potential significant effects have been identified for human health.
SA3: Economy	Two sites (Allenton Market and Land at Meadow Lane) have resulted in potential significant positive effects on economy. These sites both provide employment opportunities and support investment within Derby City. Uncertain effects have been identified for three sites (South of Sinfin Moor Lane, Land at Meadow Lane/ Chequers Road and East of Sir Frank Whittle Road) as it is unclear whether development would result in loss of businesses at the existing South of Sinfin Moor Lane site, and at this stage what sectors would be in place at the Land at Meadow Lane/Chequers Road and East of Sir Frank Whittle Road sites, and therefore the impact the development will have on the local economy and meeting Derby City's economic needs.
SA4: Employment	Two sites have resulted in uncertain effects upon employment (Land at Meadow Lane/ Chequers Road and East of Sir Frank Whittle Road) as it is currently unclear which employment sectors would be in place at this site, and therefore the type of opportunities available for employment.
SA5: Crime and Safety	No potential significant effects have been identified for crime and safety.
SA6: Housing	Potential significant positive effects have been identified for one site (Locko Road) that will contribute a large quantity of housing (100 homes or more) towards meeting Derby's housing target. Uncertain effects have been identified for 18 sites, where it is unclear how many dwellings would be provided on site.
SA7: Leisure and Recreation	Potential significant positive effects have been identified for one site (Beaufort Street) as this site is well located close to public open space, community centres and sports facilities. The proximity of these recreational spaces is likely to have a positive impact on the opportunities for residents to participate in wellbeing activities. Potential significant negative effects have been identified for five sites (Bembridge Drive, Colwell Drive, Off Greenwich Drive South Mackworth, Richmond Park Road and Residual Cultural Heart Sites). Development of these sites would result in the loss of open space or recreational space within Derby that is not anticipated to be reprovioned. Uncertain effects have been identified for three sites (Asterdale Leisure Centre, Locko Road and Mickleover Golf Course) as these sites would result in the loss of leisure and recreation facilities through development, and it is unclear whether these facilities would be replaced elsewhere in Derby.



SA Objective	Summary of Effects
SA8: Biodiversity and Natural Capital	Potential significant negative effects have been identified for two sites (Lime Lane and South of Noel Baker School) as these sites both intersect with designated sites and have the potential to result in damage to these sites.
SA9: Landscape and Townscape	Potential significant positive effects have been identified for four sites (Allenton Market, Beaufort Street, Former Showcase Cinema Car Park and Osmaston Business Centre) as these sites are located away from Green Belt and Green Wedge land and are located on brownfield land, which when developed may result in enhancement of the local landscape and townscape setting. Potential significant negative effects have been identified for nine sites. These sites are located within an area of green space, including green belt and green wedge, and development of these sites may negatively impact the existing landscape character and setting in addition to intrusion into the Green Belt/Green Wedge, particularly by resulting in the loss of a landscape asset. Uncertain effects have been identified for six sites. This has been identified where sites are located away from Green Belt/Green Wedge land. However, the site is located on greenfield land. Effects are therefore likely to be determined by individual scheme design.
SA10: Historic Environment	Potential significant negative effects have been identified for one site (Former Campion Glass) as this site is constrained by the proximity of listed buildings and development at the site has potential to directly impact these buildings and their settings. Uncertain effects on the historic environment have been identified for nine sites. These sites intersect with a number of heritage assets and there is potential for development to alter the setting of these assets both in the short and long term. The nature of effects is likely to be determined by individual scheme design.
SA11: Air, Noise and Light Pollution	No potential significant effects have been identified for air, noise and light pollution.
SA12: Water Environment	Potential significant negative effects have been identified for one site (Colwell Drive) as this site is located within Flood Zone 2 and there are potential issues with pollution and high groundwater levels. Uncertain effects on the water environment have been identified for one site (Beaufort Street). This has been identified as the site is located within Flood Zone 3 and it is unclear what specific flood alleviation measures may be implemented. However, it is anticipated that the delivery of the Our City Our River (OCOR) Programme will reduce flood risk, but effects will depend upon the implementation and scheme level design.
SA13: Climate Change	Uncertain effects have been identified for 31 sites in relation to climate change as these sites are located within an area of flood zone 3 and the implementation of flood risk mitigation measures is currently uncertain.
SA14: Greenhouse Gases	No potential significant effects have been identified for greenhouse gases.
SA15: Transport and Accessibility	Potential significant positive effects have been identified for three sites (Bold Lane, Former Campion Glass and Allestree Telephone Exchange) as these sites are all well connected to existing public and active travel routes.



SA Objective	Summary of Effects
	One site (Rough Heanor Farm) has the potential to result in significant negative effects on transport and accessibility due to its location, which is not well-connected to existing public or active transport links.
SA16: Geology and Soils	Potential significant negative effects have been identified for 15 sites. This has been identified where sites are located on greenfield land and development will result in the permanent loss of this resource. Potential significant positive effects have been identified for eight sites. These sites are located on brownfield land, encouraging the reuse of previously developed land, which represents an efficient use of land.
SA17: Waste	Uncertain effects have been identified for one site (Megaloughton Lane) as this site is located in close proximity to a waste management site and it is subsequently unclear how the presence of the waste site will impact on the development site.



8.0 Cumulative Effects

8.1 Introduction

The SEA Regulations require that cumulative effects are considered when identifying likely significant effects. Cumulative effects arise, for instance:

- Where multiple individual policies and/or sites have a combined effect on an objective; or
- Where multiple policies and/or sites individually have insignificant effects but together have a significant effect.

The significance of cumulative effects resulting from a range of activities, or multiple incidences of one activity, may vary based on factors such as the nature of the proposed sites and policies and the sensitivity of the receiving communities and environment.

This section therefore presents the findings of the following:

- **Intra-plan effects:** Consideration of how different proposed policies and sites within the Local Plan may interact and cause cumulative effects on a receptor; and
- **Inter-plan and project effects:** How the proposed policies and sites within the Local Plan could result in cumulative effects in association with other plans, policies and projects in the surrounding area.

8.2 Intra-plan effects

Table 8-1 outlines the key to effects for potential intra-plan cumulative effects.

The potential intra-plan cumulative effects identified for both proposed policies and sites are identified in **Table 8-2** over the page.

Table 8-1: Key to Cumulative Effects

Effect	Key
Positive cumulative effect	+
Negative cumulative effect	
No overall cumulative effect	0



Table 8-2: Potential Intra-Plan Cumulative Effects Summary

SA Objective	Effect	Summary of Effects
SA1: Population and Equality	+	There is potential for positive cumulative effects to occur through the delivery of multiple well-designed developments together which deliver necessary infrastructure to meet the needs of new residents. Secondary benefits to existing residents may also be realised. Additionally, the Local Plan promotes inclusive design, particularly through the general development principles, housing, infrastructure and community, and City Centre policies, improving access to all social groups inclusively.
		If developments are delivered which do not provide infrastructure to meet needs, pressure could be placed on existing services due to increased population demands arising from multiple developments, leading to potential cumulative negative effects. There is also potential for a cumulative increase in disturbance to existing local residents.
SA2: Human Health	+	Infrastructure and community policies as well as some of the proposed allocations include the provision of new community facilities and services, such as healthcare services and public leisure facilities. This could result in a positive cumulative effect on health and wellbeing. The provision and improvements to the public realm and open spaces, as part of some developments and policies, could result in positive cumulative effects on the health and wellbeing of the population in Derby.
		There is a potential for negative cumulative effects to result if multiple housing developments were to come forward without necessary capacity in healthcare facilities, due to the increased strain on existing healthcare facilities and the potential increased demand from new populations.
SA3: Economy	+	There is the potential for positive cumulative effects on the economy if multiple large-scale developments were to come forward, including proposed employment allocations. Proposed policies and sites will provide a substantial amount of office space and jobs, as well as housing provision, which will help to improve connectivity between employment centres and housing areas. Developments are further supported by the Local Plan's economy policies which aim to support existing employment space within Derby and improve investment in Derby, including through the development of defined town and district centres. This coupled with potential new developments could help to attract further inward investment and provide employment opportunities.
SA4: Employment	+	There is potential for a positive cumulative effect on employment if multiple developments were to come forward. Such developments, as identified in the site assessments, also have the potential to increase access to public transport which will help communities within Derby to be better connected to jobs, services and facilities.
SA5: Crime and Safety	+	It is assumed that all new developments will be built to a high standard of safety. There may be potential for positive cumulative effects from developing sites to provide housing and public realm improvements, particularly if designing out crime principles are applied. Policies support high quality design and landscaping which can also help to generate a sense of pride and ownership within the community, resulting in the potential to reduce crime rates further.
SA6: Housing	+	There is potential for a positive cumulative effect if multiple housing developments within Derby come forward within the plan period. These developments will help to meet Derby's housing target and increase the provision of affordable homes, reducing the significant barriers to housing and aiding in providing a mix of homes that suit the needs of the growing population. There is also potential for a cumulative positive effect on housing quality and standards across the City, by taking into account the needs of different groups in the community.
SA7: Leisure and Recreation	+	There is potential a positive cumulative effect on leisure and recreation to arise from the development of additional open space, as well as the preservation of existing open space. Additionally, the development of new community infrastructure is likely to increase opportunities for social interaction and cultural opportunities, which is further supported by improvements to infrastructure and facilities that support tourism in the area.
SA8: Biodiversity and Natural Capital	+	There is the potential for a positive cumulative effect from the implementation of the environment policies. Developments should deliver additional green spaces, include green infrastructure, and provide biodiversity enhancements in accordance with Biodiversity Net Gain requirements. Natural capital enhancements are possible through the connection of green spaces and protection of habitats linking population centres which may otherwise be lost or severed through a lack of maintenance or through other development.
		There is the potential for a negative cumulative effect on biodiversity if multiple large scale housing developments and employment developments were to come forward. Given that a number of housing allocations are located on greenfield land, there is potential for a cumulative loss of greenfield land to development, which could lead to damaged and fragmented habitat connectivity.
SA9: Landscape and Townscape	+	Positive cumulative effects may arise due to good design of housing and employment developments, and improvements to the public realm, parks and open spaces and the natural environment. In combination, such improvements could enhance the landscape and townscape character over the long term.
		There is the potential for a negative cumulative effect on landscapes and townscapes if multiple housing developments were to come forward in close proximity to parks and open spaces and areas with high townscape values. During construction of new developments there is the potential for disturbance to the setting and tranquillity of these areas, temporarily harming the visual amenity.
SA10: Historic Environment	+	A positive cumulative effect may arise if development designs are sensitive to the historic environment and enhance the setting of any surrounding designated heritage assets. This will be further supported by the environment policies, which aim to preserve and enhance the historic environment. Additionally, cumulative improvements to the public realm could improve the setting of heritage assets. Policies may also result in a cumulative improvement in air quality, and reduction in the degradation of heritage assets.
		There is the potential for negative cumulative effects on the historic environment if multiple developments were to come forward in close proximity to heritage assets, or if developments were not of an appropriate scale and design, as has been identified within the site assessments. During construction of these new developments there is the potential for disturbance to the historic environment due to noise, vibration and temporary reductions in air pollution (in particular dust soiling). During operation, these developments have the potential to negatively impact the setting of heritage assets if not sensitively designed.
SA11: Air, Noise and Light Pollution	+	If multiple developments are located with good connectivity to public transport facilities it will enable more people to use public transport modes instead of private vehicles, helping to improve air quality. Improvements to pedestrian and cycle connections may further reduce reliance on private cars and encourage low-emission sustainable and active travel, in turn providing health benefits. Therefore, there is also the potential for a positive cumulative effect on air quality. Environment, climate change, and transport and movement policies support the improvement of air



SA Objective	Effect	Summary of Effects
		quality through reducing air pollution, as well as through measures including low or zero emission transport, increasing accessibility to public transport, and increasing green infrastructure which will help to reduce air pollution.
		A temporary negative cumulative effect has the potential to arise during the construction phase, if multiple housing or employment developments were to come forward with overlapping construction periods. Construction of these developments may temporarily worsen air and noise pollution from construction plant emissions, dust and construction traffic.
SA12: Water Environment	+	Water quality and drainage measures are likely to be specific to each development, but there may be cumulative benefits if implemented City wide, particularly through the implementation of sustainable development, climate change and environmental policies. The application of drainage measures (which may include SuDS) across multiple developments, especially in combination with green infrastructure, could mitigate the impacts of flooding as a nature-based solution, contributing to urban resilience and climate change adaptation.
		There is potential for decreases in water quality from developments as a result of increases in surface water runoff and impacts on surface water and groundwater, particularly from physical alterations as a result of development from housing allocations. If not adequately mitigated, there is potential for cumulative increases in flood risk arising from housing developments, urban intensification and additional employment developments, due to increases in hard standing and sealed surfaces. A large number of new developments could result in potential negative cumulative effects on flood risk, particularly for those sites located within flood zone 3, if potential cumulative effects are not considered in site Flood Risk Assessments and adequate mitigation is not put in place.
SA13: Climate Change	+	A number of policies within the general development principles, housing, environment, and climate change groups should help to improve climate resilience through encouraging the incorporation of drainage measures which will help to reduce overall flood risk within Derby. These policies also aim to improve climate resilience, including resilience to increasing temperatures and overheating. These policies could help to provide a cumulative increase in resilience to climate change within the City.
		The addition of increased use of hard standing surfaces as part of the proposed housing and employment allocations could increase surface water runoff. Therefore, a large number of new developments could result in potential negative cumulative effects on flooding, if flood resilience measures are not implemented across developments, reducing resilience to climate change.
SA14: Greenhouse Gases	+	Policies set out in the general development principles, housing, environment, transport and movement, and climate change groups all support a transition towards reducing GHG emissions through reductions in energy use, vehicle reliance, and/or low levels of embodied carbon. These measures, alongside the support for sustainable transport modes, could cumulatively reduce GHG emissions within the City.
		If multiple developments were to come forward, there is the potential for these developments to be resource intensive and have high levels of embodied carbon. A potential negative cumulative effect is therefore identified in relation to GHG, particularly during construction.
SA15: Transport and Accessibility	+	There is the potential for positive cumulative effects on sustainable transport and accessibility if multiple developments were to come forward within Derby. Most new developments will help to improve access to sustainable transport through improvements to pedestrian and cycle connections, making active travel more appealing. Access to public transport may also be improved as part of the developments, including measures for accessible public spaces and transport networks, improving access to all groups inclusively. This is further supported by the Local Plan policies, particularly those in the transport and movement group, which aim to ensure that new development is located in suitable areas where the transport requirements can be met in a sustainable manner, and encourages travel by sustainable modes.
SA16: Geology and Soils	+	The Local Plan promotes the efficient use of land and resources where possible, in a way that makes as much use of previously developed land and brownfield sites as possible. Over half of the proposed site allocations are located on either previously developed land or brownfield sites, resulting in a potential positive cumulative effect on geology and soils.
		There are a number of proposed allocations where there is potential for land take of greenfield land to occur. Some other developments which may arise, could result in a cumulative loss of more valuable land, including agricultural land.
SA17: Waste	+	The Local Plan policies support the re-use of buildings and materials within developments. The re-use of materials within developments also contributes to positive cumulative effects, reducing construction waste.
		There is potential for increases in waste produced by demolition, excavation, and construction resulting from developments arising from the Local Plan, including housing and employment developments and therefore an overall negative cumulative effect on this waste objective.



8.3 Inter-plan and project effects

Table 8-3 outlines the sources of potential inter-plan and project cumulative effects, whilst **Table 8-4** details the potential cumulative effects identified for each of the SA topics in relation to these policies and plans. This uses the same key to effects as set out in **Table 8-1** above.

Table 8-3: Sources of Inter-Plan and Project Effects

Policy or Plan	Plan Details
A38 Derby Junctions	The project aims for Highway improvements to three existing roundabout junctions on the A38 at Derby: • A38/A5111 Kingsway Junction; • A38/A52 Markeaton Junction; and • A38/A61 Little Eaton Junction. The scheme aims to reduce congestion, improve journey times between Birmingham, Derby and the M1, facilitate regional development and growth in and around Derby City, improve safety for all road users, and connect people by maintaining existing facilities.
Midlands Rail Hub	Midlands Rail Hub aims to provide faster, better and more frequent connections across the Midlands. The scheme will add up to 300 additional trains on the rail network per day into or out of Birmingham and provide faster, more frequent or new rail links for over 50 locations including: Nottingham, Leicester, Bromsgrove, Nuneaton, Worcester, Hereford and Cardiff. Midlands Rail Hub will build two 'chords' at Bordesley, as well as 10+ engineering interventions throughout the region. • The West Chord: consists of improvements between Bordesley and Moor Street, allowing access to Birmingham Moor Street from South- West and Wales, allowing additional trains towards Worcester, Hereford, Bristol and Cardiff; and • The East Chord: creates an access to Birmingham Moor Street from the East Midlands, allowing direct access for trains from cities such as Leicester, Derby and Nottingham.
Derbyshire Local Nature Recovery Strategy	Local nature recovery strategies are a new system of spatial strategies for nature and environmental improvement across England that will establish priorities and map proposals to drive nature's recovery and provide wider environmental benefits. The Local Nature Recovery Strategy (LNRS) for Derbyshire will provide the process for nature recovery in Derbyshire. It will set a long-term vision and action plan that is formed and delivered in collaboration with partners, stakeholders and the public.
Neighbouring Local Plans	Local plans and emerging local plans in neighbouring borough's (Amber Valley, Erewash, and South Derbyshire) influence cross-boundary development improvements. The plans include: • Amber Valley Borough Local Plan 2022-2040; • South Derbyshire Local Plan 2011 to 2028; • South Derbyshire's Local Plan Part 1 2022-2041 (not yet adopted); • Erewash Core Strategy 2011-2028; and • Erewash Local Plan Review (undergoing development).
Neighbouring Transport Plans	Local Transport Plans enable Local Authorities to plan for transport in their areas. They can identify both strategic policy and implementation plans for



Policy or Plan	Plan Details
	delivering this policy. Therefore, they identify policy options for implementing transport improvements, including different modes of transport. They also prioritise areas and schemes for development over the plan period. Currently, Derbyshire Council Council's Local Transport Plan 3 (2011 to 2026) applies to Derby and all neighbouring boroughs. The East Midlands Combined County Authority (EMCCA) are currently developing a new Transport Plan that will cover the four Constituent Authorities (Derby City, Derbyshire County, Nottingham City and Nottinghamshire County Councils).
East Midlands Freeport	The East Midlands Freeport features three main sites: the East Midlands Airport and Gateway Industrial Cluster in North West Leicestershire, the Ratcliffe-on-Soar Power Station site in Rushcliffe in Nottinghamshire and the East Midlands Intermodal Park in South Derbyshire.
East Midlands Gateway	SEGRO Logistics Park East Midlands Gateway (SLPEMG) is a 700-acre development which has delivered over 4.5m sq ft of logistics accommodation to date, with a further c.70,000 sq ft available. The development incorporates a 50-acre Strategic Rail Freight Interchange (SRFI) which includes a rail freight terminal, capable of handling up to sixteen 775m freight trains per day, container storage and HGV parking. SLPEMG is centrally located in the Midlands, adjacent to East Midlands Airport, with direct access to J24 of the M1. Nottingham is 13 miles north east, Leicester 20 miles to the south and Derby is 14 miles north west.



Table 8-4: Potential Inter-Plan Cumulative Effects Summary

SA Objective	Significance	Summary of Effects
SA1: Population and Equality	+	A potential positive cumulative effect could result from the provision of new community facilities, employment opportunities and services as part of developments. New transport schemes (Midlands Rail Hub) will improve access and connectivity to community facilities and services, especially for the people who cannot drive or do not have access to a private car. If multiple housing developments within both Derby and neighbouring authorities were to come forward, more people will be placed closer to community facilities and employment opportunities. This will result in positive cumulative effects.
		If adequate community infrastructure is not developed, there is a potential for a negative cumulative effect to result if multiple developments were to come forward across the City and within neighbouring local authorities due to the increased strain on existing community facilities from the increased demand from new populations.
SA2: Human Health	+	The provision of new and improved public realm and open spaces as part of some of these developments (neighbouring local plans), has the potential to result in a positive cumulative effect on the health and wellbeing of the population in the region. This is because access to greenspace can provide better mental health and wellbeing outcomes including reduced levels of depression, anxiety and enhanced quality of life, as well as helping to bind communities together, reduce loneliness, and mitigate the negative effects of air pollution and excessive noise.
		There is a potential for a negative cumulative effect to result if multiple housing developments were to come forward without adequate infrastructure, due to the increased strain on existing community health facilities resulting from the increased demand from new populations.
SA3: Economy	+	There is the potential for a positive cumulative effect on the economy if multiple large-scale developments were to come forward. These developments will provide a substantial amount of office space and jobs, as well as housing provision, which will help to improve connectivity between employment centres and residential areas. Greater cumulative connectivity will result through investments in sustainable transport developments such as Midlands Rail Hub and A38 Derby Junctions and those arising from transport plans. This will help communities to gain greater access to jobs, services and facilities. Access to activities provides the potential for people to participate in education, work, social, leisure and cultural activities. Greater connectivity to Derby may also bring about greater tourism opportunities.
SA4: Employment	+	There is the potential for a positive cumulative effect on employment if multiple large-scale developments were to come forward. These developments will provide a substantial amount of office space and jobs, which will help to improve connectivity between employment centres. Greater cumulative connectivity will result through investments in sustainable transport developments such as Midlands Rail Hub and A38 Derby Junctions. This will help communities to gain greater access to jobs, services and facilities.
SA5: Crime and Safety	+	It is assumed that all schemes and projects will be built to a high standard of safety. There may be potential for a positive cumulative effect across Derby and neighbouring boroughs from developing land to provide housing and public realm improvements, particularly if designing out crime principles are applied. Using high quality design and landscaping can also help to generate a sense of pride and ownership within the community, resulting in the potential to reduce crime rates further.
SA6: Housing	+	It is anticipated that a positive cumulative effect will result if multiple housing developments were to come forward in combination with Derby's proposed development sites. These developments will help to meet housing targets across the Derby HMA and increase the provision of affordable housing in the wider area.
SA7: Leisure and Recreation	+	There is a potential for a positive cumulative effect to result if developments were to come forward providing additional open space. There is also potential for a positive cumulative effect arising from additional development of facilities in the wider area, as proposed within neighbouring local plans. This is likely to provide increased opportunities for recreation and leisure activities.
SA8: Biodiversity and Natural Capital	+	A positive cumulative effect may result through BNG delivery through multiple local plans and in accordance with the LNRS. These are likely to be driven by neighbouring local plan policies where green infrastructure is incorporated into design to increase biodiversity and if biodiversity is lost on site, this should be mitigated by improving the quality or management of the rest of the site or deliver off-site compensation of better biodiversity value. A further positive cumulative effect could result from the development of sustainable transport schemes (Midlands Rail Hub and those arising from local transport plans). This would increase access to public transport modes, reducing the use of a private car, and therefore reducing GHG emissions, journey times and congestion, resulting in increased tranquillity and air quality.
		There is potential for cumulative loss, damage or fragmentation of statutory and non-statutory nature conservation sites and habitats if multiple developments were to come forward across similar timeframes. Although it is assumed that any potential negative effects on protected species would be mitigated at a project level, there are wider impacts on biodiversity.
SA9: Landscape and Townscape	+	The provision of public realm improvements through local plans and transport plans could help to increase and improve the open space offering as well as the setting of Derby's townscape and landscape. This could result in a positive cumulative effect.
		There is potential that multiple developments could result in a cumulative loss of open spaces, greenfield land and alterations of the landscape.
SA10: Historic Environment	+	A potential positive cumulative effect could arise as a result of the Local Plan, in combination with neighbouring local plans, due to the requirements for historically sensitive design of the proposed housing developments which could affect the setting of any designated heritage assets and Conservation Areas, including the DVMWHS. There is also potential for neighbouring authorities to accommodate decanted need through their respective local plans, potentially taking pressure off Derby City Centre, reducing potential impacts on the World Heritage Site. A potential positive cumulative effect could also result from the development of sustainable transport schemes (Midlands Rail Hub and local transport plans). This could increase access to public transport modes, reducing the use of a private car, and therefore reducing GHG emissions, journey times and congestion in the wider area, resulting in increased tranquillity and settings of heritage assets. A further potential positive effect could result due to improved access to the historic environment provided by the new transport schemes which could present opportunities to generate activity, vitality and tourism.
		There is the potential for a temporary negative cumulative effect on the historic environment if multiple housing developments and transport schemes were to come forward at the same time. During construction of these developments there is the potential for disturbance to the historic environment due to noise and air pollution.



SA Objective	Significance	Summary of Effects
SA11: Air, Noise and Light Pollution	+	A positive cumulative effect could result from the development of sustainable transport schemes (Midlands Rail Hub and local transport plans) in combination with new Local Plan allocations and policies. Access to public transport modes could be improved, reducing the use of a private car, and reducing GHG emissions and improving air quality. A further positive cumulative effect could result from a reduction in journey times and congestion on the highway network as a result of the A38 Derby Junctions in combination with the Local Plan and neighbouring local plans/transport plans.
		A temporary negative cumulative effect has the potential to arise during the construction phase if multiple developments were to come forward together. Construction of these developments may reduce air quality through an increase in particulate matter and dust.
SA12: Water Environment	+	There is potential for proposed developments to incorporate permeable surfaces and SuDs which could help to cumulatively reduce flood risk if implemented within Derby and in neighbouring authorities. These measures are likely to be implemented through Local Plan policies regarding flood risk management.
		If adequate mitigation measures are not put in place, development in Derby and in neighbouring authority areas could result in a cumulative negative effect from increases in surface water runoff and flood risk, and impacts on surface water and groundwater, particularly from physical alteration as a result of development.
SA13: Climate Change	+	Climate change adaptation measures are likely to be specific to each development, but there may be cumulative benefits if implemented across multiple plans. Investment in sustainable transport schemes, such as Midlands Rail Hub, should have positive cumulative effects on climate change from a reduction in private car use.
		A potential positive cumulative effect could result if multiple housing and commercial developments were to come forward, due to the provision of public realm improvements and enhancements to biodiversity as part of the design. A further positive cumulative effect may result from low carbon and energy efficient design which is resilient to the effects of climate change.
SA14: Greenhouse Gases	+	There may be cumulative benefits from transport initiatives (including Midlands Rail Hub and proposals set out in the forthcoming EMCCA Transport Plan) and low carbon developments (neighbouring local plans) in reducing GHG.
		A potential temporary negative cumulative effect could result from construction if multiple housing and employment developments were to come forward together, within Derby City and neighbouring areas. Construction of these developments may increase levels of GHG emissions through the embodied carbon associated with the construction and maintenance of development. Increased development is also likely to increase transport related GHG emissions, particularly where this leads to increases in vehicular traffic as well as embodied carbon due to development.
SA15: Transport and Accessibility	+	There is the potential for a positive cumulative effect on accessibility and sustainable transport if multiple transport schemes were to come forward during the plan period, such as the Midlands Rail Hub and the schemes listed in local transport plans. These developments would help to increase and improve access to and connectivity of sustainable transport modes within Derby and the wider Derbyshire area. Additionally, there is potential for a positive cumulative effect as a result of improved accessibility for all users, including disabled and low-income users who may rely on public transportation.
SA16: Geology and Soils		There is potential for a negative cumulative effect on the efficient use of land as a number of large-scale projects, such as Midlands Rail Hub, East Midlands Freeport, and East Midlands Gateway coupled with other development in Derby and on the outskirts of Derby (e.g. the opportunity sites in the emerging South Derbyshire Local Plan Part 1), could lead to a large cumulative loss of greenfield land, some of which is agricultural land.
SA17: Waste		There is potential for a negative cumulative effect on waste as a number of large-scale projects, coupled with development in the City, could lead to a large cumulative use of resources and production of waste during construction.



9.0 Mitigation, Enhancements and Monitoring

9.1 Mitigation and Enhancement Measures

Mitigation of significant negative and uncertain effects of the plan and enhancement of positive effects are a key purpose of SA. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan. The measures are known as 'mitigation' measures. Mitigation measures include both proactive avoidance of adverse effects and actions taken after potential effects are identified.

Mitigation provided by other Local Plan policies have been applied throughout the assessment of the Local Plan, and outlined within **Appendix D and E**. The mitigation measures proposed in **Table 9-1** are additional mitigation measures proposed, designed to avoid or reduce the effects identified as potentially negative and uncertain in the proposed policy and site assessments against the SA objectives within the SA Framework. The table also includes enhancement measures, that aim to optimise positive impacts and enhance sustainability. Both enhancement and mitigation measures are not always within the control of the Local Plan and can be achieved through other plans and strategies.

Policy and site-specific mitigation measures are also included within **Appendices D and E**.



Table 9-1: Proposed Mitigation and Enhancement Measures

SA Objective	Source of Effect/s	Mitigation/Enhancement	Mechanism
SA2: Human Health	Sites: HA1 Cumulative Effects	Further assessment as part of scheme design should be undertaken, to evaluate the provision of new education and health facilities and ensure that supply is sufficient to support new communities.	Project level design and assessment
SA2: Human Health	Sites: HA16	As the site will accommodate Gypsy and Traveller households, consideration should be given to ensuring good access to healthcare and community support services, given the potential health inequalities experienced by these communities.	Project level design and assessment
SA4: Employment	Sites: HA2	Scheme level design could consider the potential for improving public transport connections at the site.	Project level design and assessment
SA5: Crime and Safety	Natural Environment Policies	Alterations to artificial light should ensure that lighting is maintained and not removed, particularly in areas of higher crime.	Project level design and assessment
SA5: Crime and Safety	Sites: HA3	New play space should be designed in line with guidance from Make Space for Girls, to aid in feelings of safety.	Project level design and assessment
SA8: Biodiversity and Natural Capital	Housing Policies Economy Policies Infrastructure and Community Policies Transport and Movement Policies Cumulative Effects	Development that may arise as a result of these policies should aim to minimise loss of biodiversity where possible. A Construction Environmental Management Plan (CEMP) should be implemented to aid in minimising disturbance during construction.	Project level design and assessment Project level CEMP
SA9: Landscape and Townscape	Sites: HA1, HA2, HA3, HA4, HA5, HA7, CC4, E5, E8 Cumulative Effects	Sensitive design should be considered for any new developments to minimise adverse effects and enhance landscape and townscape character. Particular care should be taken to ensure that high-density development and tall buildings are appropriately designed, located and scaled so that they do not result in significant adverse visual effects.	Project level design and assessment



SA Objective	Source of Effect/s	Mitigation/Enhancement	Mechanism
SA10: Historic Environment	Sites: HA2, HA6, HA11, HA15, HA16, CC4, CC5, CC11, CC12 Cumulative Effects	Sensitive design should be implemented for any new developments to ensure positive effects on local heritage assets and landscapes. Sensitive design should be considered for development to ensure there are no negative effects upon heritage assets or their settings during construction and operation.	Project level design and assessment
SA10: Historic Environment	Sites: HA4, HA9, CC13, CC14, E8 Housing Policies	A lighting strategy should be prepared to minimise light spill onto heritage assets. Sensitive design should be implemented for any new developments to ensure positive effects on local heritage assets and landscapes.	Project level design and assessment
SA11: Air, Noise and Light Pollution	Housing Policies Transport and Movement Policies Sites: HA2, HA4, HA5, HA6, HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA16, CC4, CC5, CC11, CC12, CC13, CC14, E5, E6, E7, E8 Cumulative Effects	A Dust Management Plan should be prepared as part of the CEMP. The application of Policy EN22 should also be applied.	Project level CEMP
SA11: Air, Noise and Light Pollution	General Development Principles Policies	Policy GD10 could be expanded to ensure that digital displays do not contribute to excessive levels of light pollution.	Inclusion within preferred Local Plan policies
SA12: Water Environment	Sites: HA1, HA2, HA3, HA4, HA5, HA8, HA13, CC11, CC12, CC13, CC14, E5, E6, E7, E8 Cumulative Effects	Development should be in line with the NPPF and guidance from the Environment Agency.	Project level design and assessment
SA12: Water Environment	Sites: HA2, HA8, HA11, HA12, HA13, CC5, E6, E7, E8	The plan should require appropriate water management strategies, for example, the inclusion of SuDS, within the site allocation supporting text. The sequential test should be undertaken in order to allocate this site.	Inclusion within preferred Local Plan policies
SA13: Climate Change	General Development Principles Policies	Policy GD10 could include reference to ensuring energy efficient digital billboards are implemented and encourage the use of renewable energy sources if appropriate.	Inclusion within preferred Local Plan policies



SA Objective	Source of Effect/s	Mitigation/Enhancement	Mechanism
SA13: Climate Change	Sites: HA1, HA2, HA3, HA4, HA5, HA6, HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA15, HA16, CC4, CC5, CC11, CC12, CC13, CC14, E5, E6, E7, E8 Cumulative Effects	Development should be encouraged to incorporate renewable energy generation methods such as solar panels, and should incorporate design measures that will reduce effects of climate change, such as zonal heating systems, water saving initiatives and energy monitoring devices.	Project level design and assessment as part of subsequent EIA/ planning application
SA14: Greenhouse Gases	Housing Policies Cumulative Effects	The design of new developments should include the implementation of renewable energy generation measures where possible.	Project level design and assessment
SA14: Greenhouse Gases	Economy Policies	Development that may arise as a result of these policies should aim to utilise low carbon materials within construction.	Project level design and assessment
SA13: Climate Change / SA14: Greenhouse Gases	Sites: HA1, HA2, HA3, HA4, HA5, HA6, HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA15, HA16, CC4, CC5, CC11, CC12, E5, E6, E7, E8 Cumulative Effects	Any form of construction and operation should be undertaken as sustainably as possible, making use of tools and processes, such as circular economy, waste hierarchy and should consider BREEAM and BREEAM Infrastructure.	Project level design and assessment as part of subsequent EIA/ planning application CEMP/ Operational Environmental Management Plan (OEMP)
SA15: Transport and Accessibility	Housing Policies Economy Policies Cumulative Effects	Policies should consider ensuring that developments are well located close to public transport modes or provide additional public transport infrastructure.	Inclusion within preferred Local Plan policies
SA15: Transport and Accessibility	Sites: HA12	The development requirements should ensure that a bus service is provided.	Project level design
SA16: Geology and Soils	Natural Environment Policies Transport and Movement Policies Sites: HA1, HA2, HA3, HA4, HA5, HA7, HA12, E5, E8 Cumulative Effects	Where development occurs on greenfield land, this should be focussed upon low value land, for example, which is not of agricultural use, where possible. Where possible, development should be located to avoid the loss of BMV agricultural land.	Project level design and assessment



SA Objective	Source of Effect/s	Mitigation/Enhancement	Mechanism
SA16: Geology and Soils	Sites: CC13, E6, E7	A CEMP should be prepared and include protection of SPZ from contamination.	Project level CEMP
SA17: Waste	Housing Policies Economy Policies Infrastructure and Community Policies Transport and Movement Policies Sites: HA1, HA2, HA3, HA4, HA5, HA6, HA7, HA8, HA9, HA10, HA11, HA12, HA13, HA14, HA15, HA16, CC4, CC5, CC11, CC12, CC13, CC14, E5, E6, E7, E8 Cumulative Effects	A Site Waste Management Plan should be prepared as part of the CEMP and OEMP.	Project level CEMP and OEMP



9.2 Monitoring

The SEA Regulations require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified, and remedial action imposed. The purpose of the monitoring is to provide an important measure of the sustainability outcome of the final plan, and to measure the performance of the plan against sustainability objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage sustainability information.

The aim of monitoring is to check whether the plan is having the significant effects that were predicted in the SA, and to deal with any unforeseen problems. Those remaining significant effects (albeit uncertain effects) that remain following the implementation of the mitigation and enhancement measures above include the following:

- SA2: The effects of a growing population on education and healthcare facilities;
- SA8: The number of new developments achieving Biodiversity Net Gain;
- SA9 and SA10: The potential effects on landscapes / townscape and heritage assets including their settings;
- SA12: Flood risk relating to new development;
- SA16: The loss of greenfield/BMV agricultural land; and
- SA17: Levels of waste generations on new developments.

It should be noted that these uncertain effects are generally where limited scheme information is currently available.

Table 9-2 below sets out the proposed monitoring measures which could be suitable in monitoring the uncertain residual effects outlined above. The final monitoring schedule will be included within the Adoption Statement, with any relevant targets outlined within the adopted Local Plan included.

Table 9-2: Proposed Monitoring Measures

Potential Effects	Potential Key Performance Indicators
SA2: The effects of a growing population on education facilities	The number of new education facilities provided. Number of children enrolled compared to available spaces at schools. The number of new healthcare facilities provided. The GP to patient ratio at existing surgeries
SA8: The number of new developments achieving biodiversity net gain	The number of new developments achieving 10% Biodiversity Net Gain.
SA9 and SA10: The potential effects on landscapes and heritage assets including their settings	Number of developments within Green Belt/Green Wedge. Number of applications granted planning permission contrary to advice from Historic England.
SA12: Flood risk of new development	Number of Environment Agency objections to planning applications.
SA16: The loss of greenfield/BMV agricultural land	Number of developments within Green Belt/Green Wedge. Amount of greenfield, Green Belt/Green Wedge land lost in hectares. Amount of BMV land lost in hectares.
SA17: Levels of waste generations on new developments	The amount of construction and demolition waste going to landfill (through Site Waste Management Plans or BREEAM Infrastructure). Household and commercial waste and recycling figures for the City.



10.0 Next Steps

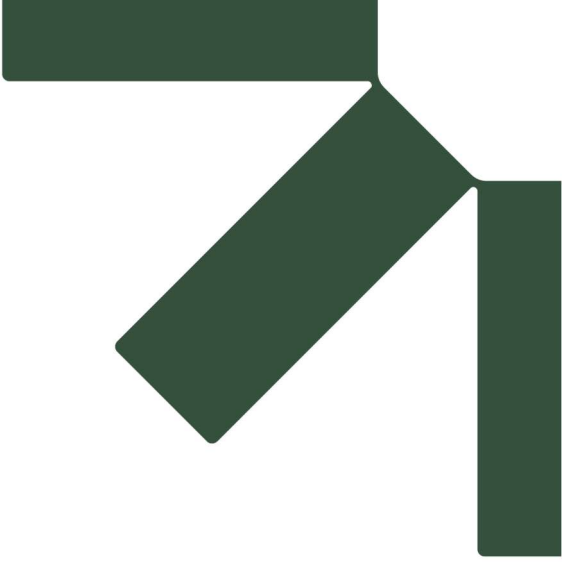
This SA Report is being published for consultation for a 6 week period from 27th July to 8th September 2026. Following consultation on both this SA Report and the Regulation 19 draft Local Plan, comments received on both will be considered. Any necessary changes will be made to the SA and to the Local Plan in response to consultee comments will be reflected within the next iteration of the Local Plan and SA.

The Proposed Submission Local Plan is expected to be published in Summer 2026. The indicative Local Plan timetable is set out in Table 11-1 below.

Table 10-1: Indicative Local Plan Timetable

Local Plan Activity	Timeframe
Consultation on the Proposed Submission Local Plan - Regulation 19	Summer 2026
Examination	Early 2027
SA Post Adoption	Summer 2027





Appendix A Baseline and Review of Plans, Policies and Programmes

Derby City Council Local Plan Sustainability Appraisal

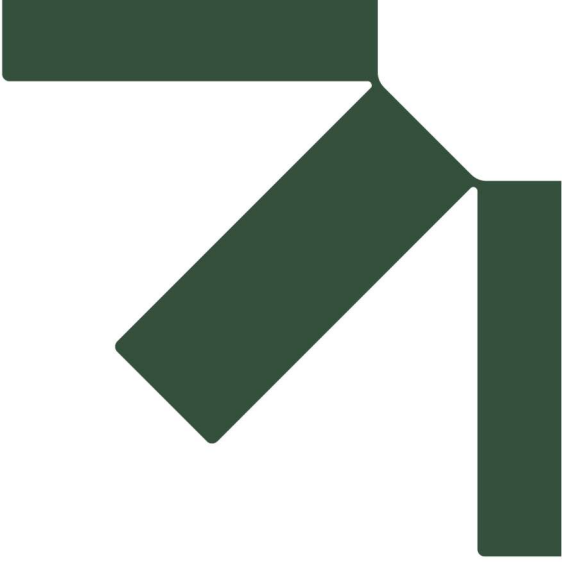
Regulation 19 Sustainability Appraisal Report

Derby City Council

SLR Project No.: 416.066467.00001

27 July 2026





Appendix B RAG Assessment Criteria

Derby City Council Local Plan Sustainability Appraisal

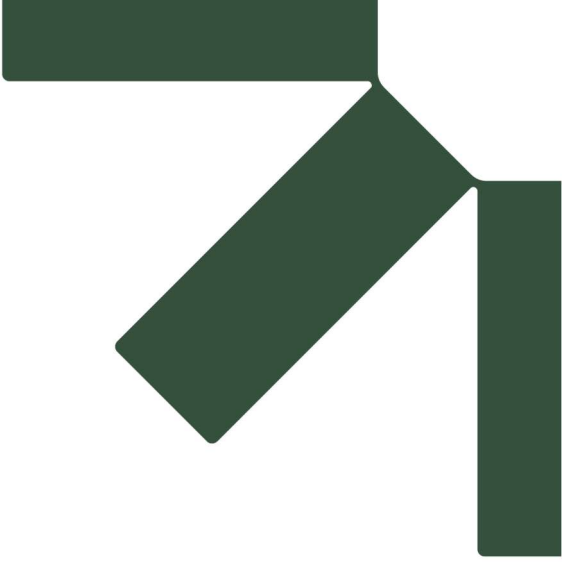
Regulation 19 Sustainability Appraisal Report

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Appendix C Spatial Options Assessment

Derby City Council Local Plan Sustainability Appraisal

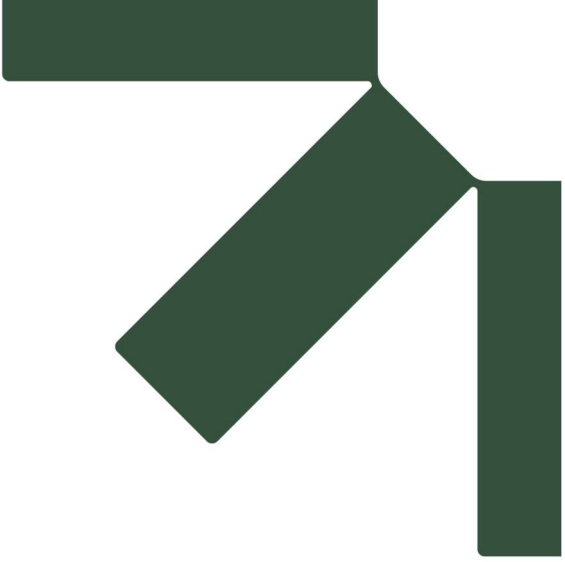
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Appendix D Policy Assessment

Derby City Council Local Plan Sustainability Appraisal

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Appendix E Site Assessment

Derby City Council Local Plan Sustainability Appraisal

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Appendix F Consultation Comments

Derby City Council Local Plan Sustainability Appraisal

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Appendix G DCC Sites Assessment Rationale Overview

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