Sustainability Appraisal (SA) of the Derby City Local Plan Part 1: The Core Strategy

SA Report
August 2015
## REVISION SCHEDULE

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<th>Rev</th>
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<th>Details</th>
<th>Prepared by</th>
<th>Reviewed by</th>
<th>Approved by</th>
</tr>
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<tbody>
<tr>
<td>2</td>
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<td>SA Report to accompany the draft Local Plan Part 1 (Regulation 18 Consultation).</td>
<td>Ian McCluskey Senior Consultant</td>
<td>Anita Copplestone Principal Consultant</td>
<td>Steve Smith Technical Director Policy &amp; Appraisal</td>
</tr>
<tr>
<td>3</td>
<td>March 2014</td>
<td>SA Report to accompany the Pre-Submission version of the Local Plan Part 1.</td>
<td>Ian McCluskey Senior Consultant</td>
<td>Anita Copplestone Principal Consultant</td>
<td>Steve Smith Technical Director Policy &amp; Appraisal</td>
</tr>
<tr>
<td>4</td>
<td>February 2015</td>
<td>SA Report to accompany the Pre-Submission Version of the Local Plan Part 1 (updated)</td>
<td>Ian McCluskey Senior Consultant</td>
<td>Anita Copplestone Principal Consultant</td>
<td>Steve Smith Technical Director Policy &amp; Appraisal</td>
</tr>
<tr>
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<td>August 2015</td>
<td>SA Report to accompany the Pre-Submission Version of the Local Plan Part 1 (updated)</td>
<td>Ian McCluskey Senior Consultant</td>
<td>Alex White Associate</td>
<td>Steve Smith Technical Director Policy &amp; Appraisal</td>
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Submitted to:
Derby City Council  
The Council House  
Corporation Street  
Derby  
DE1 2FS

Submitted by:
AECOM  
Bridgewater House, Whitworth Street, Manchester,  
M1 6LT
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INTRODUCTION
1 BACKGROUND

AECOM (formerly URS) is commissioned to assist Derby City Council in undertaking Sustainability Appraisal (SA) in support of the Derby City Local Plan (Part 1: The Core Strategy). SA is a mechanism for considering and communicating the likely effects of a plan, and alternatives to the plan, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.

This SA Report accompanies the ‘Pre-submission version’ (Regulation 19) of the Core Strategy.

1.1 SA explained

It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.1

The Regulations require that a report is published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’.2 The report must then be taken into account, alongside consultation responses, when finalising the plan.

The Regulations prescribe the information that must be contained within the report, which for the purposes of SA is known as the ‘SA Report’. Essentially, there is a need for the SA Report to answer the following four questions:

What’s the scope of the SA?

This question must be answered subsequent to a review of the sustainability context and baseline, and consultation with designated environmental authorities.

What has Plan-making / SA involved up to this point?

Preparation of the draft plan must be preceded by SA of ‘reasonable alternatives’. As well as presenting the appraisal of reasonable alternatives, the SA Report must present ‘outline reasons for selecting the alternatives dealt with’ and describe the influence of alternatives SA.

What are the appraisal findings at this current stage?

I.e. what are the likely significant effects of the Plan and what changes might be made in order to avoid or mitigate negative effects and enhance the positives.

What happens next (including monitoring)?

These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report under a list of ten points. Table 1.1 and Appendix 1 make the links between the ten Schedule 2 requirements and the four SA questions.

1.2 Structure of this SA Report

The four SA questions are answered in turn across the four subsequent parts of this Report.

1 Directive 2001/42/EC
2 Regulation 12(2)
### SA Report Question

<table>
<thead>
<tr>
<th>Sub-question</th>
<th>Schedule II requirement (the report must include…)</th>
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<tbody>
<tr>
<td>What’s the scope of the SA?</td>
<td>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</td>
</tr>
<tr>
<td>What’s the plan seeking to achieve?</td>
<td>The relevant environmental protection objectives, established at international or national level</td>
</tr>
<tr>
<td></td>
<td>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
</tr>
<tr>
<td>What’s the sustainability ‘context’?</td>
<td>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan’</td>
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<td></td>
<td>The environmental characteristics of areas likely to be significantly affected</td>
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<td>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
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<tr>
<td>What are the key issues that should be a focus of SA?</td>
<td>Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
</tr>
<tr>
<td>What has plan-making / SA involved up to this point?</td>
<td>An outline of the reasons for selecting the alternatives dealt with (and thus an explanation of ‘reasonableness’)</td>
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<td></td>
<td>The likely significant effects on the environment associated with alternatives</td>
</tr>
<tr>
<td></td>
<td>An outline of the reasons for selecting preferred options in-light of alternatives appraisal / a description of how environmental objectives and considerations are reflected in the draft plan.</td>
</tr>
<tr>
<td>What are the appraisal findings at this current stage?</td>
<td>The likely significant effects on the environment associated with the draft plan</td>
</tr>
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<td>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan</td>
</tr>
<tr>
<td>What happens next?</td>
<td>A description of the monitoring measures envisaged</td>
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N.B. The right-hand column of Table 1.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.
<table>
<thead>
<tr>
<th>Schedule 2 requirements</th>
<th>Evidence</th>
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<tr>
<td>An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</td>
<td><strong>Section 3</strong> sets out a summary of the draft plan contents and objectives.  <strong>Section 4</strong> sets out the relationship with other plans and programmes through the contextual review for each SA topic.</td>
</tr>
<tr>
<td>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</td>
<td><strong>Section 4</strong> sets out the baseline position for each sustainability topic covering those issues identified in Schedule 2(6)</td>
</tr>
<tr>
<td>The environmental characteristics of areas likely to be significantly affected.</td>
<td><strong>Section 4</strong> sets out the baseline position for each sustainability topic.</td>
</tr>
<tr>
<td>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 Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.</td>
<td><strong>Section 4</strong> sets out the baseline position for each sustainability topic, which includes consideration of biodiversity and conservation taking into account Council Directive 79/409/EEC.</td>
</tr>
<tr>
<td>The environmental protection objectives, established at international, Community or Member State 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.</td>
<td><strong>Section 4</strong> (through the contextual review) identifies key objectives, issues and opportunities at international, national and local level for each sustainability topic.</td>
</tr>
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<td>The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects.</td>
<td><strong>Part 2</strong> of the SA Report identifies significant effects associated with reasonable alternatives that were appraised as the Local Plan was being developed.  <strong>Part 3</strong> of the SA Report identifies significant effects associated with the draft Plan. Appendices provide further detailed assessments.</td>
</tr>
<tr>
<td>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.</td>
<td><strong>Part 3</strong> contains recommendations for mitigation and enhancement and how these have been taken into account in plan making.</td>
</tr>
<tr>
<td>An outline of the reasons for selecting the alternatives dealt with, and 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.</td>
<td><strong>Part 2</strong> of the SA Report provides ‘outline reasons’ for selecting alternatives, why alternatives have been dismissed or determined to be reasonable, and why the preferred options have been selected.</td>
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<tr>
<td>A description of the measures envisaged concerning monitoring in accordance with regulation 17.</td>
<td><strong>Section 34</strong> identifies monitoring indicators.</td>
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<tr>
<td>A non-technical summary of the information provided under paragraphs 1 to 9.</td>
<td>Separate document prepared.</td>
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PART 1: WHAT’S THE SCOPE OF THE SA?
INTRODUCTION (TO PART 1)

This is Part 1 of the SA Report, which introduces the reader to the scope of the SA. In particular, and as required by the Regulations\(^3\), this Chapter answers the series of questions below.

Table 2.1: Scoping questions answered

<table>
<thead>
<tr>
<th>Scoping Question</th>
<th>Corresponding Requirement (The report must include…)</th>
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<td>• An outline of the contents, main objectives of the plan</td>
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<td>• The relationship of the plan with other relevant plans and programmes</td>
</tr>
<tr>
<td></td>
<td>• The relevant environmental protection objectives, established at international or national level</td>
</tr>
<tr>
<td>What's the sustainability 'baseline' at the current time?</td>
<td>• The relevant aspects of the current state of the environment</td>
</tr>
<tr>
<td></td>
<td>• The environmental characteristics of areas likely to be significantly affected</td>
</tr>
<tr>
<td>What's the baseline projection?</td>
<td>• The likely evolution of the current state of the environment without implementation of the plan</td>
</tr>
<tr>
<td>What are the key issues that should be a focus of SA?</td>
<td>• Any existing environmental problems / issues which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
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2.1 Consultation on the scope

The Regulations require that: ‘When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies’. In England, the consultation bodies are Natural England, The Environment Agency and English Heritage.\(^4\) As such, these authorities were consulted on the scope of this SA in 2008. This consultation was achieved by providing a draft ‘Scoping Report’ for their comment. The draft Scoping Report was also sent to range of other stakeholder organisations at this time so that they might have the opportunity to comment.

The Scoping Report was subsequently finalised and is available online at:

www.derby.gov.uk/environment-and-planning/planning/local-development-framework

The SA scope was reviewed periodically to ensure that the appraisals undertaken at each stage of plan-making focused on the most relevant sustainability issues. Updated information has been presented in this SA report in sections 4-6. No significant changes to the SA Framework were identified as part of any updates to the scope. The issues facing the City have remained fairly consistent throughout the Plan-making process.

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\(^3\) Environmental Assessment of Plans and Programmes Regulations 2004

\(^4\) In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme.’
3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan and how it relates to the plans of the surrounding Local Authorities.

The Core Strategy is the first part of the Derby Local Plan and will set the overall strategic direction for planning the administrative area of Derby City over the period 2011 to 2028.

The new Local Plan will consist of two main documents:

- Part 1: Core Strategy Development Plan Document
- Part 2: Site Allocations Development Plan Document

The Core Strategy once adopted will set out the spatial strategy for Derby City *(i.e. an appropriate scale and distribution of new homes and jobs)*. The plan has been aligned with the Core Strategies for South Derbyshire and Amber Valley, which collectively comprise the Derby Housing Market Area (DHMA).

The strategic objectives for the Core Strategy are *summarised* below (please see the Core Strategy for full versions of the Spatial Objectives):

1. To enhance Derby as an attractive, vibrant and compact liveable City which has a strong City centre of regional importance; regenerated older urban areas and locally distinct neighbourhoods.

2. To develop stronger, safer and more cohesive communities.

3. To reduce Derby’s effect on climate change.

4. To strengthen Derby’s economy by making it an attractive location for major employers and inward investment, especially high tech and creative industry.

5. To give priority to making the best use of previously developed land and vacant or under used buildings in urban or other sustainable locations.

6. To support the development of balanced communities by ensuring that new, well designed, sustainable residential development helps to meet the City’s housing needs.

7. To protect and improve Derby’s natural environment.

8. To enhance the role of Derby’s Green Wedges.

9. Increase the opportunity for people to socialise, play, be physically active and lead healthy lifestyles.

10. To protect and enhance Derby’s character and built heritage; its historic assets, public realm, older inner City neighbourhoods and established suburbs.

11. To promote equality and community cohesion, healthy and active lifestyles and support improvements in community safety, particularly for children and young people.

12. To make the best use of existing infrastructure and to fully integrate and coordinate new development with investment in and provision of new infrastructure.

13. To improve accessibility to and between jobs, homes and services through sustainable transport links and public transport in order to reduce travel distances, especially commuting.
14. 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.

15. Ensuring a vibrant, accessible and attractive City centre of regional importance that has a thriving daytime and evening economy and St Peters and Cathedral Quarters, improved links to the train station and new residential areas.

16. 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 and that significant new developments always integrate public art.

3.1 What’s the plan not trying to achieve?

It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process or through the ‘Part 2’ plan). The strategic nature of the plan is reflected in the scope of the SA.
4 WHAT’S THE SCOPE OF THE SUSTAINABILITY APPRAISAL?

The SA Report must include...

- The relationship of the plan with other relevant plans and programmes.
- The relevant environmental protection objectives, established at international or national level.
- The relevant aspects of the current state of the environment.
- The environmental characteristics of areas likely to be significantly affected. The likely evolution of the current state of the environment without implementation of the plan.

4.1 Introduction

This section sets out the ‘scope’ of the SA by drawing upon the key messages from relevant plans and programmes, the current baseline position and the projected baseline.

The scope of the SA was originally established in the SA Scoping Report in 2008. This section sets out a summary of the scope (updated as necessary) under a range of sustainability topic headings. Section 5 then uses this information to identify key sustainability issues for the plan.

Contextual review

An important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing ‘sustainability context’ messages (e.g. issues, objectives or aspirations) set out within relevant published plans, policies, strategies and initiatives (PPSIs). Sustainability context messages are important, as they aid the identification of the ‘key sustainability issues’ that should be a focus of the SA. Key messages from this review are summarised below under what has been considered the most relevant ‘sustainability topic’.

Of particular importance is the National Planning Policy Framework (NPPF⁵). The NPPF, read as a whole, constitutes ‘the Government’s view of what sustainable development in England means in practice for the planning system. The NPPF also reflects international and European legislation that planning has a role in implementing. The framework is therefore heavily represented in the contextual review.

The current and projected baseline

Another important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing the situation now for a range of sustainability issues. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide ‘benchmarks’ for the appraisal of significant effects.

Just as it is important for the scope of SA to be informed by an understanding of current baseline conditions, it is also important to ensure that thought is given to how baseline conditions might ‘evolve’ in the future under the no plan / business as usual scenario. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide ‘benchmarks’ for appraisal significant effects.

4.2 Population

Contextual review

According to the NPPF, the planning system has an important role to play in supporting the needs of current and future generations. Planning for the appropriate amount and differing needs of a diverse population is therefore a key factor for the Core Strategy to address.

The current and projected baseline

The 2011 Census states that Derby’s resident population is 248,752. This is an increase of some 12,452 since the publication of the Scoping Report (2008) and 18,000 since 2001 (7.8%). The interim 2011 population projections published by the ONS suggest that the City’s population will rise to 277,591 by 2028. However, various pieces of demographic work carried out for the HMA authorities have identified alternative growth scenarios. The latest of which, published in November 2014, suggested that the population of the City would grow to 276,302 by 2028. This is slightly less than the ONS projections. The important factor for the Core Strategy, however, is that the City’s population will continue to grow, with or without the Plan in place. In accordance with the NPPF, the plan must demonstrate how the resulting ‘objectively assessed housing needs’ (OAN) will be met.

The majority of age bands in the city very closely reflect the national age structure. This is particularly evident in the older age bands, for example the 75 and 85 plus age bands in the city are almost identical to those for England. However, Derby differs from the national trend in the 15-29 age bands as both genders show significantly higher percentages than the national average. This is also evident in the 0-4 age band in both genders. The city’s ageing population is also evident with higher numbers of people in the age bands 60-64 and above. Despite a reduction in the number of people aged 70-79, there was a net increase of 2,900 more people aged 60 and over.

The 2011 Census indicates that 24.7% of Derby’s population were from BME communities. This is larger than in either the East Midlands (14.6%) or England (20.2%). The Asian/Asian British community were the largest ethnic group within Derby, comprising 12.6% of the total population. The majority of BME groups increased in size between 2001 and 2011. The most significant increases were in the ‘white other’, Pakistani and African communities. The Caribbean population in Derby was comparatively small and has not increased in proportion since 2001.

The highest proportion of BME communities live in Arboretum and Normanton wards of the City. In these two wards, over 60% of the populations are from BME communities. In Bingley, Littleover, Abbey and Sinfin, between 34-36% of resident populations are from BME communities. Conversely, Allestree, Chaddesden, Oakwood and Spondon’s populations were over 90% ‘White; English/Welsh/Scottish/Northern Irish/British’. A number of other wards were also in the high 80% bracket. This pattern is fairly similar to that exhibited in the 2001 Census.

In 2011, 52.7% of Derby residents identified their religion as Christian. This was a significant reduction from 2001 (67.4%). This is partially explained by the 11.7% increase in the number of people who stated that they have no religion (this figure now exceeds 25% of the City’s population). The proportion of Muslims, Sikhs, Hindus and Buddhists increased between 2001 and 2011. The most significant increase is in the Muslim community which increased from 4.5% of the City’s population in 2001 to 7.6% in 2011.
As noted above, the most up-to-date sensitivity testing, published to assist in South Derbyshire’s Examination suggests that the City's population will increase by 24,879 to 276,302 between 2013 and 2028. This data also confirms the Government’s projections about the City's aging population, with the largest proportional increase being in the 65+ categories. There is, however, a very small decrease in the 45-59 group.

This growth in the ageing population will place increased demand on health and social support services in the future. The plan provides an opportunity to address the specific housing needs of different parts of the population, which may not exist if the plan were not adopted. This could have a negative effect on social inclusion and equality objectives.

Table 4.1: Estimated Population of Derby City, 2013

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Change in Population</th>
<th>% Change from 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Persons</td>
<td>24,879</td>
<td>9.9%</td>
</tr>
<tr>
<td>0-15 years</td>
<td>3,124</td>
<td>6.41</td>
</tr>
<tr>
<td>15-29 years</td>
<td>3,332</td>
<td>6.10</td>
</tr>
<tr>
<td>30-44 years</td>
<td>3,733</td>
<td>7.46</td>
</tr>
<tr>
<td>45-59 years</td>
<td>-820</td>
<td>-1.76</td>
</tr>
<tr>
<td>60-74 years</td>
<td>8,690</td>
<td>27.1</td>
</tr>
<tr>
<td>75+</td>
<td>6,281</td>
<td>35.23</td>
</tr>
</tbody>
</table>

4.3 Housing

Contextual review

The NPPF highlights that local planning authorities should meet the ‘full, objectively assessed need for market and affordable housing’ in their area. They should also identify and update annually a supply of deliverable sites sufficient to provide five years’ worth of housing against their housing requirements. Housing applications should be considered in the context of the presumption in favour of sustainable development.

Amber Valley and South Derbyshire emerging Core Strategies are of particular relevance to the development of Derby City’s Core Strategy. As these authorities comprise the Housing Market Area, a joint evidence base has been gathered to identify housing need and how this should be distributed across the three authorities. The constrained nature of Derby City means that Amber Valley and South Derbyshire have an important role to play in meeting some of the identified need for the City.

Derby Housing Strategy 2009-2014 sets out a number of key issues and priority responses:

- Building cohesive communities
- Providing affordable and accessible housing.
- Regenerating homes and neighbourhoods in a sustainable way
- Support vulnerable groups and communities

The Draft Derby Housing Strategy 2015-2019 (which is being consulted on between July and September 2015) identifies a ‘vision’ to "ensure Derby's residents have access to high quality, affordable homes and housing services which support communities and improve quality of life". It sets out a number of key priorities for the Council:

- Priority 1: Best Use of Stock: getting the most out of the homes that already exist
- Priority 2: Housing quality and standards: Well managed, well maintained, greener homes
- Priority 3: Vulnerable people – providing suitable accommodation for vulnerable groups, linked where necessary to specialist support
- Priority 4: Housing development and regeneration – supplying a range of new housing that meets needs and contributes to urban renewal.

The draft strategy highlights how important the planning system is to achieving these aims, in particular the Core Strategy.

The current and projected baseline

As of 2011, Derby residents formed 102,271 households. This is an increase of nearly 10,000 from the 2001 Census. Of these, 12.2% were rented from the local authority, with a further 7.6% social rented. The vast majority of the stock is owner occupied, with over 60% being either owned outright or owned with a mortgage. 15.6% of households were private rented, which shows a significant increase from the situation indicated in the 2008 Scoping Report (with a corresponding decline in the proportion of owner occupation).

The number of dwellings in the City at the time of the Census was 106,444. This is an increase of some 8,015 since 2001. This is very similar to the Council’s own housing completion monitoring over the same period.

The dwelling stock continues to be primarily semi-detached stock (39%) compared to 35% regionally and 31% nationally.
Detached properties are almost the same level as nationally, but at 23% are significantly lower than the Regional level of 32%. Terraced properties make up about the same proportion of households as detached dwellings at 23%, with unshared flats / apartments making up about 11% of the stock. This is roughly the same proportion as shown in the 2001 Census.

The Council’s ‘Private Sector Empty Homes Strategy 2012 – 2015’ indicates that there are around 3800 empty properties in Derby. Many of these are ‘transactional vacancies’ and are necessary for the normal operation of the housing market, so the headline figures need to be treated with some caution. However, in Derby alone, around 2000 properties have been empty for more than six months, while nearly 1000 of these have been empty for more than two years.

The number of empty homes in Derby had steadily decreased during 2009/10 but this trend reversed in the following 12 months. This was seen as mainly a function of the economic downturn resulting in slow property sales, achieved prices not being as high as they were previously, and the paucity of credit combining with the economic insecurity leading to a continued stagnation of the macro housing market. In these circumstances, owners of empty homes are likely to wait for the market to recover rather than sell properties straight away.

However, since this date the previous trend has reasserted itself. There were 4,603 vacant properties in 2010 (4.5% of the supply) but this fell to 3,310 (3.1%) by 2014. There are many long term empty homes in every Ward in Derby, but the main concentration is in the Arboretum, Abbey and Normanton areas of the City.

Since the publication of the Scoping Report there has been a considerable shift in the underlying policy context and a great deal of work carried out to assess future housing needs for the City, and for the neighbouring areas of South Derbyshire and Amber Valley, which together make up the Derby Housing Market Area (HMA). This is discussed at length in Part 2 of this report in the consideration of strategic housing growth options. For completeness, some of the key results from various studies are outlined below.

Following the election of the Coalition Government in 2010, the Derby HMA authorities began a process of re-assessing its long term housing needs. Three key pieces of work have been carried out which have been used to consult on different options and refine the final household growth assumptions and targets.

The initial piece of work considered a range of growth scenarios which were consulted on in July 2011. This put forward four different growth figures based on ‘balanced migration’, ‘current building trends’ and ‘government projections’. This produced a range of growth figures for the City of between 13,740 and 24,320 new homes between 2008 and 2028. For the HMA as a whole, the range was between 30,000 and 47,900.

This consultation resulted in a broad consensus from the public that the Government Projections were considered to result in too high a target and that there was scope to consider other options. As a result, the ‘Derby HMA Housing Requirement Study (2012)’ was commissioned. This looked in detail at the assumptions used to produce the Government’s projections. This resulted in a revised projection of 33,689 for the HMA and 15,598 for the City. This figure was consulted on as part of the ‘Preferred Growth Strategy’ (PGS) consultation.

Following the publication of the PGS, and the move toward Submission and Examination of each HMA’s strategies, further work and sensitivity testing has been carried out, using updated and data and assumptions. This includes;

• The 'Strategic Housing Market Assessment Update' 2013

• SHMA Update Sensitivity Testing Report (March 2014) 9

• Review of Objectively Assessed Housing Need in light of 2012-based Subnational Population Projections (November 2014) 10

The scope of the SA, and the OAN the Councils are planning for, has been quite fluid, therefore. At time of writing, both Amber Valley and South Derbyshire have now been through Examination sessions which considered the HMA OAN and its apportionment. Most recent indications (as of December 2014) are that the figures presented to Amber Valley's Examination have been accepted by the Inspectors examining the Local Plans of South Derbyshire and Amber Valley. For completeness, the results of the two 'scenarios' presented to the Examinations are illustrated below as the most recent and up-to-date assessments.

The March 2014 analysis considered a number of different scenarios for how 'headship' rates would change moving forward (following suggestions that the 2013 SHMA Update had been pessimistic in this regard). The Inspector at Amber Valley's Examination concluded that, in his opinion, the most appropriate way forward was to take the 'mid-point' between the 2008 and 2011 based projections.

Following the suspension of Amber Valley's Examination, and in advance of South Derbyshire's, the 2012 sub-area population projections were published. It was considered important to carry out an assessment of the impact of these projections on the evidence already collected. These results were provided to the South Derbyshire Examination.

Table 4.2 provides a comparison of the different figures (these are considered again when considering 'options' later in this document). The figures are constrained to 2008-2028 for ease of comparison but it must be remembered that the plan period has now been updated to 2011 to 2028.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Derby HMA</td>
<td>35,354</td>
<td>36,828</td>
<td>35,566</td>
</tr>
<tr>
<td>Derby</td>
<td>16,125</td>
<td>17,901</td>
<td>16,725</td>
</tr>
<tr>
<td>South Derbyshire</td>
<td>10,903</td>
<td>10,718</td>
<td>10,577</td>
</tr>
<tr>
<td>Amber Valley</td>
<td>8,326</td>
<td>8,209</td>
<td>8,264</td>
</tr>
</tbody>
</table>

While these figures are lower than the ONS household growth projections, they still demonstrate that there is an on-going need for housing to meet the City's needs. In terms of delivery, the economic downturn has had a significant effect on the number of dwellings built in the City over the last four years and for expectations of delivery moving forward. In terms of the SA Objectives, this is most important in terms of ensuring housing needs are met and that the strategy helps to promote sustainable economic growth.

9 LINK (TBC)
10 LINK (TBC)
11 These figures are as accepted by the Inspector at AVBC's Examination
As a result of the anticipated population growth, it is inevitable that the demand for housing will continue to increase even if a plan is not in place. The various updates to the SHMA suggest this demand will be for between 806 and 895 dwellings per year between 2008 and 2028, resulting in a demographic need for between 16,125 and 17,901 (or 14,612 to 16,338 if numbers are rebased to 2011).

When taking the policy context of the NPPF into account, it would be logical to assume that without a plan in place, the level of potential development would be at least as high as the various SHMA updates. This is because without a Plan, there would be no target for the Council to establish a 5 year supply against. Without a 5 year supply, the Council would find it increasingly difficult to control the scale or location of housing development or plan for appropriate mitigation, particularly the further into the 'plan period' it went. Therefore, there would be less potential 'constraint' to the supply and thus higher levels of development would be expected. It is obviously very difficult to be precise about this but inevitably housing development in the City would not cease if a plan were not in place.

The table below, taken from the SHMA Update 2013 provides an indication of the need for different sized homes over the 2012 to 2028 period. This shows a different pattern for market dwellings as opposed to affordable homes. The two 2014 sensitivity testing reports did not update these figures, but for the purposes of this document they are still useful indicators of the issues facing the City.

Table 4.3: Housing stock in Derby City, 2013

<table>
<thead>
<tr>
<th>Number of bedrooms</th>
<th>Market</th>
<th></th>
<th></th>
<th>Affordable</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Households</td>
<td>Dwellings</td>
<td>% of dwellings</td>
<td>Households</td>
<td>Dwellings</td>
<td>% of dwellings</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>440</td>
<td>453</td>
<td>4.4%</td>
<td>970</td>
<td>1,000</td>
<td>29.4%</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>2,169</td>
<td>2,234</td>
<td>21.9%</td>
<td>1,017</td>
<td>1,047</td>
<td>30.8%</td>
</tr>
<tr>
<td>3 bedrooms</td>
<td>5,598</td>
<td>5,766</td>
<td>56.4%</td>
<td>1,183</td>
<td>1,219</td>
<td>35.8%</td>
</tr>
<tr>
<td>4+ bedrooms</td>
<td>1,711</td>
<td>1,762</td>
<td>17.3%</td>
<td>136</td>
<td>140</td>
<td>4.1%</td>
</tr>
<tr>
<td>Total</td>
<td>9,918</td>
<td>10,216</td>
<td>100.0%</td>
<td>3,306</td>
<td>3,405</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

In terms of tenure, the SHMA Update concluded that between 2012 and 2017 the affordable need across the HMA was 7,611 homes of which 4,647 were required to meet needs in Derby City. Although difficult to project affordable needs over a longer period, the report did go on to estimate the long term need to 2028 for affordable housing for Derby could be as high as 10,117. Without a plan in place it will not be possible to determine what constitutes an overall housing target or what the requirements would be for demonstrating a 5 year housing land supply. In such circumstances, the most likely number would be based on the 'objectively assessed needs' of the Council but this is still likely to lead to uncertainty and a lack of clarity. Without a plan in place, there is also no clear way to know whether the City's housing needs are actually being met or anything to monitor against. It may also make it more difficult to secure affordable housing or the necessary infrastructure to make development sustainable. The City Council has already had to conclude that it is unlikely to have a 5 year land supply before the Core Strategy is adopted. This will have implications.

The NPPF suggests that where this is the case, permission should normally be granted for 'sustainable' development. This will make it more difficult to refuse, or control development, in areas of sensitivity in the long term. It could also mean less ability of the Council to plan comprehensively to ensure appropriate infrastructure provision.
4.4 Crime

Contextual review

According to the NPPF, planning policies and decisions should aim to promote safe and accessible communities where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.

One of the key objectives of The ‘Derby Plan’ 2011-2026 (Sustainable Community Strategy) is to create strong communities. ‘being safe and feeling safe’ is a key priority.

The Derby Plan (2014/15) highlights the priority of keeping residents and communities safe. It particularly highlights protecting residents from nuisance and environmental crime.

The current and projected baseline

In Derby, the overall crime rate, using types of crime comparable with the Crime Survey of England and Wales (CSEW), in 2011/12, was 49.6 crimes per thousand people.

This compares with 36.6 crimes per thousand people in the East Midlands region, and 38.4 crimes per thousand people in England. In Derby, the overall crime rate decreased from 54.6 crimes per thousand in 2009/10 to 49.6 in 2011/12.

In 2010/11, the crime type with the highest rate for Derby was ‘Violence Against the Person’ with 23 crimes per thousand persons. This is greater than the East Midlands region which had a rate of 14 crimes for ‘Violence against the Person’ offences per thousand persons.

From January to April 2013 there had been 2126 reported crimes in Derby. Figure 4.1 highlights the hotspots for crime reported in June 2013. The City centre and inner urban areas are characterised by higher levels of crime. This illustrates a snapshot in time, but is typical of patterns of crime across the City over time. The situation or issues raised as a result of this have not changed since the publication of the Scoping Report.

Figure 4.1: Crime Hotspots in Derby (June 2013)
Ward-level data suggests that there are high concentrations of recorded crime in Arboretum, Alvaston and Normanton wards. Fly-tipping is also a particular issue in Arboretum and Normanton.\(^\text{15}\)

Table 4.4: Spatial distribution of crime across Derby, 2011

<table>
<thead>
<tr>
<th>Ward</th>
<th>BCS10 crimes Comparator (2011) rate per 1000</th>
<th>Fly tipping</th>
</tr>
</thead>
<tbody>
<tr>
<td>Derby average</td>
<td>61.25</td>
<td>12.25</td>
</tr>
<tr>
<td>Abbey</td>
<td>65.75</td>
<td>34.02</td>
</tr>
<tr>
<td>Allestree</td>
<td>15.83</td>
<td>5.93</td>
</tr>
<tr>
<td>Alvaston</td>
<td>92.92</td>
<td>26.6</td>
</tr>
<tr>
<td>Arboretum</td>
<td>255.92</td>
<td>58.43</td>
</tr>
<tr>
<td>Blagreaves</td>
<td>28.42</td>
<td>5.3</td>
</tr>
<tr>
<td>Boulton</td>
<td>44.78</td>
<td>17.23</td>
</tr>
<tr>
<td>Chaddesden</td>
<td>27.76</td>
<td>8.96</td>
</tr>
<tr>
<td>Chellaston</td>
<td>40.17</td>
<td>13.52</td>
</tr>
<tr>
<td>Darley</td>
<td>70.5</td>
<td>18.72</td>
</tr>
<tr>
<td>Derwent</td>
<td>67.92</td>
<td>19.32</td>
</tr>
<tr>
<td>Littleover</td>
<td>30.17</td>
<td>11.81</td>
</tr>
<tr>
<td>Mackworth</td>
<td>50.25</td>
<td>22.65</td>
</tr>
<tr>
<td>Mickleover</td>
<td>19.25</td>
<td>6.47</td>
</tr>
<tr>
<td>Normanton</td>
<td>84.33</td>
<td>69.23</td>
</tr>
<tr>
<td>Oakwood</td>
<td>22.87</td>
<td>5.81</td>
</tr>
<tr>
<td>Sinfin</td>
<td>77.08</td>
<td>23.77</td>
</tr>
<tr>
<td>Spondon</td>
<td>37.08</td>
<td>6.42</td>
</tr>
</tbody>
</table>

It is to predict future patterns of crime, trend data provides an insight into how levels of crime may continue. For example, common assault has increased year on year in Derby, going from 449 cases in 2006/7 to over 1,300 in 2010/11. Theft both from person and cars has stayed relatively level over time in Derby but is still higher than in other areas of Derbyshire. Violent crime has also had seen an overall increase from 2006 (4,790 counts) to 2011 (5,562 counts).\(^\text{16}\)

Data from the police also indicates that anti-social behaviour is also now a particular issue in the City. The form and nature of development can have an influence here. In general, the crime level could be reduced if new developments offer well lit areas and well-designed places so people can feel safe and reduce the opportunity for criminal activity. This could happen anyway, but without guidance these factors may not be prioritised by developers.

\(^{15}\) Derby City Council Neighbourhood Profiles (2011//2012)
\(^{16}\) Home Office Statistics (2013).
4.5 Health and Physical Activity

**Contextual review**

The NPPF identifies the importance of the social role of the planning system, which is defined as ‘supporting vibrant and healthy communities’, with a ‘core planning principle’ being to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’. The NPPF also outlines that high quality open spaces should be protected or their loss mitigated, unless a lack of need is established. Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.

One of the key objectives of The ‘Derby Plan’ 2011-2026 (Sustainable Community Strategy) 17 is to create strong communities. ‘Being safe and feeling safe’ is a key priority. There is a need to address health and health inequalities, particularly in terms of ensuring that new developments are planned in ways that encourage healthier lifestyles, contribute to higher quality of life and provide environments that promote good mental health.

The Council Plan (2015/15) highlights a priority of promoting better health and well-being. Measures include reducing the gap in health outcomes across the City; promoting a higher take-up of ‘public Health’ checks; supporting healthy weight loss; promoting more use of leisure centres and cycling through the implementation of the Leisure Strategy.

Fair Society, Healthy Lives (‘The Marmot Review’) 18 investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that that there is: ‘overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities’.

To ensure that the built environment promotes health and reduces inequalities for all local populations there is a need to:

- Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality;
- Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by improving active travel; good quality open and green spaces; the quality of food in local areas; and the energy efficiency of housing; and
- Support developments which provides high quality social infrastructure, including education, skills and sports facilities.

As part of its Leisure Strategy, the Council has built a new ‘multi-event sports arena’ (currently under construction on Pride Park). These will help to improve the overall leisure offer and make quantitative and qualitative improvements to the existing ‘offer’.

**The current and projected baseline**

The 2011 Census identified that well over 90% of Derby’s residents were considered to be in ‘Very Good’ (45%), ‘Good’ (35%) or ‘Fairly Good’ (14.2%) health. This is roughly the same as the regional and national situation and does not show a significant change from the 2001 Census profile referred to in the 2008 Scoping Report.

Table 4.5 outlines the health facilities that currently serve the communities of Derby. This information does not highlight where there may be capacity or performance issues; but it does give a broad indication of communities that may find it more difficult to access services.

Table 4.5: Health facilities in Derby by Ward

<table>
<thead>
<tr>
<th>Ward</th>
<th>Health centres / GP#</th>
<th>Dentist*</th>
<th>Pharmacy*</th>
<th>Care Homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abbey</td>
<td>None</td>
<td>2</td>
<td>3</td>
<td>11</td>
</tr>
<tr>
<td>Allestree</td>
<td>Park Farm Medical Centre and Surgery; Park Lane Surgery; Park Medical Practice.</td>
<td>3</td>
<td>3</td>
<td>None</td>
</tr>
<tr>
<td>Alvaston</td>
<td>Haven Medical Centre; Parkfields Surgery; The Meadowfields Practice</td>
<td>4</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>Arboretum</td>
<td>Charnwood Surgery; Macklin Street Surgery; Osmaston Surgery; Peartree medical centre; Wellside Medical Centre; Wilson Street Surgery.</td>
<td>7</td>
<td>13</td>
<td>8</td>
</tr>
<tr>
<td>Blagreaves</td>
<td>The Lanes Medical Centre, Vernon Street Medical Centre.</td>
<td>2</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Boulton</td>
<td>Alvaston Medical Centre</td>
<td>1</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Chaddesden</td>
<td>The Park Medical Practice</td>
<td>2</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>Chellaston</td>
<td>Chellaston Medical Centre; The Meadowfields Practice.</td>
<td>None</td>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>Darley</td>
<td>Brook Medical Centre; Derwent Medical Centre; Friar Gate Surgery</td>
<td>2</td>
<td>3</td>
<td>8</td>
</tr>
<tr>
<td>Derwent</td>
<td>Derwent Valley Medical Centre; Mayfield Road Medical Centre, Wilson Street Surgery.</td>
<td>2</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Littleover</td>
<td>Hollybrook Medical Centre.</td>
<td>3</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Mackworth</td>
<td>Charnwood Surgery; Vernon Street Medical Centre and Surgery.</td>
<td>2</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Mickleover</td>
<td>Mickleover medical centre and surgery.</td>
<td>2</td>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>Normanton</td>
<td>Clarence Road Surgery; Derby Family Medical Centre; St Thomas Road Surgery; Lister House; The Village Community Medical Centre</td>
<td>1</td>
<td>4</td>
<td>5</td>
</tr>
<tr>
<td>Oakwood</td>
<td>Oakwood Medical Centre and Surgery; Lister House Surgery.</td>
<td>1</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Sinfin</td>
<td>Haven Medical Centre; Hollybrook Medical Centre</td>
<td>1</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Spondon</td>
<td>Chapel Street Medical Centre; Derwent Valley Medical Centre</td>
<td>2</td>
<td>3</td>
<td>4</td>
</tr>
</tbody>
</table>

The on-going national drive to increase activity levels so people live healthier lifestyles increases the importance of green infrastructure and the need for open spaces as people embrace interest in a broader spectrum of sports and activities. The ageing population profile within Derby may also generate changing demands for sports and recreation facilities.

There is also increasing interest in the role of the planning system in promoting other aspects of health, for example, through the location and distribution of hot food takeaways, and ensuring that new neighbourhoods are conducive to cycling and walking (whether it be through the provision of infrastructure or the nature of the development).

This growth in the ageing population will place increased demand on health and social support services in the future however. Ensuring adequate healthcare facilities exist in accessible locations is clearly a key sustainability issue.

If a plan were not in place, many of the measures that can be taken to promote healthier lifestyles and provide the necessary facilities would still be implemented. However, the plan does provide an opportunity to facilitate the implementation of complementary measures and secure measures that developers may not give priority to in their schemes.

4.6 Deprivation

**Contextual review**

The NPPF states that in order to create ‘sustainable, inclusive and mixed communities,’ authorities should ensure affordable housing is provided. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

An underlying principle of The ‘Derby Plan’ 2011-2016 (Sustainable Community Strategy) is to create strong communities and to reduce inequalities.

The ‘Council Plan’ (2011-2014) sets out how the Council will implement the Derby Plan. Of specific importance was the objective for adopting the Core Strategy, completing the Castleward and Osmaston Regeneration programmes and working to maximise the provision of affordable housing. The aims of this document remain relevant to the Core Strategy.

The ‘Council Plan (2014/15) continues to prioritise the above measures. Derby Economic Strategy (2011-2016) seeks to promote economic growth and regeneration of the City’s deprived communities.

**The current and projected baseline**

An important feature of the City’s social and economic position is the relative deprivation suffered by its population. In recent years Derby’s economy has made positive progress and demonstrated strong economic performance in some sectors. Despite this there are pockets of deprivation across the City. According to the 2010 IMD, Derby is ranked 88th out of 355 local authorities in the country, placing it within the 25% most deprived areas. Figure 4.2 illustrates that the most deprived areas of Derby are in the centre of the City. Pockets of deprivation are mainly concentrated in five areas – Arboretum, Normanton, Derwent, Sinfin and Alvaston which are all in the top 10% most deprived wards nationally.

Between 2004-2007 Derby City fell from the 69th to the 66th most deprived Local Authority in England. However, between 2007-2010, it improved from the 66th to the 88th most deprived authority.

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Despite regeneration initiatives, the spatial concentrations of deprivation have remained fairly consistent across the City. A comparison of Figures 4.2 and 4.3 indicates that the majority of those LSOAs that were amongst the most deprived in 2007 were also amongst the most deprived in 2010.

Indicators of deprivation are very cross-cutting and other aspects are highlighted in other parts of Section 4 (for example, affordable housing need, unemployment, earnings, crime etc.). The IMD statistics provide a useful overview of the situation in the City. Given the complex and deep-seated issues that contribute to deprivation, it is reasonable to suggest that the spatial distribution of deprivation is likely to persist over the plan period. However, a number of regeneration initiatives and funding schemes are likely to help to further decrease the overall level of deprivation across the City.

Without on-going investment, regeneration and development, the ‘gap’ between deprived areas and more affluent areas could widen.

*Figure 4.2: Derby IMD 2010 Overall Index (Source: Derby City Council)*
Figure 4.3: Derby IMD 2007 Overall Index (Source: Derby City Council)
4.7 Biodiversity and Open Space

Contextual review

The NPPF states that effects on biodiversity should be minimised, with net gains in biodiversity to be provided wherever possible. To contribute to national and local targets on biodiversity, planning should promote the ‘preservation, restoration and re-creation of priority habitats, ecological networks’ and the ‘protection and recovery of priority species’. High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

The Natural Environment White Paper (NEWP) sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It adopts a landscape approach to protecting and enhancing biodiversity and aims to create a green economy. It strives to halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020, recognising that green infrastructure is ‘one of the most effective tools available’ to manage ‘environmental risks such as flooding and heat waves’.

Biodiversity 2020 builds on the NEWP and sets out the strategic direction for biodiversity policy for the next decade. In relation to planning, it states that the objective should be to: ‘guide development to the best locations, encourage greener design and enable development to enhance natural networks’.

The Lowland Derbyshire Biodiversity Action Plan (BAP) covers the part of Derbyshire outside the area covered by the Peak District LBAP. It seeks to conserve and enhance Lowland Derbyshire's existing wildlife and to redress past losses through habitat conservation, restoration, recreation and targeted action for priority species.

Derby Nature Conservation Strategy (2006) seeks to ensure that future generations benefit from a natural heritage that is richer in quality and also seeks to protect and improve the green public realm of the City so as to enhance peoples’ quality of life. The strategy also sets out the importance of protecting habitats and species not covered by legislation, providing buffer zones around sites and ensuring that wildlife networks are not severed.

The current and projected baseline

68% of the City area is built up. Most of the remaining 32% contains important green space, adding to the smaller areas of green space remaining in the more built up areas. Figure 4.4 identifies Derby's green open spaces, wildlife sites and the corridors that link them together.

Because of the effects of intensive farming in the countryside, some of the urban sites are now much richer in wildlife than sites in the open countryside. The limited extent of the open areas means that they are of greater relative importance than similar areas elsewhere, especially in the context of the East Midlands, which itself, is seen as the most deficient Region in biodiversity in the Country. The limited extent of the city's open areas also places them under great pressure for development from which they need protection.

Derby has one SSSI of 3.92 hectares, 10 Local Nature Reserves and 65 locally designated wildlife sites. The whole of the SSSI is found to be in a favourable condition. The Local Nature Reserves constitute 0.80 hectares per 1,000 population which is a little below English Nature's target of 1.0 ha.

99 woodlands were identified in a 1991 audit and of these 2 are considered to be ancient. It is recognised that this data is now quite old, but the extent of woodland in the City has not changed significantly over the intervening period and this is the last comprehensive survey that took place.
The extent of woodland is only about 1% of the City’s area and is recognised as being an under-represented habitat in the City. Unimproved semi-natural grassland covers less than 10 hectares and is also recognised as an important and underrepresented habitat in the City. 187 km of hedgerows were identified in 2003 of which 40% are considered to be species rich, therefore particularly valuable for wildlife.

The River Derwent is regarded as one of the most important wildlife sites in the City. There are also a number of smaller water courses and water areas within the city, the most important being Markeaton Brook.

The CDLPR identifies a range of ‘green infrastructure’ assets, including green belt, green wedges, existing open spaces and defined sites of nature conservation importance as identified in the CDLPR (2006).

Figure 4.4: Green Infrastructure (City of Derby Local Plan Review 2006)
The Lowland Derbyshire BAP identifies Derby to be home to some species found nowhere else in Derbyshire, such as the Dark Bush Cricket. Some of these (like badgers and Great Crested Newts) also have legal protection. Other species, many of which are unusual or uncommon, are recorded in the City and include Common Broomrape, White Clawed Crayfish, Great Crested Newts, Otter, Badger, Little Ringed Plover, Toothwort, Moonwort, Glow worm and Hawfinch. Records are regularly being up-dated and new ones being created in the City.

Derby has successfully retained a network of green wedges, (some of which are also linked to areas of Green Belt) and smaller biological corridors that link the countryside deep into the City, and in some cases running through it. Connectivity is recognised as important in the conservation of biodiversity and the movement of people into green areas. Much of the network is multifunctional and provides opportunities for Derby people to reach semi natural green space.

245 hectares of Green Belt land is designated to the east and north of the City. In addition 1,385 hectares of Green Wedge land performs the function of defining and enhancing the urban structure of Derby and bringing the countryside closer to the city. Many formal sports facilities, parks and areas of public open space lie within them. The Green Wedge boundaries were an important consideration in the 2002 ward boundary review as they are regarded as an influencing factor in community identity.

The Council carried out a ‘Green Wedge Review’ study in 2012. The review sought to establish the different roles and functions of each of the thirteen GWs currently identified in the existing Local Plan, in order to help assess whether the principle of each individual wedge can still be justifiably maintained. It also reviewed all of the potential development sites that have been promoted to the City Council that are located wholly or partially within wedges. It also tried to identify those promoted sites that could have a degree of potential for new development without undermining the key roles, functions and overall character of the wedge. This study has been used to inform the options that are available to the Council in making allocations. It concluded that, while there was some potential for amendments to some green wedges, they were still important features for the City and that the principle should be maintained. Clearly, any increase in the need for development will put greater pressure on green wedges and have the potential to undermine their role and function (and, consequentially, have indirect impacts on the urban form of the City). The development of further location specific species Biodiversity Action Plans and the implementation of the Lowland Derbyshire BAP would provide an improved foundation for the protection of the various species and increase awareness of their locations so measures may be put in place for enhanced protection.

However, there are also a number of threats to biodiversity that could lead to a negative effect on the baseline in the future.

Atmospheric pollution (such as acid precipitation and nitrogen deposition) and increased flood risk that may arise as a result of climate change, could pose a risk to the habitats and species present within Derby and Derbyshire.

In total, there are approximately 278 hectares of parks in Derby. This is made up of two large ‘City Parks’ at Allestree and Markeaton, seven ‘District Parks’ and 37 ‘Neighbourhood Parks’. This is complemented by areas of incidental open space, playing fields, allotments – of which there are 26 in the City - historic gardens, wildlife sites and green corridors. The amount of open space varies across the City, but it is the case that in more central areas the amount of open space available is substantially lower than that in the more modern suburban areas. The current Local Plan identifies a number of ‘proposed open space’ sites across the City that have yet to be implemented.
Increased development (including for housing, business, leisure, transport infrastructure and employment land) would place increased pressure on areas of biodiversity value and open space due to land take for development and an increase in population. An increase in population is likely to lead to an increase in leisure and recreational pressure and increased demand for natural resources such as water. New development may also lead to an increase in disturbance through human activity, loss of habitat, increased predation (e.g. from domestic pets), atmospheric, land and water based pollution.

Without a Local Plan in place, these effects could be more pronounced as there would be no strategic direction in terms of the location of growth and mitigation might be more difficult to either require or coordinate.
4.8 Cultural Heritage, Archaeology, Conservation and Townscape

Contextual review

The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.

Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

English Heritage’s ‘Heritage at Risk’ list lists every heritage asset currently considered to be at risk in the UK according to local planning authority. Heritage assets are split into a number of categories namely; buildings, places of worship, scheduled monuments, registered parks and gardens, registered battlefields, protected wreck sites and conservation areas. With regards to the City of Derby, The Heritage at Risk Register (2012) identifies 5 buildings at risk in Derby; Allestree Hall, St Helen’s House, Darley Abbey Mills South and Darley Abbey Mills North Complex 1 and 2.

The primary purpose of the Derwent Valley Mills World Heritage Site Management Plan 2013-2018 (draft) is to sustain the Outstanding Universal Value of the Site. This will be achieved by ensuring the effective protection, enhancement and promotion to present and future generations. The Plan does not seek to prevent change, but to achieve a responsible management of it. The site should become an established destination for tourism, and be a ‘working landscape’, where new uses are high quality and respect their historic character.

The current and projected baseline

Table 4.6 below shows the number of heritage assets located within the East Midlands region. The only World Heritage site located in the region is the Derwent Valley Mills, which spans across three local authority areas (Amber Valley, Derbyshire Dales and the City of Derby). The primary importance and value of the Derwent Valley Mills relates to developments in technology in the 18th century that introduced the mechanically powered factory system within the textile industry. The site covers an area that represents 6% of the total area covered by English World Heritage sites. This illustrates the regional importance of the WHS in the context of the Council’s plan.

Table 4.6: Heritage Assets in the East Midlands (Source: Heritage Counts 2012)

<table>
<thead>
<tr>
<th>Heritage Assets</th>
<th>2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>World Heritage Sites</td>
<td>1</td>
</tr>
<tr>
<td>Scheduled Monuments</td>
<td>1,518</td>
</tr>
<tr>
<td>Listed Buildings Grade I</td>
<td>996</td>
</tr>
<tr>
<td>Listed Buildings Grade II*</td>
<td>1,870</td>
</tr>
<tr>
<td>Listed Buildings Grade II</td>
<td>26,798</td>
</tr>
<tr>
<td>Registered Parks and Gardens</td>
<td>138</td>
</tr>
<tr>
<td>Registered Battlefields</td>
<td>5</td>
</tr>
<tr>
<td>Protected Ship Wrecks</td>
<td>0</td>
</tr>
<tr>
<td>Conservation Areas</td>
<td>1,103</td>
</tr>
<tr>
<td>Designated Collections</td>
<td>7</td>
</tr>
<tr>
<td>Accredited Museums</td>
<td>103</td>
</tr>
</tbody>
</table>

The City has an important historic built heritage in its stock of Listed Buildings, Conservation Areas and archaeological remains. There are 376 statutory listed buildings in the City, 9 of which are Grade I, 38 Grade II* and 329 Grade II. There are also 8 Archaeological Alert Areas, 7 Scheduled Monuments and 3 Historic Parks and Gardens, all of which add to the heritage assets of the City. 18 buildings in the City are on the “Historic Buildings at Risk Register”.

16 conservation areas identify areas of special architectural interest, which form an important part of the City’s built environment from an architectural and historical perspective.

To the north of the city centre a World Heritage Site (WHS) and buffer have been designated, following the route of the River Derwent, stretching north to Masson Mill at Matlock Bath. In Derby, the site includes the Silk Mill Industrial Museum, Darley Park, the Darley Abbey Conservation Area and St Matthews Church. The WHS was designated due to its importance in the development of the factory system.

The historic features discussed above require appropriate protection because they add to the quality of life and provide an attraction to both visitors and investors. There is, however, a tension between protection and the flexibility to permit new development to take place.

It could be assumed that there will continue to be strict protection for heritage assets and their setting provided by national planning policy. However, the current economic climate has made it difficult to secure the investment needed to improve the quality of heritage assets on the Heritage at Risk Register. This trend could be expected to continue.

Natural England, as part of the consideration of the ‘State of the Natural Environment’ in the East Midlands identifies a series of challenges that the natural environment is likely to encounter in the future. These include:

- **Increased Development** – plans for additional housing and improvements to the transport infrastructure will pose further risk to the character of areas of landscape value in the East Midlands region.

- **Land Management** – the changing global economic climate, population growth and the effects of climate change on food production will further increase pressure on areas of landscape value.

- **Flood Risk** – the risk of flooding is likely to pose an increased risk to areas of landscape value in the region.

Piecemeal development and changes to agricultural land use could also have localised effects on landscape character in Derby, but major changes would not be anticipated.
4.9 Natural Resources, Water and Soil

Contextual review

According to the NPPF, the planning system should prevent both new and existing development from contributing to or being put at unacceptable risk from unacceptable levels of air, soil, water or noise pollution or land instability. In preparing plans, the aim should be to minimise pollution and other adverse effects on the local and natural environment.

The Water Resources Regional Action Plan for the Midlands Region (2009) states that the future of water resources in Midlands Region is uncertain. Pressure on water resources will grow from increases in population, changes in lifestyle, climate change, the development of new technologies, and from changes in the use of land. These pose significant challenges to the way water resources are managed, and as a result, the way water is valued will become more important.

In Safeguarding our Soils: A strategy for England a vision is set out for the future of soils in the country. An element of this vision is the condition of soils in urban areas, which are to be 'sufficiently valued for the ecosystem services they provide and given appropriate weight in the planning system'. Good quality soils in urban areas are recognised as being 'vital in supporting ecosystems, facilitating drainage and providing urban green spaces for communities'. That planning decisions take sufficient account of soil quality is a concern of the report, in particular in cases where 'significant areas of the best and most versatile agricultural land are involved'. Preventing the pollution of soils and addressing the historic legacy of contaminated land is another element of the reports vision. Changing demands on our soils need to be better understood and it must be ensured that 'appropriate consideration is given to soils in the planning process'.


The current and projected baseline (Waste)

Derby City Council is a Waste Collection Authority and a Waste Disposal Authority. Derbyshire County Council is responsible for the disposal of the waste collected across the rest of the county.

In Derby, 518kg of residual waste was recorded per household in 2011/12. This is less than the waste per household in the East Midlands region (545kg). From 2010/11 to 2011/12, the amount of residual waste in Derby reduced by 8kg per household compared with a reduction of 24kg for the East Midlands region. However, there has been a year on year decrease in residual household waste in Derby since 2005/06 (841kg) to 2011/12.

In Derby, 46.4% of household waste was sent for reuse, recycling or composting in 2011/12. This compares to 43% in England and 46.8% in the East Midlands. The amount of waste sent for reuse, recycling or composting has increased year on year in Derby since the 2005/06 level of 27%.

The European and national drive for increased recycling / reduced landfill will mean that levels of recycling are likely to increase further during the plan period. However, increases are likely to become smaller over time as efficiencies become harder to achieve.

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Levels of waste generation are generally correlated with economic activity. Traditionally, higher levels of growth lead to a greater volume of waste, although the Government is aiming to decouple economic growth from waste production.

Modelled waste projections for Derbyshire estimate that there will be a steady increase in the levels of municipal waste generated up to 2030. There will also be a slight increase in commercial and construction waste up to 2015, before these streams ‘level-off’.

These trends are likely to occur with or without a plan in place.

The current and projected baseline (Air Quality)

There are a number of AQMA’s in Derby, largely associated with traffic congestion levels. A significant proportion of the inner and outer ring roads fall within these designated areas. These are illustrated in Figure 4.6 below.

Target levels of Nitrogen Dioxide are currently exceeded at some locations adjacent to the A52 in Spondon, the inner and outer ring road and Osmaston Road. Monitoring has shown that high levels are typically present up to 8m from the roadside, but can extend to 14m adjacent to some heavily congested roads.

The SEA Scoping Report for the LTP3 suggests that air quality is likely to remain at the current levels up to 2026. Clearly, without a plan the population – and associated increases in traffic and congestion – will continue to grow. However, a plan enables the location of air quality issues to be taken into account in guiding growth and enables strategic scale mitigation to be identified and implemented. On a more detailed level, a plan can provide design guidance to minimise the potential impact of air quality issues and ensure satisfactory living environments are created. This may not be as easy to achieve if a plan is not in place.
The current and projected baseline (Water)

Under the Water Framework Directive objectives, the current biological status of the River Derwent is classed as ‘moderate’. This is predicted to be the same in 2015.

Although the general chemical potential is also classed as moderate, it is considered to ‘fail’ the framework objective and this will be the same in 2015.26

Between 2008-2013 there were 5 ‘significant’ incidents of pollution recorded in Derby. However, in 2011, 38 of 39 industrial sites were classed as being ‘very good’ at complying with their permit conditions as part of their Operational Risk Assessment Score.28

The Water Resources Strategy for the East Midlands (prepared by the Environment Agency in 2009)29 highlights that under the worst case scenario, a further 1,025 mega litres of water per day may be required in the Severn (England) and Humber (south) River Basins by 2050 to meet the additional needs of the public, industry and agriculture.

The Humber River Basin incorporates the whole of Derby and Derbyshire. Furthermore, by 2050 climate change could reduce river flow by 10 to 15 per cent on an annual average basis, and could reduce summer river flows by 50 to 80 per cent.

Severn Trent's current Water Resource Management Plan (WRMP) forecasts a deficit in supply throughout the plan period. To rectify the deficit, their final planning scenario has allowed for certain measures that include a combination of demand management and increases in existing abstraction, where water is deemed available, so that in the final planning scenario of their WRMP, a surplus in supply and demand is forecast. The forecast supply surplus is based on the assumption that consumption rate in new households will decline from the current level of 132 litres per head per day (l/h/d) to 129 l/h/d.

Severn Trent has begun the process of producing a new Water Resources Management Plan which builds on the WRMP published in 2010. The draft WRMP considers how the company will supply water in a sustainable way over the next 25 years. Derby lies within the Strategic Grid Zone, the largest water resource grid in Severn Trent’s area; and it is the Strategic Grid Zone which faces the greatest pressures over the next 25 years. As a result of abstraction changes, there will be a net reduction of deployable output to the Strategic Grid of up to 75 ML/d (Mega Litres per day); in addition, further abstraction limitations across the zone due to environmental concerns will amount to a further 5ML/d. To offset this loss of deployable output, the Company is proposing to continue in its programme to reduce leakages, reducing demand for water and to find new, and improve existing, water supply sources.

The Darley Abbey Fish Pass Project was implemented in 2012 to help improve the ecological status of the River Derwent. The Our City, Our River Masterplan also contains measures to help improve flood risk and water quality for the River Derwent. These initiatives could help to improve the predicted chemical and ecological status of the River.
4.10 Climate Change and Flood Risk

**Contextual review**

According to the NPPF, Planning authorities should take account of the long term effects of climate and ‘adopt proactive strategies’ to adaptation, with new developments planned to avoid increased vulnerability to climate change effects.

In terms of flooding, development should be directed away from areas highest at risk and should not be allocated if there are ‘reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding’.

The Flood and Water Management Act\(^{30}\) sets out the following approaches to flood risk management:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings);
- Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water; and
- Identifying areas suitable for inundation and water storage.

The ‘Our City, Our River’ Masterplan\(^{31}\) (OCOR) represents a commitment from Derby City Council and the Environment Agency (EA) to manage the effect of flooding within Derby. The Strategy identifies that to provide sustainable flood risk management through Derby the defences through the City should be realigned away from the river. OCOR presents a preferred realignment route for the flood defences and may have an influence on the scope for development of sites across the City and, in particular, the City Centre. The Masterplan was approved by Council Cabinet as a ‘material consideration’ in July 2012.

The report ‘Action for air quality in a changing climate’\(^{32}\) focuses on the synergies between the issues of air quality and climate change. In particular, it notes the potential for additional health benefits through the closer integration of climate and air pollution policy. It is suggested that synergies can be realised through a variety of means, such as promoting low-carbon vehicles.

The Derby Climate Change Strategy (2009-2012) set out a vision which the Core Strategy should aim to reflect and help implement. This was as follows:

‘to work towards ensuring human induced climate change and its effects are limited to a level that will allow every person in Derby and throughout the world to prosper within locally and globally sustainable environments’

Key objectives of the strategy were to reduce the Council's carbon emissions by at least 25% by April 2014, facilitate the reduction in per capita CO\(_2\) emissions from 6.7 tonnes to 6.11 tonnes, to increase the generation of renewable energy and to reduce the number of households suffering from fuel poverty.

The Council adopted a new Climate Change Strategy\(^{33}\) in November 2013. This sets out 6 priority areas;

1. A thriving sustainable economy – including developing a low carbon economy
2. Smarter travel choices
3. Energy efficient homes
4. A secure local renewable energy supply.
5. Being prepared for a changing environment.
6. An informed environmental community.

**The current and projected baseline (GHG emissions and energy use)**

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\(^{31}\) Our City, Our River Master Plan, Derby City Council / Environment Agency (2012) [online] at [www.ourcityourriver.co.uk](http://www.ourcityourriver.co.uk)

\(^{32}\) Action for air quality in a changing climate, DEFRA (2012)

Consumption of energy from transport in Derby in 2011 was 1,402 gWh. This accounted for 1.3% of all energy consumption in the East Midlands region. Domestic energy consumption accounted for the majority of energy consumption in Derby in 2011 (1,790 gWh). Since 2009 there has been an increase in domestic electricity usage of 12 kWh per meter point in Derby, compared with a regional increase of 16 kWh per meter point.

In 2011, the estimate of carbon dioxide emissions for Derby was 6 tonnes per head. Since 2008 there has been a reduction in carbon dioxide emissions of 1 tonne per head for Derby[1].

Largely due to the urbanised form of the City, Derby has a lower CO₂ rate per capita compared to the averages for rest of the East Midlands and England.

Derby City however is the highest energy consuming authority in the HMA area, reflecting the high density of commercial and industrial activities.

Table 4.7: Estimated per capita emissions in Derby, East Midlands and England

<table>
<thead>
<tr>
<th></th>
<th>Estimated per capita emissions of CO₂</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2008</td>
</tr>
<tr>
<td>Derby</td>
<td>7.0</td>
</tr>
<tr>
<td>East Midlands</td>
<td>8.6</td>
</tr>
<tr>
<td>England</td>
<td>8.0</td>
</tr>
</tbody>
</table>

Source: Department for Energy and Climate Change

During 2011/12 Derby Homes and Derby City Council completed the delivery of 39 new homes which reach Code for Sustainable Homes level 4. Four of which are level 5. Renewable installations as part of new build included 10 air source heat pumps, 10 solar thermal installations and 33 photovoltaic (PV) systems. In addition 3 retrofit photovoltaic installations to existing homes were trialled.

Historically, increased development will result in a greater amount of greenhouse gas emissions. However, Derby’s Draft Climate Change Strategy (2013)[^34] states that between 2005 and 2010, carbon emissions in the City fell by 8%. Overall per-capita emissions also fell by 0.6% since 2005. However, it is still predicted that Derby will not achieve the carbon emissions reduction target of an 18% reduction on 2008 levels by 2020 without further intervention.

The Governments programme for zero carbon development will also mean that new development would have to meet increasingly higher carbon emissions reduction targets. By 2016, all new residential development is expected to be ‘Zero Carbon’ and by 2019 all industrial and commercial development is expected to follow. Achieving zero carbon development in a cost effective way is likely to require district scale energy schemes to be implemented. In a dense City Centre it may be difficult to achieve zero carbon development ‘on-site’.

The current and projected baseline (Flooding and other climate change effects)

[^1]: Department of Energy and Climate Change (2010)

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The Council's Level 1 Strategic Flood Risk Assessment provides an up-to-date assessment of flooding in Derby (see figure 4.5). Based on data from the Environment Agency and the Council's Land Drainage Team, the assessment examines the extent of flooding from a variety of sources such as rivers and minor watercourses, surface water run-off and sewers. The assessment highlights that the primary risk of flooding comes from the River Derwent and its tributaries, effecting on the City Centre and parts of Pear Tree, Normanton, Osmaston and St Lukes.

As a result of climate change, flood risk in Derby is likely to become more of an issue, with an increase in the frequency and depth of flooding of floodplains expected. In addition, more intense storm events as a result of climate change could lead to an increase in surface water flooding and flash flooding. The Our City Our River Masterplan may help to mitigate this risk in the long term.

By 2020, the mean summer temperature is also predicted to be between 0.4 and 2.4 degrees centigrade higher than current levels (depending upon various emissions scenarios). The maximum daily temperature could also be up to 3.4°C higher.35

These increases could lead to an exaggeration of the urban heat island effect, which could have a particular effect in denser urban areas of the City.

The changing climate could lead to a number of issues such as:

- An increase in heat-related health problems in summer.
- Increased energy consumption for cooling in summer.
- Increased incidence of pests and odours in summer.
- In-migration of invasive wildlife species.
- Disruption to business activities.

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35 UK Climate Impact Projections (DEFRA, 2009)
Figure 4.5: Level 1 SFRA for Derby City
4.11 Economic Development

**Contextual review**

The NPPF outlines how local planning authorities should plan proactively to meet the development needs of business whilst supporting an economy fit for the 21st century. Investment in business should not be over-burdened by the combined requirements of planning policy expectations and in drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.

Local planning authorities should also take a proactive, positive and collaborative approach to development that will widen choice in education. This includes giving great weight to plans that create or expand schools.

The ‘Derby Plan’ 2011-2016 (Sustainable Community Strategy)³⁶ aims to achieve a thriving sustainable economy where people can achieve their learning potential.

The Council Plan (2014/15) highlights the need to attract more businesses to the City and more jobs for local people. The plan calls for the attraction of investment, the implementation of key regeneration opportunities, increasing visitor numbers and improving skills.

The Derby Economic Strategy 2011-2016 (DES)³⁷ and associated delivery plans seek to achieve the economic outcome identified in The Derby Plan and aims to substantially shape the strategic context for the Local Enterprise Partnership.

The DES sets out a strategy of achieving a long-term target of 16,000 new jobs by 2023 and 5,700 up to 2016. The strategy indicates that the economy seeks to rebalance in favour of the private sector, which will in turn support enterprise growth.

Other relevant actions from the DES include:

- Continuing improvements to civic spaces, streets within the City Centre and District Centres;
- Supporting the provision of infrastructure to tackle site constraints;
- Using planning to provide recruitment and training for Derby residents (through S106 agreements)
- Implement key development and infrastructure schemes and make use of vacant and underused buildings.

**The current baseline (Economic growth)**

Derby’s economy is influenced by a vast array of factors, ranging from the supply of land and business accommodation to the skills of Derby’s workforce. It is also heavily influenced by global economic trends owing to the international relevance of many of its key businesses.

At the time of the publication of the Scoping Report, the economy of the City was very buoyant. Even at this time, however, issues were identified about unemployment, skills gaps, inequalities in earnings, the relatively small number of business start-ups in the City and a reliance on major employers. These issues remain extant.

The Council published its ‘Local Economic Assessment’ in 2011. This set out a number of key issues and trend in terms of Derby’s economy. It concluded that over half of Derby’s employment is based in public administration, education & health and manufacturing. Derby
has transformed its traditional manufacturing capabilities into high skilled activities which compete on a global scale with brands such as Rolls Royce and Bombardier. This was demonstrated by the point that two out of five residents are employed in ‘upper-tier’ occupations which is higher than other cities locally and underpinned by the fact that Derby has the highest proportion of ‘high-tech’ employment in the UK.

The employment rate of the working age population at December 2014 was 72.8%, which is below regional and national averages but above other cities locally. In the April 14-March 2015 period, this figure improved slightly to 73.4% Self-employment was very low in Derby at around 3 percentage points below the region and almost half the national average.

From 2004 to 2008, Derby’s Job Seekers Allowance (JSA) count remained relatively stable at around 3%, but the arrival of recession in autumn 2008 led to rapid increases with a peak of 5% in February 2010. Data from August 2013 suggested that JSA was at 4%, thus showing some small signs of improvement. This has now improved significantly. Data from June 2015 indicates the figure has fallen to 1.8%. While an improvement, this figure is still slightly higher than both the national and regional statistics.

Derby experienced net employment growth over the 2000-2010 period with ‘real estate & business activities’ and ‘health and social work’ benefiting the greatest. However, manufacturing witnessed a decline of around 4,000 jobs.

Despite this, the decline was less than half the national rate demonstrating the strength it has gained by moving towards higher technology manufacturing and engineering.

One of the biggest headlines was the fact that Derby has the highest workplace wages of any city outside London. These high wage levels are partly attributable to the extent of high skilled employment in the advanced manufacturing and engineering sectors. However, wage levels of residents within Derby are not as strong, suggesting that many of the high end jobs are taken up by people living outside the city. This is indicated further by the fact that Gross Disposable Household Income in Derby is below the national average and has increased at a slow rate in recent years.

The projected baseline (Economic growth)

The Derby HMA Employment Land Forecasts Update Report (2013) considered a number of different scenarios for future job growth in the City, including the use of Experian’s employment forecasts (‘labour-demand’), the labour supply resulting from population growth and current trends of ‘employment development’.

In terms of the Experian data, this suggested that between 2013 and 2028, there would be an overall increase of 5074 jobs in the City in total. However, it also noted that this would not bring job levels back to where they were before the recession started in 2008. The analysis also indicated that while there would be a healthy increase in office based jobs, industry would continue to decline. This is not a particularly optimistic picture of the City’s economy moving forward and may have several implications for long term growth and employment prospects.

The ‘labour-supply’ scenario indicated that as a result of population growth there would be an increase in the ‘working age’ population of some 21,300 across the Derby HMA by 2028 (and thus a need to generate the equivalent FTE jobs to provide sufficient employment). Note the SHMA Update indicated a similar figure of around 21,900 across the HMA and 13,971 within the City. Should this be the case, there will be a growing demand for employment land and premises of different types to meet the demands of different

38 http://www.nomRetail isweb.co.uk/reports/lmp/la/1946157129/report.aspx?town=derby
employers. This report also suggested that Derby has some of the strongest potential for industrial property growth in the country between 2013 and 2017, which will have strong implications for the nature of development needed.

While the exact future of the economy is difficult to predict, it would appear that there will be job growth from the current position across the plan period with or without a plan.

There is a considerable amount of activity which already takes place across the public and private sector to ensure the delivery of economic projects and schemes (both in terms of development and infrastructure, but also training and skills). Through such things as the Economic Strategy, Regional Growth Fund, the Council's own ‘Regeneration Fund’ and other funding mechanisms and programmes coming through the Local Enterprise Partnership, the baseline position should continue to ‘improve’ throughout the plan period. However, without a plan in place, development may not be able to come forward at the right time or in the right place to unlock economic potential or attract the necessary investment.

The current baseline (Retail)

The 2009 Derby Retail Capacity Study concluded that between 2008 and 2011 the City would have an ‘oversupply’ of comparison floorspace, but this would turn into a considerable capacity by the end of the Plan period. In terms of convenience floorspace growth, the evidence suggested that there was not a particularly high level of scope for further development and, if any were to take place, it should be focussed on the areas where population growth will be planned.

The report indicated that while District Centres do perform an important function in meeting shopping needs, most ‘main food shopping’ trips continue to take place in the existing out-of-centre stores. The exceptions to this rule are Mickleover and Sinfin District Centres, which both contain large food stores. In areas of the City where there are no large main food stores (such as Allestree and Chellaston), there is evidence of ‘leakage’ into other areas. This has some important sustainability implications, in terms of accessibility and the distances people have to travel to do normal day-to-day activities.

The projected baseline (Retail)

The 2009 Derby Retail Capacity Study indicated that over the plan period, there would be an increasing ‘need’ for new floorspace to meet the needs of the growing population. Since that time, the full effect of the recession, changing consumer habits and the completion of the Westfield (now Intu) shopping centre have continued to have an effect.

While the Intu Centre has been successful at attracting people into the City, the vitality and viability of the city centre as a whole has declined in the last few years, with some parts of the centre suffering from increased vacancy rates and / or a change in emphasis from ‘quality’ comparison retailers to more ‘value’ or budget retail and an increase in non-retail uses (in particular food/drink and financial/professional services). Although the retail market is volatile, it is anticipated that this trend is likely to continue and the mix of uses within the centre will continue to shift toward non-retail. This may have an effect on long term vitality.

There are two Business Improvement District (BID) companies within the City Centre who are tasked with making improvements to the vitality and viability of the Cathedral Quarter and St Peters Quarter. It is likely, therefore, that these areas will see some enhancements over the lifetime of the plan (though the extent of their influence is limited). The Council is also committed to making public realm improvements across the centre and is committed to building a new attractions to help increase the number of people visiting the centre and dwell time.

Permissions already exist across the City for a considerable level of new or extended floorspace (though some granted in the last few years have now lapsed). Should these be implemented, it is likely to have a significant effect on shopping patterns (particularly in relation to main food shopping). The fact that a number of permitted schemes have not come forward indicate that the retail market has not fully recovered.

The current baseline (Education)

A key component of delivering a sustainable strategy will be to ensure that there are sufficient school places, in accessible locations, to meet the needs of the growing population. The evidence collected illustrates that school place capacity is one of the most volatile and changeable areas of the evidence base. Table 4.8 outlines provision as recorded in 2012. This should be considered as ‘historical’ at the time of publication; but gives an indication of where investment may be required, particularly if new development is proposed. The respective capacities of schools are constantly changing and the key thing from a planning and sustainability perspective is that sufficient places can be provided to meet the needs of the growing population.

It is important to note that school catchment areas cross Ward boundaries; however, it appears that in 2012, provision was particularly constrained in Littleover.

The 2011 Census suggests that 24.1% of residents over 16 years of age have no qualifications. This is an increase of some 3% since 2008. This figure is marginally lower than that of the East Midlands, but 1.4% higher than the average for England and Wales.

Table 4.8: School place capacity in Derby, 2012

<table>
<thead>
<tr>
<th>Ward</th>
<th>Primary provision</th>
<th>Secondary provision</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abbey</td>
<td>2 schools with a surplus over 10%. 1 school with an 11% shortfall.</td>
<td>1 school with a surplus of 24%</td>
</tr>
<tr>
<td>Allestree</td>
<td>3 schools with a surplus of 3%, 4% &amp; 15%</td>
<td>1 school with a surplus of 4%</td>
</tr>
<tr>
<td>Alvaston</td>
<td>3 schools with a surplus (3%, 18% 7%), 1 school with a 5% shortfall</td>
<td>Served by 2 schools in Boulton Ward</td>
</tr>
<tr>
<td>Arboretum</td>
<td>4 schools with a shortfall between 1-2%, 4 schools with a shortfall (1%, 4%, 4%, 19%)</td>
<td>No secondary schools. Served by schools in surrounding wards.</td>
</tr>
<tr>
<td>Blagreaves</td>
<td>2 schools balanced. 1 school with 8% shortfall. 2 schools with 3% surplus.</td>
<td>1 school with a surplus of 1%</td>
</tr>
<tr>
<td>Boulton</td>
<td>5 with a surplus (1%, 1%, 4%, 26%, 30%)</td>
<td>2 schools with a surplus over 25%</td>
</tr>
<tr>
<td>Chaddesden</td>
<td>6 schools with a surplus. One balanced.</td>
<td>1 school with a net balance.</td>
</tr>
<tr>
<td>Chellaston</td>
<td>3 balanced. 1 with a 10% surplus. 1 with a 5% shortfall.</td>
<td>1 school with an 8% shortfall</td>
</tr>
<tr>
<td>Darley</td>
<td>3 schools with a surplus (3%, 3%, 9%)</td>
<td>1 school with a 6% shortfall</td>
</tr>
<tr>
<td>Derwent</td>
<td>5 with surplus (8%, 8%, 11%, 14%, 24%)</td>
<td>1 school with an 18% surplus</td>
</tr>
<tr>
<td>Littleover</td>
<td>2 schools balanced. 1 school with 14% shortfall</td>
<td>1 school with a 12% shortfall</td>
</tr>
<tr>
<td>Mackworth</td>
<td>4 with a surplus (2%, 10%, 14%, 26%)</td>
<td>No secondary schools</td>
</tr>
<tr>
<td>Mickleover</td>
<td>2 with a shortfall (2%, 8%). 3 with a surplus (1%, 7%, 18%)</td>
<td>1 with a surplus of 16%</td>
</tr>
<tr>
<td>Normanton</td>
<td>2 schools with a surplus (1%, 5%) 1 schools with a shortfall (6%)</td>
<td>No secondary schools</td>
</tr>
</tbody>
</table>

41 Derby City Council Neighbourhood Profiles, 2011/2012
The projected baseline (Education)

Figure 4.7 below shows the change in education and qualifications levels in Derby over a ten 10 year period from 2001 to 2010. There are gains in NVQ3 and NVQ4 qualifications, however the number of people achieving higher than an NVQ2 has remained almost constant over the ten year period whereas the rest of the East Midlands and England has made a marked improvement (>8.8%). This trend is likely to continue unless there is provision for opportunities in further education.

As the population will continue to grow, pressure on existing educational facilities will also increase. Without new or extended facilities, many schools may reach or exceed their capacity. This could have a significant effect on social cohesion and inequalities across the City. In addition, it may effect on the quality of education and, consequently, the level of achievement.

Figure 4.7: Derby Qualification Changes, 2001-2010

<table>
<thead>
<tr>
<th>Location</th>
<th>Primary School Status</th>
<th>Secondary School Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oakwood</td>
<td>1 primary school with 2% shortfall</td>
<td>No secondary schools.</td>
</tr>
<tr>
<td>Sinfin</td>
<td>5 primary schools with a surplus over 10%</td>
<td>1 secondary school with a surplus of 19%</td>
</tr>
<tr>
<td>Spondon</td>
<td>4 primary schools with a surplus</td>
<td>1 secondary school with a 2% shortfall</td>
</tr>
</tbody>
</table>
4.12 Accessibility

**Contextual review**

According to the NPPF, planning for transport and travel will have an important role in ‘contributing to wider sustainability and health objectives’. To minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.

The Local Transport Plan 3 (2011) is a statutory document that sets out the strategy for Derby’s transport for the period between 2010 and 2026. The plan sets out a transport vision for the City, supplemented by a number of goals and challenges. The vision is to:

“… to provide people living and travelling within Derby with viable travel choices and effective and sustainable transport networks.”

The long term strategy is a balanced approach, making best use of the existing transport asset by maintaining the roads, managing traffic and supporting people who choose sustainable transport modes. The LTP also supports the use of land use policies in creating an environment in which sustainable transport modes are promoted and ensuring the effective allocation of space to every transport user.\(^{42}\)

**The current baseline**

As illustrated by Figure 4.8, the City’s road pattern is one that converges towards the city centre along the three main arterial roads of the A52, A38 and A6, with an outer ring road running some 2 kilometres from the centre. An ‘inner ring road’ was finally completed in 2012, after being partially completed in the 1970s.

Traffic growth in Derby increased 5.1% between 2000 and 2007, exceeding that experienced in Leicester (3.8%) and Nottingham (1.9%). Although lower than the regional (11.3%) and the national average (9.2%), traffic growth is considered a significant problem in Derby. In addition, associated congestion is considered to be a considerable problem in the City centre and near schools.\(^{43}\)

This is particularly important from a sustainability perspective as travel and transport account for some 24% of all Co2 emissions in the City.

The City is served by rail, with direct connections to London, Birmingham, Sheffield, Nottingham and Leicester among the most important destinations. Evidence suggests that rail patronage is increasing.

The 2011 Census indicates that the percentage of households with no car is nearly 29%. This is higher than both the region (22%) and England and Wales (26%). The average number of cars/vans available to households in the City was 1.06 per household. This is lower than both the regional and national level.

Census data also suggests that some 61% of Derby residents in employment using a car or van for their journey to work. This is roughly 4% higher than the average for England and Wales, and 4% lower than for the East Midlands. The second highest mode of travel is walking, followed by bus.

\(^{42}\)Local Transport Plan, LTP 3, 2011-2016 (Derby City Council)

\(^{43}\)Source: Derby Local Transport Plan SEA Scoping Report 2010
The projected baseline

New development and growth will create the demand for travel and new trips. A large proportion of these new trips is by car and could add to problems of congestion on Derby’s road networks. It is anticipated that the long term trend will be for traffic levels to grow in the future, not just because of land use and population growth, but also the increased demand and the relative costs of owning and running a car. The likely outcome will be an increase in car journeys and travel distance which will add to the associated environmental, health and other social effects of congestion.

The long term projections produced from the Derby Area Transport Model (presented in the Local Transport Plan 3) suggests that the number of vehicle kilometres travelled on the City’s road network on an average day will increase by 58% from 2.9 million to around 4.6 million by 2026. The most significant growth will occur in the period between the morning and evening commuter peaks. The transport model also predicts a 5% increase in car ownership for households with 1 car and 70% increase in households owning more than one car from a 2006 baseline to 2026. The plan is unlikely to impact on car ownership but could affect the need and distance to travel.

The Council is already committed to making strategic improvements to the A52. This will help improve congestion on this important stretch of road and create capacity on the network as a whole. The Council has also nearing completion of the ‘T12’ road in Chellaston. This will also provide network capacity and open up access to a major employment opportunity on Infinity Park.

Without a plan in place, there may be less opportunity to create patterns of development that facilitate alternatives to the car or are able to mitigate the impact of development on the road network.
Figure 4.8: Key transport infrastructure in Derby City.
5 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?

The SA Report must include...
- Any existing environmental problems which are relevant to the plan

5.1 Introduction

Drawing on the review of the sustainability context and baseline, a range of sustainability issues were identified that should be a focus of SA. Sustainability issues are listed in Table 5.1 below for each of the sustainability topic headings that were used as the basis for scoping. Taken together, the sustainability topics and issues provide a methodological framework for the appraisal of alternatives and the draft plan. These have been drawn together into the ‘SA Framework’ in Table 5.2.

Table 5.1: Sustainability topics and issues

<table>
<thead>
<tr>
<th>Sustainability Topic</th>
<th>Key sustainability issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>The ageing profile of the City creates particular pressures on housing, education, health and other services.</td>
</tr>
<tr>
<td></td>
<td>There are significant numbers of people from minority ethnic groups, including recent arrivals from Eastern Europe. Minorities are focused in a few wards, mainly in the central and southern parts of the City. These groups have specific housing and social needs.</td>
</tr>
<tr>
<td>Housing</td>
<td>The number of households is growing creating a need for additional houses. Only some of Derby’s housing needs can be met within its boundaries, so there is a need for close coordination with neighbouring local authorities on Core Strategy preparation.</td>
</tr>
<tr>
<td></td>
<td>Evidence demonstrates a substantial need for more affordable housing in the form of both 1 and 2 bedroom properties and properties to provide for the needs of larger households, including those of Pakistani and Indian origin.</td>
</tr>
<tr>
<td></td>
<td>The existing housing stock shows relatively high levels of vacancy and the proportion of existing dwellings not meeting the decency standard is also higher than regional or national averages.</td>
</tr>
<tr>
<td></td>
<td>There are mixed views about the viability of the City centre housing market, particularly for high density development, related to concerns about the significant number of vacant flat and apartment buildings in and around the City centre.</td>
</tr>
<tr>
<td></td>
<td>As a result of recession, housing delivery and viability has become a significant issue. This has implications both in terms of general housing delivery (and meeting basic demographic needs) but also the provision of affordable housing.</td>
</tr>
<tr>
<td>Crime</td>
<td>Addressing crime and anti-social behaviour are national and local priorities. Some forms of serious crime are experienced at higher rates in Derby than the national average. Parts of the City, especially the City Centre, experience significantly higher levels of crime than others.</td>
</tr>
<tr>
<td>Health and Physical Activity</td>
<td>Increasing physical activity as a means of improving people’s health is a national and local priority. In the more deprived areas of Derby there are reduced opportunities for sport and recreation, which is reflected in lower activity rates.</td>
</tr>
<tr>
<td></td>
<td>Improving health and reducing premature mortality are national and local priorities. Life expectancy rates in Derby as a whole are slightly below national averages, but are significantly lower in its deprived areas.</td>
</tr>
<tr>
<td><strong>Deprivation</strong></td>
<td>The Index of Multiple Deprivation identifies Derby as the 69th most deprived Authority in England. Deprivation levels vary significantly across Derby, the worst incidences occurring in parts of Alvaston, Normanton, Sinfin, Derwent and Abbey wards (Mostly ‘inner areas’).</td>
</tr>
</tbody>
</table>
| **Biodiversity and green space** | Derby has limited but significant areas of bio and geo-diversity which are under pressure from competing land uses.  
- Derby has an important green infrastructure network ranging from Green Belt and Green Wedges to local corridors which are under pressure from competing land uses.  
- Some parts of Derby have less access to open space than others |
| **Cultural Heritage** | Derby has an important built heritage, including the World Heritage Site and Buffer, which is under pressure from development.  
- Derby has a number of ‘buildings at risk’. |
| **Natural Resources, Water and Soil** | There is a pressing environmental need to minimise the production of waste. There are challenging targets for recycling in order to support this.  
- Air quality is not an issue for the majority of residential areas in the City. However, large sections of the inner and outer ring roads (including public space and residential areas) have been designated as AQMAs.  
- Significant parts of the City, including parts of the City Centre, are at increased risk from flooding. The North Riverside and Castleward areas are at risk from surface water and fluvial flooding. There is some risk in the Derwent Triangle area from fluvial flooding. |
| **Climate Change and flooding** | Derby City is the highest energy consuming authority in the HMA area, reflecting the high density of commercial and industrial activities as well as the large number of dwellings. In high-density City centre sites, 70% on-site carbon-compliance, required for the zero carbon standards will be challenging for logistical reasons, and this highlights the need for developing zero carbon district heating schemes where possible.  
- Water resources in the East Midlands are constrained. Climate change is expected to reduce resource availability further. |
| **Economic Development** | The proportion of manufacturing jobs is notably higher than the national average, while the proportion in the financial sector is lower.  
- The City has seen sustained and rapid growth in new jobs, but long term unemployment is still higher than regionally or nationally.  
- A substantial proportion of the workforce commutes some distance from outside of the City. Commuters earn more on average than people who live and work in Derby.  
- There is a high proportion of working age residents without any qualifications.  
- There is a skills gap between jobs in the City and the educational attainment of its residents.  
- There is pressure on capacities at some schools across the City. |
| **Transport and Accessibility** | There is traffic congestion on major radial and cross City routes at peak times. Traffic growth in Derby has recently exceeded that in Nottingham and Leicester.  
- Access to services and facilities is generally good. However, there are some specific issues. For example, some parts of the City are more than 30 minutes from a hospital by public transport. |
### Table 5.2: The SA framework

<table>
<thead>
<tr>
<th>SA topics</th>
<th>Sustainability objectives</th>
<th>Sustainability issues/decision making criteria</th>
</tr>
</thead>
</table>
| **Climate Change and flooding**| 1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding. | - Will it minimise greenhouse gas emissions?  
- Will it reduce energy consumption?  
- Will it encourage the use of renewable energy?  
- Will it encourage the use of decentralised energy?  
- Will it encourage the use of low carbon technology?  
- Will it avoid inappropriate development in areas at risk of flooding?  
- If not, will it provide satisfactory mitigation against flood risk without increasing flood risk elsewhere? Furthermore, in such cases, will it reduce flood risk overall? |
| **Transport and Accessibility**| 2. To minimise traffic and the length of journeys travelled by people and goods.          | - Will it reduce the need to travel, especially by the private car?  
- Will it minimise the number of additional journeys by private car?  
- Will it minimise or help reduce distances between journey destinations?  
- Will it increase the number of non-car journeys?  
- Will it promote walking and cycling?  
- Will it help to provide safe, reliable and convenient public transport? |
| **Natural Resources, Water and Soil** | 3. To minimise pollution.                                                               | - Will it minimise contamination of watercourses?  
- Will it minimise air pollution?  
- Will it minimise light pollution?  
- Will it minimise noise pollution?  
- Will it minimise pollution from waste? |
| **Natural Resources, Water and Soil** | 4. To manage and conserve natural resources and minimise the production of waste.       | - Will it utilise previously developed land?  
- Will it minimise consumption of materials and resources?  
- Will it encourage re-use and recycling?  
- Will it promote the use of sustainable construction methods on new developments?  
- Will it encourage the efficient use of water?  
- Will it utilise and enhance existing infrastructure? |
| **Deprivation Population**      | 5. To reduce deprivation and inequalities.                                               | - Will it help to reduce deprivation?  
- Will it promote social cohesion?  
- Will it cater for the needs of disadvantaged groups?  
- Will it help reduce the number of children living in poverty?  
- Will it improve the satisfaction of people with their neighbourhoods?  
- Will it improve access to important local services for the most deprived? |
<table>
<thead>
<tr>
<th>SA topics</th>
<th>Sustainability objectives</th>
<th>Sustainability issues/decision making criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crime</td>
<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>- Will it reduce actual crime levels?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it help to reduce the fear of crime and anti-social behaviour?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it encourage engagement in community activities?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it help to promote equality and diversity?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it encourage people from different backgrounds to get on well together?</td>
</tr>
<tr>
<td>Housing</td>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>- Will it provide affordable housing?</td>
</tr>
<tr>
<td>Population</td>
<td></td>
<td>- Will it help to improve the quality of the existing and future housing stock?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it help to meet the City’s needs in terms of providing a range of housing types, sizes and tenures?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it help to ensure that new housing is built in the best locations with good access to a range of services?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it help to provide a more flexible housing stock through the development of lifetime homes?</td>
</tr>
<tr>
<td>Economic</td>
<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>- Will it help to provide for the education needs of new communities?</td>
</tr>
<tr>
<td>Development</td>
<td></td>
<td>- Will it help to improve equality of access to high quality learning and training opportunities?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it help to improve education and skill levels?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it encourage lifelong learning?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it help to create a better skills match with employers’ requirements?</td>
</tr>
<tr>
<td>Health and</td>
<td>9. To improve health, reduce health inequalities and increase levels of physical activity.</td>
<td>- Will it help to improve access to services that contribute to healthy lifestyles?</td>
</tr>
<tr>
<td>Physical Activity</td>
<td></td>
<td>- Will it help to reduce health inequalities?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it encourage healthy and active lifestyles?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it help to improve access to high quality sports and leisure facilities?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Will it provide a safe and attractive environment likely to lead to positive mental health amongst residents?</td>
</tr>
<tr>
<td>SA topics</td>
<td>Sustainability objectives</td>
<td>Sustainability issues/decision making criteria</td>
</tr>
<tr>
<td>-------------------</td>
<td>-------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| Cultural heritage | 10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology. | - Will it protect or enhance existing cultural assets, sites of archaeological interest and buildings of architectural and historical importance?  
- Will it improve or create quality new townscapes?  
- Will it enhance the public realm?  
- Will it increase participation in cultural activities? |
| Economic Development Population | 11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents | - Will it provide new employment opportunities, accessible to people living in areas of high unemployment?  
- Will it encourage inward investment?  
- Will it help to establish new local businesses?  
- Will it help make the City centre more attractive to inward investors and visitors?  
- Will it help to stimulate innovation and enterprise?  
- Will it encourage tourism? |
| Transport and accessibility | 12. To maximise people’s accessibility to services and facilities. | - Will new housing be well related to a range of services such as shops, schools and employment opportunities?  
- Will other development be well related to residential areas?  
- Will it help to protect and enhance the vitality and viability of local centres? |
| Biodiversity and green space | 13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment. | - Will it extend the area of green infrastructure?  
- Will it improve the quality of green infrastructure?  
- Will it make better use of green infrastructure?  
- Will it encourage people to make better use of green infrastructure?  
- Will it improve the connectivity of green infrastructure?  
- Will it encourage sustainable management of green infrastructure?  
- Will it conserve and enhance natural habitats and Regionally Important Geological Sites?  
- Will it conserve and enhance sites of nature conservation importance?  
- Will it conserve and enhance species diversity?  
- Will it provide opportunities to promote and better manage biodiversity? |
PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?
6 INTRODUCTION (TO PART 2)

The SA Report must include…

- An outline of the reasons for selecting the alternatives dealt with (and hence and explanation of why the alternatives dealt with are ‘reasonable’.
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting preferred options / a description of how environmental objectives and considerations are reflected in the draft plan.

The ‘story’ of plan-making / SA up to this point is told within this Part of the SA Report. Specifically, this Part of the SA Report describes how, prior to preparing the Local Plan, there was an appraisal of alternative approaches to addressing a range of plan issues; and precisely how the Council took account of these ‘interim’ SA findings.

6.1 Alternatives for what?

The Regulations\textsuperscript{44} are not prescriptive, stating only that the SA Report should present an appraisal of the ‘plan and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme’.

In practice, local authorities in England tend to consider reasonable alternatives for… a reasonable range of the issues addressed through plan-making.

This Section describes how, as an interim plan-making / SA step, reasonable alternatives were considered for the following key plan issues which form the basis of the Local Plan growth strategy:

- What scale of housing and employment growth is needed in the area?
- What is the most appropriate distribution strategy and settlement pattern to meet that need, taking into account the capacity and deliverability?
- What strategic sites are available, viable and suitable that can meet both the needs of the area while being consistent with the most appropriate pattern of distribution?

Of course, the availability and deliverability of sites will have an effect on both the housing target and the distribution strategy. Equally, the analysis of housing need and consideration of strategic distribution options will have an effect on which sites need to be considered. It has therefore been necessary to develop the preferred approach iteratively, taking into account a combination of top-down and bottom-up approaches.

Reasonable alternatives were also considered for a number of thematic issues, including:

- Housing Mix and Density
- Affordable Housing
- Shopping Floor Space
- Town Centre Uses/Roles
- Out of Centre Retail
- Transport
- Parking
- Sustainable Buildings
- Open Space.

\textsuperscript{44} Environmental Assessment of Plans and Programmes Regulations 2004
Alternative strategies have not been considered in the SA for every plan ‘issue’, as it is considered that there are no realistic or sufficiently distinct strategic alternatives to assess.

Examples of this include the Core Strategy’s approach to the historic environment and wildlife. While the Core Strategy does include policies for these areas; national policy or regulation is so specific that the broad approach is largely established. Such ‘thematic’ planning policies can therefore be prepared on the basis of a robust evidence base without the need to rigorously assess a series of options as part of the SA at each stage of policy development.

Instead, the sustainability appraisal framework has been used to help guide the plan policies as they have developed, so that the principles of sustainability are ‘frontloaded’. Sustainability Appraisal has also been used more purposefully to inform policy approaches at later stages of plan development when there was more policy detail (i.e. the ‘preferred options’).

### 6.2 Structure of Part 2

Each plan issue is assigned a chapter below. Each chapter answers the following questions:

- Why have alternatives been considered for this issue?
  
  *Where appropriate, there is also a discussion of related issues for which alternatives have not been considered*

- What are the reasonable alternatives?
  
  *Where appropriate, there is also a discussion of other alternatives that have not been considered*

- Why has the preferred approach been selected?
  
  *The preferred approach as set out in the Local Plan is first explained. The Council’s justified reasoning for selecting this approach is then outlined.*

  *As part of the answer to this question an explanation is also given as to how the selection of a preferred approach reflects the findings of SA. To further illuminate this explanation Appendices 3-16 of this SA Report present appraisal findings for each policy issue / set of alternatives.*
### 7 SCALE AND DISTRIBUTION OF HOUSING DEVELOPMENT

#### 7.1 Why have alternatives been considered for this issue?

The NPPF requires the local authority to meet the full, objectively assessed needs for market and affordable housing in the housing market area. This recognises that local authorities may need to work together with neighbouring authorities to consider strategic growth across boundaries to meet development requirements, including those which cannot wholly be met within their own areas. The ‘journey’ to reaching a preferred housing growth target has been quite complex and been subject to several consultations and pieces of evidence. It needs to be explained in some detail to understand the route to the ‘options’ considered.

The Regional Spatial Strategy (RSS) set out a housing target for Derby of 14,400 between 2006 and 2026. It also required a further 7,000 dwellings in South Derbyshire and Amber Valley, located within the Principal Urban Area (PUA). This was to meet some of Derby’s ‘needs’.

The January 2010 ‘Options’ consultation considered different ways in which these targets could be achieved and whether or not the Councils should consider providing more housing than the RSS required. Considering targets below the RSS figure was not considered a realistic strategy.

As a result of the Coalition Governments stated intention to revoke Regional Spatial Strategies across the country and allow local planning authorities to set their own housing targets, a decision was taken in 2011 to review the RSS targets. It was understood that any target would still have to be based on robust evidence. This was confirmed by the NPPF and the requirement to meet the “full, objectively assessed needs for market and affordable housing in the housing market area” (para. 47).

In light of this, it was considered important to subject alternative approaches to SA.

#### 7.2 What are the reasonable alternatives?

**Scale of growth**

In response to the Coalition government’s announcement regarding the setting of locally derived housing targets, a decision was taken to produce up-to-date population and household projections for all local authorities in the Derby HMA. Edge Analytics were commissioned to consider a range of scenarios using the POPGROUP population and household projection model. The results of these projections were used as the basis for the ‘Derby HMA Growth Options’ consultation in July 2011, which identified the following four broad ‘options’ for growth – though the point was made that these represented the broad range of growth. The options were as follows:

<table>
<thead>
<tr>
<th></th>
<th>Balanced Migration</th>
<th>Current Trends</th>
<th>Regional Plan</th>
<th>SNPP (Government Projection)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Derby City</strong></td>
<td>19,820</td>
<td>13,740</td>
<td>14,400</td>
<td>24,320</td>
</tr>
<tr>
<td><strong>Amber Valley</strong></td>
<td>4,620</td>
<td>7,160</td>
<td>10,200</td>
<td>11,680</td>
</tr>
<tr>
<td><strong>South Derbyshire</strong></td>
<td>5,560</td>
<td>11,360</td>
<td>12,000</td>
<td>11,900</td>
</tr>
<tr>
<td><strong>Derby HMA</strong></td>
<td>30,000</td>
<td>32,260</td>
<td>36,600</td>
<td>47,900</td>
</tr>
<tr>
<td><strong>Annual Average</strong></td>
<td>1,500</td>
<td>1,613</td>
<td>1,830</td>
<td>2,395</td>
</tr>
</tbody>
</table>
The key components and data sources used in the projections modelling process are set out in detail in the district level population and household projections reports for each authority via the following link: www.derbyshire.gov.uk.

This consultation led to a further piece of work being commissioned to try to ‘test’ the assumptions used to generate the Sub-National Population Projections (SNPP). The ‘Housing Requirement Study’ examined such things as migration assumptions and trends, headship rates, fertility, mortality and employment. This was intended to provide an up-to-date and informed basis for developing further household growth projections.

Broadly speaking, this report concluded that for fertility and mortality, the SNPP’s assumptions were valid. However, it did indicate that the SNPP’s assumptions on net-migration and ‘headship’ rates\(^45\) may be too high, thus leading to an overestimation of the area's household growth up to 2028.

The revised assumptions generated an overall HMA household growth figure of 33,659. This figure informed the 2012 ‘Preferred Growth Strategy’ (PGS) consultation (which also included options for the distribution of growth, described below). This concluded that Derby’s demographic share of the HMA need was 15,598.

Both to address some issues raised by objectors, but also to take account of updated information such as the 2011 Census, a further piece of evidence was commissioned following consultation on the PGS. The SHMA Update (2013) has already been referred to in this report in relation to the description of baseline data and evidence of the issues the Core Strategy needs to address. This document looked at a range of issues including the need for affordable housing, housing for different age groups and different house sizes. However, it also provided an updated demographic assessment of household growth. This concluded that across the HMA the need would be 35,454 between 2008 and 2028. Derby’s ‘share’ of this was 16,125.

The data from the SHMA Update was used to inform the consultation into each of the HMA authority’s ‘Regulation 18’ consultation on their Draft Plans. It also informed the ‘Pre-Submission’ versions of both Amber Valley and South Derbyshire’s documents. In advance of Amber Valley’s Examination in March 2014, their Inspector requested further sensitivity testing to be carried out to take account of new data and to assess the implications of some of the comments received during consultation. This considered a range of scenarios, particularly relating to different ways of calculating changing headship rates. The view of each HMA authorities was that the revised data did not undermine the SHMA and that the 2013 update should still be used to set the HMA OAN. This view was not entirely accepted by the Inspector, who issued a note setting out what he felt the revised figure should be. This was based on a ‘mid-point’ assessment of changing headship rates through the plan period and resulted in an HMA requirement of 36,828 between 2008 and 2028. Derby’s ‘share’ of this was 17,901.

It should be noted that much of the SA work was carried out while the period the plan was to address was set at 2008 to 2028. The Inspector at Amber Valley’s Examination considered that a revised start date of 2011 would make more sense, considering the fact that it was already 2014 and thus a more recent start date would be more appropriate. Derby City Council agreed that this would be sensible and proposed to amend the plan’s start date to 2011. This has had a consequential ‘knock-on’ effect in terms of housing requirement figures and targets. However, in the interests of consistency and clarity – particularly in terms of comparing options and illustrating the iterative and on-going nature of assessment – the figures described from this point on will continue to from a 2008 start date. The changes to ‘targets’ will, however, be made clear where necessary.

\(^{45}\) Headship rates can be defined as ‘the number of people who are counted as heads of households.'
The situation moved on again in relation to South Derbyshire’s Examination, where more sensitivity testing was considered. Again, this was as a result of new national data being produced. Using the same methodology as agreed at Amber Valley’s Examination, but using more up-to-date projections, another revised HMA OAN was suggested of 35,566 between 2008 and 2028. Derby’s ‘share’ of this was 16,725.

A Joint Hearing was held in November 2014 by the Inspectors responsible for both Amber Valley and South Derbyshire to consider the HMA OAN afresh. At the time of writing this report, the Inspectors had issued a note indicating that they were comfortable with the March 2014 figure of 36,828 between 2008 and 2028. This equates to a HMA requirement of 33,388 from 2011 to 2028.

As can be seen, a considerable amount of work has been done over the course of preparing the Plan to identify and consider different options for the OAN of both the City and the HMA. It also shows the considerable range of potential targets and the complexity that exists in determining an appropriate figure. Figure 7.1 below illustrates the range of household growth totals that have been derived from the different projection scenarios and consultation exercises for both Derby and the HMA. The figures in red reflect the HMA Councils’ suggested figures at both the Amber Valley and South Derbyshire Examinations.

Figure 7.1: Housing Projections for Derby City, 2008-2028
Spatial Distribution of Growth:

The RSS stipulated the broad distribution of housing across the HMA. As indicated by the targets described above, this proposed a strategy of urban concentration in and around the City. The options that the City could consider, therefore, were quite limited. The 2010 Options consultation considered two broad strategies for delivering the 14,400 dwellings:

A: Concentrate Development in the Urban Area
B: Regeneration with Greenfield Expansion.

Option A would seek to locate all new development on existing commitments or on previously developed land. Option B would still seek to regenerate the City centre and other brownfield opportunities. However, it would also recognise the need to release some Greenfield sites on the periphery of the City and/or within green wedges.

The potential revocation of the RSS allowed for reconsideration of the wider HMA strategy, which could have implications for the distribution of growth within Derby. The 2011 consultation on HMA Growth Options proposed four options:

1. Urban Concentration;
2. A Greater Role for Other Towns;
3. A Greater Role for Rural Settlements;

For the City, all four options assumed a starting point of 10,000 new dwellings on deliverable brownfield sites and commitments (including greenfield commitments). It was considered unrealistic to assume any less from this ‘source’ as it would mean not seeking to maximise brownfield delivery. This was considered an important principle for the Core Strategy to adhere to and was in keeping with the findings of earlier consultation, as well as being consistent with national planning guidance.

Option 1 would assume more development on Greenfield sites both within and on the edge of the City. This option closely equated to the RSS in terms of distribution.

The other options have fairly similar implications for Derby. All of them could still lead to additional Greenfield release within, or on the edge, of the City. The main difference between them is the extent to which the housing requirement is spread across the HMA and the type of settlements it would be directed to. This includes any elements of Derby’s need that cannot be met within the City.

Importantly, all of the options considered made the assumption that it would not be possible to meet all of the City’s needs within its boundary, no matter what level of growth was proposed. This principle has generally been accepted since the publication of the RSS. This view was based on a thorough assessment of sites identified through the SHLAA and the Brownfield Regeneration Statement.

Housing Growth – The Reasonable Alternatives

Table 7.1 identifies a range of strategic options for housing growth in the City that have been subjected to sustainability appraisal. These reflect an amalgamation of the various different scale and distribution options that have been considered and consulted on up to this point (as discussed above).
Generally, the consultation on strategic issues focussed on the ‘scale’ and ‘location’ of growth as two separate but related entities. This was helpful for consultation purposes but is not necessarily the best way of ascertaining what the significant sustainability implications of different alternatives are.

When taking into account the obvious constraints facing the City in terms of land supply it could easily be concluded that preparing full sustainability appraisals for different ‘growth’ and ‘distribution’ options separately would be quite artificial. Without some understanding or recognition of the probable distribution of development, the implications of different levels of growth will not be particularly enlightening. Adding a spatial dimension to the analysis adds considerable value to the process.

The evidence base and consultation exercises have concluded that there are relatively few realistic and distinctive ‘spatial’ options that could be considered within Derby. Owing to the built-up nature of the City, the choices available only really come down to the extent to which brownfield land can be utilised to meet housing need and the number of new Greenfield sites that could/should be released.

Table 7.1 outlines the implications in terms of the nature of sites that would need to be released in the City under each scenario. Section 9 goes on to discuss the alternative strategic sites that would need to be allocated to support the preferred growth strategy.

The different housing options considered to be ‘reasonable alternatives’ are based primarily on the City’s ability to deliver different levels of housing and the inherent implications of this for different objectives, including the City’s ability to meet its needs based on demographic analysis. This means that an element of realism has been introduced about the City’s ability to meet certain levels of growth.

A wider strategic issue is the extent to which any ‘residual’ housing needs that cannot be met within the City are met elsewhere. The sustainability implications of these options have also been addressed by the relevant authorities within their SA Reports.
Table 7.1: Housing Growth and Distribution: The ‘Reasonable Alternatives’

<table>
<thead>
<tr>
<th>Options</th>
<th>Scale (2008-2028)</th>
<th>Implications for the HMA</th>
<th>Rationale</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Option H1: Brownfield &amp; Existing Commitments Only</strong></td>
<td>10,000 (500 dpa)</td>
<td>This would require an additional 6,125 – 14,320 dwellings within South Derbyshire or Amber Valley depending on the scale of ‘need’ identified for the City. Note: the result of the Joint Hearing suggested a City requirement of 17,901 for 2008-2028 (16,388 2011-2028). This would mean ‘decanting’ 7,901 dwellings</td>
<td>The ‘Derby HMA Growth Options’ consultation, and subsequent Brownfield Housing Land Regeneration Statement indicated that the City had capacity for up to 10,000 new dwellings on brownfield sites, existing commitments and local plan allocations. This is based on what were considered realistic brownfield opportunities, delivered at reasonable densities. Option H1 corresponds to ‘Option A’ in the 2010 Options consultation. Not promoting additional greenfield release within the City over the course of the plan period is considered reasonable in the context of the Council’s aspirations for regeneration and existing policies on Green Wedge, Green Belt and the protection of open space.</td>
<td>This option would mean that there would have been no requirement to encroach into the Green Wedge or other greenfield land that was not already allocated in the plan or what had planning permission.</td>
</tr>
<tr>
<td><strong>Option H2: ‘Partial Greenfield Release’</strong></td>
<td>12,000 – 12,500 (600-625 dpa)</td>
<td>This would require an additional 4,125 – 12,320 dwellings within South Derbyshire or Amber Valley – depending on the scale of need identified (assuming all needs are to be met) Note: the result of the Joint Hearing suggested a City requirement of 17,901 for 2008-2028 (16,388 2011-2028). This would mean ‘decanting’ 5,901 dwellings</td>
<td>This option reflects the focus on brownfield regeneration but would also recognise the release of some greenfield land within the City. The figure of 12,000 has been derived from an analysis of housing supply and delivery and an analysis of the effect on Green Wedges. Option H2 is a broad reflection of Option B in the 2010 option consultation. This also reflects an updated view of delivery of brownfield sites from the 2010 document. This option broadly reflects the ‘evidence based’ level of capacity – taking into account a range of factors.</td>
<td>This would result in some release of existing Green Wedge sites but only where the ‘Green Wedge Study’ had identified the possibility of release without undermining the objectives of the policy and other deliverable greenfield sites which do not raise significant national or local policy issues, perform well in terms of sustainability objectives or where issues can be mitigated to some extent. It also reflects an analysis of the ‘deliverable’ supply of brownfield land.</td>
</tr>
</tbody>
</table>

46 The evidence base suggests a scale of ‘need’ between 16,125 identified by the SHMA Update 2013 and the SNPP Projection (2008) of 24,320. The preferred strategy is based on the evidence from the Housing Requirement Study, as updated by the SHMA 2013.
<table>
<thead>
<tr>
<th>Options</th>
<th>Scale (2008-2028)</th>
<th>Implications for the HMA</th>
<th>Rationale</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Option H3: Regional Spatial Strategy</strong></td>
<td>14,400 (720 dpa)</td>
<td>This would require an additional 1,725 – 12,320 dwellings within South Derbyshire or Amber Valley – depending on the scale of ‘need’ identified (assuming all needs are to be met). Note: the result of the Joint Hearing suggested a City requirement of 17,901 for 2008-2028 (16,388 2011-2028). This would mean ‘decanting’ 3,501 dwellings.</td>
<td>The RSS assumed a certain level of capacity and deliverability within the City. The evidence indicates that the level of brownfield capacity, particularly in the City Centre, is unlikely to be deliverable in current market conditions. As such, this option would represent either a substantial increase in development densities (both on brownfield and greenfield sites) and/or an increase in the amount of greenfield development required within the City. This broadly reflects ‘Option B’ in the 2010 Options consultation, though with greater emphasis on greenfield sites than would have been considered at the time of publication.</td>
<td>To deliver this level of housing, the Council would have to compromise its position on a range of policy issues, including its position on Green Wedge, sustainability principles and the effect on the highway. This would include sites at Acorn Way, Moorway Lane, A6/A38 Darley Abbey and Mickleover Sports, Station Road. These sites would be unlikely to provide all of the additional capacity on their own (these sites would only provide around 870 dwellings). To meet the additional requirements over and above this, the Council would have to consider releasing Green Belt sites and/or reconsider employment sites (such as Chaddesden Sidings, which is currently not being promoted for residential by the landowner and was not considered suitable for residential development for a range of reasons).</td>
</tr>
<tr>
<td><strong>Option H4: Housing Requirement Study / Meeting Demographic Needs in City</strong></td>
<td>15,600-17,901 (780 - 895 dpa)</td>
<td>This would require between 0 and 8,195 dwellings within South Derbyshire or Amber Valley – depending on the scale of ‘need’ identified (assuming all needs are to be met). Note: the result of the Joint Hearing suggested a City requirement of 17,901 for 2008-2028 (16,388 2011-2028). This would mean ‘decanting’ between 2,301 and 0 dwellings.</td>
<td>Following consultation on the ‘HMA Options for Growth’, further evidence was commissioned by the HMA Authorities to look at the suitability of the assumptions used by the ONS in the SNPP projection. This work concluded that a revised household growth projection for Derby should be 15,600 dwellings. Again, this would assume a greater emphasis on greenfield release and/or higher density development than for Options H2 or H3.</td>
<td>This level of growth would require all of the sites required under H3, the consideration of Green Belt sites and the potential reallocation of existing or proposed employment land over and above that already identified. It may also require the release of areas of identified as public open space.</td>
</tr>
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### Options

<table>
<thead>
<tr>
<th>Options</th>
<th>Scale (2008-2028)</th>
<th>Implications for the HMA</th>
<th>Rationale</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Option H5: SNPP/ONS Projection</strong></td>
<td>24,320 (1,216 dpa)</td>
<td>Depending on the scale of ‘need’ identified, this option would either meet the City’s ‘need’ or lead to an ‘oversupply’ of 7,200. In theory, this oversupply could be used to meet the needs of neighbouring authorities</td>
<td>This option encompasses the higher growth options identified within the 2011 HMA Growth Options consultation and the implications of accommodating a much higher proportion of growth within the City boundaries. This option is also representative of any higher projections that may be produced.</td>
<td>This option would require a far greater amount of development on greenfield sites within the City and/or would require development at much higher densities than envisaged within the RSS. It may also mean the re-allocation of identified employment sites and the inclusion of sites not considered appropriate for development within the SHLAA and areas identified as open space. It is unlikely that even this would provide sufficient capacity for this level of ‘need’.</td>
</tr>
</tbody>
</table>

The alternative strategies that were appraised prior to finalising the plan took into account a scenario where Derby would meet its identified needs within the City (i.e. Housing Alternative H4). Although the updated figure for the City’s OAN referred to above suggests a slightly higher need than option H4 originally assessed, it is not considered necessary to reappraise this option or include a new option for the following reasons:

- The strategic and sustainability implications would be very similar to alternative H4.
- As part of the Duty to Cooperate discussions to resolve the increased housing requirement, Derby City Council re-examined the capacity within the city to accommodate additional housing development. This re-affirmed that the capacity figure of 12,500 dwellings between 2008 and 2028 (11,000 between 2011 and 2028), which has previously been agreed by the respective HMA authorities for Derby City, was still valid, and that they were unable to accommodate any additional housing development beyond this number.

### 7.3 Why have other options not been considered?

The SA/SEA only requires the consideration of ‘reasonable’ alternatives. The options set out below were not considered to be reasonable alternatives for Derby’s Core Strategy:

**Higher than 10,000 – ‘brownfield only’**: It is noted that the 2010 Options consultation suggested a scenario where the RSS target of 14,400 could be met on ‘brownfield sites and existing commitments’. This assumed extremely high delivery on major sites such as Castleward, the Derbyshire Royal Infirmary and Friar Goods Yard. Up to 5000 dwellings in the City Centre were expected to come forward. This is now likely to be closer to a maximum of around 2200. This necessitated a change in thinking regarding the overall strategy.
Basing a strategy on a brownfield target substantially higher than 10,000 is no longer considered a reasonable or deliverable option. Current market conditions, in particular the move away from the apartment sector and the constraints on viability, have reduced the expected level of delivery that can be achieved on regeneration priority sites. While a greater level of brownfield development could not be ruled out, it would not be realistic to base the entire strategy on this likelihood. This strategy would also mean having to identify a much larger number of brownfield sites for regeneration than currently exist. Evidence, including that set out in the ‘Brownfield Housing Regeneration Statement’ indicates that these sites are not currently available for development, or may not be suitable for residential development if they were. The NPPF states that Local Plans must be deliverable and there would be little confidence that this would be the case.

Lower than 10,000: A strategy that provided less than 10,000 dwellings would be realistic from a ‘delivery’ perspective. However, the NPPF requires local authorities to provide for their ‘full, objectively assessed housing needs’. The two consequences, therefore, of a significantly lower target would be either to fail this requirement and/or lead to a much greater proportion of the City’s housing need being met in Greenfield locations outside the City. This is unlikely to be considered a sound or sustainable solution. This strategy could also lead to a situation where brownfield development was discouraged within the City, in favour of Greenfield development elsewhere. This is contrary to the aims of the Council and the NPPF. Even without considering this against the SA Objectives, it is clear that it would not be a sustainable option to consider in any detail.

Between the SHMA (H4) and SNPP (H5) projections: Appraising a strategy that provides a level of need between the SHMA and SNPP projections was not thought to have any value in terms of understanding the effects of realistic or deliverable options. The evidence indicates that delivering housing levels even at that suggested by Option H4 would prove difficult to achieve (both in terms of the sustainability implications, but also the availability of land). Notwithstanding these issues, Option H5 has been included because representations have been made throughout the consultation suggesting that the Council should base their target on these figures. It is considered, therefore that H5 provides an ‘upper limit’ on a ‘need’ figure – though is substantially higher than any realistic capacity figure - and that the sustainability implications of a figure between H4 and H5 can be inferred from other results. A specific assessment would provide no useful information about the implications for the Core Strategy.

7.4 Why has the preferred approach been selected?

Establishing Derby’s ‘Capacity Cap’ and ‘Unmet Needs’

It has been accepted throughout the plan making process that the City of Derby would not be able to meet all of its ‘objectively assessed housing needs’ (OAN) within its own boundaries. This conclusion has been accepted by all parties in the HMA and has not been seriously questioned in principle through any consultation exercise or alternative evidence.

This has not stopped the City Council endeavouring to identify as much new housing as it reasonably can within the City to meet its own needs in the interests of sustainable growth. It has gone through a number of rigorous and robust assessments of the opportunities that exist to meet needs and the constraints to growth in order to establish a sustainable and deliverable capacity. This capacity has been reassessed at each stage in the plan making process.

What follows is a summary of the factors that have combined to create this ‘capacity cap’; focussing on the constraints that exist, the options for increasing the target have been considered and why they are not appropriate. This work has been particularly relevant in the context of identifying the level of ‘unmet need’ to be accommodated in South Derbyshire and Amber Valley.
What follows is a summary of the factors that have combined to create this ‘capacity cap’; focussing on the constraints that exist, the options for increasing the target have been considered and why they are not appropriate.

**Capacity Constraints**

When determining the growth strategy for the City, the Council has had to take account of a range of parameters (broadly reflected in the diagram to the right)

The Core Strategy clearly has to meet the requirements of the NPPF. At the heart of this is the presumption in favour of sustainable development. This encompasses the three equally important dimensions of economic, social and environmental sustainability that must be balanced in decision making.

While the NPPF clearly wishes to ‘boost significantly the supply of housing’, it does not suggest that this is done in such a way that ignores the core planning principles it seeks to establish. The NPPF still requires constraints and adverse impacts to be taken into account. Delivering housing should not be at the expense of other important planning objectives.

Notwithstanding this, perhaps the biggest – and most obvious – constraint to growth in Derby is the fact that it is a densely populated compact city, where development is already pushing up to its borders in most directions and almost all ‘available’ land already has some recognised ‘acknowledged importance’ for uses other than housing. This limits the number of realistic opportunities to consider.

The nature of the City means that most sites will have some ‘policy’ constraint associated with them. The map below illustrates this by identifying areas in the City with at least one existing ‘policy’ constraint upon it from the ‘saved’ Local Plan. The darker the colour, the more issues exist. Much of the remaining area is made up of existing buildings or ‘undefined’ areas of open space (for example, school playing fields – which have their own policy protection). Many of these issues have already been highlighted in Part 1 of the document.

This map identifies areas of:
- Green Wedge
- Green Belt
- Open Space and other ‘Green Infrastructure’ (e.g. allotments)
- Biodiversity value (wildlife sites, corridors, protected hedgerows etc.)
- Flood Zones 2 and 3
- The World Heritage Site (WHS) and WHS Buffer
- Conservation Areas and Listed Buildings
- Air Quality Management Areas
- Areas of existing and proposed employment
- Existing school locations
While the impacts of residential development on the above issues have been major considerations, the map cannot illustrate others such as the impact of development on infrastructure – particularly transport and education - and the viability and delivery of development.

These constraints have not stopped the Council looking closely at each and every site opportunity submitted for consideration. Allocations have been made within areas of constraint where it has been demonstrated the impacts of doing so would be acceptable and/or where the impact can be mitigated.

The impact on the character of the City has been particularly important with regard to the consideration of ‘Green Wedge’ (GW) sites. There are thirteen areas that have been specifically protected from inappropriate development by successive local planning policies since 1989, helping to preserve their open and undeveloped character. Derby has successfully upheld this principle in successive planning documents and appeals. GW policy is also seen as having a high degree of consistency with the objectives of the NPPF. It is important to remember that purpose of Green Wedge policy is not about constraining housing, it is about retaining the character and identity of separate and distinct areas of the City. They
are particularly important in terms of the 'social' and 'environmental' elements of sustainable development.

Retaining the principle of GWs is seen as a key objective of the Council’s strategy and an important indicator of the sustainability of the plan. This is not to say that the Council has avoided the consideration of GWs for housing sites. The ‘Green Wedge Review’ 47 analysed each wedge to assess whether they were still meeting the objectives of the policy and whether there was scope for development without undermining their role, function or character.

This concluded that there were parts of the wedge that could be developed while still maintaining the principle of a wedge in the area. The majority of these have been carried forward as allocations in the draft Core Strategy and the others have been identified for further consideration as part of a future plan. This inevitably means that those parts of the GW which remain take on far greater importance and deserve greater protection. This has to be factored in to any assessment of the limits to the City's internal growth.

The Government attaches great importance to the Green Belt (GB), and state that boundaries should only be altered in exceptional circumstances. The PPG indicates that "unmet housing need (including for traveller sites) is unlikely to outweigh the harm to Green Belt and other harm to constitute 'very special circumstances' justifying inappropriate development on a site within the Green Belt."

The amount of GB land in the City is relatively small but is part and parcel of wider areas in neighbouring authorities. Sites have been submitted to the Council for consideration and thus a decision has had to be made about the appropriateness of amending boundaries. A 'Green Belt Review' was prepared by Derbyshire County Council in 2012. This was a review of an earlier, more comprehensive, study which concluded that the GB between Derby and Nottingham was the most sensitive. The review also concluded that the designations in and around the City were still performing a valuable role and should continue to be protected. As such, while due regard has been given to the sites submitted, protecting the principle of Green Belt in the City has carried greater weight. This, therefore, constrains potential supply.

A considerable amount of the rest of the City is identified for a range of nature conservation or ‘green infrastructure’ type designations including areas of open space, local nature reserves and wildlife sites, trees protected by TPOs and important hedgerows. These are important constraints that limit opportunities. Where they are in close proximity to ‘suitable’ sites, they may also have the effect of limiting the scale and nature of development appropriate to the site.

The NPPF indicates that development in areas at risk of flooding should be avoided. In drafting local plans, LPAs are required to adopt a sequential ‘risk based’ approach to the location of development to avoid, where possible, flood risk to people and property. The Council has carried out a Strategic Flood Risk Assessment (SFRA) which demonstrates that large areas of the City are constrained by potential flood risk. While some of this is able to be mitigated, the scale of flood risk in the City and the suitability and cost of mitigation naturally constrains ‘sustainable’ and ‘deliverable’ supply.

Local authorities have to set out a positive strategy for the conservation and enjoyment of the historic environment. The City contains a World Heritage Site (WHS) and an associated ‘buffer zone’. A number of Conservation Areas and statutory and locally listed assets are also identified across the City. In determining the overall strategy, the impact on these designations and their settings has been a key issue. Where it is deemed possible to develop within or near to such assets, their proximity is likely to limit the scale and nature of development that would be acceptable.

Securing economic growth is a constant theme running through the NPPF. Meeting the development needs of business is a key objective of the guidance and consequentially the Core Strategy. This generates a competing demand for land which may constrain the amount available for residential development. The evidence base for the Core Strategy indicates a need for around 199 hectares of land over and above that already in use.

In considering housing opportunities, regard has been had to the existing employment situation. As a result of this, a number of ‘operational’ employment sites have been identified for housing including Castleward and the former Rolls-Royce Main Works site in Osmaston. Assumptions have also been made about potential re-use of commercial space in the City Centre. It would also be expected that smaller employment sites will come forward in the Part 2 plan.

Not all proposed or existing employment sites are appropriate for housing. Firstly, not all are in suitable locations and could not create a satisfactory or sustainable form of development. Secondly, even if potentially suitable many sites are occupied by operational businesses – so the land is not available and ‘intervention’ from the Council may not be viable or in the public interest. Thirdly, it may create an imbalance between housing and employment – which could have a number of negative sustainability consequences. Finally, employment (or any brownfield site) may simply not be viable when considering the cost associated with making the site suitable for development. Delivery and viability are key considerations. The NPPF is clear that plans must be deliverable.

In terms of infrastructure limitations, it is recognised that growth in, and on the edge of, the City will have a significant impact on the transport network. Many junctions are already at capacity or will be once development takes place. A number of mitigation measures are proposed that will help reduce the impact but these will not be sufficient to produce a ‘nil-detriment’ situation. The capacity of the transport network is not necessarily a reason for capping the City's target at 11,000. The fact that much of the decanted growth is being provided on the edge of the City will clearly impact on Derby's network. However, there are fewer options available to mitigate the impact if a greater proportion of DUA development were to be focussed within the City boundary as a result of a higher target. This could lead to a situation where the functioning of the network would decline more rapidly over time, leading to increased delays and limited means to make measurable improvements. This would clearly be an undesirable situation.

The City has a number of other infrastructure capacity issues. The capacity of the City's schools is a particular issue. A number are at or above their capacity already or are expected to be so in the short to medium term. In considering the scale of development possible to achieve, the impact on existing schools is an important factor. Where capacity is limited, then the ability to provide additional spaces has to be considered. This may not always be possible to achieve and still maintain a viable or suitable development. This is, therefore, also a naturally constraining factor.

The above is just a brief summary of the issues facing the city and is not exhaustive. It is recognised that most areas will be subject to similar constraints. However, the tightly drawn boundaries of the City and its compact, high density nature pulls these constraints together in a small area; increasing their importance and sensitivity in many cases.

There are few easy' sites in Derby which don't raise significant planning issues. There is little or no point in the Council preparing a strategy that is at odds with national policy or which prejudices the delivery of wider Council objectives. This means that a balanced approach has to be taken which recognises the importance of delivering housing but does not ignore the need to protect and enhance the most important parts of the City’s urban and natural environment, promotes sustainable economic growth, provides for the needs of existing and new neighbourhoods and, above all, the need for it all to be delivered.
The key here is ‘balance’. The strategy for the City does not shy away from difficult decisions. Rather, it has sought to address each issue carefully and come to a sensible conclusion as to the level of impact generated and whether it can be minimised or mitigated. This is why development is taking place in Green Wedges, on existing employment sites, on difficult brownfield sites and in areas of environmental sensitivity.

There will inevitably be a limit, however, to what is possible to achieve or what is sensible to propose in such a constrained area within the plan period. In the opinion of the Council, this limit has been reached.

**Opportunities for Increasing the target**

Notwithstanding the constraints on the City, the Council has considered if there any ways in which the target could be increased. The options available are:

1. Allocate additional strategic sites
2. Assume greater delivery from strategic sites and locations
3. Assume a greater supply from ‘non-strategic’ SHLAA sites
4. Assume a greater windfall allowance over the plan period
5. Assume fewer losses

A number of other strategic scale sites were considered but have not been carried through to the strategy. The majority of these have either significant planning and/or delivery constraints which have ruled them out of consideration. To one extent or another, allocating any of the sites rejected would undermine the objectives of the Council’s Strategy in one or more of the following ways:

- It would undermine the role, character and function of a number of important Green Wedges across the City by either:
  - unacceptably narrowing them at sensitive locations
  - closing their ‘mouths’ and undermining their role in terms of bringing the countryside into the City
  - undermining their open and undeveloped character, and/or
  - undermining their function in terms of defining the character of existing neighbourhoods

- It would increase the City’s target without corresponding certainty over delivery or viability.

- It would undermine Council objectives in terms of open space and promoting healthy lifestyles

- It would have an unacceptable impact on the character and environment of existing neighbourhoods or sensitive parts of the City’s heritage;

- It would generate localised instances of severe traffic problems without the ability to provide appropriate mitigation

- It would introduce development in areas that have poor access to facilities and/or which do not relate well to existing communities, resulting in an unsustainable pattern of development
• It would undermine economic objectives of the plan by removing important employment allocations without suitable replacement sites being available

• It would have an unacceptable impact on education provision, without the ability to mitigate impacts (either as a result of sites not being of sufficient scale to justify a new school and/or nearby schools not being able to expand)

• It would be contrary to the NPPF in terms of the protection of Green Belt

Two GW sites were identified in the ‘Preferred Growth Strategy’ as having potential to come forward in Part 2. While broadly comfortable from a GW perspective, there were outstanding issues to resolve before they could be allocated. This amount to about 350 dwellings between them. Importantly, allocating these would not mean the Council could increase its target.

The Core Strategy identifies a ‘residual’ requirement to be met in the Part 2 plan. The two sites highlighted above form part of the pool of potential sites to meet this requirement. They do not constitute new opportunities and have already been factored into the assessment of overall capacity and delivery.

Allocating any of the other ‘rejected’ sites to increase the target would be seen as having too great an impact on the strategy to be an acceptable approach.

Increasing the net development densities of allocated sites to increase their delivery is also seen as inappropriate. Densities and the developable area of sites have been carefully considered to ensure appropriate forms of development, infrastructure provision and delivery. An appropriate balance between these issues has been struck. Setting arbitrary or unrealistic densities will not lead to greater delivery. This is not a realistic option.

The plan identifies two broad locations within which we expect residential development to come forward; Osmaston and the City Centre. There is no scope to identify further opportunities within Osmaston at this time.

The City Centre is a more complex issue. A figure of a minimum of 530 units was identified in the Draft Plan as a realistic estimate of delivery based on our understanding and knowledge of each opportunity and the prevailing market and economic conditions.

Since this time, the situation has changed considerably. The Council has now established the ‘City Living Fund’ which can provide loan funding at preferential rates. The City Centre has also recently been identified as a Government ‘Housing Zone’. Again, this unlocks preferential rate loan funding and access to the HCA’s ATLAS team who can provide expert advice and assistance in bringing sites forward. These measures should assist with the financing of schemes. The Council has also recently published a revised ‘City Centre Masterplan’ which identifies and promotes a number of regeneration priority sites.

This, coupled with increasing interest in the private rented sector (PRS) and student accommodation (which can count toward housing numbers to an extent) and relaxed permitted development rules, means that a much more positive outlook now exists.

The most recent analysis of supply indicates that there is likely to be more scope for development than previously thought. A revised estimate of likely delivery would be at least 1,000 new dwellings between 2011 and 2028; an increase of 470 over the Draft Plan. At present, this figure is less than the number of ‘opportunities’ that have been highlighted in the SHLAA, but a degree of flexibility and comfort is needed in light of the volatile nature of the City Centre market and the possibility of the same sites being put to a range of acceptable uses. Therefore, at this time, 1,000 units is a realistic and robust assessment.
If all things had remained equal, this change could have resulted in the City increasing its target without any negative consequences to the strategy. However, while the situation has improved within the City Centre, a strategic site identified in the Draft Plan has had to be removed from the supply.

The Sinfin Lane site was allocated for 700 units in the Draft Core Strategy. Since this time, the ownership of the site has changed, the planning application for housing withdrawn and the permission that existed on part of the site has lapsed. There appears to be no intention in the short to medium term to make the site available for residential development. The plan continues to identify the potential of the site to come forward for new housing but there can no longer be any certainty that the site will come forward. As such, while the broad strategy and objectives of the plan remain the same, the components of supply have had to be amended to reflect the current context.

This means that the increase to the City Centre target cannot be translated into an overall increase in the sustainable and deliverable capacity of the City as whole.

An assessment of non-strategic sites in the SHLAA suggests that the ‘residual’ to be addressed through the Part 2 plan would still be achievable. However, in order to maintain a realistic prospect of delivery, there are insufficient appropriate opportunities to increase this with any confidence.

Assuming a greater windfall allowance would also be inappropriate. An estimate of 900 dwellings over the plan period has been based on a thorough analysis of past trends and a recognition that, as more emphasis is being placed on identifying possible housing sites through the SHLAA, the number of windfalls is likely to fall. There is also a risk in having a higher allowance in that it will increase levels of uncertainty about where development will take place. This has a number of undesirable sustainability implications. As such, it is considered that the current windfall allowance is robust and should not be increased.

It is inevitable that there will be losses to the housing stock during the plan period. The assumption of 336 losses between 2016 and 2028 is conservative but robust. Any change to this component could only have a negligible impact on the target, probably insufficient to justify a change. This is also, therefore, an unreasonable way of seeking to increase the City’s target over 11,000.

In conclusion, Derby’s capacity is constantly being reviewed to ensure the Core Strategy target is robust. The most recent assessment did suggest a more optimistic outlook for the City Centre and indicate that this component of supply could deliver considerably more dwellings than previously suggested. However, this has been offset by the probable ‘loss’ from the supply of the Sinfin Lane regeneration site – at least for now. There are no other sustainable or deliverable options for increasing the City’s target.

As such, when taking all things into account, the Council is confident that its current assessment remains the best indication of the City’s sustainable and deliverable capacity.

The preferred approach

As noted above, the selection of the housing growth strategy was based on the consideration of a combination of factors. This has culminated in the following approach to housing:

- 11,000 new homes within the City boundary between 2011 and 2028 delivered on a number of strategic sites and locations across the City (some of which will be delivered as part of a future Local Plan Part 2 ‘Site Allocations Document’ or as ‘windfalls’). This equates to a target of 12,500 over the original 2008 and 2028 period.
- Regeneration and brownfield development a priority, but recognition of a need to release greenfield sites, including some in Green Wedges, to meet projected needs and maintain
a five year supply of deliverable land. The important principle of Green Wedges – which is a key planning objective - can be maintained under this approach. More details of allocations can be found in Section 9.

- Existing housing allocations at Heatherton and Manor Kingsway will be carried forward into the Core Strategy. Development is already underway at the Manor Kingsway site.

- The strategy includes the identification of large cross boundary sites at Boulton Moor, Hackwood Farm and Wragley Way, with a smaller cluster in Chellaston. These sites to provide new transport and community infrastructure to support new communities.

- Promotion of the City Centre to substantially increase its role as a residential neighbourhood through the development of around 2200 new dwellings. This will include the strategic allocations of Castleward and the Former Derbyshire Royal Infirmary (DRI) site.

- Resisting sites which would have an unacceptable impact on the role and function of Green Wedges, Green Belt or have other ‘sustainability’ or ‘delivery’ problems that cannot be satisfactorily mitigated through policy. Sites which have no realistic prospect of delivery within the Plan period have also not been identified in the Plan.

- The wider strategy does identify ‘regeneration priority sites’ that may be suitable for housing development under certain circumstances but uncertainty over delivery means they are not include in the supply.

- The strategy assumes the remaining unmet ‘need’ is to be identified within South Derbyshire and Amber Valley through the ‘Duty to Cooperate’. At the time of writing, both authorities have accepted Derby’s ‘capacity cap’ and agreed that they will meet the remaining 5,388 dwellings in sustainable locations within their districts.

- The majority of these needs are to be met in sustainable urban extensions to the City – particularly to the north-west, south-west, south and south-east of the City. A proportion of these needs are also to be met in sustainable locations outside the Derby Urban Area in Amber Valley. For example, the ‘North of Denby’ regeneration site is identified as being able to assist in meeting the City’s needs. This site is well related to the City and has considerable regeneration benefits.

The breakdown of the City’s target of 11,000 dwellings is set out in Table 7.2.

Table 7.2: Housing Supply for Derby City, 2011-2028

<table>
<thead>
<tr>
<th>Source</th>
<th>Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions 2011-2015</td>
<td>1,509</td>
</tr>
<tr>
<td>Estimated completions (2015-2016)</td>
<td>391</td>
</tr>
<tr>
<td>Developable planning permissions</td>
<td>587</td>
</tr>
<tr>
<td>Windfalls</td>
<td>900</td>
</tr>
<tr>
<td>Losses</td>
<td>-336</td>
</tr>
<tr>
<td>Strategic Allocations</td>
<td>6,655</td>
</tr>
<tr>
<td>Sites to be identified in Part 2 Local Plan</td>
<td>1,294</td>
</tr>
<tr>
<td><strong>Total Supply</strong></td>
<td><strong>11,000</strong></td>
</tr>
</tbody>
</table>
The ‘Preferred Growth Strategy’ (PGS) – which was consulted on in October 2012 – suggested a target of 12,000 new homes. This reflected what the Council considered to be the sustainable and deliverable limit to the dwellings it could provide within the City. At this time, it was considered that a higher target would mean allocating sites that were inappropriate on their own merits (though it was also recognised that it would lead to the need for housing to be provided elsewhere outside the City, which could have its own implications).

The increase to 12,500 was in response to the increase in demographic ‘needs’ identified by the SHMA Update (2013) and the addressing of some initial concerns on specific sites. The selection of a provision figure of 12,500 dwellings for the City was, therefore, based on a combination of demographic needs (based on the HRS assessment and updated evidence in the SHMA 2013) and the ability of the City to deliver housing in a sustainable way. The Council addressed this by working with the site promoters for Hackwood Farm to address the sustainability issues that had led to the conclusion that the site should not be allocated in the PGS. This strategy was consulted on through the Draft Core Strategy between October and December 2013.

Analysis of the potential impacts of the broad growth strategy and distribution strategies and sites, indicated that to go beyond 12,500 dwellings would mean identifying sites that exhibited more significant sustainability issues, or would be difficult to mitigate and deliver. The target has been updated to 11,000 to reflect the proposed change to the start date from 2008 to 2011, but the sustainability implications are the same. The contribution from different 'components' has been also been revised since the Draft Plan, following a review of supply. However, the overall strategy of the plan remains largely the same and the overall capacity is unaffected.

The City Council has maintained an approach of trying to deliver as much of its own housing needs within its own boundaries as possible. All reasonable opportunities to increase delivery have been considered but the target of 11,000 remains the most robust assessment of deliverable and sustainable capacity. The strategy includes the delivery of a mixture of site sizes and types. This mix is important in ensuring the delivery of a 5 year housing supply while continuing to promote regeneration and brownfield development. Sites which would have insurmountable sustainability or policy implications, or which are unlikely to be deliverable within the plan period, have not been included in the strategy. The target is, therefore, based on a robust assessment of sustainable and deliverable supply.

This has resulted in a strategy to ‘decant’ some of Derby’s growth outside the City. Based on an OAN of 16,388, this would equate to 5,388 dwellings being provided outside the City. This would enable the Council to meet its ‘objectively assessed housing need’ while still promoting the principles of sustainability and deliverability and meeting the objectives of the City’s plan. The level of growth being planned for across the HMA does, however, continue to reflect Option 4.
Amber Valley and South Derbyshire have consistently accepted the validity of Derby's 'capacity cap' and have agreed to meet any unmet needs within their borough/district. Both authorities Submitted plans to the Secretary of State which primarily met the City's needs in sustainable urban extensions. Amber Valley also proposed to meet a proportion of this need outside the 'Derby Urban Area' (DUA) as part of a new settlement north of Denby; an important regeneration site that is well related to the City.

Following a Joint Examination session on both plans in November 2014, the Inspectors wished to see further evidence on how the City's 'unmet need' had been established and subsequently apportioned between the two Districts. Further work has been jointly carried out to explore reasonable alternatives for meeting Derby’s unmet need. This work has considered the implications of a number of different 'apportionment' and 'distribution' scenarios. These alternatives have been tested through the SA process for Amber Valley and South Derbyshire. The Districts will carry out a separate consultation on the findings of this work before their Examinations re-open later in 2015.

The final strategies for meeting Derby’s ‘need’ will be confirmed following this consultation and Examination. However, all three authorities are confident that the full unmet need can be delivered in a sustainable and deliverable way. Importantly, the constraints on the City’s supply and the possible effects of increasing the target have continued to be recognised and accepted.

The preliminary findings of this work have confirmed earlier work which demonstrated that urban extensions can provide a number of sustainability benefits over generally more dispersed distributions. This is particularly in terms of reducing trip lengths, facilitating alternatives to the car and meeting housing needs in areas with good access to employment and key facilities. In terms of potential expansion of the City, they also have the advantage of meeting housing needs nearest to where they are being generated.

The work has also confirmed that opportunities identified for some cross boundary sites may have positive sustainability effects. In particular, this is through their ability to facilitate development within the City through the provision of new or improved infrastructure. The ‘critical mass’ generated by these proposals enables the delivery of appropriate mitigation to identified issues. Examples of this include sites at Hackwood Farm, Wragley Way and Boulton Moor. The cross boundary extensions proposed could significantly improve the viability of some schemes and enable the provision of such things as new primary schools or road capacity. This then reduces the effect on the City’s existing infrastructure and helps to ensure proposals within the City are more ‘sustainable’ in their own right. It would not be possible to provide this level of mitigation if the City’s target were to significantly increase. This is a demonstrable benefit in decanting some of the City's growth to the edge of the urban area.

Other potentially positive aspects of extensions to the City include the probable boost to the local economy the new residents will bring. People living on these sites will inevitably be drawn to Derby's centres for retail, leisure and employment needs; hopefully leading to increased vitality and viability and less leakage to neighbouring economies.
This work has, however, also confirmed earlier assessments that concluded there are significant constraints around the City that will limit the opportunities that can be considered appropriate. These include Green Belt and a number of important heritage assets. A number of potential opportunities have been ruled out for these reasons. These constraints naturally limit the scale of growth that is possible on the edge of the City. The probable effect on the City’s transport network and the increasing pressure being generated on Derby’s schools and health infrastructure are other important factors that may constrain what is possible to deliver ‘sustainably’ within the DUA. There is also an indication that excessive levels of growth on the edge of the City could, in some locations, undermine community cohesion and negatively affect existing communities.

To an extent, the effects identified can be addressed to an extent through the provision of new infrastructure. However, evidence also suggests there is a limit to what is possible to deliver before the mitigation identified is no longer sufficient or deliverable. Unconstrained growth around the City would not, therefore, be appropriate and would be likely to lead to a situation where the effects outweigh the benefits. While there are some benefits associated with extensions, therefore, the evidence would indicate that the level of growth achievable through extensions is not as high as may have been considered in the past.

The assessment has also highlighted some positive sustainability effects in the delivery of housing outside the DUA to meet the City’s needs. These include ensuring that a sufficient scale of housing provision is secured to facilitate regeneration objectives in the borough and help to provide housing choice.

Overall, the three authorities are confident that the City’s unmet housing needs will be met in deliverable and sustainable locations, the effects of which will be less harmful than if the same level of development took place in the City itself.

**Reflecting the findings of the SA**

The preferred approach is broadly in-line with alternative H2 and reflects the Council’s assessment of its sustainable and deliverable capacity. This broadly reflects the findings of the SA, which suggests the most favourable growth option for the City is for partial Greenfield release. It is considered that this approach would achieve the best balance between environmental protection and the delivery of housing need. It also reflects a joint approach between the three HMA authorities.

On a more strategic level (i.e. across the HMA), the SA process has highlighted that in the main a focus on ‘urban concentration’ would also have the greatest benefits, or least negative effects, in terms of reducing the need to travel, promoting ‘modal shift’ / travel choices and reducing trip lengths made by private car. This will help to minimise (though not necessarily reduce) carbon dioxide emissions and other pollutants. Derby is, and will remain the economic focus of the HMA and will generate a large number of jobs through the plan period. Concentrating housing growth close to areas of economic growth and activity has obvious benefits.
The critical mass that can be created as a result of the urban concentration could also help to facilitate the provision of new social infrastructure and other services. Again, this helps to reduce the need to travel but will also help to create more cohesive communities who have good access to the facilities they need for a decent quality of life. This conclusion is further strengthened by the prevalence of existing facilities within the City which new communities can make use of.

It is recognised, however, that all levels of growth will have negative effects on some sustainability objectives. For example, although the increase in car-borne traffic could well be less with the preferred distribution of housing than it could be, all levels of growth will, inevitably generate additional levels of traffic within the City. This will probably lead to the exacerbation of congestion and air quality problems on parts of the transport network. It will also lead to the loss of greenfield resources, both within the City and on its periphery. Any level of growth will also put additional pressure on local services such as schools. The strategy also requires the provision of a number of new schools and contributions to the extension of existing facilities in the City.

Some of those impacts can be mitigated by locating development in accessible locations or providing on-site facilities to reduce the need to travel. This is particularly achievable on the large cross boundary urban extensions proposed at Wragley Way and Boulton Moor and, to a lesser extent, at Hackwood Farm. This strategy provides the best opportunity to provide strategic mitigation measures. The provision of open space and the provision of qualitative improvements to existing facilities can also help to reduce the impact on green infrastructure. However, there will be inevitably be some negative impacts associated with growth.

It is also recognised that, while some of the direct impacts on those issues on the City are likely to be lower than might be the case with higher growth options, the cumulative impact on the City will be higher as a result of development taking place elsewhere within the wider urban area. Again, this is considered to be the inevitable consequence of an overall strategy to meet ‘objectively assessed housing needs’. The wider strategy proposed does allows for greater levels of mitigation to be provided – particularly in relation to the large cross boundary allocations. This mitigation may not be possible to achieve with a greater proportion of development within the City boundary.

The full appraisal for each alternative is set out in Appendix 3.
8 SCALE AND DISTRIBUTION OF EMPLOYMENT DEVELOPMENT

8.1 Why have alternatives been considered for this issue?

The NPPF states that local planning authorities should set out a clear economic vision and strategy for their areas which positively and proactively encourages sustainable economic growth.

The Core Strategy also has a ‘thriving sustainable economy’ as one of its main objectives. The Derby Economic Strategy, which will try to achieve the Core Strategies aims, sets out a number of ambitious objectives and targets. The Core Strategy’s role is to help achieve these. In particular, it has a role in improving the quality of life of its residents and creating an environment where enterprise can ‘thrive’. This underlying policy context has a considerable bearing on the realistic options that can be considered. The City has an economic influence outside its boundaries, which means that there are HMA implications that also have to be considered.

In light of this, it was considered important to subject alternative approaches to SA.

8.2 What are the reasonable alternatives?

Scale and Distribution

The spatial context of the City plays an important role in defining the ‘choices’ available in terms of the scale and distribution of employment land within the City. The existing supply is largely made up of three major local plan allocations, supplemented by a number of smaller sites and major City centre office permissions (see Figure 8.1).

A ‘call for sites’ exercise carried out in 2010 did not highlight any additional strategically significant alternative locations within the City for employment use. This suggests that what is currently identified in the CDLPR is the upper limit of what can realistically be identified for new development. While there may be opportunities for the recycling of existing sites for employment use, this would not add to the gross supply of land. No other strategic opportunities have been identified through the continuous consultation that has taken place thus far.

The only real choice that exists is the extent to which these sites will be needed to meet the overall requirement. It is not unrealistic to make assumptions about the implications of the different options for growth.

Unlike for housing, the RSS did not stipulate how much employment land would be required across the HMA or in each District. Instead, it indicated that HMAs should keep up-to-date employment land reviews to inform the allocation of a range of sites at sustainable locations. It went on to set out some detailed criteria for site allocations.

The Derby HMA Employment Land Review (ELR) was published in March 2008. The ELR suggested a gross land requirement of 366ha across the HMA, with 145ha in Derby, 85ha in Amber Valley and 137ha in South Derbyshire. This was based on an analysis of past trends and inclusion of a ‘buffer’ for flexibility.
Figure 8.1: Employment Allocations in Derby City

Table 8.1: 2008 ELR Employment Land Position

<table>
<thead>
<tr>
<th>Authority</th>
<th>Worst Case Supply</th>
<th>Historic Take-Up</th>
<th>5 Yr Buffer</th>
<th>Gross Land Need 2026 (no buffer)</th>
<th>Gross Land Need (5 year buffer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Derby</td>
<td>227.15 ha</td>
<td>5.78 ha pa</td>
<td>28.90 ha</td>
<td>115.60 ha</td>
<td>144.50 ha</td>
</tr>
<tr>
<td>Amber Valley</td>
<td>92.45 ha</td>
<td>3.38 ha</td>
<td>16.90 ha</td>
<td>67.60 ha</td>
<td>84.50 ha</td>
</tr>
<tr>
<td>South Derbyshire</td>
<td>56.68 ha</td>
<td>5.48 ha</td>
<td>27.40 ha</td>
<td>109.60 ha</td>
<td>137.00 ha</td>
</tr>
<tr>
<td>Total</td>
<td>375.98 ha</td>
<td>14.64 ha</td>
<td>73.20 ha</td>
<td>292.80 ha</td>
<td>366.00 ha</td>
</tr>
</tbody>
</table>
At the time of publication, Derby's employment land supply was as illustrated in Table 8.1 above.

This suggested that Derby had an oversupply of land compared to historic take-up rates, whereas South Derbyshire had a considerable undersupply. Amber Valley had a marginal oversupply of land, though the report suggested some issues over the quality of land in the district.

The ELR suggested that, as Derby is the economic driver for the area, it could be counterproductive to see a significant reduction in the amount of land allocated. Furthermore, given the close functional relationship between authorities in the HMA, it suggested that South Derbyshire and Amber Valley might be able to take advantage of Derby's supply to meet their needs.

This report generated a number of options that were consulted on in the 2010 Options consultation. The options were broken down into separate 'scale' and 'distribution' options at an HMA level. These are set out below for completeness:

**Scale:**
- Option 1: Provide land across the HMA in line with the recommendations of the ELR;
- Option 2: Provide less land across the HMA than recommended in the ELR;
- Option 3: Provide more land across the HMA than recommended in the ELR.

**Distribution:**
- Option 1: Divide HMA provision based on existing distributions of employment land;
- Option 2: Divide HMA provision based on employment land review distributions;
- Option 3: Divide HMA provision based on distribution of new housing.

These options, while useful for consultation purposes, posed some difficulties in terms of carrying out meaningful assessment of their sustainability implications. This was essentially because different options were not always mutually exclusive in terms of their implications for the City. To resolve this, a set of 'composite' options were generated which reflects the actual realistic options open to the Council. These are reflected in Table 8.3. These were considered appropriate options to assess against SA Objectives.

The 'Preferred Growth Strategy' published in October 2012 suggested that the Council would continue to allocate the three large strategic sites at Raynesway, Chaddesden Sidings and land south of Wilmore Road (the so-called ‘Global Technology Cluster’). The City Centre would also remain a strategic location for major commercial development, particularly for office development.

This approach broadly reflects Option E2. While it essentially seeks to maintain the existing allocations from the current Local Plan in terms of ‘net’ developable land, this option equates quite closely to both the ‘meet trends’ option.

Following consultation on the PGS, the HMA Authorities commissioned some work to ensure that their draft Strategies were based on robust up-to-date evidence of ‘need’. The ELR was updated in 2013 to take account of changes in economic circumstances, the economic outlook, and to take account of revised assumptions on expected population growth consistent with the Preferred Growth Strategy at the HMA level.

The updated report did not consider or assess the supply of employment land and floorspace within the HMA, nor does it consider the supply-demand balance. The 2008 Employment Land Review included assessment of the supply of employment land across the HMA and the
Commissioning authorities consider that the supply-side position has not changed substantially since this was prepared.

The updated ELR report forecasts requirements using a number of different scenarios that reflect the varying factors which could influence future economic performance. These are as follows:

- Baseline Labour Demand Forecasts – based on Experian econometric forecasts for performance of the three authorities, dated Spring 2012;
- Labour Supply Policy-ON Forecasts – aligned to the demographic forecasts from the 2012 Derby HMA Housing Requirements Study and taking account of potential/target growth sectors;
- Past Take-Up Forecasts – based on forecasting forward past completions of employment land in the Derby HMA over the past 10 and 20 years.

The forecasts varied widely as illustrated in Table 8.2 below. Consequently, the ELR update suggests that it is extremely difficult to accurately predict the level of land that may need to be developed for employment across the HMA (and for inclusion in the HMA Core Strategies).

To an extent, the results of this exercise fit well into the ‘options’ already considered. For the City, the ‘Labour Demand’ option would fit into the ‘Plan for a reduction of employment land’ alternative and both the ‘Policy-ON Labour Supply’ and ‘Past Trend’ scenarios fit into the ‘Plan to Meet Trends’ alternative. The ‘Plan for Higher Growth’ option remains relevant, as the Council could decide that even the lowest of the Derby figures is too low, or it could endeavour to meet some of the neighbouring authority’s requirements within the City boundary.

The Council considers that this work has helped to confirm that the approach adopted in the pre-submission Local Plan is the correct one for the City.

Table 8.2: Employment Land Requirement Forecasts 2013

<table>
<thead>
<tr>
<th>Land Requirement (Ha)</th>
<th>Amber Valley</th>
<th>Derby</th>
<th>South Derbyshire</th>
<th>HMA Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labour Demand</td>
<td>21.7</td>
<td>26.6</td>
<td>46.69</td>
<td>94.99</td>
</tr>
<tr>
<td>Policy-ON Labour Supply</td>
<td>52.0 – 72.0</td>
<td>130.1 – 129.7</td>
<td>69.29 – 91.19</td>
<td>273.29</td>
</tr>
<tr>
<td>20 Year Completions</td>
<td>32.5</td>
<td>142.3</td>
<td>122.0</td>
<td>196.8</td>
</tr>
<tr>
<td>10 Year Completions</td>
<td>15.8</td>
<td>132.7</td>
<td>164.0</td>
<td>312.5</td>
</tr>
</tbody>
</table>

Table 8.3: Strategic Employment Land Alternatives for Derby

<table>
<thead>
<tr>
<th>Option</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Option E1. Plan for Higher Growth within the City</strong></td>
<td>Following this approach would mean continuing to support the development of all of the sites and commitments in the current supply but also identifying additional land within the City.</td>
</tr>
<tr>
<td></td>
<td>This would assume a substantial increase in take-up rates and/or assume a great degree of focus on the City across the HMA (thus taking some of South Derbyshire or Amber Valley’s growth into account). In practice, this would mean planning for more than the 199ha gross currently identified in the current Local Plan.</td>
</tr>
</tbody>
</table>
Option | Assumptions
--- | ---
Option E2. Plan to Meet Trends / Maintain Existing Supply | The 2008 ELR recommendation for employment land requirements was based on an analysis of long-term take-up across the HMA. It also added a 25% buffer to allow for flexibility. An updated requirement would suggest a ‘need’ for 132.5 ha between 2008-2028. The Updated ELR in 2013 suggests a need for between 132.7 - 142.3 ha for the period 2008-2012 based upon past completions.
This figure is actually very similar to the ‘Policy ON Labour Supply’ figure for the City identified in the ELR 2013. In terms of sustainability, the implications are thought to be the same. Maintaining the existing ‘net’ supply as identified in the CDLPR would provide for approximately 125ha of land (subject to the details of final development). While slightly below the ELR figure of 132ha, the strategic and sustainability implications are likely to be the same. This option would assume that long-term trends continue into the future.

Option E3. Plan for a Reduction in Employment Land | This option would assume that the overall take-up of land would fall below recent trends. This could be as a result of the continuing economic downturn and/or the restructuring of the economy to something more office based or other ‘non-B’ uses (such as retailing and healthcare).
This approach would mean the de-allocation of existing employment land sites (or promoting alternative uses for sites that currently have outline planning permission for employment uses). However, it could mean a more significant reduction than needed to simply meet current trends. It would also lead to a strategy geared more toward office development, as opposed to manufacturing or storage and distribution. The geographic focus of employment would also be likely to shift toward the City centre. Notwithstanding existing permissions, this approach would have to rely on the regeneration of existing sites for new industrial floorspace.
Following the ELR 2013, this option could see a reduction in employment land to as little as 26ha.

8.3 Why has the preferred approach been selected?

The preferred approach

The selection of the preferred approach has been based on the consideration of a combination of factors. This has culminated in the following approach to employment:

- Regeneration and brownfield development a priority – particularly in existing employment areas and the City Centre.
- Promotion of the City Centre as the primary location for new retail, leisure and office development.
- Focus on the implementation of Infinity Park Derby (IPD), Derby Commercial Park, the ‘Derwent Triangle’ commercial development and implementation of City Centre office schemes.
- Permissive policies relating to the redevelopment of existing employment land for new employment uses, in order to recycle and refresh the industrial stock. Some areas of existing employment activity to be identified as being of greater importance and ‘protected’ from alternative uses likely to undermine its economic function.

This approach would provide some 199 hectares gross (circa 128ha net) of new employment land, complemented by the delivery of new office space in the City centre. This will also be complemented by the identification of a ‘strategic location’ in South Derbyshire. This area could, subject to certain criteria, act as a long term extension to the strategic allocation on land south of Wilmore Road (Infinity Park Derby and its environs).
The Councils Reasoning

As with housing, the options for the City are limited to an extent by the limited scope it has in terms of land supply. The preferred strategy of the Council is, therefore, to maintain the existing supply. This equates to 199 hectares gross, or 128 hectares net (based on an understanding of the sites in question and what has happened on other strategic employment sites in the past, such as Pride Park). This essentially leads to a strategy of maintaining the existing strategic allocations from the City of Derby Local Plan Review (2006) at land South of Wilmore Road, Derby Commercial Park (Raynesway) and Chaddesden Sidings.

For economic and sustainability reasons, the Strategy will also identify the City Centre as a key employment generating location – mainly for office development. Along with other non-strategic sites ‘saved’ in the Local Plan, this will add up to around 199 hectares of land, gross.

The various evidence base documents prepared to support the preparation of the plan demonstrate that using forecasts to determine future employment land needs is extremely difficult. The latest evidence suggests that a possible range of ‘needs’ from 26.6 hectares at the lower end, up to 142.3 hectares at the upper end. When distributing overall HMA ‘Policy-On’ figures proportionately across the HMA in line with the distribution of housing, the Derby Urban Area ‘requirement’ would be 154 hectares. As such, the Council do not consider that any of the quantitative forecast techniques, considered in isolation, provide a sufficiently robust basis from which to derive a target. However, while the labour supply and DUA distribution approach have their drawbacks, they are considered to be the most appropriate and realistic way of informing policy. This is generally because they provide the most consistent link between the scale and location of population growth being proposed across the HMA. This ‘scenario’, therefore, provides a reasonable starting point to consider overall needs.

As stated above, this results in a ‘need’ figure for the DUA of 154 hectares. This is considered to be a sustainable solution as it should facilitate alternative modes of travel to the car and/or reduced journey lengths from where people live to where they work. The focus on the City also helps to provide a critical mass of economic activity that will help to generate and economic growth that will, in turn, have sustainability benefits in terms of jobs, deprivation and social cohesion. Dispersing employment land across the HMA more widely may not lead to similar benefits.

The existing supply has the ability to provide a minimum of 1287 hectares, though the existing supply has the ability to provide a minimum of 1287 hectares (this may be higher if detailed proposals lead to a higher proportion of the site coming forward for employment uses). While this is lower than the 154 hectares the ‘forecasting’ would require, it should be noted that this figure included a significant amount of flexibility in terms of replacing land lost to other uses and providing a ‘buffer’. This would suggest that there is some scope for flexibility in terms of the overall requirement.

In addition, additional land could potentially be identified through the expansion of ‘saved’ non-strategic allocations or through the intensification of uses at existing sites (for example, the former Celanese works at Spondon). While this would not necessarily add to the ‘supply’ figure, it would still ‘contribute’ to the economic objectives of the plan. The Council is confident, therefore, that its strategy will provide sufficient land to meet its needs over the plan period. Furthermore, South Derbyshire District Council have identified additional land to the south of Sinfin Moor Lane as a potential long term extension to the site. This could provide up to 20 hectares of additional land.
Reflecting the findings of the SA

This strategy broadly reflects the 'maintain existing supply/meet trends' option E2.

This approach broadly reflects the SA findings, which suggest that maintaining existing supply/meeting trends would help to deliver a more suitable level of employment without putting undue pressure on housing, environmental quality or the economies of neighbouring authorities.

Increasing the supply of employment land could help to diversify and strengthening the City's economic position and help to tackle deprivation. However, this could be at the expense of communities in neighbouring authorities, increased congestion, pollution and pressure to deliver housing. On the other hand, planning for decline in employment provision would lead to a widening of inequalities, weakening of the local economy and the need for longer commutes.

The full SA findings for each alternative are presented in full in Appendix 4.
9 STRATEGIC SITE ALLOCATIONS FOR HOUSING AND EMPLOYMENT

9.1 Why have alternatives been considered for this issue?

In addition to establishing a broad spatial approach to housing and employment growth there is also a need for the Local Plan to ‘allocate’ sites to deliver this growth. In order to come to a conclusion about the ‘preferred growth strategy’ it is necessary to understand the specific sites and locations that may be available, what the implications of their development would be against the SA Objectives and what mitigation might be needed to address issues raised.

The need to select the best performing sites is the issue under consideration within this Chapter. This helps to answer the question: What strategic sites are available, viable and suitable that can meet both the needs of the area while being consistent with the most appropriate pattern of distribution?

It should be noted that the SA process is not the only factor in considering whether a site should be allocated or not. Other issues, such as need, deliverability and underlying policy objectives will also have a bearing on which sites are identified for development.

9.2 What are the reasonable alternatives?

The identification of specific housing sites has essentially been carried out as part of the SHLAA process. The identification of specific employment sites has arisen from the ELR. These documents essentially formed the starting point for the identification of opportunities, though iterative assessment through the SA process, and the preparation of evidence base documents including the Green Wedge Study, the Brownfield Regeneration Statement, the collation of information within ‘Site Summaries’ and the assessment of options through strategic transport modelling have all contributed to the selection process.

Figure 9.1 and Table 9.1 list the key strategic sites that have been considered as reasonable alternatives for consideration in the ‘preferred growth strategy’.

Housing Sites

A number of reasonable site options have been considered. Reasonable options have been generated by applying a series of ‘filters’ to SHLAA sites:

- Brownfield sites or locations that have the capacity to deliver over 150 dwellings.
- Clusters of smaller sites that are close together and can be viewed as one ‘strategic location’.
- Greenfield sites identified by the SHLAA to be available and potentially deliverable on either Green Belt or Green Wedge sites which are of a scale that would be considered ‘strategic’.
- Employment sites potentially suitable for residential development.

Alternatives that have not been considered are:

- Brownfield sites under 150 dwellings identified in the SHLAA as being suitable and deliverable that are expected to come forward without being allocated.
- Greenfield sites below 150 dwellings not part of a clustering of sites or in a strategically important location such as a Green Belt or Green Wedge.
Employment sites

1.1.1 There are a limited number of employment sites that could be allocated to deliver the required level of employment growth. Therefore, it is essentially a choice between continuing to allocate existing sites or not. The following sites were appraised to identify any key constraints and opportunities:

- Derwent Triangle
- Global Technology Cluster
- Derby Commercial Park (Raynesway).
- The City Centre

9.3 Why has the preferred approach been selected?

The preferred approach

The Council’s preferred approach is to allocate a number of strategic sites, with a variety of uses. The proposed use at each site is detailed in Table 9.1.

Table 9.1: Strategic Site Allocations

<table>
<thead>
<tr>
<th>Policy</th>
<th>Strategic Sites Allocated</th>
<th>Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Derwent Triangle</td>
<td>‘Derwent Triangle’ &amp; ‘Chaddesden Sidings West’</td>
<td>Employment</td>
</tr>
<tr>
<td>Derby Commercial Park</td>
<td>‘Derby Commercial Park’</td>
<td>Employment</td>
</tr>
<tr>
<td>Land South of Wilmore Road</td>
<td>‘Global Technology Cluster’</td>
<td>Employment</td>
</tr>
<tr>
<td>City Centre</td>
<td>‘Castlevard’ &amp; ‘Former DRI site’ and the general area of the ‘Central Business District (CBD)’</td>
<td>Mixed use</td>
</tr>
<tr>
<td>Osmaston Regeneration Area</td>
<td>‘Osmaston’</td>
<td>Housing on brownfield land</td>
</tr>
<tr>
<td>Manor Kingsway</td>
<td>‘Kingsway Hospital’</td>
<td>Housing on brownfield land</td>
</tr>
<tr>
<td>Boulton Moor</td>
<td>‘Boulton Moor East and West’</td>
<td>Housing on greenfield</td>
</tr>
<tr>
<td>Rykneld Road</td>
<td>Rykneld Road</td>
<td>Housing on greenfield</td>
</tr>
<tr>
<td>Hackwood Farm</td>
<td>‘Hackwood Farm’</td>
<td>Housing on greenfield</td>
</tr>
<tr>
<td>Mickleover and Mackworth</td>
<td>‘Mackworth College Green Wedge’ &amp; ‘Onslow Road’</td>
<td>Housing on greenfield</td>
</tr>
<tr>
<td>Brook Farm</td>
<td>‘Brook Farm’</td>
<td>Housing on greenfield</td>
</tr>
<tr>
<td>Land South of Mansfield Road</td>
<td>‘Lime Lane, Oakwood’</td>
<td>Housing on greenfield</td>
</tr>
<tr>
<td>Wragley Way</td>
<td>‘Wragley Way’</td>
<td>Housing on greenfield</td>
</tr>
<tr>
<td>South of Chellaston</td>
<td>‘Woodlands Farm (Chellaston)’ &amp; ‘Land off Holmleigh Way’</td>
<td>Housing on greenfield</td>
</tr>
</tbody>
</table>
9.3.1 The Council came to its decision on a list of preferred sites (i.e. sites the Council intends to allocate) on the basis of evidence from a range of sources. Considerable weight has been given to evidence gathered through consultation and technical evidence which included a detailed assessment of sites put forward for development.

Figure 9.1: Preferred and non-preferred sites
Housing sites within the City essentially fall into three broad categories: sustainable brownfield regeneration sites; smaller deliverable greenfield releases and large cross-boundary strategic allocations. In all three categories, the Council has considered the sustainability of the site – in particular whether it is well related to existing services and facilities, employment facilities and whether it can be easily accessed by public transport, cycling or walking. Where this currently is not the case, such as in some of the peripheral sites, creating a critical mass of development with neighbouring sites in South Derbyshire will ensure that such facilities and accessibility can be created on-site. Sites where these issues are unlikely to be able to be mitigated have not been selected.

In addition to this, the Council has considered whether sites would undermine current policy objectives such as the protection of defendable Green Wedges and Green Belt and whether their development would create, or exacerbate, local transport or environmental problems – including impacts on important environmental and heritage assets. Again, where these cannot be fully addressed, it has selected sites where some level of mitigation is deliverable (such as ensuring that development would not encroach into the green wedge to an unacceptable degree). Where an issue cannot be mitigated (for example, if a site has poor access to the City's single hospital) then the Council has weighed the significance of the impact against any positives the site can provide and the NPPF requirement to meet objectively assessed housing and employment needs. In all cases, the Council has had regard to the likely deliverability of the site, in line with the requirements of the NPPF.

There are sites where either the individual or cumulative implications are too great, cannot be adequately mitigated and the impacts or the benefits of the site were not considered to outweigh the negatives. These sites have not been allocated in the Plan.

Two locations have been identified where the potential for regeneration has been identified – including the potential for new housing – but there is insufficient certainty at this time for them to be included in the housing land supply. These are the Former Celanese Site and the Sinfin Lane site. The Sinfin Lane site was identified as a strategic allocation in the Draft Plan, but changes to land ownership and the withdrawal and lapsing of planning applications on the site has significantly reduced the certainty of delivery. As such, the plan continues to recognise the potential of the site.

In terms of strategic employment sites, the existing allocations in the CDLPR have been carried forward, complemented by the City Centre. There are few realistic choices to meet the City's long term needs and all three large sites either have permission already or applications are being considered. They have been demonstrated to be suitable for employment in the past and delivery now appears to be a realistic prospect. Continuation of the strategy is, therefore, appropriate. No other sites are needed.

Further rationale for the allocation (or not) of sites is provided for each individual site in Appendix 6 along with a description of the site way the Core Strategy seeks to address issues that the SA has raised.

Reflecting the findings of the SA

The findings of SA have also been taken into consideration in selecting strategic sites.

The sites that generally perform the best are those in the inner parts of the City such as ‘Castlward’ and ‘former DRI’. These sites have better accessibility to jobs, services and facilities and could help to regenerate areas of need. The City Centre as a whole provides similar benefits in terms of access to facilities, sustainable modes of travel, access to jobs and
making the best use of previously developed land. All these sites have been allocated as preferred options which reflect the findings of the SA.

The Osmaston Regeneration area is well related to areas of deprivation and has good access to facilities, including open space, a district shopping centre and is relatively well related to employment.

Some of the selected sites and areas are in relatively close proximity to air quality management areas (primarily the City Centre and Osmaston).

The majority of Greenfield sites considered are constrained by multiple sustainability issues, so there is little to differentiate some of the preferred and non-preferred sites in terms of their sustainability implications. The SA in this instance is of greater value in identifying measures for mitigation and enhancement, rather than identifying which sites would be most suitable for allocation. Again, this is really the result of limited options across the City. The impact of greenfield sites on the role, function and character of either Green Wedge, Green Belt or the character of the area more generally has been a key consideration.

Access to services and sustainable modes of transport is poor for some preferred sites, so there will be a need to consider how services will be enhanced or created alongside strategic developments. Most of the Greenfield sites are also poorly related to areas of deprivation and large areas of employment (this is not universally the case). The scale of some sites allows the delivery of appropriate on-side mitigation – including the provision of new schools, shops and services.

A number of sites have not been allocated that might be considered to perform well in some measures of sustainability (before considering mitigation or delivery) but which have specific and significant issues. The Council has not allocated these sites in the Part 1 plan for the following reasons set out below. More detail on why all ‘strategic’ sites considered have not been identified in the Core Strategy can be found in Appendix 6 and other relevant parts of the Council’s evidence base.
**A38/A6 Roundabout** - The Council consider that due to the small scale of the site it would not help to deliver strategic improvements to infrastructure. There are also access issues and it is not well related to other strategic developments or facilities. Concerns over potential impacts on the setting of the World Heritage Site were also of concern. A planning application for residential development on this site was considered in 2014 and was refused. The reasons included those which had been highlighted as concerns in the Core Strategy process.

**Acorn Way** - The Council consider that the impact on the function of the Green Wedge would be significant and there are also highways access issues that render the site unsuitable for development. A planning application for 250 dwellings was considered on this site in 2014. While the applicant overcame the highways concerns, the impact on the Green Wedge role and function, and the relationship of the development with the existing built environment was considered unacceptable. As such, the proposal was refused. A second application for less housing was refused for the same reasons in April 2015.

**West of the Hollow** - there are accessibility issues at this site. The Council also considers that the impact on the function of the Green Wedge in this area would be particularly negative. In addition, it was only identified as an option in terms of it being part of a potential ‘cluster’ with South Derbyshire. South Derbyshire District Council have not identified the larger site in their draft Core Strategy and, as such, the Derby site would not be appropriate on its own.

**Breadsall Green Wedge** – This site was identified in the ‘Preferred Growth Strategy’ as having some potential for residential development. Subject to the exact area identified for development, it was considered that some development could take place within the Green Wedge without unacceptably undermining its overall role and function. However, there have been outstanding concerns over a number of issues – including ground stability and potential impacts on the setting of the World Heritage Site - that are still being considered. As such, the Council has not been sufficiently confident of its acceptability to include it in Part 1 of the Plan. It will continue to discuss and consider the site as part of the Part 2 plan.

**Sinfin Lane** - This site is suitable for residential development and was included in earlier drafts of the plan. However, there is now increased uncertainty over its deliver which means that it is now identified as a 'regeneration priority' site. The Council would still welcome residential development on the site and the policy allows for this to happen. However, it does not 'count' toward the housing supply at this time.

A summary of the appraisal findings in relation to the site options are presented within Appendix 5 of this Report. Technical Appendix A includes the detailed site appraisal pro formas for each site.

Appendix 6 provides further detail into how the site appraisal findings have been taken into account in the Local Plan.
10 HOUSING MIX

10.1 Why have alternatives been considered for this issue?

The NPPF sets out the need for Local Planning Authorities (LPA) to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It also highlights that LPAs should:

- plan for a mix of housing based on current and future demographic, market trends and the needs of different groups in the community;
- identify the size, type, tenure and range of housing required in particular locations; and
- set policies to meeting affordable housing needs where this has been identified.

The Derby Sub-Region Strategic Housing Market Assessment Update (2013) gives consideration to the requirement for private and affordable house types. The latest update recommends the following targets for the City.

<table>
<thead>
<tr>
<th>Number of bedrooms</th>
<th>Market Housing</th>
<th>Affordable Housing</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bedroom</td>
<td>5%</td>
<td>20-25%</td>
<td>10.7%</td>
</tr>
<tr>
<td>2 bedroom</td>
<td>20%</td>
<td>30%</td>
<td>24.1%</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>45-55%</td>
<td>30-35%</td>
<td>51.3%</td>
</tr>
<tr>
<td>4 bedroom</td>
<td>20-30%</td>
<td>10-15%</td>
<td>14%</td>
</tr>
</tbody>
</table>

Both the SHMA and the Housing Strategy (2009) also identify the growing numbers of elderly households, the need for smaller households, including down-sizing options for small households living in large houses and also the need for larger family houses, including for Black and Minority Ethnic (BME) households. The need for large family accommodation for BME households is also highlighted as a key priority in The Derby Black and Minority Ethnic Housing Strategy 2005 – 2008 which identifies high levels of overcrowding as a concern.

It is important that the Council’s preferred approach is justified by a consideration of alternative approaches.

10.2 What are the reasonable alternatives?

The following three alternative approaches have been considered:

1 Set a City wide policy establishing the proportions of different house types sought on large sites;
2 Set policies establishing the proportions of different house types to be sought on large sites; in different parts of the City;
3 Do not set targets for different house types across the City. Rely on criteria-based policies*.

Why have these alternatives been considered?

The issues identified, particularly through the SHMA and Housing Strategy suggested two approaches for the Core Strategy. The first (alternative 1) is to set City wide targets for the proportions of different house types to be sought on large sites. This could be based on the findings of the SHMA or other relevant needs evidence.
An alternative response (alternative 2) would be a more area based approach where different targets are set across the City based on identified needs. This approach would provide a more targeted response to identified needs and may help, for example, in providing for specialist needs such as those arising in the BME community. A disadvantage would be the effect on the economic viability of sites and this issue would need to be given detailed consideration.

*A third alternative emerged after the issues and options consultation. This alternative was considered by Derby City Council to reflect the difficulties in setting evidence-based targets to different parts of the City. As such, this alternative would not set any targets but would seek to achieve a suitable mix which would be responsive to the changing market conditions and needs over time, through the application of criteria-based policies and a case by case basis.

**Why have other alternatives not been considered?**

Derby City Council does not consider that there are any other reasonable alternatives.

**10.3 Why has the preferred approach been selected?**

**The preferred approach**

The Council’s preferred approach is outlined in policy CP7. It requires developments to *have regard to the most up to date SHMA in delivering an appropriate mix of housing*. There is no broad target across the City, and no specific targets for larger development sites. As such, the delivery will differ across the City according to the most up to date information at the time. This approach is most similar to alternative 3 as it suggests that a criteria-based approach should influence the housing mix rather than providing ‘snap-shot’ targets.

**The Council’s reasoning**

The NPPF states that local authorities should plan for a mix of housing based on current and future demographic trends. It requires local authorities to prepare and periodically update SHMA’s. Guidance is that SHMA’s should be updated regularly. This is logical because the housing market is affected by many different factors including the economy, employment, house prices etc. Setting a specific mix policy for the long term is considered too rigid in the current and expected medium term economic and housing market climate. A rigid and restrictive policy could have the effect of affecting viability and delivery of housing. Therefore, the Council has chosen an option which allows developments to be judged on a case by case basis in line with the most up to date SHMA information which is available at that time.

**Reflecting the findings of the SA**

The preferred approach partly reflects the SA findings, which suggests that setting bespoke targets for sites would help to deliver the most appropriate mix of housing to match need. However, a criteria-based approach (i.e. the preferred option) would not necessarily ensure that minimum standards were always achieved. The SA findings for all three alternatives are presented in full in Appendix 7.
11 DENSITY

11.1 Why have alternatives been considered for this issue?

The adopted City of Derby Local Plan Review seeks a minimum density of 35 dwellings per hectare (dph) which is slightly higher than the 30 dph minimum that was set out in PPS3, reflecting the compact urban nature of Derby City. This policy has been implemented successfully. Since 2005 densities reported in Annual Monitoring Reports have varied from 35 dph to 100 dph. This difference reflects the variation in focus between greenfield and brownfield sites, the latter tending to be built at higher density.

Whilst the use of brownfield land remains a national planning policy priority, there is also recognition that higher densities need to be balanced against other factors such as achieving mixed and balanced communities and high quality design and protecting local character. The consultation responses gathered as part of preparing the Core Strategy highlighted some of the current vacancy problems associated with some higher density apartment schemes and a more flexible approach was suggested, taking into account other factors such as mix of uses, the importance of back gardens, design and the approach towards renewable energy provision.

It is important that the Council’s preferred approach is justified by a consideration of alternative approaches.

11.2 What are the reasonable alternatives?

The following two alternative approaches have been considered:

1. Establish a minimum density across the City;
2. Apply varying approaches to housing design, and density in different parts of the City, taking into account factors such as housing need, local character and accessibility.

Why have these alternatives been considered?

There are considered to be two main alternatives relating to density. The first (alternative 1) is to maintain the current approach and establish a minimum density across the City which could be either 30 dph or more to reflect the urban nature. This has the advantage of being an established approach which enables flexibility through site by site consideration.

A second option (alternative 2) would be to apply varying approaches to housing design in different parts of the City, taking into account factors such as housing need as identified in the SHMA, local character and accessibility. This could take a prescriptive approach whereby character areas are defined and density and design criteria established accordingly. Or it could take a character based approach.

Why have other alternatives not been considered?

The Council does not consider that there are any other reasonable alternatives.

11.3 Why has the preferred approach been selected?

The preferred approach

The Council’s preferred approach is most similar to alternative 2. It does not set a minimum density standard, but recognises that higher or lower densities could be more appropriate for different parts of the City. This would be established through design principles.
SA of the Derby City Local Plan Part 1: Core Strategy

The Councils reasoning

Minimum densities were not considered appropriate for the Local Plan. This approach was considered too prescriptive for a strategic plan and that it would be far better to consider appropriate densities on a case-by-case basis. The danger in setting density targets – either City-wide or on smaller geographical areas – is that they can override other important factors such as the character of an area and may not always assist with the principle of ‘place-making’.

Policies CP3 and CP4 provide a framework which will ensure an appropriate density to be considered (which will be supplemented by design guidance to be published at a later date). Policy CP3 states that proposals will be required to ‘optimise’ development densities which should help to mitigate concerns over the inefficient use of land. This also ties in with the NPPF, which suggests that local authorities should avoid unnecessary prescription.

This approach partially reflects the SA findings, which suggest that applying different density standards would help to ensure that new development was sympathetic to the character of the surrounding areas. However, the lack of defined standards will lead to a degree of subjectivity and the possibility that appropriate standards are not met for some areas or sites. This may mean that land is not used as efficiently as possible. However, an emphasis on judging each case on its merits within a robust decision making framework will allow site specific issues to be addressed more appropriately. This might be particularly important in sensitive areas (for example, Conservation Areas or sites in close proximity to Listed Buildings). In such cases, the Council’s approach could lead to more sympathetic design solutions.

The appraisal findings for the two options are presented in full in Appendix 8
12 AFFORDABLE HOUSING

12.1 Why have alternatives been considered for this issue?

The principle of seeking affordable housing on appropriate sites is established in the NPPF. The adopted City of Derby Local Plan Review sets a target of seeking 1,400 affordable homes over the period 2004 – 2011 to be met by seeking 20% - 30% affordable housing on all sites of 15 dwellings or more. The number of affordable housing completions has been monitored and reported in the Annual Monitoring Report which shows that over the period since 2004 only about 175 have been achieved each year which is below the 200 per year target.

The Housing Strategy (2009), informed by the findings of the SHMA (2008) identified the need for 553 affordable houses a year which was substantially higher than the 397 per year identified at the time the current local plan was prepared. The SHMA (2008) reflected a greater need for affordable housing and recommended that up to 40% of affordable housing should be sought and that lowering the 15 dwelling site threshold should be considered.

Consequently, the Issues and Options paper (2010) set out two alternatives to reflect these recommendations. These were:

1: Reduce the affordable housing threshold below 15 dwellings;
2: Seek an increased proportion of affordable housing on appropriate sites.

Since the publication of the Options paper, the evidence has been updated through the SHMA 2013.

The SHMA update establishes that as at October 2012, 44.4% of households were unable to afford market housing without subsidy in the City (40.9% across the HMA).

Projections for the period 2012-2017 suggest that there is a housing need across the HMA for 7,611 affordable homes. A significant proportion of this need is in the City (4,647) which represents a substantial increase from the estimates in the 2008 SHMA.

The estimated split in affordability types for the City is recommended at 22.4% for ‘intermediate’ provision and 77.6% for social/affordable rented.

The SHMA highlights that there is a clear shortfall of affordable housing in the HMA which provides a strong justification for policies seeking affordable housing provision in new development schemes. However, it suggests that the specific targets for affordable housing provision would need to be informed by the economic viability of residential development in each authority.

It is important that the Council’s preferred approach is justified by a consideration of alternative approaches.

12.2 What are the reasonable alternatives?

The following alternative approaches have been considered:

1. Focus on housing delivery by relaxing affordability targets (reducing the target to 20% and / or increasing the threshold to 25 dwellings).

2. Maintain a site threshold of 15 dwellings and 30% affordability requirement.

3. Focus on tackling affordability issues by increasing affordability targets up to 40% and / or decreasing the policy threshold below 15 dwellings.
4 Apply a mix of targets to different scales of development. This could mean:

- Increasing the affordability target above 30% for Greenfield developments.
- Maintaining a target of 30% and a threshold of 15 dwellings for brownfield and smaller scale developments.
- Reducing the policy threshold below 15 dwellings and / or applying a lower % target for smaller developments.

Why have these alternatives been considered?

The strategic issue for the delivery of affordable housing comes down to the question of the viability of delivering housing development against the viability of providing affordable dwellings. The options presented explore the balance between tackling affordability and the delivery of housing in difficult locations.

Why have other alternatives not been considered (i.e. are considered unreasonable)

Meeting all of the affordable needs identified by the SHMA is not considered realistic in light of the evidence and the NPPF policy requirement that plans are deliverable. No other strategic options were considered.

12.3 Why has the preferred approach been selected?

The preferred approach

The Council’s preferred approach is detailed in policy CP7 of the Core Strategy. It maintains a dwelling threshold of 15, with a target of 30% affordable homes, subject to considerations of viability. The Draft Core Strategy also included a reference to a target of an 80/20 split between social rent and ‘intermediate’ housing. This reflected the SHMA evidence.

Further viability work carried out by National CIL Services (NCS) to assist the Council suggested that continuing with a specific split within Policy would have a negative impact in terms of viability. Alternative approaches were then considered which maintained the maximum 30% target, but considered the effect of different splits. Increasing the level of ‘affordable rent’ and ‘intermediate’ housing did have a positive effect on viability. Allied to this, further discussions with Council Housing Strategy officers and the development industry also appeared to indicate that a less rigid approach to the split of affordable housing would be helpful in terms of delivery, and meeting different needs across different parts of the City.

The final policy has been amended, therefore, to become more flexible in how affordable housing is provided through S106 agreements. It does, however, maintain the 30% target with the caveat that the Council will negotiate on this where viability is a concern.

This broadly reflects Option 2. However, policy CP7 also sets a target for Lifetime Homes. It is noted that the recent publication of the Housing Standards Review may have implications for this policy. The timing of this has not provided the Council with sufficient time to address the issue. As such, it will be something that they wish to consider following consultation on the plan and address through modifications if necessary and acceptable to the Inspector. This is not seen as being a major issue in terms of the ‘soundness’ of the plan.
The Council's reasoning

Using the economic viability model provided through the PBA Economic Viability Report and the NCS Viability Report, the Council has considered the implications of different affordable housing targets on viability and deliverability; This suggests that providing anything above 30% on all but the highest value sites would be unlikely to be viable. Providing 30% is marginal in many cases but there is evidence to suggest that it may be viable in some cases. If the economic situation improves, or if landowners or developers were to take less of a return (in response to reduced risk, for example) then 30% may be more achievable in the longer term. It is recognised that it will not meet all of the needs identified but provides the most pragmatic option in ensuring some realistic delivery over the lifetime of the Plan.

The Council recognises that this will mean that some development will be subject to negotiation, but do not see this as unusual or as an impediment to the delivery of housing.

The Council considers that a target of 30% offers a sensible balance between meeting the Government and Council's objectives on delivering affordable housing and the need to deliver housing more generally. It also provides a reasonable level of flexibility to account for improvement in the market. Opting for a lower target based on the 'lowest common denominator' identified by the evidence (i.e. the lowest level of affordable housing 'viable' across all parts of the City or on all development types) would restrict the Council's ability to require higher levels on sites that can accommodate it, or take advantage of improved economic situation in the future. This is seen as contrary to the aims of the NPPF.

Reflecting the findings of the SA

The preferred approach broadly reflects the SA findings, which suggest that alternative 2 would be least likely to have significant negative effects and would have positive implications in terms of housing delivery. However, although alternative 4 is a more risky and difficult approach to deliver, it would have the potential to have a more significant positive effect in terms of meeting housing needs (quantity and affordability) across the City. The policy as drafted is also positive in relation to the delivery of Lifetime Homes and more accessible homes. While not a 'strategic' issue, these elements have positive implications for a number of SA objectives.

The full appraisal findings for each alternative can be found in Appendix 9.
13 SHOPPING FLOORSPACE

13.1 Why have alternatives been considered for this issue?

The City Council’s shopping capacity study concluded that there is a current oversupply of non-food floorspace in the City, such as clothing/footwear and DIY. This implies that, in the short term the Council should not be making provision for any additional non-food floorspace. However, as the Core Strategy looks at the next 15-20 years, there will be an eventual ‘need’ for new retail development, although how much will depend on how well the economy will perform over the next few years and the approach the Council takes to the overall level and location of new development.

In relation to the capacity for new food and convenience retail, there is some evidence to suggest that a number of existing stores are trading above capacity. This implies that there would be an additional need for new food stores in the City to release some of the pressure on existing locations. This has been addressed to an extent by a number of permissions granted for new retail supermarket development since the publication of the capacity assessment. However, it should be noted that the large permissions granted do not appear to be moving forward. There have been a number of applications for smaller ‘deep discount’ stores that have been delivered. This would appear to illustrate a changing retail market.

It is important that the growth in retail floorspace is properly managed and that the Core Strategy gives a clear indication of how much growth is to be accommodated and where that growth should go in order to meet the Core Strategy’s Objectives. Making provision for either too much or too little development could have a significant effect on the vitality and viability of centres and on their ability to provide for the needs of the population.

It is important that the Council’s preferred approach is justified by a consideration of alternative approaches.

13.2 What are the reasonable alternatives?

The following alternative approaches have been considered:

1  Lower Growth Option;
2  Medium Growth Option; and
3  High Growth Option.

Why have these alternatives been considered?

The reasons why the above alternatives have been considered are set out below:

Alternative 1

This is based on a view that expenditure on comparison goods will grow at a low rate, taking into account the economic downturn. Using this approach suggests that there is a significant oversupply of floorspace at present. Over the plan period this approach would generate a ‘need’ for approximately 22,000 square metres of non-food floorspace up to 2021 and a further 15,000 square metres between 2021 and 2026. For means of comparison, the Westfield extension totalled approximately 65,000 square metres of new space.

In relation to food retailing, this would not generate any need for any significant additional floorspace in the City. New facilities to serve areas of growth might be needed but these would be small scale ‘top-up’ facilities, rather than main large food stores.
This option would not result in a need to make any specific allocations within the Core Strategy. The option does not identify a specific need for new foodstores (outside meeting the needs of new communities) and any ‘need’ identified for new comparison floorspace would be accommodated within the broad range of regeneration opportunities which exist with the City Centre. As this option also assumes an ‘oversupply’ in the early years of the Plan (dependent on an economic ‘upturn’ to become a deficit) more recent evidence would seem to suggest that the economic recovery has not come to fruition. Thus the logic of this option would continue to assume little or no need for additional floorspace for the foreseeable future.

Alternative 2

This alternative sees a significant oversupply of floorspace in the short term but generates an increased ‘need’ over the Core Strategy period (30,000 square metres up to 2021 and a further 21,500 square metres up to 2026). This was considered the most appropriate and realistic level of growth in the Council’s retail study.

This alternative would allow for a limited amount of new convenience floorspace over the long term, but not enough to accommodate major food stores. This option would not support numerous large food stores but may be able to accommodate one, or as an alternative a number of smaller stores supporting growth areas. Overall, this alternative would mean making provision for around 3,500 square metres by 2021. As a means of comparison, a typical discount food store, such as Aldi or Lidl, are usually around 1,200 square metres in size.

As with Alternative 1, this option would require the allocation of one or more sites for new supermarket development. It would generate a significant level of apparent ‘need’ for comparison goods, where specific allocations would be needed to ensure they would be met.

Alternative 3

This alternative takes an optimistic approach to growth and obviously this generates the most ‘need’ for new floorspace (38,000 square metres up to 2021 and a further 27,000 square metres up to 2026). Taking this view, this option would generate a significant ‘need’ for new food store development over the course of the plan. Up to 7,500 square metres of new food floorspace would be required by 2021 under this option, with a further 2,600 square metres up to 2026.

This option would mean making specific allocations for both convenience and comparison floorspace. The levels of comparison floorspace indicated would require another ‘Westfield’ sized development either within the City Centre or elsewhere in the City (subject to the distribution strategy established).

Why have other alternatives not been considered (i.e. are considered unreasonable)

Derby City Council does not consider that there are any further reasonable alternatives.

13.3 Why has the preferred approach been selected?

The preferred approach

The council’s preferred approach is not to allocate additional allocations for major food or non-food retail outside existing commitments or areas of growth. New retail development is capable of being considered under generic development management policies and/or the specific policies for the city and local centres.
The Council's reasoning

This approach reflects the number of recent permissions for retail which have soaked up a considerable amount of the strategic capacity. There is also evidence of a clear decline in the City Centre’s vitality and viability which suggests that there is no urgent need or requirement to identify significant increases in floorspace provision outside that already committed. There are also a number of sites within the City Centre that are awaiting regeneration and which may be suitable for retail development. Any growth that may come forward could be directed to these sites. The Core Strategy does not, however, set any form of target as there is no evidence of an urgent need for significant additional floorspace that would justify a specific allocation.

The failure of the large supermarkets to deliver their permissions within the City is seen as further evidence of there being no strategic ‘need’ for new retail allocations at this time. The Council considers its generic criteria policies promoting defined centres as the most appropriate location for new development, supported by its sequential test and impact policies, will be sufficient to address future needs.

Reflecting the findings of the SA

The preferred approach is most similar to alternative 1, which reflects low levels of growth. All options will ensure the provision of key services and facilities for residents and all will facilitate job creation and economic activity. However, the approach partially conflicts with the SA findings, which suggest that alternative 2 would result in a significant positive effect in terms of supporting a vibrant city centre.

The full SA findings for these alternatives are presented in full in Appendix 10.
14 **TOWN CENTRE USES/ROLES**

14.1 **Why have alternatives been considered for this issue?**

A series of alternatives are set out that consider how new retail floorspace across the City should be distributed; whether it should be focussed on existing shopping centres or whether a more dispersed approach should be considered.

However, this also opens up further questions about other ‘town centre’ type uses such as leisure, offices, cultural and tourism facilities and where these should be located and how centres will function in the future.

Existing national policy promotes the ‘town centre’ first approach and all options would see some level of priority given to the City centre to be in line with this. However, the Council must consider whether the City centre will be capable of accommodating all of the new floorspace identified and, if not, whether the approach should be to extend the traditional ‘City centre shopping area’ or to promote the expansion of other centres or locations.

In some cases it is recognised that new or expanded local shopping facilities could be needed to serve the required growth. However, the options assume that the current network of neighbourhood centres and small shops will continue to function as at present.

14.2 **What are the reasonable alternatives?**

The following three alternative approaches have been considered:

1. Meet the needs for major comparison/non-food retail floorspace, leisure, office and cultural development in the City centre;
2. If needs cannot be met in the City centre, then consider the dispersal of some of this growth into the district centres; and
3. If need cannot be met in the City centre or in improved/enlarged District Centres, then accept more development in out-of-centre locations.

**Why have these alternatives been considered?**

The reasons why the above alternatives have been considered are set out below:

**Alternative 1:**

This alternative would maintain the current role, nature and function of all existing centres in the City. The City centre would remain the focus for major development of ‘town centre uses’, including retail, office, leisure and major cultural facilities.

To be consistent with national policy, first preference with this alternative would be to focus growth within the existing core shopping area. If retail ‘needs’ cannot be accommodated within the core City centre shopping area then the second preference would be to expand in an edge-of-centre location.

Shopping development outside the City centre would be limited to the small scale consolidation of district shopping centres. Retail parks would continue to play a complementary role and would not see significant expansion or increased flexibility in the range of goods they can sell.

Major office and leisure development would be limited to sites within, or on the edge, of the inner ring road.
Alternative 2

This alternative would be considered where the overall ‘need’ could not be accommodated within the City centre.

This alternative would still see a focus on the City centre but growth that could not be accommodated would be redirected to district centres. A decision would be needed about which district centres were able to accommodate the growth and what scale of development would be appropriate.

This could see some or all district centres change their current roles and become more focussed on comparison shopping, rather than primarily meeting day-to-day shopping needs. They could also cater for a greater range of town centre uses such as offices.

This could result in a rebalancing of the shopping centre hierarchy to include a distinction between higher order and lower order district centres. It is recognised that most district centres in the City have grown in an unplanned away based on historic village centres. This means that opportunities for new development may be limited and that more radical options for change would have to be considered, such as major redevelopment.

Out-of-centre retail parks would maintain their complementary role and would not see significant expansion or increased flexibility in the range of goods they can sell but some limited expansion or consolidation would be acceptable. Out-of-centre business parks could cater for small scale office development.

Alternative 3:

This option would still see some development in the City centre but this would be balanced across the network of centres. This option would see a greater proportion of development in existing district centres and retail parks. It may also mean the creation of new out-of-centre retail locations, although no potential sites for this have been identified as yet.

The option could also lead to a change in the role of some or all out-of-centre retail parks and locations to become more like the City and district centres. This could mean a relaxation of controls which currently limit sales to ‘bulky goods’ items such as DIY goods and furniture in order to allow them to sell more ‘high street’ type goods.

This option would also mean a wider dispersal of major office development into new or existing business parks.

Why have other alternatives not been considered?

Derby City Council does not consider that there are any further reasonable alternatives.

Why has the preferred approach been selected?

The preferred approach

The Council’s preferred approach is outlined in a number of Core Strategy policies. It sets out a hierarchy for focusing the majority of retail, office space and leisure towards the City Centre, but recognises that there may be a need for some small scale edge of City provision and to support the new neighbourhoods being created or expanded in these areas. The decision to go for a lower level of retail growth, and a stated aim to try and limit further out-of-centre expansion, also supports this approach.
The Council’s reasoning

This preferred approach is consistent with the requirements of the NPPF, which continues to support a ‘town centre first’ approach to retail development. However, the NPPF also provides scope for Local Plans to allocate sites outside defined centres where a ‘need’ exists. In recent years the Council has resolved to grant permission for a number of ‘out-of-centre’ and ‘edge-of-centre’ supermarket proposals. These have soaked up a significant amount of the short to medium term capacity identified by the 2009 Retail Capacity Report. This, coupled with a clear general decline in the retail market and the observed impact that this has had on the vitality and viability of the City Centre, suggests that there is no urgent ‘need’ to identify land for large scale out-of-centre retail development at this stage.

At time of press, none of the schemes with permission have been implemented, which also suggests that there is no urgent ‘need’ for additional floorspace outside of that which currently has permission. As such, it is considered that most ‘needs’ can be met within the City Centre. However, this would not prohibit the provision of new facilities to support the growth of new communities (for example, in Heatherton, Boulton Moor or Hackwood Farm) or stop ancillary or complementary facilities being provided where a local need or deficiency can be identified.

Making provision for significant retail floorspace outside the City Centre where a ‘need’ may not currently exist could also lead to unnecessary car-borne trips and the associated sustainability implications of this. It could also have a general negative impact on encouraging growth into the City Centre which has significant sustainability benefits in terms of encouraging development in the most accessible location in the City, helping to promote ‘linked trips’ by alternatives to the car and encouraging sustainable economic growth.

The policies for such uses will still allow the consideration of planning applications for out-of-centre development where the sequential and impact tests can be met.

Reflecting the findings of the SA

This approach is broadly indicative of Alternative 1.

This reflects the SA findings which suggest that only alternative 1 would have significant positive effects against any of the sustainability objectives.

The implementation of this alternative would help to enhance the vitality of the City Centre and enhance the quality and quantity of offices within this area.

The SA findings for each alternative are presented in full in Appendix 11.
15 OUT OF CENTRE RETAIL

15.1 Why have alternatives been considered for this issue?

Existing policies try to protect and enhance the vitality and viability of existing shopping centres, such as the City centre. One way of trying to achieve this has been by limiting the types of goods that out-of-centre shops could sell.

Over recent years the nature of the retail market and the business models of many retailers have been changing. This has been placing significant pressure on existing policies that try to maintain a complementary role between ‘in-centre’ and ‘out-of-centre’ locations for retail.

Retailers are also finding different ways to operate in an increasingly competitive market. For example, supermarkets are selling an increasingly wide range of goods and services, including clothes and footwear. In addition, some companies also now wish to have a presence in both ‘in-centre’ and ‘out-of-centre’ locations.

In Derby some retailers have also been able to take advantage of historic planning permissions to open stores on retail parks that may not normally have been permitted. The current economic climate is also making it difficult to fill vacant units with traditional ‘bulky goods’ retailers, such as DIY stores or household electrical outlets. This has also led to increasing pressure for different types of retailer to operate from these locations.

The Core Strategy Review provides an opportunity to assess whether some changes to policy are needed to reflect changes within retail or whether extra controls are needed to give the City centre greater protection.

It is important that the Council's preferred approach is justified by a consideration of alternative approaches.

15.2 What are the reasonable alternatives?

The following three alternative approaches have been considered:

1. No change to existing policy;
2. Allow increased flexibility; and
3. No restrictions on out-of-centre.

Why have these alternatives been considered?

The reasons why the above alternatives have been considered are set out below:

Alternative 1

The Council would maintain its existing policies. The range of goods sold from out-of-centre locations would continue to be restricted to ‘bulky goods’ only. This would help to maintain their ‘complementary role’ with the City and District Centres.

The sale of comparison goods, such as clothing and footwear, would continue to be restricted to help sustain and enhance the vitality of the City centre.

Alternative 2

The Council would continue to try and maintain a complementary relationship between out-of-centre locations and defined shopping centres. It would, however, also recognise the changing nature of retailing.
Flexibility could be achieved by either broadening the range of goods that could be sold from out-of-centre locations and/or allowing the sale of ‘restricted’ goods from a part of a shop’s floorspace. Importantly, this approach would not result in the removal of all restrictions.

**Alternative 3**

The Council would remove the restrictions on out-of-centre retail locations so they can sell any and all types of goods from all of their floorspace. Existing defined retail parks would become part of the ‘Shopping Centre Hierarchy’. There would be no difference between retail parks and the City centre in terms of what can be sold.

**Why have other alternatives not been considered (i.e. are considered unreasonable)**

Derby City Council does not consider that there are any further reasonable alternatives.

**15.3 Why has the preferred approach been selected?**

**The preferred approach**

The Council’s preferred approach does not specify where different types of goods can be sold. However, it does state that ‘The Council will seek to mitigate the effect of development and ensure that the role of out-of-centre shopping remains complementary to defined centres by imposing appropriate conditions on the scale of development and the goods that can be sold from any retail outlet’.

**The Councils reasoning**

While the constantly changing nature of the retail market, and the fluid nature of many retailers’ ‘business models’ has reduced the distinction between ‘high street’ and ‘out-of-town’ retailing, the Council still considers there to be a need to be able to control the nature of out-of-centre retailing. This is primarily still to protect the vitality and viability of defined centres, though it has other benefits in terms ensuring genuine ‘bulky goods' operators can still find representation within the City.

The Council does recognise that its current policy is becoming increasingly difficult to implement in current market conditions. As noted above, changing business models often need/desire the sale of goods that would be ‘contrary’ to policy but at such small levels that it would be difficult to demonstrate a true ‘impact on centres (not least as the NPPF has made the test of ‘impact’ arguably more difficult to apply).

An approach which allows the implementation of conditions, but which also gives flexibility in its implementation, is seen as the most appropriate way to address this issue. The approach proposed will allow the Council to judge each case on its merits and apply the most appropriate condition it can to ensure there will not be an unacceptable impact on centres and that a complementary role is maintained as much as possible between centres and out-of-centre locations.

The reasoned justification for the policy suggests that the approach taken to conditions will be dependent on the merits of each case. In some circumstances, therefore, the existing policy will be maintained though in others a more flexible approach will be taken that reflects the particular characteristics or impact of a proposal.
Reflecting the findings of the SA

The preferred approach is broadly a mix of alternatives 1 and 2. This reflects the findings of the SA, which suggests that alternative 1 would best help to ensure that the vitality and viability of the City centre and district centres are protected over the plan period. Although a degree of flexibility would support economic objectives, it is not as positive in terms of ensuring sustainable patterns of travel and the vitality of centres.

The full appraisal results for each alternative can be found in Appendix 12.
16 TRANSPORT

16.1 Why have alternatives been considered for this issue?

Transport and access to jobs, shopping, leisure facilities and services has a direct effect on quality of life. A safe, efficient, and integrated transport system is important in supporting a strong and prosperous economy. However there are also negative effects of transport such as safety, congestion and associated economic and environmental issues that need to be tackled in order to sustain growth.

It will be important for development to be planned in a way that minimises the need to travel, and makes it possible for the residual trips generated to be undertaken by non-car modes. This follows Government policies and the associated transport challenge of tackling road congestion and carbon emissions, maximising accessibility to jobs, shopping, services and facilities for those lacking access to a private car, improving air quality, reducing road casualties and encouraging healthy lifestyles.

The following options present a range of alternative ways of managing existing and future travel demand and behaviour.

16.2 What are the reasonable alternatives?

The following four broad strategic alternative approaches have been considered:

1. Maintenance of the existing Transport Asset: Make no provision to accommodate, or to influence mode of travel, for trips generated by new or existing development;
2. Demand Management: Accommodate travel demand generated by new and existing development by focussing on measures to reduce reliance on motorised travel, especially travel by car;
3. Measures to increase use of alternatives to the car: Accommodate travel demand generated by new and existing development by focusing on public transport and improvements for pedestrians and cyclists; and
4. Major works: accommodate travel generated by new and existing development by focussing on improved road infrastructure

Why have these alternatives been considered?

The reasons why the above alternatives have been considered are set out below:

Alternative 1

This alternative would prioritise investment in maintaining the existing transport network to maximise its efficiency and reliability. This includes important transport assets such as footways, cycle ways, rights of way, infrastructure on bus routes, street lighting, traffic signals and roads.

The quality of the transport network has direct effects on accessibility, regeneration, air quality, congestion, quality of life and travel safety. However, prioritising investment in maintaining the road network alone is unlikely to lock in any benefits gained from improving its reliability and efficiency, particularly during peak traffic periods. The predicted growth in car traffic is likely to erode any benefits and lead to increased congestion. In turn, this will reduce the reliability of the road system not only for commuter traffic but also public transport and buses. Whilst congestion can be an effective tool to manage travel demand it is environmentally and economically damaging and inefficient, and combined with a lack of alternatives, the transport system might fail.
In order to meet future housing needs, there may be a need to develop land that is less accessible and requires major investment in transport infrastructure and services, for example, greenfield sites that are located on the outskirts of the City. Without investment, sites lacking good transport access will limit the travel choices.

Alternative 2

This alternative would focus on putting developments in the right places and prioritising investment in measures to influence travel behaviour such as managing the level of commuter parking in the City Centre and ‘Smarter Choices’. Spatial planning directly affects the demand for travel and if land use is integrated then the need to travel will be minimised. However, in an urban area, spatial planning and demand for travel is heavily influenced by existing land use and transport provision. In this case, new development is most sensibly located in areas that are already accessible by public transport, walking and cycling.

Investment in demand management and Smarter Choices would help tackle congestion, minimising associated economic, air quality and climate change effects. Those people lacking access to a private car would have access to a choice of improved alternative means of transport. Those currently using private cars would also have access to a more attractive and improved range of alternative means of transport. Smarter Choices marketing would help to lock in the benefits of these improved choices. New walking and cycling infrastructure and other measures to influence travel behaviour would also encourage healthier lifestyles.

Alternative 3

This alternative would prioritise investment in public transport, walking and cycling. This approach would help to tackle the negative effects of peak hour car use and congestion by providing realistic alternatives. The greater the uptake of these alternatives, the greater the potential improvements to the reliability of public transport, making this an increasingly attractive option. However, it could reduce road capacity for private cars if there is no space to accommodate bus priority, cycle and pedestrian improvements other than using existing road capacity.

This alternative also seeks to improve awareness of sustainable travel options and marketing services such as travel awareness campaigns, setting up websites for car share schemes and supporting car clubs. These techniques can be very effective at changing travel behaviour, but some, such as personal travel plans, can be expensive when provided to large numbers of people, as in alternative 2.

Alternative 4

This option would prioritise transport investment in new road schemes and improvements to make the road network more efficient. The road network and parking facilities would be able to accommodate more vehicles, improving access for private cars, buses and road freight vehicles. However, the scope to provide additional capacity may be limited in terms of physical constraints and cost. Increasing road capacity may have short term benefits and the predicted growth in car traffic is likely to erode any benefits and lead to increased congestion.

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48 Smarter Choices are techniques for influencing people’s travel behaviour towards more sustainable options such as encouraging school, workplace and individualised or personal travel planning. They also seek to improve awareness of public transport and provide marketing services such as travel awareness campaigns, setting up websites for car share schemes and supporting car clubs. These techniques can be very effective at changing travel behaviour, but some, such as personal travel plans, can be expensive when provided to large numbers of people.
Regional policy (which has now been superseded) indicated that targeted improvements to road capacity should only be considered as a last resort to accommodate residual car trips after intensive travel demand management and public transport, walking and cycling options have been explored. However, national research has indicated that, when based on full appraisal of environmental and social costs and benefits, targeted new infrastructure can offer good value for money. This may include smaller projects which unblock pinch-points and variable infrastructure schemes to support public transport in urban areas.

Why have other alternatives not been considered (i.e. are considered unreasonable)

Derby City Council does not consider that there are any further reasonable alternatives.

16.3 Why has the preferred approach been selected?

The preferred approach

The Council's preferred approach is set out in Policies CP23 and CP24 of the Core Strategy. These policies are mainly focused on managing demand and promoting sustainable modes of travel. However, there would be some investment in transport infrastructure to mitigate the effect of new development or resolve existing problems on the network. This approach broadly encompasses elements of all four options, there is an emphasis on managing the demand for travel and providing improved travel choice. Trying to locate development in accessible locations, promoting cycling, walking and public transport (and providing the necessary infrastructure to support these activities) are key parts of the overarching strategic transport policies. These themes are, however, also addressed in a number of site specific policies – particularly where the SA and other analysis has identified a potential issue in terms of accessibility. Examples of this include the requirement for improved pedestrian and public transport links into the Hackwood Farm site.

The plan also recognises the need to invest in the transport network by providing support for specific infrastructure schemes that have been identified by the Council and other transport providers. A number of these schemes, such as the highways Agency scheme to grade separate the A38 junctions or the Council's proposals for the A52, are not specifically related to the growth identified in the Plan, but they will still help to mitigate the potential impacts.

The Council's reasoning

The Council considers that while maintenance will continue to be an important factor, clearly not trying to manage demand, increase choice or create additional capacity where necessary would not be a sustainable option to pursue.

Reflecting the findings of the SA

The preferred approach therefore represents a combination of alternatives 2-4.

This broadly reflects the findings of the SA, which suggest that there could be significant positive effects on SA objective 2 by reducing the need to travel. Where analysis of a site has suggested specific accessibility or transport issues, then the site specific policies have sought to mitigate the problems where possible and practical to do so. This is in-keeping with the general strategic objectives of the policy.

The SA findings for these alternatives are presented in full in Appendix 13.
17 PARKING

17.1 Why have alternatives been considered for this issue?

Earlier consultation on the Core Strategy highlighted concerns over parking in the City. From a planning perspective, these focussed on the amount of ‘on-site’ parking we allow with new development and the effect of this on the economy, environment and social well-being of the City.

Concerns ranged from a worry that limitations on parking have discouraged investors coming to the City, right through to the effect of on street parking on the quality of life of residents.

There is increasing demand for car ownership and the private car will continue to be an important way of travelling for many people. It is crucial, therefore, to ensure that new development takes account of parking needs and makes adequate provision for car users.

It is important that the Council’s preferred approach to managing parking demand is justified by a consideration of alternative approaches.

17.2 What are the reasonable alternatives?

The following five alternative approaches have been considered:

1. Continue to use City of Derby Local Plan Review policies;
2a. Relax parking standards in the City centre;
2b. Relax parking standards across the City;
3. Provide new public parking in the City centre; and
4. Flexible approach to parking taking into account the needs of the development and/or nature of the area.

Why have these alternatives been considered?

Alternative approaches 1-5 set out ways of addressing the issue of how much ‘on-site’ parking should be permitted with new development. The reasons why the above alternatives have been considered are set out below:

Alternative 1

This would mean continuing to use the existing ‘maximum parking standards’ set out in the current Local Plan. This would also mean the continuation of more restrictive standards in the City centre and limiting long stay parking in order to discourage car borne commuting. Priority would continue to be given to short stay public parking in the City centre and complementary measures such as ‘park and ride’. A limited amount of flexibility would be provided within the policy to allow more parking than the ‘maximum’ in some circumstances.

Alternative 2a

Alternatives 2a and 2b assume that the principle of ‘maximum parking standards’ are a good way of providing some level of control and consistency.

This alternative would entail continuing to use the ‘maximum parking standards’ used elsewhere in the City but also applying them within the City centre. This would remove the distinction between the City centre and the rest of the City. City centre developers would have the opportunity to provide more on-site or ‘allocated’ parking with commercial development than they currently can.
Alternative 2b

This alternative would assume that existing parking standards across the City are too restrictive as currently drafted and that a general relaxation across the whole City, including the City centre, is needed. This approach would allow an increase in parking provision for all forms of development across the City.

Alternative 3

Under this alternative, current City centre parking standards would be maintained, constraining the amount of spaces allowed for new developments. However, additional public parking provision in the form of new car parks would be provided to make it easier for City centre workers to park close to their jobs. An element of this approach could be to relax current controls on temporary parking within the City centre, particularly for long stay parking on sites awaiting development. This could help to address any short term issues with parking.

Alternative 4

Within this alternative, ‘maximum parking standards’ would not be used across the City. Instead, decisions would be based on the characteristics and needs of individual developments and / or locations. A range of factors could be taken into account including the nature of the business, public transport accessibility, availability of public parking, congestion and the need to encourage investment and economic activity.

Why have other alternatives not been considered?

Derby City Council does not consider that there are any further reasonable alternatives.

17.3 Why has the preferred approach been selected?

The preferred approach

The Council’s preferred approach is mixture of alternatives 2B and 4. The approach will remove the City centre parking area standards and adopt ‘City-wide’ maximums across the City as a whole for commercial development. However, standards for residential development will be removed provision will considered on a case-by-case basis, taking the needs of the development and local characteristics into account.

New public parking will continue to be permitted, but only where there is a demonstrable need for the parking.
The Council’s reasoning

The principle of maximum standards for parking for commercial development is maintained. Applicants will still be able to argue for more parking in certain circumstances, but it was considered that allowing unrestricted parking levels for new development would serve to undermine some general transport and sustainability objectives of the Core Strategy. The Council has, however, recognised the need for some balance and recognition of the needs of car drivers.

The Council has adopted this approach in response to the results of consultation, which suggested that the restrictive approach used in the Local Plan was having a negative impact on economic growth and City Centre vitality. Removing what may have been seen as an artificial, or unfair, restriction in the City Centre should, therefore, have positive economic impacts. It is recognised that this may have some negative impacts in terms of potential traffic growth and the promotion of sustainable modes of transport. It is considered that the continued promotion of alternatives to the car, coupled with the accessibility of the city centre, should help to mitigate concerns. In addition, the cost of developing land for parking within the city centre may mean that the actual effect of the change in policy will be relatively small.

Adopting specific standards for residential development across the City was also seen as being unhelpful in many cases, as need for residential parking is intrinsically linked to the specific nature of the housing development. Local characteristics, including current parking provision or transport difficulties will also be important. Applying strict standards sometimes reduces flexibility and can exacerbate local problems – particularly in terms of off-street parking.

Reflecting the findings of the SA

The preferred approach partially reflects the SA findings, which suggest that a flexible approach to parking would provide the most favourable outcomes. The SA highlights that removing parking standards in the City centre could lead to significant negative effects on the baseline position for SA objective 2, though the situation outside the City Centre should be unchanged. The potential negative impact on SA objective 2 is also balanced against the anticipated improvements to the City Centre economy as a result of the change in policy.

The removal of standards for residential parking could have some negative effects in terms of promoting more sustainable transport modes. The SA findings for each alternative are presented in full in Appendix 14.
18 SUSTAINABLE BUILDINGS

18.1 Why have alternatives been considered for this issue?

One of the key responses arising from the Issues and Ideas consultation was the need to make new buildings more environmentally friendly.

When the Council was considering options for approaching this issue, the Government intended that all new homes would be zero carbon by 2016 with all non-domestic buildings reaching the same standard by 2019. The Government set out a clear path to zero carbon development by gradually tightening the requirements of Building Regulations with regards to sustainability (in particular energy and water efficiency) to help drive this change. A number of sustainability codes were established to help drive this change, including the Code for Sustainable Homes and BREEAM. At this time, it was reasonable to explore different options for supporting this step change in sustainability standards by setting targets through the Code for Sustainable Homes and BREEAM.

The Cleaner, Greener Energy Study for the Derby HMA and Erewash looks at the potential to set sustainable construction targets higher than those set out in the proposed changes to the Building Regulations. The study found that it could be viable to exceed Building Regulations targets, as is already being achieved in Manchester and London. New Government incentives, including the Renewable Heat Incentive and Feed in Tariff is making sustainable construction more cost effective for developers.

It is important that the Council’s preferred approach to the delivery of sustainable buildings is justified by a consideration of alternative approaches.

18.2 What are the reasonable alternatives?

The following three alternative approaches were considered:

1. Use the incremental increase in building regulations as local targets for sustainable construction;
2. Set targets for sustainable construction in advance of the changes to Building Regulations; and
3. Expect all new buildings to meet the standards set out in alternative 1 but also identify strategic sites where standards can be exceeded and environmental sustainability exemplified.

NB: The Housing Standards Review was introduced in 2012, which sought to reduce the use of multiple standards and codes in the development industry. Following a number of consultations on potential options for streamlining design standards, the Government has proposed a system whereby there will be a single set of national standards. Local Authorities are able to adopt optional higher standards for a limited number of factors, such as water efficiency. However, other than this option, the proposals effectively limit the approach that can be taken locally with regards to sustainable design. The outcome of the Housing Standard Review is yet to be formalised, but it is clear that the role of Local Authorities in setting local standards will be diminished. However, it appears that for the time being local planning authorities will continue to be able to set and apply policies in their local plan requiring development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. Therefore, it was still considered useful to understand the local implications of the 3 alternatives identified above. This would help inform policy development in terms of whether the Council should seek to adopt the optional requirements on water efficiency or whether it would be appropriate to set energy requirements above those set in the Building Regulations.
Why have these alternatives been considered?

The reasons why the above alternatives were considered are set out below:

**Alternative 1**

This option would ensure that developers continue to work to the existing timetable that is currently in place. It was also considered that the option would be unlikely to affect site viability as developers should already be factoring in effects to future site acquisitions.

**Alternative 2**

This alternative was considered as it would show clear commitment to tackling climate change.

**Alternative 3**

This would represent a mix and match between alternatives 1 and 2. This alternative has been considered as it would enable ambitious targets to be set, whilst recognising the viability issues posed by seeking higher standards of carbon savings in new development.

Why have other alternatives not been considered (i.e. are considered unreasonable)

Derby City Council does not consider that there are any further reasonable alternatives.

18.3 Why has the preferred approach been selected?

**The preferred approach**

The Council's preferred approach is broadly reflective of alternative 1, which is to rely upon incremental changes to the building regulations. Higher standards are not explicitly required or encouraged for strategic sites. This represents a shift from the position suggested in the Draft Plan, which specifically set out dates by which certain standards had to be met. Increasing uncertainty about what will be expected (with some potential for significant changes to Government requirements identified in the Housing Standards Review consultation in 2014) and concerns raised about viability and delivery of the policy have led to a change in emphasis.

The Core Strategy still promotes 'best practice' in relation to sustainable design and renewable energy.
The Council's reasoning

The Council’s choice of Alternative 1 reflects the need to meet national targets but feels that to go any further could impact on growth and particularly the delivery of new homes. For this reason, the Draft Policy also recognises that meeting the national targets would also be subject to viability tests – thus recognising the importance the NPPF puts on delivery (though it is also recognised that this could, in some circumstances, reduce the effectiveness of the policy). There is also no evidence available to suggest any reason why any particular sites should have their own standards/requirements identified in policy (as in alternative 3). The generic policy is sufficient to facilitate site specific opportunities where they exist.

The policy has become less specific than the draft for a variety of reasons, not least the perceived impact of the policy on viability and delivery. Many consultees pointed to the requirement of the NPPF to over burden developers. While the policy did refer to 'viability' many still did not think it was appropriate to stipulate standards and target dates.

Using the model and data provided by NCS, the Council considered the impact on viability of going from CoSH4 to CoSH3. On average, this reduced costs by around £4000 per dwelling. While this does not seem too significant, on marginal schemes this could be important. As such, when considering other priorities like affordable housing, the Council removed the specific requirement for CoSH and BREAM 'very good' by 2016 and replaced this by tying requirements specifically to Government standards. This is a more flexible and sensible approach in the current economic climate and must resultant in development consistent with Government objectives and policy.

Reflecting the findings of the SA

This approach partially reflects the SA findings which suggest that alternative 1 would have the least negative effect on housing delivery. However, the SA findings suggest that alternative 3 would have the most positive effect across the range of sustainability objectives. Alternative 3 would allow for higher standards to be achieved at strategic sites without affecting the viability of smaller scale development.

The SA findings for these alternatives are presented in full in Appendix 15.
19 OPEN SPACE

19.1 Why have alternatives been considered for this issue?

From consultation undertaken by the Council, it is clear how highly valued all of the City’s parks are in terms of quality and quantity and the important role they play in people’s lives. The Local Plan policies have been in place since the original Local Plan which was adopted in 1998. These policies aim to provide accessible high quality open space for Derby’s residents. The Council have been reviewing these policies as part of preparing the Core Strategy. As part of this review, the Council have examined whether they are the best way to meet the needs of our local communities, whether they continue to be deliverable in the current financial climate and whether they should be changed to better meet future circumstances.

It is important that the Council’s preferred approach relating to open space is justified by a consideration of alternative approaches.

19.2 What are the reasonable alternatives?

The following three alternative approaches have been considered:

1. Continue to use the City of Derby Local Plan Review policies;
2. Allow greater flexibility for the development of existing public open space; and
3. Reduce the overall amount of new open space identified as part of new development and at the same time seek more financial contribution to improving the quality of existing public open space.

Why have these alternatives been considered?

The reasons why the above alternatives have been considered are set out below:

**Alternative 1**

This alternative seeks to maintain the existing approach to the provision of public open space by:

- Protecting all public open space unless an assessment has been undertaken which has clearly shown it is more than what is needed; and
- Continuing to have regard to a minimum standard of 3.8 hectares of open space for every 1000 people distinguishing between incidental and major open space.

This alternative has been considered as it sets out an approach that would help to increase the level of open space in the City over the next sixteen years. It would also relieve pressure on existing open space through extra provision.

**Alternative 2**

This alternative would continue to protect most open space but would provide the flexibility to allow for the development, for example for housing, on open space where there is a surplus. In particular it could allow for the development of open space that is poor quality and not valued by the community. This approach could provide funding to improve the quality of other public open space in the local area.

This alternative has been considered as it sets out an approach that would provide measures to enable open space of poorer quality to be removed, where appropriate, over the plan period.
Alternative 3

This alternative was considered as it would allow a more flexibility to seek financial contributions to improve the quality of existing public open space close to new residential developments rather than always seeking new open space. New open space would normally be prioritised where:

- access to existing open space in the area is poor and financial contributions to nearby sites would have little benefit;
- the site is large and justifies the provision of smaller areas of open space on site; and
- the development is close to a proposed new park and could contribute to its delivery.

Why have other alternatives not been considered (i.e. are considered unreasonable)

Derby City Council does not consider that there are any further reasonable alternatives.

19.3 Why has the preferred approach been selected?

The preferred approach

The Council’s preferred approach is set out in CP17. It requires development to have regard to open space standards, and only permits loss or change of use in exceptional circumstances.

This approach is broadly reflective of alternative 1, but it also allows for some flexibility as proposed for alternatives 2 and 3.

The Council’s reasoning

Carrying forward the current City of Derby Local Plan policy would result in a continuous increase in open space regardless of existing provision. In contrast, the approach set out in the new policy provides multiple benefits to the Council, the local community and the wider objectives of the Core Strategy. It will allow the provision of open space to be informed by current local provisions thus ensuring either new spaces or qualitative improvements to existing spaces; ensuring that local communities have adequate access to a diverse range of spaces. The policy would also assist to create or enhance connections between public green spaces and the wider GI network, providing access for the wider community, particularly in areas of deficiency, and increasing the biodiversity benefits of public green spaces. These linkages will also ensure that the public green space policy contributes to the plan’s aspiration of promoting alternatives to the motor car.

When combined with the aspirations of the Green Infrastructure policy, the Public Green Space policy will assist with the Core Strategy’s objective of mitigating against the impact of climate change. Finally, the policy recognises that the future of local provision, especially the potential loss of public green spaces, should be determined by sound and robust evidence to ensure that any decision would not have a detrimental effect on local provision.

Reflecting the findings of the SA

This approach broadly reflects the SA findings, which suggest that alternative 1 would have the most positive effect on maintaining and enhancing the City’s green infrastructure assets. It was concluded that a focus on alternatives 2 and 3 could have significant negative effects on SA objectives relating to biodiversity and the natural environment.

The SA findings for each alternative are presented in full in Appendix 16.
PART 3: WHAT ARE THE APPRAISAL FINDINGS AND RECOMMENDATIONS AT THIS CURRENT STAGE?
20 INTRODUCTION (TO PART 3)

The SA report must include...
- The likely significant effects on the environment associated with the draft plan approach.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach.

Chapters 21-33 present an appraisal of the Core Strategy (Pre-Submission version). Chapter 34 then discusses overall conclusions at this stage.

It should be noted that the policies in this version of the Local Plan have already been appraised several times as the plan has developed. This included appraisals of the draft policies at interim stages before the Regulation 18 consultation on the draft Local Plan in October 2013. Recommendations were made at these interim stages of appraisal, some of which led to amendments to the draft policies.

20.1 Methodology

The appraisal identifies and evaluates ‘likely significant effects’ on the baseline associated with the Local Plan, drawing on the sustainability objectives and issues identified through scoping (see Part 1) as a methodological framework.

Effects are predicted taking into account the criteria presented within Regulations. Effects are predicted taking into account the criteria presented within Regulations. So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for ‘cumulative’ effects is also considered. These effect ‘characteristics’ are described within the appraisal as appropriate.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario).

In light of this, there is a need to make some assumptions regarding how the plan will be implemented ‘on the ground’. Given reasonable assumptions, it is not always possible to predict likely significant effects, but it is possible to comment on the merits of Local Plan in more general terms.

20.2 Appraisal findings

To give the appraisal ‘added structure’, each policy within the Local Plan is assigned one (or more) of the following symbols in-line with predicted ‘broad implications’. To reflect the different effects that policies could have, some policies may be scored as both positive and negative against the same SA objective.

It is important to note that these symbols are not necessarily used to indicate ‘significant effects’. They are designed to show the most likely ‘direction of travel’ either toward or away from the achievement of an objective.

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50 Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004
51 In particular, there is a need to take into account the effects of the Local Plan acting in combination with the equivalent plans prepared for neighbouring authorities. Furthermore, there is a need to consider the effects of the Local Plan in combination with the ‘saved’ policies.
21 SUSTAINABILITY OBJECTIVE 1: TO REDUCE DERBY’S CONTRIBUTION TO CLIMATE CHANGE AND MANAGE ITS EFFECTS, INCLUDING FLOODING.

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Core Policies

Policy CP2 is likely to have positive implications by requiring developers to explore mitigation and adaptation to climate change. There is recognition that off-site measures to reduce carbon could be necessary, and support for decentralised energy schemes. However, there is no requirement to demonstrate how these measures have been considered and incorporated into development. Therefore, positive effects are uncertain and likely to be driven by the market rather than as a result of this policy.

Policy CP2 does not recognise that viability could be less of an issue at some locations and that higher standards of sustainability could be achieved at those locations. However, the Government consultation on National Housing Standards suggests that energy/carbon standards should be dealt with solely by the Building Regulations Part L 52. This has now been confirmed through the Deregulation Act 2015.

There are direct requirements for managing flood risk and drainage as part of CP2, which is a proactive approach.

Policy CP7 could conflict with SA objective 1, as the need to deliver affordable / Lifetime Homes could make it difficult to achieve higher standards of sustainability in new developments. This would be a particular issue up to 2016 before the requirement for zero carbon developments is envisaged to become mandatory.

Policy CP9 is likely to have positive effects, by supporting the growth of the low carbon economy and other technological advancements such high speed rail and digital connectivity. All these would help to reduce the need to travel and thus greenhouse gas emissions. Conversely, economic growth per se is generally associated with an increase in energy use and waste production (although this would be likely to occur anyway in the absence of a Local Plan).

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52 Housing Standards Review Consultation (DCLG, 2013)
Policies CP11-CP13 all direct development to the City Centre as a priority. As this is the most accessible location by public transport, it is the most appropriate strategy for helping to reduce greenhouse gas emissions from transport.

Policy CP16 would have a positive effect if schemes to reduce flood risk are identified and secured through development. There is also a specific clause that will seek to resist culverting, and remove exiting culverts in favour of natural watercourses. This should have positive implications on green infrastructure and help to adapt to climate change.

Policy CP17 could complement policy CP16 as it allows for a wider range of functional open space to be sought rather than traditional parks and amenity green space.

Policies CP23 and CP22 contain clauses that support the development of sustainable modes of transport. In combination, the effects on reduced greenhouse gas emissions would be minor, especially considering the level of growth envisaged.

CP24 could have mixed effects. On the one hand, it promotes the use of private vehicles, but there are also provisions for park and ride schemes, which would increase usage of public transport.

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### Spatial policies

Policies AC1-AC5 promote development within the City Centre, which should help to reduce the need to travel and promote alternative modes of transport. The relaxation of parking standards within the City Centre could have a negative effect on promoting public transport, though the overall effect on traffic levels and associated emissions would be unknown at this time. Parts of the City Centre are also subject to flood risk, though other policies in the Plan should reduce the potential risk in this area. The increase in the proportion of dwellings expected to come forward in the City Centre will have a positive impact on this objective.

Policies AC7 and AC8 will help to realign flood defences along the River Derwent. Scheme details will be drawn up in a Masterplan. The Core Strategy also highlights the potential to explore the feasibility of incorporating low-carbon energy schemes into the plan.
The supporting policy text to AC15, AC11 and AC12 suggests that decentralised energy schemes ought to be considered at these sites in line with Policy CP2, which is positive with regards to the reduction of carbon emissions. The effects are considered to be uncertain at this stage though.

Although there are higher land values (which typically permit higher standards of sustainability), none of the ‘greenfield’ policies make an explicit reference to sustainable design or carbon reduction targets. These sites would still be subject to the requirements and objectives of Policy CP2, but without specific guidance a ‘positive’ outcome cannot be guaranteed. The sites on the periphery of the City may also be more likely to be ‘car based’, though this is mitigated to an extent by the requirement for on-site mitigation measures such as provision of new schools and shops. This is particularly relevant for sites AC18, AC19, AC20, AC21 and AC23.

Other planning policy requirements such as infrastructure improvements could, however, make it difficult to achieve higher levels of sustainability for these developments. The Government’s policy on national housing standards also suggests that setting local standards for energy/carbon is no longer the preferred approach. However, planning still has an important role to play in facilitating district-wide schemes at strategic sites where possible.

Parts of a number of allocated sites are at risk of fluvial and pluvial flooding. Development would either need to avoid these areas, provide satisfactory mitigation and/or ensure that surface water run-off was not increased. The site specific policies for these sites do address this issue, but there is clearly a risk that needs to be highlighted. It should also be noted that for sites AC11, AC12, AC13 and AC15, the proposed land-use at these sites would not be as sensitive.

Parts of the development sites associated with AC6 could be at risk of surface water flooding. Although these areas are small, new development should seek to ensure that surface water run-off does not increase in this area.

The effects of some policies on this objective are unknown at this time as the nature of development that could take place has some uncertainty. Both sites AC13 (Celanese) and AC17 (Sinfin Lane) could either remain in commercial use or come forward for housing (or a mix). The effects of this would have to be assessed at the time of an application. Policies for the sites do address the ‘what if’ scenarios, seeking to ensure that facilities are provided on site and issues such as drainage are properly addressed. This should help to minimise the impact – but clearly significant development on either site could have an impact.

Implementing the levels of growth required will lead to an annual increase of approximately 10,000 tonnes of carbon dioxide emissions equivalent from transport. Securing a range of measures to promote public transport and smarter choices could help to reduce this effect considerably, but overall, there would still be an increase in emissions. This is an inevitable consequence of housing growth, which would also be likely to occur in the absence of the Local Plan. It is however, considered that the relatively compact nature of the City and promotion of development in areas such as the City Centre and other accessible locations could mean that this figure is less than it might be when compared to similar levels of development elsewhere.
22 SUSTAINABILITY OBJECTIVE 2: TO MINIMISE TRAFFIC AND THE LENGTH OF JOURNEYS TRAVELLED BY PEOPLE AND GOODS.

Core Policies

Policies CP2 and CP3 both encourage a reduction in the use of private cars, particularly lone occupancy. In combination this is likely to have a positive effect on the baseline position.

Even if sites are well located, an increase in housing growth associated with policy CP6 is still likely to increase the amount of congestion in the City, which is recognised as a key sustainability issue. However, if strategic developments can help to deliver infrastructure improvements, this effect could be mitigated. However, policy CP7 ‘affordable housing’ could affect the ability to secure improvements to transport networks due to competing priorities.

CP9 also seeks to enhance digital connectivity, which would reduce the need to travel, particularly for business purposes. The split of employment land across the HMA seeks to ensure that there are adequate employment opportunities outside of Derby in Amber Valley and South Derbyshire, so the increase in jobs within the City centre is more likely to benefit local communities and reduce the need to travel outside the City.

CP10 could have mixed effects. The employment locations outlined for expansion in the policy are not optimally located to enable sustainable modes of transport. Therefore, an increase in car use may be expected alongside a growth in jobs at these sites. From a positive perspective, expansion could help to deliver infrastructure improvements, which could help to alleviate congestion. Directing as much employment and residential growth into the City Centre as possible might also help to reduce overall journey lengths.

CP12-CP13 all seek to locate services, leisure and office jobs in the City centre as a priority. This can help to encourage the use of public transport. However, for those people that choose to use private transport, a concentration in the inner parts of the City is likely to maintain current levels of congestion. Policy CP14 could increase levels of visitors to the City, but a focus on Pride Park and the City Centre would mean that visitors were more likely to access those areas via railway.
Improving transport links between the university campus and the City centre would help to increase walking and cycling both for students and residents to the north west of the City centre. Policy CP21 would help to reduce the need to travel for residents in urban extensions. This would be beneficial for communities to the south of the City where the majority of strategic sites are located.

Policy CP23 is likely to have a significant positive effect on the baseline by promoting sustainable modes of travel in preference to private car travel. Policy CP24 would have synergistic effects by facilitating park and ride schemes, and helping to reduce congestion through infrastructure improvement schemes. However, on the other hand, such improvements could actually encourage greater car usage. It will be important for any new infrastructure required to take proper account of the needs of cyclists and pedestrians. Policy CP24 makes specific reference to this in relation to the design of the SDITL, which is a positive feature of the policy.

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**Spatial Policies**

Growth within the City Centre should have a positive impact on this objective. It should minimise the need to travel and promote choice.

The constricted nature of Derby City means that there are restrictions as to where strategic sites can be located. As such, most of the strategic greenfield sites are not always ideally located in terms of access to local facilities and services and they do not encourage public transport use. However, these policies do seek to create new facilities and services to help support new and existing communities, and where practicable, seek improvements to public transport, pedestrian and cyclist accessibility. The ability to provide this type of mitigation (for example, the creation of sustainable and viable bus services) has been a key consideration in site selection. With these enhancements, potential adverse effects can be minimised, and in some instances positive effects could be realised. A number of policies require the provision of new local shopping or community facilities – either as part of the City site or as part of a large sustainable cross boundary allocation. This ought to ensure that essential goods and services can be accessed on foot, cycle or by public transport. The plan calls for a number of new primary schools and local shopping centres, particularly on Hackwood Farm (AC21), Rykneld Road (AC20), Boulton Moor (AC23) and Wragley Way (AC18) – though these will mainly be located in South Derbyshire (though should still help minimise the cumulative impact on the City). The critical mass generated by some of these sites will make it more likely that new services and infrastructure can be provided viably.

Without substantial mitigation /enhancement, the cumulative effect of housing and employment growth policies is likely to lead to a significant negative effect on the baseline in terms of increased congestion and travel time through travel to jobs and higher order goods. Policies CP23 and CP24 will help to mitigate these effects.
effects to an extent by implementing Smarter Choice measures and public transport improvements. Strategic measures, such as the improvement of the A52 and grade separation of the A38 should also have a beneficial impact on traffic and congestion. A number of the sites may also help to deliver infrastructure improvements; for example, AC15 and AC18 would require a new link road and improved links between the housing and employment site to be delivered as part of development. This is important, because without strategic road improvements, the developments would lead to more negative effects.

Policies for extending employment land could also lead to an increase in road traffic. This would be a particular issue for sites with an element of distribution / manufacturing such as AC11, AC12 and AC15. These sites are likely to contain a significant amount of B8 development, which will mean a potentially large amount of road freight traffic. While this could add to the overall amount of traffic on the network, both sites are coming forward with new road infrastructure in place to support them. This should also help to minimise the impact as additional capacity has been created to accommodate them.

On balance, the Core Strategy is likely to have mixed effects. Whilst there would be an increase in traffic associated with growth, this would also be likely to occur without the plan in place as population and car ownership is likely to increase in any event. Planning for growth in a more strategic way should allow infrastructure improvements to be secured which can help to accommodate new and existing development in a more coordinated manner. Therefore, the plan is likely to have an overall positive effect, compared to what would happen if the plan were not in place.
### SUSTAINABILITY OBJECTIVE 3: TO MINIMISE POLLUTION.

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**Policy CP2** would help to reduce emissions to the air and watercourses by helping to reduce reliance on the private car and incorporating Sustainable Urban Drainage Systems into new developments.

The construction of 12,500 new homes in the plan period will have effects in the short, medium and long term. There could be an increase in noise and dust pollution during construction, and where there are watercourses an increased risk of sedimentation. Considerate construction would help to mitigate these effects though.

The cumulative effect of increased traffic from new development (CP6 / CP10) could also have a significant negative effect in terms of air quality in the longer term (although it should be noted that housing growth would still be anticipated in the absence of a Local Plan). Concentrating housing development at the periphery of the urban area ought to minimise the proportion of new housing that is affected by poor air quality. However, increased traffic movements into the City centre would exacerbate existing issues in AQMAs.

Policy CP23 could help to reduce emissions from transport by encouraging the use of public transport, walking and cycling as a priority. However, strategic infrastructure improvements (CP24) might actually contribute towards maintaining car-dominated travel patterns by increasing road capacity and making certain routes more attractive (at least in the short to medium term).

Policy CP8 will help to ensure that gypsies and travellers do not locate on unallocated and unmanaged spaces. This will help to ensure that pollution to watercourses and the generation of uncontrolled waste is minimised. The effects are not considered significant.

Policies CP9 and CP10 could help to remediate areas of potentially contaminated land. However, an increase in employment (particularly distribution at Derby Commercial Park) could also lead to an increase in emissions to air and pollution to watercourses.
Maintaining and enhancing green infrastructure and wildlife habitats (CP16-CP19) can help to regulate pollution, but it is important to ensure that species are resistant to the effects of pollution and climate change.

**Spatial Policies**

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**Regeneration policies** have the potential to clean up areas of contaminated, or potentially contaminated land (for example AC6, AC11, AC13, AC14, AC17 and AC19), which would have a **significant positive effect** on the baseline position. However, there is also the potential to increase traffic in areas within close proximity to an AQMA, particularly in the City Centre and the outer ring road area.

AC12 and AC15 in particular could lead to an increase in heavy goods vehicle movement, which could affect local air quality.

Greenfield policies have the potential to increase pollution to watercourses by increasing the amount of hard-standing in these areas and increasing traffic. There are also recorded waste water constraints for some of the areas, so development would need to enhance the network to be permitted. Surface water run-off would also need to be managed through the use of Sustainable Urban Drainage Systems.

Construction effects could also lead to a temporary increase in noise and dust pollution and sedimentation of watercourses where the sites are close to watercourses (AC18). These effects would need to be mitigated at the project level by securing a range of planning conditions.

The effects from housing development at AC23 and AC20, in particular could be exacerbated by existing developments and proposed sites in South Derbyshire which lie adjacent to these sites and form part of larger strategic developments. On the whole, these effects would be temporary and capable of being mitigated at the project level.

On balance, the Core Strategy is likely to have **significant negative effects** on the baseline, particularly by affecting air quality in sensitive areas. There could also be cumulative adverse effects on water and soil resources. However, mitigation / enhancement measures would help to reduce these effects and in some instances could lead to a **positive effect** on the baseline.
SA of the Derby City Local Plan Part 1: The Core Strategy

24

SUSTAINABILITY OBJECTIVE 4: TO MANAGE AND CONSERVE NATURAL RESOURCES AND MINIMISE THE PRODUCTION OF WASTE.

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Core Policies

Policy CP2 ought to have positive implications by encouraging renewable energy schemes and sustainable design. There is also a preference for development that is located in areas that make use of existing utilities and infrastructure.

Sustainable construction is encouraged as a part of CP2, which could include the use of materials with a lower ecological footprint. However, as these policies do not set out firm requirement/standards, positive effects are less likely to occur in this respect.

House building uses resources and produces waste. A proportion of this housing would also be on greenfield land, which does not encourage the recycling of land. Therefore, policy CP6 would have some negative implications. However, the policy does identify a number of large brownfield opportunities and encourage the reuse of vacant properties and the provision of homes with a long life by encouraging ‘Lifetime Homes’. It should also be remembered that house building would occur in the absence of the Local Plan, albeit with less control or mitigation in place. As such, the policy may lead to positive impacts when compared to a ‘no plan’ scenario but these implications are hard to predict.

Encouraging higher densities in the City is positive as it would utilise existing infrastructure and the use of brownfield land. However, waste management arrangements can be difficult on higher density developments. The use of effective and innovative communal waste management practices should be encouraged to mitigate this.

Policies CP11 and CP12 seek to promote development within existing centre, which should have positive implications with regards to the utilisation of previously developed land and existing infrastructure.
Significant levels of construction associated with road schemes (CP24) would generate inert waste and would also demand the use of resources. However, recycled aggregates can be used for highways schemes, just as the wastes can be recycled themselves. The effects would also be temporary and are not considered to be significant.

Spatial Policies

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In combination, the spatial policies are likely to have negative implications due to the materials and wastes associated with construction and the loss of greenfield land. The effects are not considered to be significant, as growth would still occur in the absence of the Local Plan (albeit in a less coordinated way).

Although the effects are mostly recorded as negative, the Local Plan does encourage the use of previously developed land were possible and directs development to locations that are already well-served by infrastructure. This is inherently positive, but not considered to be a significant effect.
25 SUSTAINABILITY OBJECTIVE 5: TO REDUCE DEPRIVATION AND INEQUALITIES.

Core Policies

Access to a home and employment are two of the most important factors in reducing levels of deprivation. Therefore, policies that promote growth (CP6, CP9, CP10, CP14) could have a positive effect in the long term in helping to reduce inequalities. Provision of affordable homes (CP7) would also help to tackle inequalities in income.

However, it is important to ensure that local communities can benefit from job opportunities or growth may only lead to a widening in inequalities. It may be beneficial to set conditions to ensure that a significant proportion of jobs are set aside for local communities.

Policy CP8 would have a specific positive effect for gypsies and travellers, who can be at a disadvantage without provision of well-serviced sites.

Policies CP21 and CP23 both seek to improve access to services and community facilities.

Policy CP24 supports these policies by seeking to improve access to public transport and enhance walking and cycling links. This would be positive for residents in deprived areas that often do not have access to a car.

Policy MH1 provides a mechanism for allowing community facilities and services to be enhanced or created as a part of new development. This could help to regenerate areas of deprivation where the development was close by.
Spatial Policies

Regeneration policies AC2, AC6, AC14 and AC17 could all have a positive effect on the baseline position by helping to regenerate areas in close proximity to deprived communities. Policies AC15, AC16, AC11 and AC12 would also help to increase access to jobs, although this would be to varying degrees for different communities. The cumulative effect is likely to be a significant positive effect as it would help to improve access to housing, jobs and services to existing and new communities. Though the nature of development likely to come forward on AC17 is now uncertain – and may remain in employment uses for the short to medium term – any development on the site could have a positive effect on the area.

Most greenfield housing policies would not lead to development in the most deprived areas, but these development sites are not located in the most affluent parts of the City either. The exception is policy AC22, which would encourage housing development close to areas of high deprivation.

It may be possible to use Community Infrastructure Levy (CIL) – if adopted - to fund infrastructure improvements in areas of need. However, there are significant demands on the strategic developments to deliver local facilities and secure other mitigation measures. Therefore, it may not be viable to seek contributions for off-site measures as well. This will need to be determined at the time of any application.

Overall, the Local Plan is likely to have a significant positive effect on tackling deprivation. Development is focused in the centre and to the south of the City, which contain the majority of deprived areas. However, deprived areas such as Normanton and parts of Chaddesden do not contain any sites for regeneration. It will therefore be important to ensure that these communities benefit from new job opportunities and infrastructure improvements. Given the level of policy requirements relating to affordability, Lifetime Homes and Infrastructure contributions, it may be difficult to ensure that areas away from development sites benefit (through CIL for example). This will make the wider impact of development more uncertain.
26  SUSTAINABILITY OBJECTIVE 6: TO REDUCE CRIME AND PROMOTE SAFER AND MORE COHESIVE COMMUNITIES.

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Access to a home and employment are two of the most important factors in reducing offending and re-offending rates. Therefore, policies that promote growth (CP6, CP9, CP14) would have a positive effect in the long term in helping to reduce crime levels. Provision of affordable homes that are indistinguishable from market homes would also help to integrate people from different backgrounds.

Policy CP3 requires that developments provide ‘good standards’ of safety and security. What this means in practice is unclear, but the policy ought to have positive implications. Having said this, there is specific reference to the encouragement of sprinklers in new homes, which would have a minor positive effect in terms of enhancing fire safety.

Policies CP11, CP12 and CP15 all seek to ensure that the City and other centres are viable, vibrant locations by day and night. By planning for an appropriate mix of uses, the policies can help to ensure that there is natural surveillance in centres, which can help to reduce crime and the fear of crime. CP15 also has a particular focus on considering the implications for community safety of any increase in food and drink uses.

Provision of adequate open space and leisure facilities and community facilities (Policy AC17 and AC21) can result in a reduction in anti-social behaviour and crime as they act as diversionary activities for potential offenders. However, facilities need to be designed appropriately to avoid concentrations of anti-social behaviour in residential areas.
Spatial Policies

Policies AC1 and AC2 are likely to increase activity in the City Centre, which aids natural surveillance. Policies AC6, AC11-AC15, AC17 and AC19 will also help to improve the appearance of neighbourhoods in more deprived areas, whilst increasing access to affordable housing and/or employment. In combination, these policies are likely to have positive implications by helping to reduce fear of crime (by improving environments) and actual levels of crime in the longer term (through access to housing and employment and other services).

Greenfield housing allocations on the edge of the City are less likely to have a positive effect in terms of helping to tackle deprivation. However, an aspect of affordable housing would be delivered, which is positive in helping to house potential offenders (and thus help to prevent criminal activity). These effects are not considered to be significant in isolation.

Taking the effect of the Local Plan policies as a whole, there is likely to be a minor significant positive effect on the baseline position in the longer term.
SUSTAINABILITY OBJECTIVE 7: TO ENSURE THAT THE EXISTING AND FUTURE HOUSING SUPPLY MEETS THE NEEDS OF THE CITY.

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### Core Policies

Policies CP2, CP3 and CP4 seek to secure high quality design from all development. Some aspects of quality design can cost more, but on the other hand, the resulting development would be more attractive to prospective buyers, and would be designed to last longer. This should help to ensure short term and longer term needs are met.

The level of housing growth proposed by CP6 is not enough to meet all the needs of the City’s population. However, there is not an adequate supply of land in the City to meet this need in a sustainable or deliverable manner. It has been agreed across the HMA that a proportion of the demand would be met in South Derbyshire and Amber Valley. Therefore, there is some reliance on other areas bringing forward housing to meet the City’s need. If this weren’t to happen then the City’s Core Strategy would not be meeting this objective. However, while this would technically be the case, the draft Core Strategies published by South Derbyshire and Amber Valley – and the Duty to Cooperate – should ensure that cumulatively, the objective will be met.

Policy CP7 sets targets for the delivery of affordable housing and lifetime homes. A 30% affordable housing target will not provide sufficient levels of affordable dwellings to meet the needs identified by the evidence. However, it has been demonstrated that meeting this need through Section 106 Contributions alone would not be possible. The policy does, therefore, make reference to the other means by which affordable housing will be secured.

Policy CP7 may also affect the viability and deliverability of housing schemes. The policy indicates that the target of 30% affordable housing will be subject to viability tests, which should help to mitigate any concerns over the deliverability of overall housing numbers.

A stronger local economy (CP9) would help to boost the housing market by providing direct jobs in construction and also to help residents to gain access to the property market. CP10 also allows for some poor quality employment sites to be considered for housing, which would also contribute to meeting the City’s need.
Accommodation for gypsies and travellers and students would be provided in appropriate, accessible locations through the delivery of policy CP8. ‘Part 2’ of the Local Plan will address any specific requirements based on new evidence currently being produced.

Cumulatively, policies CP16, CP17, CP19, CP20 and CP21 could all affect viability by adding to the development cost. Conversely, they could improve facilities for local communities and ensure that housing is well served by local services and better reflects local character. The exact effects would depend upon the characteristics of development. The effects are therefore uncertain at this stage.

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Spatial Policies

All policies relating to the provision of new housing will have a positive effect on meeting general housing needs and provide the potential to meet ‘specialist’ needs.

A number of spatial policies seek to deliver housing throughout the City Centre, which will help to provide a range of accessible dwellings. Policy AC1 in particular would help to improve the quality of existing stock by supporting the redevelopment of vacant properties and upper floors for residential uses.

Regeneration policies would also facilitate the delivery of at least 2200 dwellings in areas that have good accessibility. A mixed-tenure approach to housing will also ensure that a range of housing suitable for different social groups is provided in Osmaston, and there is a significant opportunity to improve existing housing stock and local facilities. As such, this policy would have a significant positive effect on the baseline position.

Provided that development created a new neighbourhood and secured significant remediation to the site, there would be potential for residential development through policy AC13. At this stage, the likelihood is uncertain though. Equally, the provision of housing on AC17 is uncertain at this time, but has the potential to have a positive effect.

Greenfield policies would all have a positive effect on the baseline position by helping to deliver a significant proportion of the City’s housing needs. The magnitude of the effects would differ from site to site as some are larger and better located than others. Cumulatively there would be a significant positive effect, especially when allocations in South Derbyshire and Amber Valley are taken into account.
SUSTAINABILITY OBJECTIVE 8: TO IMPROVE LEVELS OF EDUCATION AND SKILLS AND REDUCE EDUCATION INEQUALITIES.

Within Derby, there is a high proportion of working age residents without any qualifications and there is a skills gap between jobs in the City and educational attainment of its residents. The implementation of a number of policies within the Core Strategy should help to tackle these key issues.

For example, Policy CP22 highlights that the council is committed to supporting the continued growth and development of Derby University and the Colleges, particularly in terms of developing links between education and industry and in encouraging lifelong learning and achievement. The delivery of this policy would therefore help to improve access to high quality learning and training opportunities and encourage lifelong learning. Amendments to the policy following the Draft Plan consultation have served to strengthen this element of the plan, particularly in relation to the provision of training (CP9).

Furthermore, policy CP21 identifies a requirement to seek improvements in school provision, including improvements/extension of existing secondary schools and primary schools to meet the growing needs of the existing population and from new housing development. The policy also sets out the need to deliver new primary schools on a series of sites/broad locations located throughout Derby. Policy CP23 highlights need to actively manage the pattern of development to ensure that new development connects residents to educational opportunities. The implementation of these policies will contribute towards ensuring that the educational needs of the existing and new communities are met over the plan period.

These requirements are also set out in MH1, which provides an overarching policy on how new development will be required to help meet the educational needs of new residents.

Policy CP8 sets out the need to ensure that sites for Gypsies, Travellers and Travelling Showpeople are well related to the existing built up area and have convenient access to schools.
Spatial Policies

The ‘regeneration’ and ‘greenfield’ housing policies identify the need to deliver new educational provision as part of the development of sites across Derby. This will have a positive effect in terms of helping provide access to educational facilities to meet the needs of new communities. For example, policies AC6 and AC14 identify the need to develop/refurbish schools within the Eastern Fringes of the City and Osmaston. Policy AC23 sets out the need to deliver a new on-site primary school as part of new development on land at Boulton Moor and policy AC17 identifies the need to extend a local secondary school and/or develop a new secondary school as part of development on land between the southern edge of Wragley Way and the City boundary.

All the ‘greenfield’ policies set out the requirement for contributions to create or extend primary and secondary school provision as part of new development. This would help to ease pressure on schools from new development. The effects have been recorded as positive as strategic development provides an opportunity to tackle increasing pressure on schools from a growing population. There will, however, be potential conflicts between these requirements and the viability of development, particularly when factoring in other calls on available development finance (such as affordable housing, green infrastructure, highways etc.). The Council will need to consider how it will prioritise competing demands in implementing schemes on case-by-case basis.

On balance, it is considered that the Core Strategy would have a minor significant positive effect on the baseline position.
29 SUSTAINABILITY OBJECTIVE 9: TO IMPROVE HEALTH, REDUCE HEALTH INEQUALITIES AND INCREASE LEVELS OF PHYSICAL ACTIVITY.

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**Core Policies**

Access to a good quality home is a key determinant of wellbeing, so policies CP6 and CP7 would have a positive effect on the baseline position by helping to increase access to a range of households to meet differing needs. Policy CP8 would also help to ensure that gypsies and travellers live in healthy environments, which would help to reduce possible inequalities between social groups.

Policies CP5, CP9 and CP10 would contribute to regeneration, which could have knock on benefits for health and wellbeing in the longer term.

CP13 and CP17 support the development of leisure facilities that could lead to increased engagement in physical activity. However, these are behavioural choices, so it is difficult to determine a direct effect. However, the implications are likely to be positive.

Policies CP16, CP17, CP18 and CP21 in combination would have a **significant positive effect** on the baseline position by encouraging and enabling people to access open space and leisure facilities. Policy CP21, in particular, also allows for the provision and improvement of health related facilities across the City (including facilitating any improvements that may be instigated by the City’s health authorities).

CP23 would have a positive effect on health by encouraging more people to walk and cycle. Policy CP24 may also improve access to healthcare services, jobs and leisure, but this may be more likely to be via private car, so the effects are mixed.
Spatial Policies

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**Broad Implications**

**Spatial Policies**

Policies AC15, AC11, AC12 and possibly AC13 would all provide opportunities for increased access to jobs. Access to employment is a key driver to health and wellbeing. In the long term, these policies (*in combination*) could have a positive effect on the baseline position.

A number of the strategic housing sites would help to secure enhancements to facilities and services in local communities, with knock-on benefits to health in the longer-term. Those sites in close proximity to deprived areas (AC6, AC14, AC22) would have the greatest benefit.

A number of infrastructure improvements would also be secured at adjacent developments in South Derbyshire. Of note is a new health centre/GP surgery as part of the Boulton Moor development, which would complement the development proposed by policy AC23.

Access to a GP/Health Centre is particularly poor for AC21 ‘Hackwood Farm’. Any residents locating in this area may therefore have to travel further to access primary health care. It is not clear at this stage if healthcare facilities would be provided to support the developments in this area, but the combined developments could put pressure on existing services.

Development at the Former Celanese Site (AC13) would not have good access to facilities. However, the policy makes it clear that if the site were to be developed as a new residential neighbourhood in the future, then facilities would need to be provided on-site. At this time, the effects cannot be known.

Overall, the plan is likely to have a **significant positive effect** on the baseline position for this objective. However, increased development could have a significant negative effect on air quality by generating additional congestion in urban areas. This could have negative effects on the health of some communities in the inner areas of Derby in particular (*where levels of deprivation are higher*).
**SUSTAINABILITY OBJECTIVE 10: TO PROTECT AND ENHANCE DERBY’S CULTURAL HERITAGE INCLUDING ITS TOWNSCAPE AND ARCHAEOLOGY.**

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ensuring their protection. Conversely, increased development and visitors to these areas could have an adverse effect on the setting of heritage features. Application of policy CP3 and CP20 should ensure that any negative effects are avoided.

Policy MH1 highlights that the council may seek contributions for the protection and enhancement of the City’s cultural heritage through the use of planning obligations. This should further contribute towards a positive effect in relation to protecting and enhancing existing cultural assets and buildings of historical importance.

Development at strategic sites has the potential to affect local character. However, the site specific policies incorporate a range of measures that aim to mitigate negative effects / enhance the positives in relation to protecting and enhancing Derby’s cultural heritage. This includes:

- **Policy AC1** emphasises the need to enhance the City Centre’s standing as a regionally important cultural destination. In particular, the policy sets out the need to strengthen quality in every aspect of place making and reinforce distinctiveness through architecture, public realm and public art and enhance key historic assets which have the greatest potential for positive effect on the townscape character and vitality of the City centre. The policy also includes specific reference to the need to manage the effects of tall buildings on heritage.

- **Policy AC3** identifies the importance of ensuring frontages are designed that do not have an adverse effect on the historic character and environmental quality of the surrounding area, this will help to preserve the setting of heritage in the City Centre.

- **Policy AC2** highlights need to ensure that proposals for new development do not have an adverse effect on the City’s heritage and character.

- **Policy AC5**: reflects the overarching ‘placemaking’ policies in terms of requiring a high quality of design, which respects the City Centres existing character, street patterns, street scene and heritage assets. It also identifies where the Council will prioritise public realm improvements across the centre.

- **Policy AC6** highlights the need for regeneration of the former DRI site to deliver the effective protection and enhancement of heritage assets within and adjacent to the area and for new development to positively contribute to the townscape of London Road.
• Policy AC7-AC9 – these policies set out need to continue to recognise the outstanding universal value of the World Heritage Site by protecting and enhancing its special character, appearance and distinctiveness.

• Policy AC8 – sets out the need for new development to require satisfactory treatment of the area adjoining the River Derwent in terms of visual, recreational and natural history importance.

• Policy AC10 – highlight that Darley Abbey Mills Complex and Darley Park Stables are a key part of the Derwent Valley Mills World Heritage Site and should be sensitively transformed into a vibrant destination for business, leisure, tourism and cultural activity and make them a flagship project within the WHS. Furthermore, the policy sets out the need to maintain the historic urban form as part of delivering this new development.

• Policy AC14 emphasises how regeneration of the Osmaston area will need to help to provide a legacy for Rolls-Royce, recognising the historic and cultural significance of their presence in Osmaston.

• Policy AC19 highlights the need to avoid any detrimental effects on heritage features. In combination with policy CP20, development at this site should therefore be sensitive to local character.

In isolation, the ‘greenfield’ policies are unlikely to have a significant effect on the character of the built environment. However, cumulatively, and in combination with significant development in South Derbyshire, there could be a fundamental change to the character of the urban fringes in the south of the City. The greatest effects are likely to be generated through development in South Derbyshire, but sites at Boulton Moor and Rykneld Road in particular could also contribute to a change in character. The creation of significant new green infrastructure and maintenance of the remaining green wedge at Boulton Moor would help to ensure that the openness of this area is maintained. However, policy AC20 does not contain any specific measures to ensure character is retained. Policies CP4, CP16, CP17 and CP18 could help to guide development in this respect, but it may also be useful to set a clear expectation of what is expected at this strategic site. The development at ‘Rykneld Road will be ‘enclosed’ by major road networks and the Highfields Farm development, so it will be important to maintain a strong element of openness within the site. Development at this site has already been granted outline planning consent though.

On balance, the Local Plan is likely to have a neutral / minor positive effect on the baseline. It is unlikely that there would be significant effects upon designated heritage features as there are a range of protective policies and mitigation measures proposed. However, policies CP6, CP10 and a number of site specific policies could have a significant negative effect on the setting of heritage assets if design and layout focuses on protecting the designated heritage features ‘on-site’ without a consideration of the wider context. Relevant ‘CP’ policies should ensure this will not be the case, but the risk will exist.
### Core Policies

The requirement for sustainably designed commercial and industrial developments can support inward investment in higher value businesses that are seeking quality premises. Policy CP2 sets out a broad requirement for development proposals to take steps to achieve the most sustainable development possible. Whilst this is positive, there is no requirement to demonstrate how the policy has been implemented. Therefore, the effects are uncertain and likely to be driven by the market.

Policy CP6 would support employment in the construction industry, which could help local businesses and act as a catalyst for economic growth.

Policies CP9-CP11 are also likely to have a significant positive effect on the baseline by supporting economic growth in the City centre and other strategic locations. The majority of employment opportunities would be accessible to more deprived communities. CP9 also provides the framework for a range of different types of business and industry coming to the City. This comprehensive approach should help to implement the Council’s overall economic strategy.

Policies that promote the City centre as the key location for office and retail development would also help to maintain and increase inward investment to the City. The relaxation of parking standards for City centre development from current Local Plan standards may also help to attract businesses to the centre and support inward investment. However, this may have negative consequences in terms of traffic, congestion and resulting pollution and air quality.

Policies CP16–CP20 have the potential to improve the quality of the environmental services on offer across Derby. This should make the City a more attractive prospect for businesses and visitors. However, the combination of such policy requirements may restrict development in some locations or make it more expensive to secure.
Key strategic allocations at AC11, AC12, AC15 and within the City Centre will provide sufficient land and opportunities to meet all of Derby’s economic needs. The policies for these sites also provide a great deal of flexibility in terms of the type of development permitted. This will give the scope to make sure most needs are met.

City centre policies AC1-AC5 and regeneration of areas such as Castleward (AC6) will help to make the City centre more attractive to inward investors and visitors. Policy AC7 would also have a positive effect on the economy by helping to ‘unlock the economic potential’ of the River Derwent Corridor through the sensitive regeneration of riverside sites. AC1 and AC2 also make specific provision for the creation of the ‘Central Business District’ which should become the main focal point for office development. Not only will this have a direct positive impact on the economy of the City, it should also have indirect benefits by providing additional custom to shops and services within the remainder of the City Centre.

The allocation of additional employment space at key sites would also help to support local businesses. The effects of policy AC13 are unclear as the site is heavily constrained and employment uses may not be viable.

Policies AC7-AC9 could have a beneficial effect on levels of tourism by enhancing the historic and natural environment along the River Derwent.

Greenfield and regeneration-based housing policies would help to provide a boost to the local construction industry over the plan period. Meeting housing need in the City would also help to maintain a healthy labour market by providing suitable places to live.

Overall, the Local Plan is likely to have a **significant positive effect** on the baseline position.
### SUSTAINABILITY OBJECTIVE 12: TO MAXIMISE PEOPLE’S ACCESSIBILITY TO SERVICES AND FACILITIES.

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**Core Policies**

Derby is a compact city and most residents have relatively good access to services and facilities (*though clearly there are areas where access is worse than others*). Policy CP3, CP23 and CP24 all seek to improve access to services by enhancing walking, cycling and strategic road networks.

The delivery of housing (CP6) at a strategic scale provides opportunities to enhance community services and facilities. It would be more difficult to fund such improvements without strategic development. Policies CP16, CP17, CP19 and CP21 all provide a framework for securing enhanced access to open space, wildlife and community facilities, whilst policy MH1 provides the delivery mechanism. While it is recognised that increased housing growth is also likely to lead to additional pressures on existing facilities and services, the full implementation of the Strategy should still lead to overall benefits.

With the exception of the City centre itself, the key employment locations are mainly on the outskirts of the City. Access to these sites is mixed. For those communities to the west and north of the City, access is poorer than for those in the south and east. Policy CP24 does, however, seek to ensure the delivery of new transport infrastructure into Land South of Wilmore Road (AC15).

Policies that promote centres as the priority location for retail, office and leisure facilities (CP11-CP13) would have a positive effect on the baseline position as these locations are easier to access by public transport, and for district/neighbourhood centres by walking and cycling.
Spatial Policies

Policies AC6, AC14, AC17 and AC19 will help to secure housing and/or mixed use developments in areas that have fairly good access to services and sustainable modes of transport. New local centres will also be secured as part of regeneration initiatives.

AC21 does not currently have particularly good access to facilities. The provision of a larger cross-border site does allow for the potential for a new on-site primary school and small scale shopping facilities, which should help the situation. However, it will still have relatively poor access to District Centres, which cannot be mitigated entirely, though the provision of new pedestrian facilities is designed to assist in this regard.

Employment sites for enhancement and expansion (AC11, AC12, AC13, AC16) would be very accessible to communities in close proximity, but those to the north and west of the City may find it more difficult to access jobs in these locations. The University and Hospital are, however, major employers in this part of the City which helps to redress this balance to an extent.

“Greenfield” policies will lead to the development of a significant proportion of housing in areas that are currently not ideally served by local services and transport links. However, a key part of each development will be to secure improvements to existing facilities or to provide new services were there is a need. There will also be facilities provided as part of developments in adjoining parts of South Derbyshire that will serve communities in Derby. This will help to ensure that local communities have better access to goods and services in this part of the City and mitigate the risks. However, most of the sites could remain moderately or poorly related in terms of public transport links due to their peripheral nature. This will be mitigated to some extent through the implementation policies, though the limited nature of the choices open to the Council mean that there is little choice. Pressures on the viability and delivery of development may also increase the risk of development not being able to deliver the facilities identified by policy. This factor will make the impacts of the development more uncertain.

The dense nature of the City means that accessibility to services is generally good. Therefore, overall the plan is likely to have a neutral effect. Some development will be located in areas that are not well related to existing services. However, enhancement measures associated with strategic developments should mitigate the negative effects and potentially benefit existing communities.
33 SUSTAINABILITY OBJECTIVE 13: TO PROTECT AND ENHANCE GREEN INFRASTRUCTURE, BIODIVERSITY, GEODIVERSITY AND THE NATURAL ENVIRONMENT.

Core Policies

Policy CP2 could help to improve wildlife habitats through the use of Sustainable Urban Drainage Systems. The use of green infrastructure for adaptation measures is also 'encouraged'. In practice, there is limited experience of incorporating adaptation measures into developments, so it is unclear how much influence this policy would have without setting a firm requirement for adaptation measures.

The delivery of housing, employment and road schemes could have an adverse effect on wildlife through direct loss of green space, increased disturbance to habitats and through increased demands for water. It is unlikely that any designated habitats would be affected, but cumulatively, there is potential for urban wildlife to be affected by increased disturbance and fragmentation. Conversely, housing development could provide the opportunities to secure enhancements to open space and wildlife habitats. However, in-line with the precautionary principle, negative effects have been identified at this stage.

Policy CP7 could affect the ability of developments to secure enhancements to open space and wildlife value if viability was an issue. This may be a particular issue on brownfield sites which can actually have greater ecological value than greenfield sites that have been degraded through intensive agriculture.

Several housing and employment locations are in close proximity to sites of wildlife interest, particularly those running alongside the River Derwent. Increased heavy traffic into these areas, and expansion of businesses could put additional pressure onto these wildlife sites from pollutants and disturbance. However, this should be balanced against the site specific policies, which generally highlight the need to protect these features, and generic policies CP16-CP19.

Policies CP16-CP19 would help to ensure that the baseline position did not deteriorate. Policy CP19 in particular could have a significant positive effect by seeking to ensure a net gain in biodiversity over the plan period.
Although some areas of Green Wedge have been released as part of the Local Plan site allocations, Policy CP18 is positive as it seeks to protect the character and openness of the remaining Green Wedge from further development.

Green roofs could have a positive effect on the City’s biodiversity connectivity and would also help to adapt to the effects of climate change by helping to cool buildings. Policies CP19 and CP16 could be used as a mechanism to secure such design features. However, it may be useful to set out an explicit reference to this within policy CP16 to encourage the consideration of green roofs where appropriate.

Policy CP23 offers the opportunity to improve connectivity between open space networks by securing improvements to walking and cycling routes. Some of the schemes identified in CP24, including the SDITL, will have a negative impact to an extent as they will be implemented on greenfield land.
policies to ensure that any impact is avoided, mitigated or that the features of importance are enhanced. As noted above, without mitigation the effects are likely to be negative. However, the policies do address this and thus the effects must be considered uncertain at this stage.

Development at Boulton Moor (AC23) would lay either side of the City’s only SSSI (Boulton Moor). However, the value of the site is for its rare geological remains (underground) rather than for wildlife, so the effect could be kept to a minimum provided that the site is not disturbed by ground works or landscaping. A buffer zone could be established.

Whilst, policies AC6, AC11, AC12, AC13 and AC16 involve development on brownfield land, these are also within close proximity to local wildlife sites, presenting the potential for negative effects. However, AC11 and AC15 include a clause that requires an ecological survey and appropriate mitigation measures to be secured. AC15 also specifically refers to the protection of the Local Geological Site, and there are measures seeking to enhance / expand green infrastructure and biodiversity within policies AC16, AC12 and AC13. Therefore, the effects would not be expected to be significant at these sites (i.e. the effects are considered to be neutral).

Several strategic greenfield sites are also within close proximity to a local wildlife site. However, the only site identified in the Local Plan containing any previous formal wildlife designations is Onslow Road (part of AC22). The DWT have now reconsidered the classification of this site and, though there are still important features in proximity to potential development, any impact of development would be considered less significant. In any event, the policy for this site ensures that wildlife features should be protected though, so the effects are not considered to be significant.

Policies AC18 – AC26 each seek to protect and enhance green infrastructure and biodiversity as necessary, which should help to mitigate potential negative effects at these sites.

Negative/uncertain implications have been recorded at a number of strategic sites at this stage to reflect the loss of natural green space and/or potential effects on wildlife. Although site specific clauses (and policies CP16 –CP19) should help to mitigate these effects and / or lead to enhancement, the extent and quality of measures that would be secured through development are not known at this stage. Having said this, it is not anticipated that significant effects would arise.

Policy AC9 seeks to enhance biodiversity throughout the World Heritage Site wherever possible, which is inherently positive. Whilst policies CP16-CP19 already provide the necessary policy framework for biodiversity, policy AC9 could prompt specific action in this area.

The effects of the plan as a whole are mixed. The need for significant housing growth in a constrained City boundary could lead to unavoidable (cumulative) pressure on wildlife and open spaces. However, strategic development also offers an opportunity to enhance green infrastructure and biodiversity. It will be important to monitor the effects of development and ensure that enhancement measures are secured as part of development schemes. Assuming mitigation and enhancement measures are secured, the effect of the Local Plan is expected to be neutral.
34 CONCLUSIONS AT THIS CURRENT STAGE

34.1 Conclusions and monitoring

The effects of the Core Strategy have been summarised in Table 34.1 below. Measures envisaged for monitoring identified effects and/or general trends against each sustainability topic have also been included. No further recommendations for mitigation or enhancement have been suggested beyond those that have already been suggested at previous stages of appraisal.

Table 34.1: Summary of sustainability effects of the Local Plan

<table>
<thead>
<tr>
<th>Sustainability Objectives</th>
<th>Summary of effects</th>
<th>Monitoring envisaged</th>
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</thead>
</table>
| 1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding. | Overall, the plan is likely to have mixed effects on the baseline position. Carbon emissions are likely to increase from transport, although mitigation measures would help to reduce this effect somewhat. The drive to reduce carbon emissions from homes and businesses will also help to offset the potential for increased emissions from new development. However, it may be difficult to achieve zero carbon development in the City due to competing policy demands and a lack of energy strategies for areas of growth. On balance the plan contributes a moderate negative effect in terms of generating an increase in greenhouse gas emissions. Adaptation to climate change will be enhanced through the implementation of flood management schemes throughout the plan period. New development also presents an opportunity to improve surface water drainage, green infrastructure and resilience to heat. In combination there could be a significant positive effect in terms of adaptation to climate change. | - Renewable energy capacity installed by type.  
- Domestic emissions per capita (tonnes).  
- Number of strategic flood risk assessments undertaken  
- Applications granted contrary to Environment Agency advice.  
- Proportion of new homes achieving emissions reductions above building regulation requirements.  
- Net change in surface water run-off at key sites. |
| 2. To minimise traffic and the length of journeys travelled by people and goods. | The level and distribution of residential and employment development is likely to lead to an increase in the number and distance of car trips. This will exacerbate the already constrained network. As the NPPF requires authorities to meet their OAN and job needs, this growth is likely to be happen. Equally, background trends point to increasing levels of car ownership. Development on brownfield sites, particularly the City Centre, and providing local facilities, encouraging walking, cycling and improved public transport links will help to reduce the effects. A number of local road improvement schemes would also help to reduce congestion – in some places this could improve the baseline position. There is still likely to be an overall increase in the level of traffic and travel, which is considered to be a negative effect. However, this growth would be likely to occur in any event, so the plan ought to have a positive effect on minimising the anticipated growth in traffic. The effects are also likely to be less severe as a result of Derby’s compact nature and generally good accessibility. The plan also opts for a lower growth option than may have been the case – thus helping to reduce potential impacts. | - Distance travelled to work.  
- Inbound traffic flows.  
- Public transport journeys originating in the LTP area.  
- Number of cyclists recorded at specific sites.  
- Number of businesses within the LTP area adopting travel plans.  
- Proportion of employment land within 400m of a bus stop.  
- Number of residents that travel to work by car / public transport / cycling /walking. |
Consequently, the plan is predicted to have a **minor significant positive effect** on the baseline position.

If strategic improvements to the A38 could be achieved there would be a greater positive effect on the baseline in terms of traffic and congestion reduction. However, this would be a Highways Agency led scheme that is outside the control of the Council (though recent announcements suggest that there is an increasing likelihood that this will now happen, potentially within the plan period).

There is the potential for water quality to be improved through the enhancement of green infrastructure, sustainable urban drainage schemes and the delivery of the Our City Our River Masterplan. However, increased development could also lead to an increased risk for pollution, particularly during construction phases. On balance the effects are considered to be **neutral**.

The effect on air quality from growth has not been quantified but logic dictates that growth will bring additional traffic, which in turn will have a **significant negative effect** on existing areas of poor air quality – particularly in relation to the AQMAs. Measures to reduce reliance on the private car may help to reduce the significance of the effect to an extent but the nature and location of the growth will lead to an unavoidable negative effect.

It should be noted that housing and employment growth would still occur in the absence of the local plan, so there could be a potential worsening of air quality anyway (particularly considering existing issues in the City and trends in car ownership etc.). Therefore, it is considered that the mitigation measures put forward in the plan will have a ‘positive’ impact on minimising the ‘natural’ increase in pollution.

Due to the increased use of natural resources and generation of waste for construction, negative implications could be anticipated. However, the level of housing growth would be unlikely to be significantly different without a Local Plan (it may, indeed, be higher without the implementation of specific strategic allocations). There would therefore be insignificant effects in terms of the use of natural resources and generation of waste for construction.

Whilst a number of greenfield sites would be lost to development, the plan also identifies brownfield development sites for housing and employment, and gives priority to the re-use of empty homes. This should help to maximise the use of previously developed land. This would have positive effects, as without a plan in place it is less likely that difficult brownfield sites would be delivered.

<table>
<thead>
<tr>
<th>Sustainability Objectives</th>
<th>Summary of effects</th>
<th>Monitoring envisaged</th>
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<tbody>
<tr>
<td>3. To minimise pollution.</td>
<td>Consequently, the plan is predicted to have a <strong>minor significant positive effect</strong> on the baseline position. If strategic improvements to the A38 could be achieved there would be a greater positive effect on the baseline in terms of traffic and congestion reduction. However, this would be a Highways Agency led scheme that is outside the control of the Council (though recent announcements suggest that there is an increasing likelihood that this will now happen, potentially within the plan period).</td>
<td>- Water Framework Directive Status of River Derwent and Markeaton Brook. - Number of complaints received concerning construction sites. - Status and extent of Air Quality Management Areas. - Number of fly-tipping reports.</td>
</tr>
<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>Due to the increased use of natural resources and generation of waste for construction, negative implications could be anticipated. However, the level of housing growth would be unlikely to be significantly different without a Local Plan (it may, indeed, be higher without the implementation of specific strategic allocations). There would therefore be insignificant effects in terms of the use of natural resources and generation of waste for construction. Whilst a number of greenfield sites would be lost to development, the plan also identifies brownfield development sites for housing and employment, and gives priority to the re-use of empty homes. This should help to maximise the use of previously developed land. This would have positive effects, as without a plan in place it is less likely that difficult brownfield sites would be delivered.</td>
<td>- Domestic consumption of water in litres per day - Percentage of development on previously developed land. - Percentage of household waste recycled/composted. - Household waste collected per head. - % of developments achieving a higher water efficiency rating than required by building regulations.</td>
</tr>
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### Sustainability Objectives

<table>
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<tr>
<th>Sustainability Objectives</th>
<th>Summary of effects</th>
<th>Monitoring envisaged</th>
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</table>
| 5. To reduce deprivation and inequalities. | By supporting the growth of employment and providing for housing need across the City, the Core Strategy is likely to have a **significant positive effect** in helping to reduce deprivation. A high proportion of development is focused on areas that are significantly or moderately deprived, in particular Sinfin, Osmaston and the City Centre, which will help to ensure that inequalities do not widen. | - Index of Multiple Deprivation.  
- Gaps in the level of deprivation between worst and best performing areas.                                                                                     |
| 6. To reduce crime and promote safer and more cohesive communities. | There is unlikely to be any significant effects on community safety in the short to medium term. However, in the longer term, improved access to housing, employment and more attractive environments could help to reduce levels of crime, anti-social behaviour and re-offending across the City. The Local Plan is therefore likely to have a **minor significant positive effect**. | - Crime rates per 1000 population.  
- Provision of infrastructure and community benefits in conjunction with new housing development.  
- Acquisitive crime rates at strategic developments.  
- Net loss/gain in community facilities.                                                                                                                                  |
| 7. To ensure that the existing and future housing supply meets the needs of the City. | The plan will help to deliver 11,000 homes across the City up to 2028. The majority of the wider need for the City area will be met on the edges of the City in South Derbyshire and Amber Valley at a number of strategic sites.  
- This level of development would help to improve the availability of housing to meet the needs of different groups; having a **significant positive effect** on the baseline position.  
- Although positive effects would be achieved in terms of regeneration, the level of affordable housing and properties that could benefit deprived communities may not address the full need. | - Gross affordable housing completions and breakdown for different dwelling types/sizes.  
- Affordable housing secured.  
- Net additional dwellings per year.  
- Net additional dwellings over the previous five year period.  
- Average Household Size.                                                                                                                                               |
| 8. To improve levels of education and skills and reduce education inequalities. | Overall, the plan is likely to have a **minor significant positive effect** on the baseline. New development will help to secure enhancements to existing education provision at a number of strategic sites. Creating the conditions for employment growth could also help to secure more jobs for local people and link to the development of skills and qualifications.  
- The continued support for the University and Derby College’s activities in the City could also help to reduce the skills gap that currently exists. | - Proportion of the population over 16 with basic qualifications.  
- Schools with a deficit/surplus of school places to serve their catchment area.  
- Proportion of working age population with no qualifications.                                                                                                           |
| 9. To improve health, reduce health inequalities and increase levels of physical activity. | Air quality could worsen in parts of the City, with a knock on effect on health for a small number of communities. This would have negative implications.  
- However, measures to encourage greater levels of walking and cycling could help to improve health in the longer-term.  
- By providing a greater choice of housing and supporting economic growth, the health and wellbeing of communities | - Healthy life expectancy.  
- Participation levels in sport.  
- Provision of public open space in conjunction with new housing.                                                                                                          |
**SA of the Derby City Local Plan Part 1: The Core Strategy**

<table>
<thead>
<tr>
<th>Sustainability Objectives</th>
<th>Summary of effects</th>
<th>Monitoring envisaged</th>
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<tbody>
<tr>
<td></td>
<td>could be improved in the long term, but it would be dependent upon the most deprived communities accessing job opportunities and affordable homes. This will be of particular importance in the inner areas such as Arboretum and Normanton Wards.</td>
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<td></td>
<td>Although some enhancement of open space is likely to occur with development, there is likely to be a negligible effect on levels of physical activity (though it does, at least, provide the opportunity for activity).</td>
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<td></td>
<td>The plan makes provision to help support the implementation of new leisure facilities, including the new multi-event arena at Pride Park and new Aquatic Centre in the City Centre. These would probably happen without the Core Strategy in place, however, so the effect of the plan in this respect is relatively minor.</td>
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<td></td>
<td>On balance, the Local Plan is likely to have a minor significant positive effect on the baseline.</td>
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<tr>
<td>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</td>
<td>In combination with sites in South Derbyshire, the delivery of strategic development sites in the City has the potential to have a significant negative effect on the character of settlements on the edge of the City. Measures to secure appropriate character-led design could help to minimise the effects and in some cases enhance landscape quality. However, a residual adverse effect on the townscape would be unavoidable.</td>
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<td></td>
<td>In the main the plan avoids development in the most sensitive areas and is proactive in protecting heritage assets. The specific policy protection for the World Heritage Site, Darley Abbey Mills and the focus on delivering high quality development in the City Centre, would suggest that the plan would have a significant positive effect on existing heritage features.</td>
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<td></td>
<td>In areas earmarked for regeneration, there is also the potential for development to help enhance heritage assets that could otherwise fall into disrepair. This could have a significant positive effect in the baseline.</td>
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<td></td>
<td>The delivery of new homes would support the construction industry, with knock-on benefits for local businesses. Allocation of additional higher quality employment land would also have a positive effect on the baseline position by increasing the range of sites available for inward investment. This may encourage diversification and the further development of the technology-based industries.</td>
<td></td>
</tr>
<tr>
<td>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</td>
<td>If strategic infrastructure improvements are secured through development, this will further improve the performance of the local economy.</td>
<td></td>
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<tr>
<td></td>
<td>The plan is likely to have a significant positive effect on the baseline position.</td>
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<td></td>
<td>- Change in the quality of landscape character at strategic sites.</td>
<td></td>
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<tr>
<td></td>
<td>- Number of buildings ‘at risk’</td>
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<td>- Investment in heritage assets.</td>
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<td></td>
<td>- Development granted contrary to heritage policies</td>
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<tr>
<td></td>
<td>- % of people that think the character of their neighbourhood has improved / stayed the same / declined.</td>
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<td></td>
<td>- Level of gross floor space completed, under construction or committed for A1 use in the City centre</td>
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<td></td>
<td>- Gross annual pay</td>
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<td></td>
<td>- Employment rate</td>
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<tr>
<td></td>
<td>- Percentage change in VAT registrations</td>
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<tr>
<td></td>
<td>- Hectares of new employment land completed</td>
<td></td>
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<tr>
<td></td>
<td>- Total number of visitors</td>
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</tbody>
</table>
### Sustainability Objectives

<table>
<thead>
<tr>
<th>Summary of effects</th>
<th>Monitoring envisaged</th>
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</table>
| A proportion of housing development would be located in peripheral locations, which in the main have poorer access to services and public transport links. However, a number of community facilities would be provided or enhanced as part of these strategic developments; which in some cases could improve access to local services for existing communities as well. This would have a **minor positive effect** on the baseline position. | - Number and frequency of new bus routes developed as part of new housing and employment development.  
- Length of new/improved cycleway and pedestrian routes.  
- Health of local shopping centres.  
- Average time taken to travel to school.                                                                                       |
| Increased growth in the City Centre will have a **minor positive effect** on the baseline. Currently, there is a very small residential population in the City Centre, but clearly these have very good access to facilities and services. The creation of a new residential neighbourhood and promotion of 'City Living' will provide a greater number of new residents with these benefits. |                                                                                                                                                                                                                       |
| A number of infrastructure improvements would also be facilitated through new development; helping to improve access to services. However, this would continue to be mostly car-based travel.                                                                                                         |                                                                                                                                                                                                                       |
| The level of growth required will also inevitably put pressure on existing facilities (though this would happen with or without the plan in place).                                                                                                               |                                                                                                                                                                                                                       |
| On balance a **neutral effect** could be anticipated.                                                                                                                                                                 |                                                                                                                                                                                                                       |
| Development on a strategic scale has the potential to have negative effects on wildlife and the connectivity of habitats. In particular, a number of strategic sites are in close proximity to local wildlife sites. As the city has a limited number of open spaces of wildlife value, they are particularly vulnerable to increased pressure from development; therefore a negative effect could be anticipated. | - Extent of greenbelt and green wedge.  
- Hectares of local nature reserve per 1000 population  
- Extent of ancient woodland, hedgerows and natural grassland.  
- Net loss / gain in biodiversity.  
- Biodiversity enhancement in new developments?                                                                                           |
| However, application of policies in the plan would seek to ensure that development provided the opportunity for enhancement of open space and wildlife features. In particular, the objective to seek a *net increase in biodiversity* could have a **significant positive effect** on the baseline.              |                                                                                                                                                                                                                       |
| At this stage there is a fair degree of uncertainty about these effects.                                                                                                                                              |                                                                                                                                                                                                                       |
PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?
35 PLAN FINALISATION, ADOPTION AND MONITORING

The SA Report must include…

- A description of the measures envisaged concerning monitoring

This part of the SA Report explains the next steps that will be taken as part of the plan-making / SA process, including in relation to monitoring.

35.1 Plan finalisation and adoption

The Core Strategy has been ‘published’ for consultation so that final representations can be made. It is the intention that the Core Strategy will then be ‘Submitted’ for consideration by an Independent Planning Inspector at Examination. The Inspector will then judge whether or not the Plan is ‘sound’.

Assuming that the Inspector does not request that further work be undertaken in order to achieve soundness, it is expected that the Plan will be formally adopted in 2016. At the time of adoption an SA ‘Statement’ must be published that sets out (amongst other things):

- How this SA findings and the views of consultees are reflected in the adopted Plan, *i.e. bringing the story of ‘plan-making / SA up to this point’ up to date; and*

- Measures decided concerning monitoring.

35.2 Monitoring

At the current stage (i.e. within the SA Report), there is only a need to present measures envisaged concerning monitoring. As such, Table 34.1 (in section 34) suggests measures that might be taken to monitor the effects (in particular the negative effects) highlighted by the appraisal of the Local Plan (see Part 3 of this SA Report). Monitoring indicators can also track the general direction of travel of the baseline position.
APPENDIX 1: REGULATORY REQUIREMENTS

Annex I of the SEA Directive prescribes the information that must be contained in the SA Report; however, interpretation of Annex I is not straightforward. The table below explains how we (AECOM) have interpreted the Annex I requirements.

<table>
<thead>
<tr>
<th>Annex 1</th>
<th>Interpretation of Annex I</th>
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</thead>
<tbody>
<tr>
<td><strong>The report must include…</strong></td>
<td><strong>The report must include…</strong></td>
</tr>
<tr>
<td>(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;</td>
<td>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;</td>
</tr>
<tr>
<td>(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</td>
<td>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
</tr>
<tr>
<td>(c) the environmental characteristics of areas likely to be significantly affected;</td>
<td>The relevant environmental protection objectives, established at international or national level</td>
</tr>
<tr>
<td>(d) 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;</td>
<td>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</td>
</tr>
<tr>
<td>(e) the environmental protection objectives; established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;</td>
<td>The environmental characteristics of areas likely to be significantly affected</td>
</tr>
<tr>
<td>(f) 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;</td>
<td>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</td>
</tr>
<tr>
<td>(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;</td>
<td>Key environmental problems / issues and objectives that should be a focus of appraisal</td>
</tr>
<tr>
<td>(h) an outline of the reasons for selecting the alternatives dealt with and 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</td>
<td>An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the reasonableness of the approach)</td>
</tr>
<tr>
<td>(i) a description of the measures envisaged concerning monitoring.</td>
<td>The likely significant effects associated with the draft plan</td>
</tr>
</tbody>
</table>

I.e. answer - What's the scope of the SA?  
I.e. answer - What's the context?  
I.e. answer - What is the baseline?  
I.e. answer - What are the key issues & objectives?  
I.e. answer - What has Plan-making / SA involved up to this point?  
I.e. answer - What are the appraisal findings at this current stage?  
I.e. answer - What happens next?
APPENDIX 2: OPTIONS APPRAISALS - METHODOLOGY

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising a number of reasonable alternatives, covering:

- the broad quantum of growth and spatial approaches to growth in housing and employment;
- potential strategic site allocations for housing and employment;
- a range of thematic topics.

The following appendices identify the reasonable alternatives that have been appraised and present the appraisal findings in full.

The appraisal tables should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

At each stage in the process, the appraisals have been reviewed to refine the assessment, take account of new evidence, changes to guidance or the results of consultation.

Methodology
For each of the alternatives, the appraisal identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability topics and issues identified through scoping (see Part 1) as a methodological framework.

Effects are predicted taking into account the criteria presented within Regulations.\(^{53}\) So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. The potential for ‘cumulative’ effects is also considered.\(^{54}\) These effect ‘characteristics’ are described within the appraisal as appropriate.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a no plan scenario).

In light of this, there is a need to make considerable assumptions regarding how policy approaches will be implemented ‘on the ground’. Where assumptions are relied-upon this is made clear in the appraisal text.\(^{55}\)

In many instances it is not possible to predict significant effects, but it is possible to comment on the merits of alternatives in more general terms. This is helpful, as it enables a distinction to be made between alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

Appraisal Key:
Where sufficient evidence is available, alternatives have been ranked in order of preference, with numbering indicating the rank of individual alternatives, i.e. 1, 2, 3, 4, 5. The most preferable option is given a ‘1’ rating.

Where it is not possible to rank alternatives, due to insufficient evidence or information, this is indicated by a dashed line, like this: -

Where significant effects are identified, the alternative is colour coded, red for a significant negative effect, and green for a significant positive effect. A lighter shade indicates a significant effect with a lower

\(^{53}\) Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

\(^{54}\) In particular, there is a need to take into account the effects of the Local Plan acting in combination with the equivalent plans prepared for neighbouring authorities. Furthermore, there is a need to consider the effects of the Local Plan in combination with the ‘saved’ policies.

\(^{55}\) It is worth noting that, as stated by Government Guidance (The Plan Making Manual, see http://www.pas.gov.uk/pas/core/page.do?pageId=156210): “Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification.”
magnitude. These ratings are to provide a better appreciation of the magnitude of effects, but it should be remembered that they do not reflect objective measurements.
APPENDIX 3: APPRAISAL OF SCALE AND DISTRIBUTION OF HOUSING ALTERNATIVES

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative broad spatial approaches to the scale and distribution of housing:

1) Regeneration (10,000) Brownfield Housing & Commitments only
2) Partial Greenfield Release) (12,000) Brownfield Housing & Commitments + some greenfield release (or increase in densities on brownfield)
3) Regional Spatial Strategy (14,400) Brownfield Housing & Commitments + more significant greenfield release
4) Housing Requirement Study (15,600) – Meeting ‘Demographic Need’ within the City (based on HRS study)
5) ONS (24,000) Meeting ONS Projections within the City

The appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 2, above.

Assumptions
The sustainability of housing developments is largely dependent on where specific sites are located, how they relate to other land uses and the way in which they are implemented (including the extent to which effects can be mitigated through the provision of new infrastructure). This is a high level assessment which considers the strategic issues and the extent to which each of the broad options for growth – and their implied distribution strategies – relates to each of the Sustainability Objectives. The following assumptions are made for the appraisal:

- The alternatives are appraised without policies mitigation or assumptions about the effects of other policies.
- The alternatives are assessed against the baseline for each of the SA Objectives, (i.e. taking the situation as it currently exists, how this option would effect on the baseline for the SA Objective in the future). Where appropriate, the relative merits of the options are also considered.
- It is recognised that, while there is likely to be debate over the true ‘objectively assessed need’ for the City, most evidence suggests that it will not be lower than the figure identified by the Housing Requirement Study (2012). Appraisal of these options has been modified to account for this evidence.
- Owing to the continuously changing nature of both the HMA and City ‘objectively assessed need’ figure, Option 4 has not been amended. It is considered, however, that the range of dwelling numbers considered (10,000 to 24,000) provides sufficient scope for the impacts to be considered at a strategic scale. Any particular implications that arise from a specific assessment are, however, addressed in the following tables.
### Table presenting an appraisal of the following alternative approaches:

1. Regeneration (10,000) Brownfield Housing & Commitments
2. Partial Greenfield Release (12,000) Brownfield Housing & Commitments + some greenfield release (or increase in densities on brownfield)
3. Regional Spatial Strategy (14,400) Brownfield Housing & Commitments + more significant greenfield release
4. Housing Requirement Study (15,600-17,901) – Meeting ‘Demographic Need’ within the City (based on HRS study)
5. ONS (24,000) Meeting ONS Projections

#### Sustainability objective

1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.

#### Discussion of significant effects

Higher levels of growth in the City would likely lead to increased greenhouse gas emissions, and the need to allocate more land in areas of potential flood risk. Clearly, the higher the level of growth envisaged, the greater the increase in emissions is likely to be. Option 5 will therefore have the most significant impact on the baseline position in this respect. For alternatives 1-3, the amount of development in the City would be likely to be lower than the baseline position (i.e. a no plan position). This would lead to lower emissions of carbon emissions from the City. However, housing need would need to be met elsewhere, so carbon emissions would essentially still be generated in the context of the wider housing market area.

Increased areas of hard standing would also have a negative effect on surface water drainage patterns. As such, alternative 1 is the least negative and option 5 is the most negative (though all options require some element of greenfield development). Assuming all ‘objectively assessed needs’ have to be met, then lower levels of development within the City (and thus reduced greenfield impact) are likely to have to be met elsewhere.

Options 1-3 would mean either not meeting some of Derby’s ‘needs’, or meeting them in other areas. This could have a negative impact in terms of increasing the need to travel (and travel distances). The severity of this impact will be dependent on where, and how, development in those areas would take place. However, this may reduce the inherent ‘benefits’ for the City in delivery lower levels of growth.

There may be some opportunities to develop district heating schemes on new sites, but these would be limited to areas of high heat demand and where schemes could make a profit – in this respect, higher growth options are more attractive. It may be more difficult to achieve higher levels of sustainability on brownfield sites, so options 2-4 are most desirable in this respect.

#### Rank of preference

<table>
<thead>
<tr>
<th>Sustainability objective</th>
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<td>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.</td>
<td>Higher levels of growth in the City would likely lead to increased greenhouse gas emissions, and the need to allocate more land in areas of potential flood risk. Clearly, the higher the level of growth envisaged, the greater the increase in emissions is likely to be. Option 5 will therefore have the most significant impact on the baseline position in this respect. For alternatives 1-3, the amount of development in the City would be likely to be lower than the baseline position (i.e. a no plan position). This would lead to lower emissions of carbon emissions from the City. However, housing need would need to be met elsewhere, so carbon emissions would essentially still be generated in the context of the wider housing market area. Increased areas of hard standing would also have a negative effect on surface water drainage patterns. As such, alternative 1 is the least negative and option 5 is the most negative (though all options require some element of greenfield development). Assuming all ‘objectively assessed needs’ have to be met, then lower levels of development within the City (and thus reduced greenfield impact) are likely to have to be met elsewhere. Options 1-3 would mean either not meeting some of Derby’s ‘needs’, or meeting them in other areas. This could have a negative impact in terms of increasing the need to travel (and travel distances). The severity of this impact will be dependent on where, and how, development in those areas would take place. However, this may reduce the inherent ‘benefits’ for the City in delivery lower levels of growth. There may be some opportunities to develop district heating schemes on new sites, but these would be limited to areas of high heat demand and where schemes could make a profit – in this respect, higher growth options are more attractive. It may be more difficult to achieve higher levels of sustainability on brownfield sites, so options 2-4 are most desirable in this respect.</td>
<td>Alt 1</td>
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### Sustainability objectives

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<tbody>
<tr>
<td>2. To minimise traffic and the length of journeys travelled by people and goods.</td>
<td>All alternatives are likely to lead to an increase in traffic within the City. Although, this should be assessed against the projected baseline position, which would be anticipated to see an increase in traffic in the City anyway (to accommodate housing needs). Logically, the greater the level of growth, then the greater the impact on congestion (though this is also dependent on the specific location of development to an extent). Option 5 will inevitably, therefore, have the biggest negative impact in terms of traffic growth. All the alternatives would involve allocation of sites in the inner parts of the City on brownfield land. These are accessible to City Centre jobs. Partial greenfield release could also be aligned with employment sites, which would improve access to jobs for residents in these areas. However, most of the greenfield sites are located around the edge of the City, which could encourage the use of private cars to access employment. This could lead to increased congestion on major routes in and out of the City. Due to higher land values on greenfield sites, alternatives 2-5 would have greater potential to support infrastructure improvements. Option 5, could have the most significant negative effect on levels of congestion in the City. Options 1-3 could result in the potential decanting of some housing growth to South Derbyshire and Amber Valley. Depending on the location of this development, while the number of journeys may not change significantly, therefore, the length of trips may increase. It may also mean a greater number of trips made by car – again, depending on the location of the development outside the City.</td>
<td>Alt 5</td>
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<td>3. To minimise pollution.</td>
<td>Each of the development alternatives has the potential to create pollution during construction activities in particular. These would generally be temporary in nature, and it would be possible to mitigate effects. However, there are AQMAs within the City already and any level of growth is likely to lead to an increase in traffic and thus an associated increase in air pollution. Logically, the higher the level of housing then the greater the cumulative effect would be on existing areas of concern. Importantly, however, alternatives 1, 2 and 3 all recognise to an extent that they would not be meeting the City’s ‘objectively assessed needs’. As such, there would still be associated growth elsewhere that would still lead to increased levels of traffic into the City from alternative locations (subject to adjoining authorities accepting some of Derby’s development). Alternatives 4 and 5 are likely to cause more significant problems both in terms of the quantity of new development but also in terms of the concentration of growth within the City. Alternative 5 could be particularly damaging in this respect. These would be likely to be long term and permanent effects.</td>
<td>Alt 5</td>
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<tr>
<td>4. To manage and conserve natural resources and</td>
<td>All growth options are likely to have negative implications as they will all lead to development on greenfield land. However, development would also be likely to occur in the absence of a Local Plan, so the effects of alternative 1-4 are considered to be neutral in this respect. Increasing levels of growth would be likely to lead to a greater use of</td>
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</table>
### Discussion of significant effects
(and discussion of relative merits in more general terms)

#### Minimise the production of waste.
Natural resources (for construction) and a greater generation of wastes (an on-going effect). This is likely to occur with or without a plan so the effects on the baseline are not considered to be significant except for a significant negative effect for alternative 5 which would involve much higher levels of growth.

Having said this, a Local Plan would allow for a more planned approach to growth, so there may be better opportunities to enhance existing infrastructure.

#### 5. To reduce deprivation and inequalities.
Each of the alternatives could have a positive effect on the baseline in the longer term, as there would be an element of regeneration with brownfield development. Increased amounts of affordable housing would also help to reduce poverty.

However, planning for much higher levels of growth, and allocating multiple greenfield sites (Alternative 5) could mean that brownfield sites are less attractive in the short term, and therefore, regeneration in areas of greatest need could be delayed or prevented. This would have a negative effect on the baseline and could potentially widen the inequality gap between different parts of the City. Therefore, alternatives 4 and 5 are considered likely to have a significant negative effect. Planning for too few houses, could also have a detrimental effect on the baseline by forcing higher densities, or restricting supply. This could have a negative impact on choice and affordability.

Provision for significantly higher levels of growth in the City could also lead to lower levels of development outside of the HMA, having wider implications on levels of deprivation.

#### 6. To reduce crime and promote safer and more cohesive communities.
This objective is not necessarily affected by the scale or distribution of development.

Each of the alternatives could have a positive effect on the baseline in the longer term, as there would be an element of regeneration with brownfield development that can help to address existing problems (possibly through improvements to the environment, the creation of additional activity in certain areas).

However, planning for significantly higher levels of growth in the City, and allocating multiple greenfield sites (Alternatives 4 and 5) could mean that brownfield sites are less attractive in the short term, and therefore, regeneration could be delayed or prevented. This would have a significant negative effect on the baseline and could potentially widen the inequality gap between different parts of the City.

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<td>Alt 1</td>
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<td>5. To reduce deprivation and inequalities.</td>
<td>Each of the alternatives could have a positive effect on the baseline in the longer term, as there would be an element of regeneration with brownfield development. Increased amounts of affordable housing would also help to reduce poverty.</td>
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<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>This objective is not necessarily affected by the scale or distribution of development. Each of the alternatives could have a positive effect on the baseline in the longer term, as there would be an element of regeneration with brownfield development that can help to address existing problems (possibly through improvements to the environment, the creation of additional activity in certain areas). However, planning for significantly higher levels of growth in the City, and allocating multiple greenfield sites (Alternatives 4 and 5) could mean that brownfield sites are less attractive in the short term, and therefore, regeneration could be delayed or prevented. This would have a significant negative effect on the baseline and could potentially widen the inequality gap between different parts of the City.</td>
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<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>While housing development will occur with, or without, the Plan, all growth options would clearly meet the SA objective to an extent. However, Options 1-3 would provide a level of homes within the City below that identified by the Housing Requirement Study or SHMA Update. An undersupply of housing land within the City associated with alternative 1 would restrict opportunities for residents to access a home to meet their needs. A restriction on greenfield sites would also mean that housing sites were more difficult to develop. This would lead to a significant negative effect on the baseline position. Alternatives 2 and 3 would be more deliverable in terms of releasing potentially easier to develop greenfield sites, but they would not meet all needs within the City. Thus there would be a reliance on other local authorities. This creates an element of risk in terms of delivery (though technically, the City’s needs would still be being met). Assuming that there were sufficient sites to accommodate this level of development, and the market were able to deliver them; then alternative 4 would have a significant positive effect on the baseline as it would meet all demographic needs within the City. If delivery were not possible, then the actual effect of this option would be negative, as there would be no other solution. Alternative 5 would provide a significant oversupply of housing when compared to the objectively assessed needs identified in the Housing Requirement Study and SHMA Update. While this would ‘meet needs’, there are risks that flooding the market with potential development sites may affect land values (supply exceeding demand), which in turn may restrict the delivery of sites. This could have a negative effect on meeting needs. It would also affect growth strategies in Amber Valley and South Derbyshire.</td>
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<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>Alternatives 2-4 would have a minor significant positive effect on the baseline position, as new development could help to deliver new education facilities in areas were provision is stretched. At much higher levels of growth associated with alternative 5, the balance between the provision of new facilities and the additional pressure from increased population may be tipped the other way. The scale of growth is unlikely to have a significant effect on the underlying ‘skills gap’ that exists in the City or basic educational attainment.</td>
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<td>9. To improve health, reduce health inequalities and increase levels</td>
<td>A growing population will have a greater need for health services, access to recreation, jobs and housing. Alternative 1 will help to provide some of this need, but falls short on housing numbers and may reduce the ability to deliver strategic improvements. Alternatives 4 and 5 could over-burden local services and lead to a significant loss of open space, including existing playing pitches. Alternatives 2 and 3 would allow for a more balanced approach that allowed for strategic infrastructure improvements</td>
<td>2</td>
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<td>of physical activity.</td>
<td>outside of the City Centre – though both would still need the release of greenfield land which could effect on playing pitches or open spaces depending on the strategic sites identified. However, this could also involve enhancements to health and community facilities and enhancements to recreation / open space. Each option would maximise brownfield use, so the potential for regeneration in the areas of greatest need would be comparable. However, greater levels of development on greenfield sites could lead to a deepening of inequalities between certain communities.</td>
<td>1 2 3 3 4</td>
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<tr>
<td>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</td>
<td>All options will increase the risk of impact on the City’s cultural and historic heritage. However, it is considered that the risk to heritage would exist anyway in the absence of the plan as there would be pressure for housing development to meet housing needs. Each of the alternatives would involve maximising brownfield development. As most of the City’s heritage assets are located in the inner built-up areas, particularly the City Centre, the effect is likely to be the same for each of the alternatives in this respect. Provided that regeneration in these areas was sympathetic to the existing character, there would be opportunities to enhance the public realm. However, at higher levels of growth, densities may have to be higher too, and this could lead to inappropriate development. Higher levels of growth associated with alternatives 3-5 could also have a detrimental effect on the character of settlements on the urban edge. At higher levels of growth, more sensitive Green Wedge or Green Belt may have to be released which would lead to the merging of a number of settlements. Alternative 5 would be likely to have a major significant negative effect on heritage and townscapes as it would require a higher number of sites to come forward and higher densities, which would not reflect the character of the urban fringe. It would be easier to manage the effects associated with lower growth options.</td>
<td>1 2 3 3 4</td>
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<tr>
<td>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</td>
<td>Each of the alternatives would have positive implications for the local economy by providing work in the construction industry. However, housing would come forward irrespective of the Local Plan, so the effect on the projected baseline is unclear. Alternative 1 in particular is likely to deliver a lower amount of housing than would come forward without a plan, so it could be deemed to have negative implications for the economy. Greenfield development could also play a part in upgrading infrastructure, which could have the knock on benefit of attracting businesses to locate in the area. However, planning for higher levels of growth could lead to the loss of some employment land for residential development. The effect could be mitigated by avoiding higher quality employment sites, and by allocating an element of employment as part of mixed-use schemes.</td>
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<tr>
<td>12. To maximise people’s accessibility to services and facilities.</td>
<td>Each of the alternatives could assist in the regeneration of inner urban areas on strategic brownfield sites. Options 2-5 would require additional development to be located on edge of City locations too and more peripheral greenfield sites, which are in the main not as well served by existing infrastructure and services. The effects would be mixed and difficult to understand at a strategic level. On one hand, development provides the opportunity to improve infrastructure and deliver new facilities to support new and existing communities. However, it also creates additional pressure on infrastructure. At higher levels of growth, the increased densities that would be involved could lead to significant pressure on existing facilities and infrastructure. Option 5 would generate the most pressure and risk on facilities and would increase the risk of not being able to meet the needs generated and would appear to carry the highest level of risk.</td>
<td>2 1 1 1 3</td>
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<tr>
<td>13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.</td>
<td>The City has limited, but important wildlife features. All options will require the development of greenfield land, thus all have the ability to impact on this objective. However, it is likely that there would also be significant pressure on greenfield sites in the absence of a Local Plan. The anticipated changes to the baseline position are difficult to predict, but it is reasonable to assume that the level of development would be equal to or greater than what would occur under alternatives 1-3. Development would also be less ‘planned’, and could therefore be more damaging to biodiversity. Therefore, these alternatives are considered likely to have a neutral or positive effect. At lower levels of growth, it should be possible to avoid important habitats by selecting strategic sites with fewer environmental constraints. For higher growth, effects on wildlife habitats and species would become more likely as more greenfield land would need to be released. New development could also help to enhance green infrastructure and access to open space, provided that the levels of growth are not too intense. Assessment of site options demonstrates that Options 2-5 will all need to see the release of some Green Wedge. Obviously, the higher the housing target, the more Green Wedge sites will have to be reallocated and the greater the impact on green infrastructure and the risk to biodiversity. Alternative 5 would have a significant negative effect as it would require the release of a significant amount of Green Wedge or Green Belt, and the amount would also be above that expected in the absence of the Local Plan.</td>
<td>1 2 3 4 5</td>
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Summary

It is inherently difficult to assess the significance of the impacts of different scale options without making reference to specific sites. Due to the constrained nature of the City, each of the options could have a significant negative effect by adding to congestion and pressure on facilities. Each of the alternatives would also lead to a greater use of natural resources and generation of wastes during the plan period. However, this would happen without the plan in place, so the significance of the impacts are difficult to assess with any certainty.

Although alternative 1 is more favourable from an environmental perspective, it would lead to a significant undersupply of housing, which could have knock-on negative effects on the economy, health and wellbeing. It would also lead to even greater levels of greenfield release outside the City which would have its own sustainability implications for the authorities in question. Alternative 5 is at the other end of the spectrum and would lead to an over-supply of housing based on the Council’s own assessment of housing need. This could have a negative effect on employment opportunities and put significant pressure on infrastructure, environmental assets and local services. It would also reduce the likelihood of more difficult brownfield sites coming forward.

Alternatives 2-4 are more balanced – though even here, logic dictates that as the numbers increase the impacts that correlate more to the scale of growth are likely to become more severe. In the main, alternative 2 is the most favourable as it is more likely to allow for the most sensitive greenfield locations to be avoided while providing for a considerable proportion of the City’s objectively assessed housing needs.

However, Options 3 and 4 could have a slightly more positive effect in terms of housing provision and a boost to the local economy and reduce the ‘risks’ associated with ‘exporting’ growth to nearby authorities. They would, however, lead to a greater proportion of greenfield land within the City having to be delivered, which could lead to a number of negative impacts (in particular, but not restricted to, the impact on the role and function of Green Wedges) (The consequence of this is, however, that it could mean that fewer greenfield sites in Amber Valley and/or South Derbyshire would need to be released.)
APPENDIX 4: APPRAISAL OF ALTERNATIVES TO THE SCALE AND DISTRIBUTION OF EMPLOYMENT LAND

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to employment provision:

1) Plan for increased land supply within the City
2) Maintain existing supply
3) Plan for a reduction in employment land

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 2, above.

Assumptions:

- All options are considered on a ‘policy-off’ basis (i.e. there is no assumed mitigation in place)
- All options are based on a consideration of performance against the baseline for the Objective. Where appropriate, the relative merits of the options are also considered.
- All options (following) are based on a ‘gross’ land requirement target/strategy (i.e. how much additional land will be required to meet ‘needs’)
- All options assume that existing permissions will come forward (although the GTC has a resolution to grant, the S106 has not been signed yet, the application also does not cover the entire site)
- All options assume a City centre focus for new office development and regeneration of existing sites as ‘givens’. This is in line with the requirements of the NPPF. To assume anything else would be unrealistic and unreasonable.
### Appraisal findings

#### Table presenting an appraisal of the following alternative approaches:

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<tr>
<td><strong>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.</strong></td>
<td>The impact of different levels of employment growth on climate change are different to assess without reference to sites or the nature of employment activity taking place. A lot will depend on this. However, logic demands that an increased provision of employment land in the City could mean that a larger amount of land at risk of flooding would have to be considered. Maintaining the current supply would mean allocating land with some risk of flooding, but as these are already part of the supply (and in some cases have planning permission), the impact on the ‘baseline’ would be minimal. Whilst, higher levels of growth in the City would increase the contribution towards carbon emissions from Derby, the denser pattern of development could lead to lower emissions overall when considering the effect on neighbouring authorities. A lower level of provision would appear on the face of it to lead to a reduction in carbon emissions and release land for alternative uses. However, employment would come forward in a less-planned manner, which could mean that opportunities to deliver district energy schemes were not as likely.</td>
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<tr>
<td><strong>2. To minimise traffic and the length of journeys travelled by people and goods.</strong></td>
<td>Planning for increased levels of employment land supply could mean that more workers are attracted into the City from neighbouring authorities. There is already net commuting into the City and this could be exacerbated. This could add to congestion issues on the periphery of the City in particular. Conversely, a reduction in supply could mean that residents of Derby City need to travel to neighbouring authorities to access employment opportunities. This would also have a negative effect on traffic and the length of journeys carried out. Maintaining the existing supply of land would still lead to an increase in traffic over and above current levels – though the impact on the baseline is likely to be less pronounced as a considerable amount of development is already committed. In all cases, current trends suggest that patterns of employment growth have not resulted in sustainable modes of travel. This is something that the Core Strategy should seek to address whatever strategy is chosen.</td>
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<tr>
<td><strong>3. To minimise pollution.</strong></td>
<td>Increased supply of employment land in the City could have a significant negative effect on air quality, particularly in and around the AQMAs – this is likely to be the result in relation to both Options 1 and 2. Increased industrial activity could also increase point source and diffuse pollution to the River Derwent. A decrease in supply would reduce the potential for pollution in Derby City, but it may only shift the problems to surrounding areas.</td>
<td>3</td>
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</tbody>
</table>
### Sustainability objective

#### 4. To manage and conserve natural resources and minimise the production of waste.

No significant effects on the baseline position are anticipated. However, higher levels of employment provision would create a greater demand for commercial waste management facilities. Meeting this need could require the development of additional facilities or to transport waste longer distances for treatment.

#### 5. To reduce deprivation and inequalities.

Alternative 1 could help to increase the number of job opportunities available to communities in Derby City. However, it could have a negative effect on the ability of communities in neighbouring authorities to access jobs in their local area. Increased provision of employment land could also put pressure on land for housing, which could prevent some people from accessing an affordable home. Reducing the provision of employment land would have a negative effect as it would not support the role of Derby as the economic centre. This would have a negative effect on the opportunities to regenerate and tackle unemployment in areas of deprivation. It may be particularly difficult for such communities to access jobs in manufacturing / industry which could lead to a widening of inequalities. Maintaining existing supply would provide a more suitable level of need for communities in the City without having an undue effect on employment opportunities within neighbouring authorities.

#### 6. To reduce crime and promote safer and more cohesive communities.

No significant effects are anticipated on the baseline position. However, alternative 3 could have negative implications if job opportunities were affected. There is a strong link between access to employment and levels of crime.

#### 7. To ensure that the existing and future housing supply meets the needs of the City.

An over-supply of employment land (alternative 3) should bring more jobs to the City. Although a proportion of workers would commute from outside the City, there would likely be a need for more houses to support the labour force. This could boost levels of house building in the borough, but the lack of available land could make it difficult to achieve the required level of need. A decline in employment land could have the opposite effect. A lower level of economic investment in the City could have knock-on effects on the level of house building. However, it could free up employment sites for house building. Maintaining current supply would help to achieve a better balance between employment growth and housing delivery.
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<td><strong>8. To improve levels of education and skills and reduce education inequalities.</strong></td>
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<td>Access to employment and the development of a skills based industry could have a positive effect in terms of increasing the aspirations and opportunities for communities. In this respect, alternatives 1 and 2 would have a positive effect on the baseline position. However, the effects are not anticipated to be significant as other factors play a role in supporting educational achievement. It is considered that alternative 3 could have a negative effect on the baseline, as it would reduce job opportunities and the role of the City as an economic centre.</td>
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<td>9. To improve health, reduce health inequalities and increase levels of physical activity.</td>
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<td>There are no significant effects anticipated on the baseline position. However, higher levels of employment could help to reduce inequalities in health if deprived communities were able to benefit from job opportunities. Likewise, lower levels of employment could contribute to maintenance or widening of inequalities.</td>
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<td>10. To protect and enhance Derby's cultural heritage including its townscape and archaeology.</td>
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<td>Higher levels of growth would be expected to have a negative effect on landscape and heritage through an increase in noise, congestion, and perhaps changes to the character of settlements. However, effects would depend upon the scale, location and design of developments and mitigation could minimise the effects. It is likely that higher levels of growth would lead to effects on landscape character in the City Centre due to an intensification of uses. Again, effects are dependent upon design, as sometimes positive effects can be achieved through regeneration of areas of poor quality. Maintaining current supply would mean that effects were restricted to the key employment allocations at GTC, Raynesway and the City Centre. The effect on the baseline position is considered to be neutral. Reducing levels of employment provision could protect the character of some areas outside the City Centre, but it could lead to an intensification of uses in existing areas. It could also act as a barrier to the regeneration of areas of poor quality.</td>
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<td></td>
<td>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</td>
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<td>Alternative 1 would support significant economic growth in the City and could help to diversify the economy and strengthen its manufacturing provision. However, an oversupply of land in the City could have a negative effect on neighbouring authorities wishing attract higher value industry to those areas. Alternative 2 would help to encourage a reasonable level of economic growth that would see Derby remain as the economic centre of the HMA. Alternative 3 would have a significant negative effect as it could deter investment in the City. This could lead to a decline in the local economy or an over reliance on service based businesses in the City Centre. This would not meet the needs of lower-skilled groups in particular.</td>
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</table>
### Sustainability objective

| Discussion of significant effects (and discussion of relative merits in more general terms) | Rank of preference |
|---|---|---|
| **SA of the Derby City Local Plan Part 1: The Core Strategy** | Alt 1 | Alt 2 | Alt 3 |
| **12. To maximise people’s accessibility to services and facilities.** | Alternative 1 would lead to a greater concentration of employment in the City, which could have mixed effects. On the one hand it would help to focus development into strategic locations, and could help to deliver new infrastructure and services. However, it could also increase congestion, which would make it more difficult to access certain parts of the City and could increase reliance on the car. Alternative 3 on the other hand could lead to an increased need to commute outside the City to access employment, particularly in industrial / manufacturing jobs. Maintaining existing supply would have a more predictable effect, as there would be focus on existing strategic employment locations. | ? | - | ? |
| **13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.** | Higher levels of growth would be expected to have a negative effect on wildlife and open space through an increase in disturbance, habitat loss and fragmentation. Any additional allocations would probably have to be in Green Wedges, Green Belt. This would exacerbate any impact on green infrastructure already resulting from allocations in the existing Local Plan. It is recognised that a large proportion of the existing land supply is in close proximity to identified sites of importance for nature conservation (though existing policies also seek to provide appropriate mitigation for this). However, effects would depend upon the scale, location and design of developments and mitigation could minimise the effects and in some cases lead to enhancement. An increased provision of employment land within Derby could also release some pressure in neighbouring authorities. Lower levels of provision would reduce the effect on biodiversity and open space in the City and may open up opportunities to utilise surplus land for open space or wildlife sites. | 3 | 2 | 1 |

**Summary:** Increasing the supply of employment land could help to diversify and strengthen the City’s economic position and help to tackle deprivation. However, this could be at the expense of communities in neighbouring authorities, increased congestion, pollution and pressure to deliver housing. On the other hand, planning for decline in employment provision would lead to a widening of inequalities, weakening of the local economy and the need for longer commutes. Maintaining existing supply would help to deliver a more suitable level of employment without outing undue pressure on housing, environmental quality or the economies of neighbouring authorities.
APPENDIX 5: OPTIONS APPRAISAL (SITE ALLOCATIONS)

Introduction

As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising a list of housing and employment sites. The interim appraisal findings are presented in full within this Appendix.

Site options appraisal methodology

Site options were subjected to SA utilising a strict ‘appraisal question’ based methodology. Site appraisal questions were developed to reflect the sustainability issues identified through SA scoping as far as possible – see Table 1; however, given data availability it is only possible to draw on data-sets for which data is available for each and every site option.

Table 1: Scope of the site appraisal methodology

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Appraisal criteria used</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.</td>
<td>• Is the site within an identified Flood Zone?</td>
<td>The ability of development to adopt building integrated low carbon technologies is not affected by location.</td>
</tr>
<tr>
<td></td>
<td>• Is the Site within an area identified as being at risk from surface water flooding?</td>
<td>Suitability for district energy schemes has not been established for each site.</td>
</tr>
<tr>
<td>2. To minimise traffic and the length of journeys travelled by people and goods.</td>
<td>• Distance to an existing high quality bus route.</td>
<td>A major limitation relates to the fact that large sites will have differing levels of accessibility.</td>
</tr>
<tr>
<td></td>
<td>• Distance to a train station.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Distance to an existing cycle route.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Distance to Derby City Centre by public transport.</td>
<td></td>
</tr>
<tr>
<td>3. To minimise pollution.</td>
<td>• Proximity to AQMAs.</td>
<td></td>
</tr>
<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>• Would development of the site contribute to waste water capacity constraints?</td>
<td>It is assumed that development would be constrained by the presence of contaminated land. Therefore, a negative effect is recorded for higher risk sites. It is also possible to view development as an opportunity to remediate contamination. This would result in a positive effect, but is still a constraint.</td>
</tr>
<tr>
<td></td>
<td>• Use of previously Developed Land.</td>
<td>There is an assumption that there are waste water capacity constraints to the south and west of the River.</td>
</tr>
<tr>
<td></td>
<td>• Potential contamination on site.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Proximity to electricity transmission cables or high pressure gas lines.</td>
<td></td>
</tr>
<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>• Relationship to deprived areas.</td>
<td>It is assumed that development can bring with it investment that will in turn help to facilitate an increase in prosperity locally / reduce spatial inequalities in terms of relative deprivation. The criteria does not account for sites that straddle areas with a mix of deprivation.</td>
</tr>
<tr>
<td>Sustainability objective</td>
<td>Appraisal criteria used</td>
<td>Comments</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------------</td>
<td>----------</td>
</tr>
</tbody>
</table>
| 6. To reduce crime and promote safer and more cohesive communities. | • Could there be a loss of community facilities?  
• Effect on allotment space. | It is not possible to make a meaningful assessment of effects on levels of crime at this scale. |
| 7. To ensure that the existing and future housing supply meets the needs of the City. | N/A | It is not appropriate to simply examine the size of sites as a proxy for the number of homes/affordable homes that could be delivered (taking into account the assumption that larger developments can deliver a higher proportion of affordable housing). This is on the basis that sites will often eventually be brought forward in combination. |
| 8. To improve levels of education and skills and reduce education inequalities. | • Distance to primary / secondary schools. | It may have been possible to assess the potential for new development to effect on school capacity. However, in practice, developments will be required to provide enhanced school place provision to account for population growth in an area. |
| 9. To improve health, reduce health inequalities and increase levels of physical activity. | • Distance to a City, District or Neighbourhood park.  
• Distance to indoor leisure facilities.  
• Loss of Green Belt or Green Wedge.  
• Loss of designated public open space. | Criteria do not account for the quality of parks and leisure facilities. Nor do they account for the usage of facilities and potential over-capacity. |
| 10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology. | Distance to:  
- Scheduled Ancient Monuments  
- Listed Buildings  
- Registered Historic Park / Garden  
- Conservation Area  
- Archaeological Alert Area  
- World Heritage Site or buffer zone | Ideally, it would be desirable to establish the extent and sensitivity of different character areas and to make an assessment of how each site option could effect upon local character. This information was not available and is not strictly objective. |
| 11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents | • Whether the allocation would lead to the loss or creation of employment space. | NB: Employment land is often somewhat substitutable, i.e. can be possible to develop other sites for the same or similar employment use. |
| 12. To maximise people’s accessibility to services and facilities. | • Distance to a local or District Centre.  
• Distance to a large supermarket.  
• Distance to a GP, Pharmacy, Dentist and Hospital Facilities.  
• Distance to primary / secondary schools.  
• Distance to Core Business and Employment Areas. | A major limitation relates to the fact that large sites will have differing levels of accessibility. It has also only been possible to take into account existing facilities, when in practice it will often be possible to bring forward new facilities as part of development. |
SA of the Derby City Local Plan Part 1: The Core Strategy

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Appraisal criteria used</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.</td>
<td>Distance to wildlife habitats:  - SSSIs.  - European designated sites.  - Local Wildlife Sites.  • Effect on Wildlife Corridors</td>
<td>It was only possible to establish the presence or absence of BAP species at a small number of sites. Therefore, a consistent assessment for all sites would not be achievable.</td>
</tr>
</tbody>
</table>

Table 2 presents a concise list of the appraisal questions posed, along with the ‘decision rules’ used to categorise performance. A red categorisation equates to the prediction of a ‘significant constraint’, an amber categorisation equates to the prediction of a ‘potentially significant constraint’, and a green categorisation equates to the prediction of ‘no constraint’. The decision rules are generally quantitative. This allows for the analysis of the sites to be undertaken using Geographical Information System (GIS) software. In the main, no qualitative information / professional judgement has been drawn on when categorising sites as red, green or amber. This has not been the case with regard to some criteria where a ‘policy’ judgement has had to be made (for example, in relation to the effect on ‘Green Wedge’ objectives).

In addition, in some cases, there has been no attempt to try and qualify the scale or extent of an effect on a particular feature. Instead, the SA’s role is to indicate that there is an issue that would have to be addressed (for example, this would apply to the criterion considering effect on defined wildlife sites). Most of the rules are distance related. It is important to note that all distances are ‘as the crow flies’ as it was not possible to take account of routes / pathways (e.g. the distance of the route that would be taken in practice when walking or travelling by car to reach a local centre). It is recognised that this is a potential weakness and may give a false impression of the accessibility of some sites once the quality, directness, topography or attractiveness of routes are taken into account. Where this is an issue, it will be addressed in the commentary. Most distance rules have been developed internally by the plan-making / SA team, following a review of thresholds applied as part of Site Allocation / SA processes elsewhere in England. A number of thresholds reflect the assumption that 400m is a distance that is easily walked by those with young children and the elderly.

Importantly, the criteria also do not necessarily carry equal weight. As such, any assessment should be considered as a whole, taking a balanced view of the issues raised.
Table 2: Site appraisal questions and criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Scoring</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Accessibility to existing Centres, services and social infrastructure</strong></td>
<td></td>
</tr>
<tr>
<td>How accessible is the site to Derby City Centre by Public Transport?</td>
<td>( R = &gt;30 \text{ min public transport (&gt;5km)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 15-30 \text{ minutes (2.5km-5km)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-15 \text{ min (&gt;2.5km)} )</td>
</tr>
<tr>
<td>How accessible is the site to the nearest District or Local Centre by Foot?</td>
<td>( R = &gt;15 \text{ min walk (1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 10-15 \text{ min walk (800-1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-10 \text{ min walk (0-800 metres) or is a city centre site.} )</td>
</tr>
<tr>
<td>Would the site lead to the loss of existing community facilities?</td>
<td>( A = \text{Yes} )</td>
</tr>
<tr>
<td></td>
<td>( G = \text{No} )</td>
</tr>
<tr>
<td>How well related is the site to a large supermarket (2500 sqm +)</td>
<td>( R = &gt;5.6 \text{km} )</td>
</tr>
<tr>
<td></td>
<td>( A = 3 \text{km-5.6km} )</td>
</tr>
<tr>
<td></td>
<td>( G = &lt;3 \text{km} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to a health centre or GP Services by foot?</td>
<td>( R = &gt;15 \text{ min walk (1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 10-15 \text{ min walk (800-1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-10 \text{ min walk (0-800 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to a pharmacy by foot?</td>
<td>( R = &gt;15 \text{ min walk (1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 10-15 \text{ min walk (800-1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-10 \text{ min walk (0-800 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to a dentist by foot?</td>
<td>( R = &gt;15 \text{ min walk (1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 10-15 \text{ min walk (800-1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-10 \text{ min walk (0-800 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to the nearest hospital facilities by public transport?</td>
<td>( R = &gt;30 \text{ min public transport (&gt;5km)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 15-30 \text{ minutes (2.5km-5km)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-15 \text{ min (&gt;2.5km)} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to the nearest primary school by foot?</td>
<td>( R = &gt;15 \text{ min walk (1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 10-15 \text{ min walk (800-1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-10 \text{ min walk (0-800 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to the nearest secondary school by public transport?</td>
<td>( R = &gt;30 \text{ min public transport (&gt;5km)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 15-30 \text{ minutes (2.5km-5km)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-15 \text{ min (&gt;2.5km)} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to the nearest City Park?</td>
<td>( A = &gt;5000 \text{ metres} )</td>
</tr>
<tr>
<td></td>
<td>( G = &lt;5000 \text{ metres} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to the nearest District park?</td>
<td>( R = &gt;15 \text{ min walk (1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 10-15 \text{ min walk (800-1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-10 \text{ min walk (0-800 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to the nearest neighbourhood park?</td>
<td>( R = &gt;400 \text{ metres} )</td>
</tr>
<tr>
<td></td>
<td>( A = 200-400 \text{ metres} )</td>
</tr>
<tr>
<td></td>
<td>( G = &lt;200 \text{ metres} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
<tr>
<td>How accessible is the site to the nearest indoor leisure and recreational facilities?</td>
<td>( R = &gt;15 \text{ min walk (1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( A = 10-15 \text{ min walk (800-1200 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( G = 0-10 \text{ min walk (0-800 metres)} )</td>
</tr>
<tr>
<td></td>
<td>( \text{n/a site is for employment} )</td>
</tr>
</tbody>
</table>
### Sustainable Transport and Air Quality

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Scoring</th>
</tr>
</thead>
</table>
| How accessible is the site to an existing high quality bus route? (at least 3 services per hour) | **R** = >10 min walk  
                             **A** = 5-10 min walk  
                             **G** = 0-5 min walk |
| How accessible is the site to the main train station by public transport? | **R** = >30 min public transport (>5km)  
                             **A** = 15-30 minutes (2.5km-5km)  
                             **G** = 0-15 min (>2.5km) |
| How accessible is the site to a cycle route?                            | **R** = >800 metres  
                             **A** = 400-800 metres  
                             **G** = 0-400 metres |
| Is the site within, or in close proximity to an existing AQMA?           | **R** = Within or adjacent to an AQMA  
                             **A** = <1 km to an AQMA  
                             **G** = >1 km to an AQMA |

### Biodiversity and Green Infrastructure

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Scoring</th>
</tr>
</thead>
</table>
| Could allocation of the site have a potential adverse effect on a SSSI?  | **R** = < 400 metres  
                             **A** = 400-800 metres  
                             **G** = >800 metres |
| Would allocation of the site result in any likely significant effects in the integrity of a European designated site for nature conservation? | **R** = Likely to result in a significant effect on integrity  
                             **A** = Potential to result in a significant effect on integrity  
                             **G** = Unlikely to result in a significant effect on integrity |
| Could allocation of the site have a potential adverse effect on a designated Local Wildlife Site, Local Nature Reserve, Potential Wildlife Sites or any other site of wildlife value as identified by the Derbyshire Wildlife Trust? | **R** = Contains or is adjacent to an existing site  
                             **A** = Contains or is adjacent to a proposed site  
                             **G** = Does not contain or is not adjacent, or allocation is greenspace. |
| Would allocation of the site result in the severance or partial severance of a designated Wildlife Corridor in the Adopted City of Derby Local Plan? | **R** = Yes, creates a clean break in the corridor  
                             **A** = Partial Severance  
                             **G** = No |
| Would the allocation have an effect on allotment space?                  | **R** = Contains allotment space  
                             **G** = Does not contain allotment space |
| Would allocation lead to the loss of designated or proposed open space (as identified in the City of Derby Adopted Local Plan)? | **R** = Yes  
                             **A** = Yes, but it has been demonstrated that the land is no longer needed for public open space purposes.  
                             **G** = No |
| Would the allocation lead to loss of land within the Green Belt?         | **R** = Within or adjacent to Green Belt and would cause harm to the objectives of the designation.  
                             **A** = Within or adjacent to the Green Belt but not likely to cause harm to the objectives of the designation.  
                             **G** = Not within or adjacent to the Green Belt. |
| Would allocation of the site lead to a loss of any land in a Green Wedge? (Subjective assessment) | **R** = Within or adjacent to Green Wedge and would cause harm to the objectives of the designation.  
                             **A** = Within or adjacent to the Green Wedge but not likely to cause harm to the objectives of the designation.  
                             **G** = Not within or adjacent to Green Wedge |
## Flood risk and water

<table>
<thead>
<tr>
<th>Question</th>
<th>Rating</th>
</tr>
</thead>
</table>
| Is the site within an identified flood zone?                             | R = F3A or 3B (DCC Maps)  
|                                                                          | A = FZ2 (DCC Maps)  
|                                                                          | G = FZ1 (DCC Maps)  |
| Is the site within an area identified as being at risk from surface water flooding? (As identified in the SFRA) | R = Site is at risk of surface water flooding  
|                                                                          | G = Site is not at risk of surface water flooding  |
| Would development of the site contribute to waste water capacity constraints? | A = Site is located to the south or west of the River  
|                                                                          | G = Site is not located to the south or west of the River  |

## Landscape, townscape and the historic environment

<table>
<thead>
<tr>
<th>Question</th>
<th>Rating</th>
</tr>
</thead>
</table>
| Is the site within, adjacent to or in close proximity to a Scheduled Ancient Monument? | A = Yes  
|                                                                          | G = No  |
| Does the site contain, is it adjacent to or in close proximity to a Listed or Locally Listed Building(s) or the setting of a Listed Building? | A = Yes  
|                                                                          | N = No  |
| Is the site within, adjacent to or in close proximity to a registered Historic Park / Garden? | A = Yes  
|                                                                          | N = No  |
| Is the site within, adjacent to or in close proximity to a Conservation Area? | A = Yes  
|                                                                          | N = No  |
| Is the site within the World Heritage Site or the WHS buffer zone?       | A = Yes  
|                                                                          | N = No  |
| Does the site lie within an Archaeological Alert Area?                   | A = Yes  
|                                                                          | N = No  |

## Land resource issues

<table>
<thead>
<tr>
<th>Question</th>
<th>Rating</th>
</tr>
</thead>
</table>
| Would allocation of the site result in the use of Previously Developed Land? | R = No, site is greenfield and not within or adjoining an existing urban area  
|                                                                          | A = Greenfield site within or adjoining existing urban area / brownfield site not adjacent or in close proximity to existing urban area  
|                                                                          | G = Yes, site is on land that is fully or partially brownfield and which Is in close proximity to existing urban area.  |
| Has the site been identified as being potentially contaminated by DCC Environmental Health? | R = The whole site has been identified as being potentially contaminated and is of a high risk rating  
|                                                                          | A = Part of the site has been identified as being potentially contaminated and / or the site has a lower risk ranking  
|                                                                          | G = The site does not include land identified as potentially contaminated.  |
### Economic Growth

<table>
<thead>
<tr>
<th>Question</th>
<th>R = Allocation will lead to significant loss of on-site employment (&gt;5000m²)</th>
<th>A = Allocation will lead to the loss of some on-site employment, but this will be less than 5000m²</th>
<th>G = No loss of employment space</th>
</tr>
</thead>
<tbody>
<tr>
<td>How accessible is the site to the nearest existing Core Business and Employment Areas?</td>
<td>R = &gt;2km</td>
<td>A = 1-2km</td>
<td>G = &lt;1km</td>
</tr>
<tr>
<td>Would the allocation of the site result in a loss of employment space?</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Would the allocation of the site result in the creation of employment space?</td>
<td>A = Some new employment floorspace as part of a mixed use development, but this would be less than 5000m²</td>
<td>G = Significant new employment floorspace (&gt;5000m²)</td>
<td>N/A Site is for housing only</td>
</tr>
<tr>
<td>Could the allocation of the site assist in the regeneration of deprived areas?</td>
<td>A = The site does not lie within the 30% most deprived SOAs in the City</td>
<td>G = The site lies within the 30% most deprived SOAs in the City</td>
<td></td>
</tr>
</tbody>
</table>

### Physical Infrastructure and Utilities

<table>
<thead>
<tr>
<th>Question</th>
<th>R = The site scores ‘high’ on the relevant National Grid Risk Table</th>
<th>A = The site scores ‘moderate’ on the relevant National Grid Risk Table</th>
<th>G = The site scores ‘negligible’ on the relevant National Grid Risk Table</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the site within:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) 30m of an underground electricity cable; or b) 100m of an electricity transmission overhead line; or c) 140m of a high pressure gas pipeline?</td>
<td>R = The site scores ‘high’ on the relevant National Grid Risk Table</td>
<td>A = The site scores ‘moderate’ on the relevant National Grid Risk Table</td>
<td>G = The site scores ‘negligible’ on the relevant National Grid Risk Table.</td>
</tr>
</tbody>
</table>
SUMMARY OF APPRAISAL FINDINGS

Appraisal findings in relation to the site allocation options are presented in Table 3 below. Sites shaded blue in the table indicates which site options the Council subsequently determined should be ‘preferred’, i.e. those which are presented as allocations in the draft Core Strategy. Sites have been considered for housing allocations only unless otherwise stated. For detailed scores and comments for each site see Technical Appendix A: Site Allocation Appraisals.

Table 3: Site allocations options: Summary of appraisal findings

| Site Location | Distance to Derby City Centre | Distance to District/Local Centre | Loss of existing community facilities | Accessible to pharmacy by foot | Accessible to hospital by public tr. | Accessible to primary school by foot | Access to high quality bus route | Access to train station by public tr. | Access to cycle route | Effect on AQMA | Effect on Wildlife Sites | Effect on SSSI | Effect on allotment space | Effect on the Green Wedge | Effect on Character | Proximity to WHS or WHS Buffer | Proximity to Archaeological AA | Proximity to energy infrastructure | Proximity to WHS Buffer | Proximity to Core Business/Eng | Commentary |
|---------------|------------------------------|----------------------------------|--------------------------------------|-------------------------------|-----------------------------------|------------------------------------|---------------------------------|----------------------------------|-------------------|----------------|------------------------|-----------------|------------------------|-------------------------|----------------|-------------------------|------------------------|-------------------|------------------|----------------|
| A38/A6 roundabout | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | Some accessibility issues, particularly proximity to leisure facilities and a neighbourhood park. It would, however, have a significant effect on green wedge objectives, in particular through its visual intrusion, prominence and effect on character. Proximity to World Heritage Site a particular concern in this regard. |
| Acorn Way | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | Few significant effects although access to some services is average-poor. The effect on the Green Wedge policy is considered a particularly significant issue. Access to the site is also severely constrained. |
| Boulton Moor (East) | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | A number of significant effects, particularly regarding access to facilities. There is also a lack of access to employment and the site is green field with a risk of surface water flooding on part of the site. The site is within a defined Green Wedge. |
| Boulton Moor (West) | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | The access to facilities performs averagely to poor; particularly poor is the access to transport links. The site is also green field and would mean the removal of green wedge land. However, this can be achieved without undermining the objectives of the Green Wedge policy. |
## SA of the Derby City Local Plan Part 1: The Core Strategy

### Site Location

<table>
<thead>
<tr>
<th>Site Location</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Breadsall Green Wedge</td>
<td>The site is adjacent to Croft Wood, but the proposals submitted by the site promoter would not encroach into the defined wildlife site. The site has poor access to local parks. There are also pockets of potential surface water flooding.</td>
</tr>
<tr>
<td>Brook Farm</td>
<td>Few significant effects, performs averagely regarding access to facilities by foot. Would result in a loss of proposed public open space. Small parts at risk of surface water flooding. Green Wedge study indicates wedge could be removed without undermining strategy. Site is adjacent to the Lees Brook wildlife site.</td>
</tr>
<tr>
<td>Castleward (Mixed use)</td>
<td>Site is close to an AQMA and could result in a loss of a small area of public open space. The planning application for the site does not lead to a loss of POS. The site is accessible to all forms of transport and has good access to facilities. Part of the site would be more than 400 metres from a Neighbourhood Centre, but generally the site as a whole is well related to Bass' Recreation Ground Neighbourhood Park. Access to the park is constrained by the presence of a major road, which would need to be addressed.</td>
</tr>
<tr>
<td>City Centre (Mixed use)</td>
<td>The City Centre is a broad strategic location which has been identified for a mix of uses. The significance of the effects will be dependent on the specific sites that come forward, though it is important to note that parts of the City Centre are subject to flooding and that there are wildlife and heritage features that development will need to take account of. The significance of any effects cannot be fully assessed at this stage. The City Centre as a</td>
</tr>
</tbody>
</table>
### SA of the Derby City Local Plan Part 1: The Core Strategy

#### Site Location

<table>
<thead>
<tr>
<th>Site Location</th>
<th>Distance to Derby City Centre</th>
<th>Distance to District/Local Centre</th>
<th>Distance to District Park by foot</th>
<th>Distance to District Park by bus</th>
<th>Loss of existing community facilities</th>
<th>Loss of land within the Green Belt</th>
<th>Site is potentially contaminated</th>
<th>Site is within a flood zone</th>
<th>Proximity to energy infrastructure</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>DRI (Mixed use)</td>
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<td>N/A</td>
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<tr>
<td>Derwent Triangle (Housing)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>The site is within a flood zone and is adjacent to the River Derwent defined wildlife site. The site has some accessibility issues which would be more relevant if the site were identified for housing.</td>
</tr>
<tr>
<td>Derwent Triangle (Employment only)</td>
<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>The site is within a flood zone and is adjacent to the River Derwent defined wildlife site.</td>
</tr>
<tr>
<td>Evans of Leeds / Sinfin Lane</td>
<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>Few significant effects. Distance to parks and leisure is average to poor however. Waste water and surface water runoff would need to be controlled.</td>
</tr>
<tr>
<td>Former Celanese (Housing)</td>
<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>Very poor access to a number of services including medical and leisure activities. Site is potentially contaminated and may have flood issues.</td>
</tr>
<tr>
<td>Former Celanese (Employment)</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>N/A</td>
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<td>N/A</td>
<td>N/A</td>
<td>Site is potentially contaminated and may have flood issues. Accessibility issues less important for an employment allocation.</td>
</tr>
</tbody>
</table>

#### Commentary

**Derwent Triangle (Housing)**
- Very few significant effects although may effect on some defined heritage features. The site has excellent access to facilities and more sustainable modes of travel. The site is adjacent to an AQMA.

**Evans of Leeds / Sinfin Lane**
- Few significant effects. Distance to parks and leisure is average to poor however. Waste water and surface water runoff would need to be controlled.

**Former Celanese (Housing)**
- Very poor access to a number of services including medical and leisure activities. Site is potentially contaminated and may have flood issues. Accessibility issues less important for an employment allocation.
## Site Location

| Site Location       | Distance to Derby City Centre | Distance to District/Local Centre | Loss of existing community facilities | Loss of retail | Accessible to hospital by public tr. | Accessible to train station by public tr. | Accessible to high quality bus route | Access to health/GP by foot | Access to pharmacy by foot | Access to dentist by foot | Access to hospital by public tr. | Accessible to school by foot | Accessible to secondary school by foot | Accessible to indoor leisure. | Accessible to a cycle route | Proximity to WHS or WHS Buffer | Proximity to SSSI | Effect on Wildlife Sites | Site has significant effects regarding accessibility to parks/leisure and is also within the Green Belt. General access to facilities is average. | Commentary |
|---------------------|-------------------------------|----------------------------------|--------------------------------------|---------------|-------------------------------------|-----------------------------------------|--------------------------------------|----------------------------|------------------------------|----------------------------|--------------------------------|-------------------------------|--------------------------------|--------------------------------|----------------------------|--------------------------|------------------------------------------------|-----------------------------|
| Hackwood Farm       |                               |                                  |                                      |               |                                     |                                         |                                      |                             |                              |                             |                                      |                               |                                 |                                 |                           |                          | Site has poor access to numerous facilities. Site is green field and could effect on a wildlife site, depending on the extent of the developable area. | N/A |
| Kingsway Hospital   |                               |                                  |                                      |               |                                     |                                         |                                      |                             |                              |                             |                                      |                               |                                 |                                 |                           |                          | Poor access to public parks/leisure however otherwise performs well. | N/A |
| Kingsway Hospital   |                               |                                  |                                      |               |                                     |                                         |                                      |                             |                              |                             |                                      |                               |                                 |                                 |                           |                          | The site has significant effects regarding accessibility to parks/leisure and is also within the Green Belt. General access to facilities is average. | N/A |
| Land East of Spondon|                               |                                  |                                      |               |                                     |                                         |                                      |                             |                              |                             |                                      |                               |                                 |                                 |                           |                          | The site has poor accessibility, in particular to medical and park facilities. Other than this, the site performs well. | N/A |
| Land off Holmleigh Way|                             |                                  |                                      |               |                                     |                                         |                                      |                             |                              |                             |                                      |                               |                                 |                                 |                           |                          | The site has the potential to flood and would result in a loss of proposed public open space. It performs well in other areas, but access to parks/leisure is also a problem. | N/A |
| Land off Oaklands Avenue |                         |                                  |                                      |               |                                     |                                         |                                      |                             |                              |                             |                                      |                               |                                 |                                 |                           |                          |                                                                        |
### Site Location

| Site Location                  | Distance to Derby City Centre | Distance to District/Local Centre | Distance to large supermarket | Access to health/GP by foot | Accessible to pharmacy by foot | Accessible to hospital by public tr. | Accessible to secondary school by public tr. | Accessible to primary school by foot | Accessible to District Park by foot | Accessible to N’hood Park by foot | Accessible to indoor leisure. | Access to high quality bus route | Access to a cycle route | Accessible to train station by public tr. | Proximity to an AQMA | Effect on SSSI | Effect on European site | Effect on Wildlife Sites | Presence of a Waste Contactor | Proximity to a Wildlife site | Effect on allotment space | Loss of land within Green Wedge | Loss of land within a Green Belt | Site within Identified flood zone? | Surface Water Flooding | Waste water constraints | Proximity to SAM | Proximity to Listed Building | Proximity to Historic Park/Garden | Proximity to Conservation Area | Proximity to WHS or WHS Buffer | Proximity to Archaeological AA | Proximity to Archaeological AA | Proximity to Conservation Area | Proximity to WHS or WHS Buffer | Proximity to Archaeological AA | Proximity to Fishing Site | Proximity to AONB | Proximity to WHS | Proximity to SSSI | Proximity to European site | Proximity to European site | Proximity to European site | Commentary |
|-------------------------------|-------------------------------|----------------------------------|-------------------------------|-----------------------------|-------------------------------|----------------------------------|----------------------------------------|-----------------------------------|-------------------------------|---------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-----------------------------|-----------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| Lime Lane / Land South of Mansfield Road | N/A                           | N/A                              | N/A                           | N/A                         | N/A                           | N/A                              | N/A                                    | N/A                               | N/A                           | N/A                            | N/A                           | N/A                           | N/A                           | N/A                                    | N/A                          | N/A                         | N/A                         | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | Few significant effects although there are some significant environmental ones. Site is adjacent to Chaddesden Wood. For the majority of local services, the accessibility is average. Potential for a significant effect on the objectives of the Green Wedge and local wildlife species (note, the assessment was based on the submitted site which covered a greater area of Green Wedge than identified in the allocation. The allocated area would be considered as having an ‘amber’ impact on Green Wedge). |
| Mackworth College            | N/A                           | N/A                              | N/A                           | N/A                         | N/A                           | N/A                              | N/A                                    | N/A                               | N/A                           | N/A                            | N/A                           | N/A                           | N/A                           | N/A                                    | N/A                          | N/A                         | N/A                         | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | Few significant effects although a local wildlife site could be affected and access to schools and other facilities is poor. Would lead to the loss of playing pitches and remove land from the Green Wedge. However, this can be achieved without undermining the objectives of the policy. |
| Mickleover Sports (Station Road) | N/A                           | N/A                              | N/A                           | N/A                         | N/A                           | N/A                              | N/A                                    | N/A                               | N/A                           | N/A                            | N/A                           | N/A                           | N/A                           | N/A                                    | N/A                          | N/A                         | N/A                         | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | Significant poor accessibility and transport links along with a loss of greenfield land. Unacceptable impact on Green Wedge role, function or character. |
| Mickleover STW               | N/A                           | N/A                              | N/A                           | N/A                         | N/A                           | N/A                              | N/A                                    | N/A                               | N/A                           | N/A                            | N/A                           | N/A                           | N/A                           | N/A                                    | N/A                          | N/A                         | N/A                         | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | N/A                           | Site has flood potential and effects on a wildlife site. There would be a loss of public space, with poor access in places. |
### Site Location

<table>
<thead>
<tr>
<th>Site Location</th>
<th>Distance to District Centre</th>
<th>Distance to Local Centre</th>
<th>Distance to Existing Community Facilities</th>
<th>Distance to Large Supermarket</th>
<th>Accessible to Pharmacy by Foot</th>
<th>Accessible to Dentist by Foot</th>
<th>Accessible to Hospital by Public Tr.</th>
<th>Accessible to Primary School by Foot</th>
<th>Accessible to Secondary School by Public Tr.</th>
<th>Distance to Nearest City Park</th>
<th>Distance to Neighbourhood Park by Foot</th>
<th>Accessible to Indoor Leisure</th>
<th>Accessible to High Quality Bus Route</th>
<th>Accessible to a Cycle Route</th>
<th>Proximity to an AQMA</th>
<th>Effect on SSSI</th>
<th>Effect on Wildlife Sites</th>
<th>Effect on Allotment Space</th>
<th>Effect on Public Open Space</th>
<th>Site within Identified Flood Zone?</th>
<th>Site within Identified Flood Zone?</th>
<th>Site within Green Belt</th>
<th>Site within Green Wedge</th>
<th>Proximity to an Area of Mercury Accumulation</th>
<th>Proximity to European Site</th>
<th>Effect on SSSI</th>
<th>Proximity to European Site</th>
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<tbody>
<tr>
<td>Moorway Lane Green Wedge</td>
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<tr>
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</table>

**Commentary**

- **Moorway Lane Green Wedge**: A number of significant effects including the loss of a Green Wedge and potential for flood issues. Access to facilities is average to poor.

- **Moorways (Osmaston Park Road)**: The site has significant environmental effects severing a wildlife corridor and resulting in a loss of public open space. It does generally perform well elsewhere however.

- **Onslow Road, Mickelover**: Few significant effects, although there could be a significant effect on a wildlife site. Generally performs well.

- **Osmaston**: Very few significant effects. Performs very well across most criteria. There is some poor public transport access, although this may be mitigated.

- **Royal Hill Farm, Spondon**: Site would effect on the Green Belt as well as affecting a wildlife site. Access to facilities is predominantly average to poor.
<table>
<thead>
<tr>
<th>Site Location</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rykneld Road</td>
<td>The site has some significant access issues, but otherwise performs well. Only a small part of the western side of the site would be affected by flood risk.</td>
</tr>
<tr>
<td>West of the Hollow, Mickleover</td>
<td>There are some significant accessibility issues to parks, leisure and employment, as well as Green Wedge land being lost. Site performs generally well though impact on Green Wedge considered unacceptable.</td>
</tr>
<tr>
<td>Woodlands Farm (Chellaston)</td>
<td>(N/A) There are a number significant issues regarding accessibility to facilities on foot, though it does have reasonably good access to local shopping facilities.</td>
</tr>
<tr>
<td>Wragley Way, Sinfin</td>
<td>There are some significant access issues for parks/leisure, transport and medical facilities. There may also be water issues. The site performs well other than this however.</td>
</tr>
<tr>
<td>Raynesway East</td>
<td>Much of site in flood zone 3. Green Belt and Green Wedge on boundaries; also historic park/garden nearby just outside city boundary. Limited access to public transport but potential for improvement as development of the site could make a service more viable.</td>
</tr>
<tr>
<td>Sinfin Moor</td>
<td>Would open up a major potential employment area. Within Flood Zone 3 but layout and design of buildings and development as a whole, including incorporation of SUDS could</td>
</tr>
</tbody>
</table>
### Rough Heanor Farm

<table>
<thead>
<tr>
<th>Site Location</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site potentially contaminated</td>
<td>Site includes PDL</td>
</tr>
<tr>
<td>Access to core business/employment</td>
<td>Access to energy infrastructure</td>
</tr>
<tr>
<td>Creation of new employment space</td>
<td>Proximity to archaeological site</td>
</tr>
<tr>
<td>Loss of employment space</td>
<td>Proximity to scheduled monument</td>
</tr>
<tr>
<td>Proximity to listed building</td>
<td>Site includes PDL</td>
</tr>
<tr>
<td>Proximity to historic park/garden</td>
<td>Site potentially contaminated</td>
</tr>
<tr>
<td>Proximity to conservation area</td>
<td>Proximity to archaeological site</td>
</tr>
<tr>
<td>Proximity to WHS or WHS buffer</td>
<td>Proximity to scheduled monument</td>
</tr>
<tr>
<td>Proximity to green wedge site</td>
<td>Site potentially contaminated</td>
</tr>
<tr>
<td>Proximity to surface water flooding</td>
<td>Proximity to scheduled monument</td>
</tr>
<tr>
<td>Water constraints</td>
<td>Proximity to agricultural area</td>
</tr>
<tr>
<td>Proximity to flood zones</td>
<td>Site includes PDL</td>
</tr>
<tr>
<td>Site includes PDL</td>
<td>Site includes PDL</td>
</tr>
</tbody>
</table>

**Commentary:**

- The site is significantly constrained in terms of highways access and could have a significant negative impact on green wedge policy objectives. The site contains a Locally Listed building which would have to be addressed. The site has reasonable access to local facilities and some open spaces, though access to District and Neighbourhood parks is currently limited.

- Mitigate effects. No public transport service to or adjacent to the site; development of the site may make a service viable. Green Wedges either side of the site and a wildlife site within it. Landscaping and other additional planting would assist in mitigating any effects.
APPENDIX 6: TAKING ON-BOARD THE FINDINGS OF SITE OPTIONS APPRAISAL

Introduction
As described within Part 2 of the main SA Report document, and in Appendix 5 above, an interim stage of plan-making / SA involved appraising a list of housing and employment site options. Table 1 describes in detail how the Council has chosen to reflect SA findings (or not, as the case may be) in the preferred approach as set out in the Core Strategy. Purple text represents the Council's response / rationale. The sites are illustrated below.
## Table 1: Summary findings from the appraisal of site options and an explanation of how findings have been reflected in the Plan

<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
<tbody>
<tr>
<td>DER 0013</td>
<td>A38/A6 roundabout</td>
<td>• Distance to neighbourhood park&lt;br&gt;• Access to indoor leisure facilities.&lt;br&gt;• Effect of site on Green Wedge objectives&lt;br&gt;• Proximity to WHS buffer.</td>
<td>• Distance to a large supermarket.&lt;br&gt;• Access to a pharmacy, hospital, train station, and district park.&lt;br&gt;• Waste water constraints.&lt;br&gt;• Greenfield.&lt;br&gt;• Moderately related to areas of deprivation.</td>
<td>No</td>
<td>Site not allocated. This site scores well on aspects of the appraisal. However, it is very small scale and the issues where it scores poorly are of significant importance. The Council consider that this site would not help to deliver strategic improvements to infrastructure, there are access issues and it is not well related to other strategic developments. Development of the promoted site would visibly intrude into it and have a significant and prominent visual effect on the openness and character of the Green Wedge at this point. The site is very much part of the Green Wedge and development would be damaging to its definition and undermine its strong boundaries. Significant concerns also exist over the potential impact on the setting of the World Heritage Site from development in this location. This view has been confirmed through the refusal of a planning application on the site. The Council feels that the ‘benefits’ associated with a relatively small amount of housing could not outweigh the impacts on these important policy objectives.</td>
</tr>
<tr>
<td>DER 0015</td>
<td>Acorn Way</td>
<td>• Distance to neighbourhood park&lt;br&gt;• Access to indoor leisure facilities.&lt;br&gt;• Effect of site on Green Wedge objectives</td>
<td>• Distance to local centre, GP, dentist, hospital, City park, district park, train station.&lt;br&gt;• Proximity to an AQMA.&lt;br&gt;• Effect on wildlife site.&lt;br&gt;• Greenfield.</td>
<td>No</td>
<td>Site not allocated. The Council consider that the effect on the function of the Green Wedge would be significant and would serve to undermine the role, character and function of the wedge and thus undermine the principle that is established. This is an important policy objective running through the plan.</td>
</tr>
<tr>
<td>Site Ref (SHLAA)</td>
<td>Site name</td>
<td>Significant constraints highlighted by SA</td>
<td>Other potential issues highlighted by SA</td>
<td>Allocated?</td>
<td>Have constraints and other issues flagged by SA been reflected in the Plan? How?</td>
</tr>
<tr>
<td>-----------------</td>
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<td>------------------------------------------</td>
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<td>--------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| DER 0105a       | Boulton Moor (East) | • Access to a pharmacy, hospital, Primary School, district park, indoor leisure facilities, quality bus route, train station, and cycle route.  
• Greenfield.  
• Poor access to Core Business Areas.  
• Surface water flooding. | • Distance to Derby City Centre.  
• Loss of land in Green Wedge  
• Access to local service centre, large supermarket, GP, City Park, Neighbourhood Park.  
• Effect on SSSI.  
• Wastewater constraints.  
• Moderately related to areas of deprivation. | Yes | Mitigation measures proposed by the Council are as follows:  
• Creation of significant new green infrastructure to enhance open space and compensate for the loss of Green Wedge.  
• Delivery of a new on-site primary school and contributions to secondary school provision.  
• Flood mitigation measures.  
• Park and ride and associated bus service.  
• New shopping and community facilities and requirement for comprehensive development across both the Derby and South Derbyshire sites.  
• Site boundary amended following draft consultation to further reduce negative impact on green wedge character.  
Policy CP19 would mitigate any potential effects on SSSI. |
| DER 0105b       | Boulton Moor (West) (Fellowlands) | • Access to a dentist, hospital, District Park and leisure facilities. | • Distance to Derby City Centre.  
• Access to local service centre, large | Yes | As above.  
In the main, issues have been tackled. However, |

The Council also have concerns over how development in this location would relate to the existing urban form. This view has been confirmed through the refusal of two recent planning applications.
## SA of the Derby City Local Plan Part 1: The Core Strategy

<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
</table>
| DER 0101         | Breadsall Hilltop Green Wedge | • Access to hospital, district park and neighbourhood park.  
• Effect on wildlife sites.  
• Surface water flooding. | • Distance to Derby City Centre.  
• Access to GP, pharmacy, dentist, indoor leisure facilities and train station.  
• Loss of land within Green Wedge.  
• Greenfield.  
• Site potentially contaminated.  
• Moderately related to areas of deprivation. | No | access to a train station will remain poor but this cannot be addressed.  
Together, these sites would mean the removal of some green wedge. However, this can be achieved without undermining the objectives of the Green Wedge policy.  
Planning permission now exists on this site for 190 dwellings. |
| DER 0016         | Brook Farm | • Access to dentist, neighbourhood park and indoor leisure facilities.  
• Loss of proposed public open space. | • Access to GP, pharmacy, Royal Derby Hospital, a city park, and train station.  
• Loss of land within Green Wedge.  
• Greenfield.  
• Moderate access to Core Business Areas.  
• Moderately related to areas of deprivation. | Yes | The council has proposed the following mitigation measures at this site:  
• Provision of new open space.  
• Contribution towards primary and secondary school provision.  
• Sensitive landscaping.  
• Surface water management scheme.  
• Requirement for environmental buffer zone. |
<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
</table>
| DER 0089 | Castleward |  - Distance to District or City Park (although well related to a Neighbourhood park)  
- Proximity to AQMA  
- Surface water flooding.  
-  |  - Proximity to City Centre  
- Adjacent to Lees Brook wildlife site  
- Loss of community facilities.  
- Access to GP, Royal Derby Hospital.  
- Waste water constraints  
- Proximity to listed buildings/Conservation Area.  
- Site potentially contaminated.  
- Loss of employment space.  
- | Yes |  - between housing site and Lees Brook  

*In the main, the issues have been tackled. However, access to some facilities could remain poor (dentist) or moderate (GP, Pharmacy, train station, employment).*  

*This site now has planning permission for up to 275 dwellings. It was granted on appeal following concerns raised over access.*  

- The council has proposed the following mitigation/enhancement measures at this site:  
  - New primary school.  
  - New or replacement community facilities.  
  - Improved pedestrian links to City centre.  
  - Improved access to Bass’ Recreation Ground.  
  - Protection of heritage assets.  
  - Small scale commercial uses.  

*This site has planning permission and is under construction.*
<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Centre</td>
<td></td>
<td>Proximity to AQMA.</td>
<td>Access to Royal Derby Hospital.</td>
<td>Yes</td>
<td>Policy CP2 would help to mitigate flood risk.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Possible effect on defined wildlife sites.</td>
<td>Distance to primary school.</td>
<td></td>
<td>Policy CP16 would seek to mitigate loss of open space.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Parts of the area are within flood zone 2 &amp; 3</td>
<td>Severance of wildlife corridor.</td>
<td></td>
<td>Policy CP20 would help to manage effects on built heritage.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Surface water flooding.</td>
<td>Waste water constraints.</td>
<td></td>
<td>Policies AC1-8 address significant constraints – including impact on built and natural environment and drainage (through implementation of OCOR).</td>
</tr>
<tr>
<td>DER 0120 DRI</td>
<td></td>
<td>Proximity to AQMA.</td>
<td>Access to Royal Derby Hospital and Neighbourhood Park.</td>
<td>Yes</td>
<td>The council has proposed the following mitigation/enhancement measures at this site:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Distance to District Park or City Park</td>
<td>Waste water constraints.</td>
<td></td>
<td>• Protection of heritage assets built into the policy</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Surface water flooding.</td>
<td>Site potentially contaminated.</td>
<td></td>
<td>• Pedestrian links to City centre and train station</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Proximity to listed buildings/conservation area.</td>
<td></td>
<td>• Creation of a ‘green link’ between Arboretum Park and Bass’ Recreation Ground.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Policy CP2 would help to mitigate flood risk.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>This site has outline permission for up to 400 dwellings, supermarket and complementary commercial development.</td>
</tr>
<tr>
<td>Derwent Triangle</td>
<td>Housing</td>
<td>Access to GP, hospital and secondary school.</td>
<td>Distance to local centres and some services and facilities.</td>
<td>Not for housing</td>
<td>The council allocated this site for employment, so issues identified relevant to housing are not relevant. It was considered that this site could not provide a satisfactory form of development for a new residential neighbourhood. As a result, the owners have progressed plans for an employment scheme. The site is more appropriate for these uses (see below).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Parts of site in defined flood zones.</td>
<td>Access to cycle route.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Site potentially contaminated (would need investigation).</td>
<td>Potential effect on adjacent wildlife site (River Derwent)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Derwent Triangle</td>
<td></td>
<td>Parts of site in defined flood zones.</td>
<td>Distance to local centre.</td>
<td>Yes</td>
<td>The council has proposed the following measures at this site:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Employment

<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
<tbody>
<tr>
<td>DER 0118</td>
<td>Evans of Leeds (Sinfin Lane)</td>
<td>• Site potentially contaminated (would need investigation).</td>
<td>• Access to cycle route.</td>
<td>Yes (As a ‘Regeneration Priority Site)</td>
<td>• ‘Less vulnerable’ uses proposed.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Access to a dentist and Royal Derby Hospital.</td>
<td>• Access to Potential effect on adjacent wildlife site (River Derwent)</td>
<td></td>
<td>• Treatment of the adjoining area to maintain recreational and nature importance.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Loss of employment land.</td>
<td>• Distance to City Centre.</td>
<td></td>
<td>• Built in protection for the restoration of the canal.</td>
</tr>
<tr>
<td></td>
<td>Former Celanese</td>
<td>• Surface water flooding.</td>
<td>• Access to GP, pharmacy, City, district or Neighbourhood Park, leisure facilities and train station.</td>
<td></td>
<td>• Potential for decentralised energy scheme.</td>
</tr>
<tr>
<td></td>
<td>(Housing or Employment TBC)</td>
<td>• Effect on wildlife sites.</td>
<td>• Proximity to AQMA.</td>
<td></td>
<td>• Requirement to assist in the implementation of the OCOR Masterplan.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Parts of site within flood zone 3.</td>
<td>• Waste water constraints.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Potentially contaminated.</td>
<td>• Potentially contaminated.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Loss of employment land.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Surface water flooding.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The council has proposed the following measures at this site should residential development be proposed:

- Provision of a small local centre.
- Provision of a link road.
- Require on-site and off-site junction improvements.
- Sound attenuation measures.
- Management of Great Crested Newt population.
- Sustainable Urban Drainage Systems.

### Former Celanese

<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>• Access to GP, pharmacy, dentist, hospital, primary school, secondary school, district/neighbourhood park and leisure facilities.</td>
<td>• Moderately related to deprived areas.</td>
<td>Yes (As a ‘Regeneration Priority Site)</td>
<td>• Development of the site for housing would require contaminated land to be remediated.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Effect on wildlife sites.</td>
<td>• BAP species.</td>
<td></td>
<td>• Flood risk mitigation measures would need to be secured.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Parts of site within flood zone 3.</td>
<td>• Proximity to AQMA.</td>
<td></td>
<td>• Residential development would also need to create a standalone community with a range of facilities.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Potentially contaminated.</td>
<td>• Access to high quality bus route.</td>
<td></td>
<td>The Council recognises that there are several potential issues with this site that need to be addressed. The policy framework suggested</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Loss of employment land.</td>
<td>• Distance to City, district and local centre.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site Ref (SHLAA)</td>
<td>Site name</td>
<td>Significant constraints highlighted by SA</td>
<td>Other potential issues highlighted by SA</td>
<td>Allocated?</td>
<td>Have constraints and other issues flagged by SA been reflected in the Plan? How?</td>
</tr>
<tr>
<td>----------------</td>
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<td>--------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| DER 0018 | Hackwood Farm | • Access to GP, dentist, hospital, district / neighbourhood park, leisure facilities and train station.  
• Effect on wildlife sites.  
• Access to Core Business Areas.  
• Greenfield.  
• Surface water flooding. | • Moderately related to deprived areas.  
• Waste water constraints.  
• Loss of land in Green Wedge.  
• Distance to City and district/local centre.  
• Access to pharmacy and primary school. | Yes | The council has proposed the following measures at this site:  
• A new primary school.  
• A new local centre.  
• Enhancements to green wedge and provision of new public open space.  
• Retention of hedgerows.  
• Pedestrian link enhancements and public transport improvements. |
| DER 0003 | Manor / Kingsway Hospital | • Distance to district/neighbourhood park and leisure facilities.  
• Proximity to an AQMA.  
• Surface water flooding. | • Moderately related to deprived areas.  
• Waste water constraints.  
• Distance to City and district/local centre.  
• Access to GP, dentist, pharmacy and primary school and rail station.  
• Potentially contaminated.  
• Proximity to Listed Building(s) | Yes (mixed use) | The council has proposed the following measures at this site:  
• Delivery of a high quality business park.  
• Park and ride interchange.  
• Pedestrian and cycle routes on site.  
• New sports facilities and open space.  
• Policy requires appropriate flood mitigation measure  
• Policy addresses the protection of on-site heritage features.  

*In the main, the issues have been tackled. The site has planning permission and development has commenced.*
# SA of the Derby City Local Plan Part 1: The Core Strategy

<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
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<th>Significant constraints highlighted by SA</th>
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<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
</table>
| Land East of Spondon | • Access to Derby Royal Hospital.  
• Distance to neighbourhood or district park.  
• Distance to leisure facilities.  
• Loss of public open space.  
• Loss of land within greenbelt.  
• Surface water flooding. | • Distance to Derby City Centre.  
• Access to GP, pharmacy, dentist, City park, and train station.  
• Proximity to AQMA.  
• Greenfield.  
• Moderately related to deprived areas and Core Business Areas. | No | The Council noted the considerable sustainability constraints when deciding not to allocate this site. Effect on the Green Belt and ability to create a suitable point of access were considered to be particularly significant constraints and there is an insufficient case to release the site at this time. |
| Land off Holmleigh Way | • Distance to City Centre.  
• Access to dentist and hospital.  
• Distance to district and neighbourhood park and leisure facilities.  
• Access to train station.  
• Surface water flooding.  
• Poorly related to Core Business areas. | • Distance to supermarket.  
• Distance to City Park.  
• Waste water constraints.  
• Greenfield.  
• Moderately related to deprived areas. | Yes | The council has proposed the following measures at this site (In combination with Woodlands Farm, Chellaston):  
• New primary and secondary school provision.  
• Provide a buffer between the A50 and Holmleigh Way.  
• Comprehensive flood mitigation measures.  
• Provide access to existing local facilities.  
• Link to walking and cycling routes. |
| Land off Oaklands Avenue | • Access to GP.  
• Distance to district, neighbourhood park and leisure facilities.  
• Access to train station.  
• Part of site within flood zone 3.  
• Surface water flooding.  
• Loss of proposed public open space (City Park). | • Distance to City Centre.  
• Access to pharmacy and primary school and high quality bus route.  
• Loss of land in Green Wedge.  
• Waste water constraints.  
• Greenfield.  
• Moderately related to Core Business Areas. | No | The Council noted the considerable sustainability constraints when deciding not to allocate this site. In particular, the Council consider that there are also considerable highways/access, school place provision and flooding issues to be addressed before it could be considered suitable for allocation. The impact on Green Wedge principle would also need to be given further consideration, as would the impact on proposed open space provision. These issues may be considered further in Part 2. |
<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name (Land South of Mansfield Road)</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
</table>
| DER 0030        | Lime Lane (Land South of Mansfield Road) | • Access to Royal Derby Hospital.         | • Distance to City Centre and local centre. | Yes (partially – the eastern side of the submitted site has not been allocated in the plan) | The council has proposed the following measures at this site:  
  • Reduction in developable area to address Green Wedge concerns. This would still mean development will take place within an existing Green Wedge, but the Green Wedge Study suggests that some development could take place within this wedge without it undermining the principle.  
  • Comprehensive surface water management strategy required.  
  • Contribution to primary and secondary school provision.  
  • Expansion, enhancement and on-going maintenance of Chaddesden Wood.  
  *Some of the key issues have been tackled. However, accessibility to a GP, Pharmacy, Dentist, local centre and train station will remain fairly poor.*  |


### Site Ref (SHLAA) | Site name (Station Road) | Significant constraints highlighted by SA | Other potential issues highlighted by SA | Allocated? | Have constraints and other issues flagged by SA been reflected in the Plan? How?
--- | --- | --- | --- | --- | ---
**DER 0160** Mackworth College Green Wedge | • Access to secondary school. • Access to district park and leisure facilities. • Effect on wildlife sites. • Surface water flooding. | • Distance to City Centre. • Access to pharmacy and hospital. • Distance to neighbourhood park. • Distance to train station. • Greenfield. • Moderately related to Core Business Areas. • Waste water constraints. | Yes | The council has proposed the following measures at this site (in combination with Onslow Road): • Allow open countryside to penetrate the suburbs. • Contributions to extend primary and secondary school provision. • Extend cycle routes. • Creation of open space. • Enhance biodiversity. Retention of hedgerows and ponds. • New health centre. • Sustainable flood mitigation measures. *In the main, the issues have been tackled. However, the site will remain only moderately related to a train station and hospital. It is difficult to address these issues.*

The site now has planning permission for 200 dwellings. |

**DER 0020** Mickleover Sports (Station Road) | • Distance to City Centre. • Access to dentist, City / district and neighbourhood parks, leisure facilities, high quality bus route and train station. • Effect on wildlife sites. | • Distance to local centre, GP, pharmacy and primary school. • Waste water constraints. • Greenfield. • Moderately related to deprived areas and Core Business Areas. | No | The Council noted the considerable sustainability constraints when deciding not to allocate this site. In particular the Council consider that the effect on the function of the Green Wedge by closing the mouth of the Green Wedge would be significant. |

While the Council considers that this site may have some potential for development (it was identified as a 'star' site in the Preferred Growth Strategy), there were a number of outstanding issues to be resolved before it could be considered for... | Mickleover STW (Andrew Avenue) | • Distance to district park and leisure facilities. • Effect on wildlife sites. | • Distance to local centre. GP, dentist, neighbourhood park, high quality bus route and train station. | No |...
### SA of the Derby City Local Plan Part 1: The Core Strategy

<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
</table>
| DER 0156         | Moorway Lane Green Wedge | • Loss of open space.  
• Land within Green Wedge.  
• Part of site in flood zone 3.  
• Poorly related to Core Business Areas.  
• Surface water flooding. | • Waste water constraints.  
• Greenfield.  
• Potentially contaminated.  
• Moderately related to areas of deprivation. | No. | The Council noted the considerable sustainability constraints when deciding not to allocate this site. In particular, the Council consider that the effect on the function of the Green Wedge would be significant and there are also considerable highways and school place provision issues. The site also has some significant accessibility issues, being poorly related to a large number of local services and facilities. |
| DER 0098         | Moorways (Osmaston Park Road) | • Distance to, GP, secondary school, district park, neighbourhood park, leisure facilities and train station.  
• Loss of land within Green Wedge.  
• Part of site within flood zone 3.  
• Greenfield.  
• Surface water flooding. | • Distance to City Centre, Local Centre, pharmacy, dentist, hospital, high quality bus route.  
• Waste water constraints.  
• Moderately related to Core Business Areas. | No | This site is owned by the City Council and has not been allocated as a re-provision of leisure and sports facilities at the Moorways site is now part of the Council endorsed leisure strategy. Policy CP21 seeks to enable the provision of these facilities. The site is, therefore, considered to be available at this time and may not be within the lifetime of the plan. |
<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
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<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
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<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
<tbody>
<tr>
<td>DER002 1/0027</td>
<td>Onslow Road</td>
<td>- Access to dentist, district and neighbourhood parks and leisure facilities. &lt;br&gt;- Effect on wildlife sites. &lt;br&gt;- Surface water flooding.</td>
<td>- Distance to City centre. &lt;br&gt;- Distance to GP, high quality bus route and train station. &lt;br&gt;- Loss of land in Green Wedge. &lt;br&gt;- Waste water constraints. &lt;br&gt;- Greenfield. &lt;br&gt;- Moderately related to areas of deprivation and Core Business Areas.</td>
<td>Yes</td>
<td>The council has proposed the following measures at this site (in combination with Mackworth College Green Wedge): &lt;br&gt;- Allow open countryside to penetrate the suburbs. &lt;br&gt;- Contributions to extend primary and secondary school provision. &lt;br&gt;- Extend cycle/pedestrian routes. &lt;br&gt;- Creation of open space. &lt;br&gt;- Protect and enhance biodiversity. Retention of nature conservation interest in terms of hedgerows and ponds. &lt;br&gt;- New health centre. &lt;br&gt;- Sustainable flood mitigation measures. &lt;br&gt;<strong>In the main, the issues have been tackled. However, the site will remain only moderately related to a train station and may not assist in regeneration of the most deprived areas. It is difficult to address these issues.</strong></td>
</tr>
<tr>
<td></td>
<td>Osmaston</td>
<td>- Access to Royal Derby Hospital and secondary schools. &lt;br&gt;- Proximity to AQMA. &lt;br&gt;- Distance to District Park. &lt;br&gt;- Surface water flooding.</td>
<td>- Distance to City Centre. &lt;br&gt;- Access to dentist, main train station &lt;br&gt;- Waste water constraints. &lt;br&gt;- Proximity to listed building(s). &lt;br&gt;- Potentially contaminated. &lt;br&gt;- Loss of employment space.</td>
<td>Yes</td>
<td>The council has proposed the following measures at this site: &lt;br&gt;- Refurbishment of Nightingale Primary School &lt;br&gt;- Improved pedestrian and cycle links &lt;br&gt;- Maintain and enhance Marble Hall. &lt;br&gt;- Provision and enhancement of local amenities and facilities. &lt;br&gt;- Regeneration of vacant former employment site and wider deprived</td>
</tr>
</tbody>
</table>
### Site Ref (SHLAA  ) | Site name | Significant constraints highlighted by SA | Other potential issues highlighted by SA | Allocated? | Have constraints and other issues flagged by SA been reflected in the Plan? How?
--- | --- | --- | --- | --- | ---
Royal Hill Farm, Spondon | DER0001 Rykneld Road | - Access to hospital, neighbourhood park, leisure facilities, cycle route.  
- Effect on wildlife sites.  
- Loss of land within Green belt and Green Wedge.  
- Surface water flooding. | - Distance to local centre, GP, pharmacy, dentist, City Park, District Park, high quality bus route and train station.  
- Moderately related to areas of deprivation and Core Business Areas. | No | The Council noted the considerable sustainability constraints when deciding not to allocate this site. Effect on the Green Belt, the poor relationship of the site to the existing built up area, the truncation of an existing green wedge and ability to create a suitable point of access were considered to be particularly significant constraints and there is an insufficient case to release the site at this time. |
DER0001 Rykneld Road | - Access to dentist and primary school.  
- Distance to district park, neighbourhood park, leisure facilities.  
- Poorly related to Core Business Areas.  
- Surface water flooding. | - Access to hospital, a city park, train station and cycle route.  
- Waste water constraints.  
- Greenfield site on edge of urban area.  
- Moderately related to deprived areas. | Yes | The council has proposed the following measures at this site:  
- New primary school and extensions to secondary school.  
- Expansion of existing local centre including a small supermarket.  
- Employment uses.  
- Pedestrian and cycle routes.  
- Highways improvements.  
- Policy CP2 tackles Surface water Flooding.  
In the main issues have been tackled. However, access to a train station will remain poor.  
The adjacent Highfield Farm Allocation in South Derbyshire will also provide access to play areas and a new country park. |
### SA of the Derby City Local Plan Part 1: The Core Strategy

<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
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<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
</table>
| DER 0099         | West of the Hollow, Mickleover | • Distance to district park, leisure facilities, and high quality bus route.  
• Loss of land within Green Wedge  
• Poorly related to Core Business Areas. | • Distance to City Centre.  
• Access to GP, Neighbourhood Park and train station.  
• Waste water constraints.  
• Moderately related to deprived areas. | No. | The sustainability performance of this site is comparable or preferable to some of the preferred sites. However, the Council is concerned that without the wider site in South Derbyshire coming forward there are accessibility issues at this site and it would have a poor relationship with the existing built up area. The Council also considers that the effect on the function of the Green Wedge in this area would be particularly negative. |
| DER 0022         | Woodlands Farm (Chellaston) | • Distance to City Centre.  
• Access to dentist, hospital, district park, leisure facilities, and train station.  
• Effect on wildlife sites.  
• Poorly related to Core Businesses. | • Access to large supermarket, GP, City park, neighbourhood park.  
• Waste water constraints.  
• Greenfield land.  
• Moderately related to areas of deprivation. | Yes | The council has proposed the following measures at this site (In combination with Land south of Holmleigh Way):  
• New primary and secondary school provision.  
• Provide a buffer between the A50.  
• Provide access to existing local facilities.  
• Link to walking and cycling routes.  
This site now has planning permission. |
| Rough Heanor Farm | • Distance to a dentist, leisure facilities and park.  
• Green Wedge.  
• Previously Developed Land. | • Distance to City Centre.  
• Access to GP, pharmacy, train, cycle routes, and neighbourhood park.  
• Listed Building.  
• Waste water.  
• AQMA.  
• Poorly related to Core Businesses.  
• Loss of employment land. | No | The Council is concerned that a satisfactory and viable form of development can be achieved on this site. It has significant access issues and it is unclear whether a viable and satisfactory solution could be found. The impact on the Green Wedge principle and function in this area is also of concern. There is far too little certainty over whether a viable and satisfactory form of development could be achieved here to include it in the plan. Equally, the scale of development possible would raise questions over its ‘strategic’ nature. It would not provide particularly large amounts of new housing – this would have to be weighed up against any negative aspects of a proposal. |
## SA of the Derby City Local Plan Part 1: The Core Strategy

<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
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</tr>
</thead>
</table>
| DER 0104         | Wragley Way, Sinfin | • Distance to City Centre.  
• Access to hospital, neighbourhood park, leisure facilities and train station. | • Site within flood zone.  
• Waste water constraints.  
• Greenfield.  
• Moderately related to deprived areas and Core Business Areas. | Yes | The council has proposed the following measures at this site:  
• Provision of new primary schools.  
• Extend existing / provision of new secondary school.  
• Flood mitigation measures.  
• Provision of new public open space.  
• Landscaping.  
• New highways infrastructure / contribution towards the Southern Derby Link Road.  
*In the main, issues have been tackled. However access to a train station and hospital will remain poor (which cannot be mitigated) and the site may not benefit deprived areas.*  
*Permission now exists for 150 units within the City boundary.* |
|                  | Raynesway East Employment | • Access to district centre.  
• Access to park and indoor recreational facilities.  
• Access to bus.  
• Local Wildlife Site.  
• Flood Zone 3. | • Access to Derby City Centre.  
• Access to train.  
• Proximity to AQMA.  
• Adjacent to green wedge and green belt.  
• Water capacity.  
• Adjacent to Historic park.  
• Potentially contaminated. | Yes | The Council has proposed the following measures at this site:  
• Require a landscape buffer zone on each side of the River Derwent to protect wildlife interests  
• Requires comprehensive flood alleviation measures  
• Seek to ensure that development does not have an adverse impact on setting of Elvaston Park  
*This site has planning permission and development has commenced. The policy will, however, ensure future phases will be 'compliant'.* |
<table>
<thead>
<tr>
<th>Site Ref (SHLAA)</th>
<th>Site name</th>
<th>Significant constraints highlighted by SA</th>
<th>Other potential issues highlighted by SA</th>
<th>Allocated?</th>
<th>Have constraints and other issues flagged by SA been reflected in the Plan? How?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sinfin Moor</td>
<td></td>
<td>• Distance to City Centre.</td>
<td>• Access to cycle route.</td>
<td>Yes</td>
<td>The Council has proposed the following measures at this site:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Distance to local centre.</td>
<td>• Adjacent to green wedge.</td>
<td></td>
<td>• Require comprehensive flood alleviation measures</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Distance to neighbourhood park and indoor recreational facilities.</td>
<td>• Potential water capacity issues.</td>
<td></td>
<td>• Require the provision of a network of green infrastructure – including landscape buffers, structural planting, measures to conserve woodland at the Moor Plantation, measures to maximise biodiversity value of areas of the site used for water discharge and mitigation, landscaped buffers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Access to bus stop and train station.</td>
<td></td>
<td></td>
<td>• Encourage the development of small scale complementary uses to serve the immediate employment area</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Local wildlife site</td>
<td></td>
<td></td>
<td>• Ensure that development minimises the impact on the recreational and biodiversity value of Sinfin Moor Lane</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Within flood zone 3.</td>
<td></td>
<td></td>
<td>• Require implementation of improved transport links (through ‘T12’ and ‘SDITL’)</td>
</tr>
</tbody>
</table>
APPENDIX 7: APPRAISAL OF ALTERNATIVES (HOUSING MIX)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches for delivering affordable housing within Derby:

1) Set a City wide policy establishing the proportions of different house types sought on large sites; and

2) Set policies establishing the proportions of different house types to be sought on large sites in different parts of the City.

3) Do not set targets for different house types across the City. Rely on criteria-based policies.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
### Appraisal findings: Housing Mix

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To reduce Derby's contribution to Climate Change and manage its effects, including flooding.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>2. To minimise traffic and the length of journeys travelled by people and goods.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>3. To minimise pollution.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: All alternatives would help to reduce housing deprivation throughout Derby through providing the required proportions of different house types. Alternative 2/3 is the preferred approach as it would help to establish the correct types of houses that reflect specific localised needs throughout the City. The implementation of this alternative would also assist in meeting specialist housing needs, such as those of the BME community.</td>
<td>2 1 1</td>
</tr>
<tr>
<td>Sustainability objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
<td>Rank of preference</td>
</tr>
<tr>
<td>---------------------------</td>
<td>------------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>It is considered that all three alternatives would lead to significant positive effects on the baseline. The SHMA (2008, updated in 2011, 2013), Housing Strategy (2009) and the Housing Requirement Study (2012) set out the need to deliver specific housing types within the City. All the alternatives would help to ensure that the required housing types are delivered within Derby over the plan period. Alternative 2 or 3 would be the preferred approach they would help to ensure that housing types are delivered on larger sites throughout different parts of the City that specifically reflects the local housing need. The implementation of this alternative would also assist in meeting specialist housing needs, such as those of the BME community. Alternative 3 provides a greater degree of flexibility than alternative 2, but it would not set specific targets, so an appropriate mix may not always be achieved.</td>
<td>2 1 1</td>
</tr>
<tr>
<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>9. To improve health, reduce health inequalities and increase levels of physical activity.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Alternative 2 or 3 is the preferred approach as it would help to ensure that appropriate types of housing are delivered on sites throughout Derby that take into account the need to deliver the correct type of housing that reflects the local character. This will help to ensure that the local townscape, sites and buildings of architectural and historic importance are protected and enhanced as part of delivering appropriate housing types within Derby. Alternative 3 is more flexible and would allow for subtle differences in density and character to be accounted for across larger sites. However, the lack of minimum targets could mean that the appropriate mix was not always achieved.</td>
<td>2 1 1</td>
</tr>
</tbody>
</table>
Sustainability objective | Discussion of significant effects (and discussion of relative merits in more general terms) | Rank of preference
--- | --- | ---
11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents | It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms. | - - -
12. To maximise people’s accessibility to services and facilities. | It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms. | - - -
13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment. | It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms. | - - -

Summary

It is considered that all three alternatives would lead to significant positive effects on the baseline associated with SA objective 7. The SHMA (2008, updated in 2011), Housing Strategy (2009) and the Housing Requirement Study (2012) set out the need to deliver specific housing types within the City. The recommended target for private market house types (within the SHMA) is 40% 1 and 2 bedroom properties and 60% 3 and 4 bedroom properties for the City. Both alternatives would help to ensure that the required housing types are delivered within Derby over the plan period.

All three alternatives would help to reduce housing deprivation throughout Derby through providing the required proportions of different house types. Alternative 2 would help to establish the correct types of houses that reflect specific localised needs throughout the City. The implementation of this alternative would also assist in meeting specialist housing needs, such as those of the BME community.

Alternative 2 would be the most beneficial approach as it would help to ensure that housing types are delivered on larger sites throughout different parts of the City that specifically reflect the local housing need. However, concerns would be raised over the long term relevance of setting such targets and whether this would actually impede delivery over the lifetime of the Plan.

Alternative 3 is more risky in terms of ensuring delivery of different housing types, but more flexible. This would allow the Council to take account of prevailing market and viability conditions in assessing planning applications. This would assist in overall housing delivery.
APPENDIX 8: APPRAISAL OF ALTERNATIVES (HOUSING DENSITY)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches for delivering affordable housing within Derby:

1) Establish a minimum density across the City; and

2) Apply varying approaches to housing design, and density in different parts of the City, taking into account factors such as housing need, local character and accessibility.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
### Appraisal findings: Housing Density

**Table presenting an appraisal of the following alternative approaches:**

1. **Establish a minimum density across the City; and**
2. **Apply varying approaches to housing design, and density in different parts of the City, taking account of factors such as housing need, local character and accessibility.**

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>2. To minimise traffic and the length of journeys travelled by people and goods.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>3. To minimise pollution.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternative 2 would provide the opportunity to set higher densities in appropriate locations which would ensure the efficient use of land. This would have a positive effect on the baseline associated with this SA objective especially where new housing is developed on previously developed land within Derby.</td>
<td>2 1</td>
</tr>
<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>Sustainability objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
<td>Rank of preference</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Both alternatives aim to deliver new housing at an established density throughout Derby. Alternative 2 is the preferred approach as it would help to ensure that appropriate densities are delivered on sites throughout Derby that take into account the need to deliver the correct type of housing that meets local housing needs. This will help to ensure that the City’s needs (in terms of providing a range of housing types and sizes) are met. Furthermore alternative 2 accords with the NPPF requirement for authorities to set out their own approach to housing density to reflect local circumstances.</td>
<td>2 1</td>
</tr>
<tr>
<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>9. To improve health, reduce health inequalities and increase levels of physical activity.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Alternative 2 is the preferred approach as it would help to ensure that appropriate densities are delivered on sites throughout Derby that take into account the need to deliver the correct density of housing that reflects the local character. This will help to ensure that the local townscape, sites and buildings of architectural and historic importance are protected and enhanced as part of delivering appropriate densities on new housing developments.</td>
<td>2 1</td>
</tr>
</tbody>
</table>
### Sustainability objective

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>12. To maximise people’s accessibility to services and facilities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
<tr>
<td>13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- -</td>
</tr>
</tbody>
</table>

### Summary

Both alternatives aim to deliver new housing at an established density throughout Derby. Alternative 2 is the preferred approach as it would help to ensure that appropriate densities are delivered on sites throughout Derby that take into account the need to deliver the correct type of housing that meets local housing needs. This will help to ensure that the City’s needs (in terms of providing a range of housing types and sizes) are met. Furthermore, alternative 2 accords with the NPPF requirement for authorities to set out their own approach to housing density to reflect local circumstances.

Alternative 2 would also help to ensure that appropriate densities are delivered on sites throughout Derby that take into account the need to deliver the correct type of housing that reflects the local character. This will help to ensure that the local townscape, sites and buildings of architectural and historic importance are protected and enhanced as part of delivering appropriate densities on new housing developments.
APPENDIX 9: APPRAISAL OF ALTERNATIVES (AFFORDABLE HOUSING)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches for delivering affordable housing within Derby:

1 Focus on housing delivery by relaxing affordability targets (reducing the target to 20% and / or increasing the threshold to 25 dwellings).

2 Maintain a site threshold of 15 dwellings and 30% affordability requirement.

3 Focus on tackling affordability issues by increasing affordability targets up to 40% and / or decreasing the policy threshold below 15 dwellings.

4 Apply a mix of targets to different scales of development. This could mean:
   - Increasing the affordability target above 30% for Greenfield developments
   - Maintaining a target of 30% and a threshold of 15 dwellings for brownfield and smaller scale developments.
   - Reducing the policy threshold below 15 dwellings and / or applying a lower % target for smaller developments.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
### Appraisal findings: Affordable Housing

Table presenting an appraisal of the following alternative approaches to housing affordability:

- **(1)** Focus on housing delivery
- **(2)** Maintain current targets and thresholds
- **(3)** Focus on affordability
- **(4)** Apply a mix of targets to different types of development

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
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</thead>
<tbody>
<tr>
<td></td>
<td><strong>Alt 1</strong> <strong>Alt 2</strong> <strong>Alt 3</strong> <strong>Alt 4</strong></td>
<td></td>
</tr>
<tr>
<td>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.</td>
<td>It is not considered that any of the alternatives would have a significant effect on the baseline. With regards to the merits of each approach. Alternative 1 could lead to a higher degree of house building in the short term. Reducing the need to deliver on affordability targets could also mean that a higher quality design (including sustainability measures) was possible. Alternative 3 could make it difficult to deliver higher standards of sustainability into new development.</td>
<td></td>
</tr>
<tr>
<td>2. To minimise traffic and the length of journeys travelled by people and goods.</td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline.</td>
<td></td>
</tr>
<tr>
<td>3. To minimise pollution.</td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline.</td>
<td></td>
</tr>
<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline. However, alternative 3 could make it difficult for developers to consider the use of materials with a lower ecological footprint due to the increased pressure on budgets.</td>
<td></td>
</tr>
</tbody>
</table>
### 5. To reduce deprivation and inequalities.

Alternative 1 would help to ensure that more houses were built, and this would benefit some people. However, lower affordability targets would mean that some communities may not be able to access these homes. This could actually exacerbate inequalities for some people, which is determined to be a significant negative effect. Alternative 2 is very much a continuation of current policy, which would help to address affordability without leading to disparities between different areas. Alternative 3 would ensure that the housing that was delivered was affordable to more people. However, the stringent targets could affect the viability of a lot of schemes, meaning that levels of house building were very low. This would have a significant negative effect on the local economy and would hold back regeneration in areas of need. Alternative 4 could help to encourage development in areas where viability could be an issue. However, the affordable housing delivery may not be sufficient to meet local needs. Conversely, higher targets could be delivered on more attractive sites, but the level of need may not be that great in those areas. Without delivering a proportion of affordable housing offsite, this could lead to disparities on affordability across the City. Nevertheless, it is considered that alternatives 4 and 2 would have a significant positive effect on the baseline position.

<table>
<thead>
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<th>Sustainability objective</th>
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<td>Alt 1  Alt 2  Alt 3  Alt 4</td>
</tr>
<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>Alternative 1 would help to ensure that more houses were built, and this would benefit some people. However, lower affordability targets would mean that some communities may not be able to access these homes. This could actually exacerbate inequalities for some people, which is determined to be a significant negative effect. Alternative 2 is very much a continuation of current policy, which would help to address affordability without leading to disparities between different areas. Alternative 3 would ensure that the housing that was delivered was affordable to more people. However, the stringent targets could affect the viability of a lot of schemes, meaning that levels of house building were very low. This would have a significant negative effect on the local economy and would hold back regeneration in areas of need. Alternative 4 could help to encourage development in areas where viability could be an issue. However, the affordable housing delivery may not be sufficient to meet local needs. Conversely, higher targets could be delivered on more attractive sites, but the level of need may not be that great in those areas. Without delivering a proportion of affordable housing offsite, this could lead to disparities on affordability across the City. Nevertheless, it is considered that alternatives 4 and 2 would have a significant positive effect on the baseline position.</td>
<td>3 1 3 2</td>
</tr>
<tr>
<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline.</td>
<td>- - - -</td>
</tr>
<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>Alternative 1 would have a positive effect on the baseline in terms of supporting higher levels of housing development. It could also help to regenerate sites that are struggling in terms of viability. However, whilst this alternative is positive from a building perspective, it does not necessarily meet the needs of certain communities in the City. Alternative 2 would be similar to the existing baseline, so no significant effects would be anticipated, although there would be generally positive implications. Alternative 3 would help to deliver a higher amount of affordable housing, which would address the issues flagged in the SHMA. However, the targets would make a lot of developments unviable, which would affect the deliverability of housing targets. This would have a profound negative effect, particularly in the current economic climate. Alternative 4 would help to support development in areas that may struggle in terms of viability; however, the affordable housing provision on site may not match to need. Nevertheless, a positive effect is anticipated.</td>
<td>2 3 4 1</td>
</tr>
<tr>
<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline. However, the higher costs associated with alternatives 3 and 4 could make it difficult to secure contributions towards new schools or extensions to existing schools (for strategic greenfield sites). This could mean that development puts undue pressure on local facilities, or that the development was not deemed appropriate.</td>
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<td>Sustainability objective</td>
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<tr>
<td><strong>9. To improve health, reduce health inequalities and increase levels of physical activity.</strong></td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline.</td>
<td><img src="1" alt="Green" /> <img src="2" alt="Red" /> <img src="3" alt="Green" /> <img src="4" alt="Red" /></td>
</tr>
<tr>
<td><strong>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</strong></td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline. However, alternatives 1 and 3 could better help to encourage regeneration on brownfield sites where viability is an issue. This could have a positive effect on the quality of the surrounding areas if design is sensitive to the local character.</td>
<td><img src="1" alt="Green" /> <img src="2" alt="Red" /> <img src="3" alt="Green" /> <img src="4" alt="Red" /></td>
</tr>
<tr>
<td><strong>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</strong></td>
<td>Alternative 1 would have a positive effect on the baseline in terms of supporting higher levels of housing development. It could also help to regenerate urban brownfield sites. Alternative 2 would be similar to the existing baseline, so no significant effects would be anticipated, although there would be generally positive implications. Alternative 3 would help to deliver a higher amount of affordable housing, which would address the issues flagged in the SHMA. However, the targets would make a lot of developments unviable, which would affect the deliverability of housing targets. This would have a profound negative effect on the local construction industry, particularly in the current economic climate. Alternative 4 would help to support development in areas that may struggle in terms of viability, whilst ensuring that higher value sites are still viable.</td>
<td><img src="1" alt="Green" /> <img src="2" alt="Red" /> <img src="3" alt="Green" /> <img src="4" alt="Red" /></td>
</tr>
<tr>
<td><strong>12. To maximise people’s accessibility to services and facilities.</strong></td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline. However, higher affordability targets associated with alternatives 3 and 4 could affect the ability of developments to contribute towards strategic infrastructure improvements.</td>
<td><img src="1" alt="Green" /> <img src="2" alt="Red" /> <img src="3" alt="Green" /> <img src="4" alt="Red" /></td>
</tr>
<tr>
<td><strong>13. To protect and enhance green infrastructure, biodiversity.</strong></td>
<td>It is not considered that any of the alternative approaches would have a significant effect on the baseline. However, higher affordability targets associated with alternatives 3 and 4 could affect the ability of developments to contribute towards green infrastructure enhancement.</td>
<td><img src="1" alt="Green" /> <img src="2" alt="Red" /> <img src="3" alt="Green" /> <img src="4" alt="Red" /></td>
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<tr>
<td>Sustainability objective</td>
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<td>geodiversity and the natural environment.</td>
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</table>

**Summary**

Alternative 1 would have a positive effect on housing delivery, but it could result in a widening of inequalities between communities. At the other end of the spectrum, alternative 3 could have a profound negative effect on the local economy by making a significant amount of developments unviable. Whilst, this approach would help to address the affordability issues where developments where secured, the level of housing delivery would mean that overall, the amount of affordable housing need remained high. Alternative 2 is a continuation of current policy, and this would mean accepting that the identified affordable housing need would not be met. However, there are unlikely to be any significant negative effects associated with this option. Alternative 4 has the potential to have a significant positive effect in terms of delivering enough houses and securing an appropriate level of affordability according to viability. However, the differing targets would mean that for strategic greenfield sites, a proportion of the affordable housing may need to be delivered offsite to ensure that disparities do not occur between areas at the urban edge and the inner urban areas. Seeking a higher target for strategic sites may also affect the ability to secure contributions towards a range of other enhancement measures. Overall, alternative 2 would appear to provide the most sensible balance between meeting needs and the delivery of housing across the City.
APPENDIX 10: APPRAISAL OF ALTERNATIVES (SHOPPING FLOORSPACE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches for the delivery of shopping floorspace:

1) Lower Growth Option;
2) Medium Growth Option; and
3) High Growth Option.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
### Appraisal findings: Shopping Floor Space

Table presenting an appraisal of the following alternative approaches:
1. Lower Growth Option;
2. Medium Growth Option; and
3. Higher Growth Option.

<table>
<thead>
<tr>
<th>Sustainability objective</th>
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<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To reduce Derby's contribution to Climate Change and manage its effects, including flooding.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of the higher growth option (alternative 3) would contribute towards reducing the reliance on existing shopping floorspace through increasing its distribution and amount located throughout Derby. This would have a positive effect on reducing the distance travelled by people living in Derby in order to access shopping facilities. In turn, this would have an indirect effect in relation to reducing the amount of greenhouse gases emanating from people travelling to access shopping facilities. Alternative 2 (the medium growth option) is ranked second as it would lead to similar effects as described above in relation to alternative 3, but to a lesser extent.</td>
<td>Alt 1</td>
</tr>
<tr>
<td>2. To minimise traffic and the length of journeys travelled by people and goods.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of the higher growth option (alternative 3) would contribute towards reducing the reliance on existing shopping floorspace through increasing its distribution and amount located throughout Derby. This would have a positive effect on reducing the distance travelled by people living in Derby in order to access shopping facilities. In turn, this should reduce congestion within the City as well. Alternative 2 (the medium growth option) is ranked second as it would lead to similar effects as described above in relation to alternative 3, but to a lesser extent.</td>
<td>Alt 1</td>
</tr>
<tr>
<td>3. To minimise pollution.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of the higher growth option (alternative 3) would contribute towards reducing the reliance on existing shopping floorspace through increasing its distribution and amount located throughout Derby. This would have a positive effect on reducing the distance travelled by people living in Derby in order to access shopping facilities. In turn, this would have an indirect effect in relation to reducing the amount of greenhouse gases emanating from people travelling to access shopping facilities. This would help to minimise pollution within Derby. Alternative 2 (the medium growth option) is ranked second as it would lead to similar effects as described above in relation to alternative 3, but to a lesser extent.</td>
<td>Alt 1</td>
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</table>
### Sustainability objective

<table>
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<tbody>
<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>8. To improve levels of education and skills and reduce education</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>9. To improve health, reduce health inequalities and increase levels of physical activity</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
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### SA of the Derby City Local Plan Part 1: The Core Strategy

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<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
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</thead>
<tbody>
<tr>
<td><strong>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>Alt 1</td>
</tr>
<tr>
<td><strong>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</strong></td>
<td>It is considered that alternative 2 would lead to significant positive effects on the baseline. The amount of growth in new shopping floorspace set out as part of alternative 2 is considered the most appropriate and realistic in terms of the growth identified in the Council’s retail study. The implementation of alternative 2 would help to ensure that the most appropriate level of shopping floorspace is delivered throughout Derby over the plan period. All alternatives would lead to the delivery of new shopping floorspace throughout Derby, but to varying levels. This would contribute towards a positive effect on maintaining a prosperous and economically vibrant City and in terms of increasing job opportunities throughout Derby.</td>
<td>3</td>
</tr>
<tr>
<td><strong>12. To maximise people’s accessibility to services and facilities.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Each of the options would help to increase the amount of shopping floorspace located throughout Derby over the plan period to varying levels. This would help to ensure that people’s accessibility to services and facilities is maximised. The higher growth option (alternative 3) would provide the highest level of new shopping floorspace. Therefore, this has been identified as the preferred option in relation to this SA objective. Alternative 2 (medium growth option) is ranked second as it would provide the second highest level of new shopping floorspace.</td>
<td>3</td>
</tr>
<tr>
<td><strong>13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>-</td>
</tr>
</tbody>
</table>

**Summary:** All alternatives would lead to the delivery of new shopping floorspace throughout Derby, but to varying levels. This would contribute towards a positive effect on maintaining a prosperous and economically vibrant City and in terms of increasing job opportunities throughout Derby. The amount of growth in new shopping floorspace set out as part of alternative 2 is considered the most appropriate and realistic in terms of the growth identified in the Council’s retail study. The implementation of alternative 2 would help to...
ensure that the most appropriate level of shopping floorspace is delivered throughout Derby over the plan period.
The implementation of the higher growth option (alternative 3) would contribute towards reducing the reliance on existing shopping floorspace through increasing its distribution and amount located throughout Derby. This would have a positive effect on reducing the distance travelled by people living in Derby in order to access shopping facilities. In turn, this should reduce congestion within the City and greenhouse gases emanating from people travelling in order to access shopping facilities.
APPENDIX 11: APPRAISAL OF ALTERNATIVES (TOWN CENTRE USES)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to the distribution of town centre uses:

1) Meet the needs for major comparison/non-food retail floorspace, leisure, office and cultural development in the City centre;

2) If needs cannot be met in the City centre, then consider the dispersal of some of this growth into the district centres; and

3) If need cannot be met in the City centre or in improved/enlarged District Centres, then accept more development in out-of-centre locations.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
Appraisal findings: Town Centre Uses

Table presenting an appraisal of the following alternative approaches:

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternatives 1 and 2 would help to ensure that town centre uses are delivered within the City centre and existing district centres throughout Derby. This would help to ensure that these uses are in locations that are accessible for alternative modes of travel to the car. In turn, this would have an indirect positive effect on reducing greenhouse gas emissions through encouraging use of sustainable methods of transport when accessing town centre uses. However, it is noted that edge-of-centre development may be required as part of alternative 1. If this alternative is pursued, then there would be a need to ensure that these locations are accessible through sustainable methods of transport. The implementation of alternative 3 has the potential to significantly increase car use and congestion through development of town centre uses in out-of-centre locations. The implementation of this alternative could have an indirect negative effect through increasing greenhouse gas emissions emanating from travelling to access town centre uses.</td>
<td>1 1 3</td>
</tr>
<tr>
<td>2. To minimise traffic and the length of journeys travelled by people and goods.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternatives 1 and 2 would help to ensure that town centre uses are delivered within the City centre and existing district centres throughout Derby. This would help to ensure that these uses are in locations that are accessible for alternative modes of travel to the car. This would have a positive effect in terms of encouraging the use of sustainable methods of transport when accessing town centre uses. However, it is noted that edge-of-centre development may be required as part of alternative 1. If this alternative is pursued, then there would be a need to ensure that these locations are accessible through sustainable methods of transport. The implementation of alternative 3 has the potential to significantly increase car use and congestion through development of town centre uses in out-of-centre locations. The implementation of this alternative could increase the use of the private car when accessing out-of-centre locations.</td>
<td>1 1 3</td>
</tr>
<tr>
<td>Sustainability objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
<td>Rank of preference</td>
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</tr>
<tr>
<td>3. To minimise pollution.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternatives 1 and 2 would help to ensure that town centre uses are delivered within the City centre and existing district centres throughout Derby. This would help to ensure that these uses are in locations that are accessible for alternative modes of travel to the car. In turn, this would have an indirect positive effect on minimising pollution through reducing greenhouse gas emissions emanating from the use of the private car. However, it is noted that edge-of-centre development may be required as part of alternative 1. If this alternative is pursued, then there would be a need to ensure that these locations are accessible through sustainable methods of transport in order to minimise pollution. The implementation of alternative 3 has the potential to significantly increase car use and congestion through development of town centre uses in out-of-centre locations. The implementation of this alternative could have an indirect negative effect through increasing pollution from greenhouse gas emissions emanating from travelling to access town centre uses.</td>
<td>1 1 3</td>
</tr>
<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Whist all the alternatives would see some level of priority given to the delivery of town centre uses in the City centre, the implementation of alternative 1 would provide the best opportunity for regeneration of derelict/Brownfield sites located throughout the City centre. This would help to ensure that previously developed land located throughout the City is utilised over the plan period.</td>
<td>1 2 2</td>
</tr>
<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Implementation of any of the alternatives would contribute towards reducing deprivation throughout Derby through enhancing access to job opportunities. The location of these job opportunities would be dependent upon each alternative.</td>
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</tr>
<tr>
<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
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<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
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### Sustainability objective

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<tr>
<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
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<tr>
<td>9. To improve health, reduce health inequalities and increase levels of physical activity.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
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<tr>
<td>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Provided that new development is designed appropriately, the implementation of alternatives 1 and 2 would both help to enhance the quality of the townscape within Derby City centre/district centres through the encouraging the delivery of new town centre uses in these areas.</td>
<td>1 1 3</td>
</tr>
<tr>
<td>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</td>
<td>It is considered that alternative 1 would lead to significant positive effects on the baseline. The Derby HMA Employment Land Review (2008) highlights that there is a poor stock of City centre offices, which effects on Derby’s ability to attract major office-based inward investment. Alternative 1 aims to meet the needs for major comparison/non-food retail floorspace, leisure, office and cultural development in the City centre. Implementation of this option should help to ensure that the stock of office space in the City centre is increased and improved. Implementation of all of the alternatives should help to encourage inward investment and establish new businesses within Derby. Furthermore, this would help to provide new employment opportunities throughout the City. However, implementation of alternatives 1 and 2 would have the additional benefit of contributing towards enhancing the vitality of the City centre and district centres respectively.</td>
<td>1 2 3</td>
</tr>
<tr>
<td>12. To maximise people’s accessibility to services and facilities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Implementation of alternatives 1 and 2 would contribute towards enhancing people’s accessibility to retail, leisure, office and cultural facilities within existing areas of Derby (City centre for alternative 1 and district centres for alternative 2). This would also help to enhance the vitality of these areas.</td>
<td>1 1 3</td>
</tr>
<tr>
<td>Sustainability objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
<td>Rank of preference</td>
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<td>-------------------</td>
</tr>
<tr>
<td>13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternative 3 may pose a risk to areas of biodiversity, geodiversity and natural environment, dependent upon the location of new development on out-of-centre areas. If this option is pursued, there will be a need to consider the importance of protecting the natural environment in deciding upon locations for out-of-centre development. The implementation of alternatives 1 and 2 should help to ensure that areas of biodiversity, geodiversity and natural environment are protected through delivering new development within the existing built up areas.</td>
<td>1 1 3</td>
</tr>
</tbody>
</table>

**Summary**  
It is considered that alternative 1 would lead to significant positive effects on the baseline associated with SA objective 11. The Derby HMA Employment Land Review (2008) highlights that there is a poor stock of City centre offices, which effects on Derby's ability to attract major office-based inward investment. Alternative 1 aims to meet the needs for major comparison/non-food retail floorspace, leisure, office and cultural development in the City centre. Implementation of this option should help to ensure that the stock of office space in the City centre is increased and improved.  
Implementation of all of the alternatives should help to encourage inward investment and establish new businesses within Derby. Furthermore, this would help to provide new employment opportunities throughout the City. However, implementation of alternatives 1 and 2 would have the additional benefit of contributing towards enhancing the vitality of the City centre and district centres respectively.  
The implementation of alternatives 1 and 2 would help to ensure that town centre uses are delivered within the City centre and existing district centres throughout Derby. This would help to ensure that these uses are in locations that are accessible for alternative modes of travel to the car. This would have a positive effect in terms of encouraging the use of sustainable methods of transport when accessing town centre uses. This would also help to reduce greenhouse gas emissions and reduce congestion throughout the town centre.  
However, it is noted that edge-of-centre development may be required as part of alternative 1. If this alternative is pursued, then there would be a need to ensure that ensure that these locations are accessible through sustainable methods of transport. The implementation of alternative 3 has the potential to significantly increase car use and congestion through development of town centre uses in out-of-centre locations. The implementation of this alternative could increase the use of the private car when accessing out-of-centre locations.  
The alternative that is chosen to be pursued will be largely dependent upon the level of growth in shopping floorspace that is to be planned for over the plan period. Alternative 1 is identified as the preferred approach in terms of the baseline associated with each of the SA objectives, as it will help to ensure that town centre uses are accessible to people living within and around Derby through encouraging new development in the City Centre. The implementation of this alternative would help to enhance the vitality of the City Centre and enhance the quality and quantity of offices within this area.
APPENDIX 12: APPRAISAL OF ALTERNATIVES (OUT OF CENTRE RETAIL)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to out of centre retail:

1) No Change to Existing Policy;
2) Allow Increased Flexibility; and
3) No restrictions on out-of-centre retailing.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
Appraisal findings: Out of Centre Retail

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternative 1 would help to ensure that the sale of comparison goods is directed towards City and district centres over the plan period. Dependent upon the delivery of other transport related policies in the core strategy, these locations are likely to be accessible via sustainable methods of transport (including public transport, walking and cycling). This should have an indirect positive effect in terms of reducing greenhouse gas emissions through encouraging people to use sustainable methods of transport when shopping for comparison goods. The implementation of alternative 3 would have the opposite effect to alternative 1 through increasing car usage when accessing out-of-centre retail parks. This is likely to increase the amount of greenhouse gas emissions. However, this negative effect could be mitigated to a certain extent through the delivery of sustainable transport provisions in and around new out-of-centre retail parks. Alternative 2 is ranked second as it sets out an approach that would help to maintain the role of the City and district centres, whilst providing opportunities for out-of-centre retail. This would ensure that some of the positive effects relating to alternative 1 (as set out above) would be captured, whilst the negative effects associated with out-of-centre retail parks could be an issue.</td>
<td>1 2 3</td>
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</table>

<p>| 2. To minimise traffic and the length of journeys travelled by people and goods. | It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternative 1 would help to ensure that the sale of comparison goods is directed towards City and district centres over the plan period. Dependent upon the delivery of other transport related policies in the core strategy, these locations are likely to be accessible via sustainable methods of transport (including public transport, walking and cycling). This should have a positive effect in terms of increasing the use of public transport when accessing comparison goods. The implementation of alternative 3 would have the opposite effect to alternative 1 through increasing car usage when accessing out-of-centre retail parks. This could have a negative effect in terms of the baseline associated with this SA objective. However, this negative effect could be mitigated to a certain extent through the delivery of sustainable transport provisions in and around new out-of-centre retail parks. Alternative 2 is ranked second as it sets out an approach that would help to maintain the role of the City and district centres, whilst providing opportunities for out-of-centre retail. This would ensure that some of the positive effects relating to alternative 1 (as set out above) would be captured, whilst the negative effects associated with out-of-centre retail parks could be an issue. | 1 2 3 |</p>
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<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
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<td></td>
<td>above) would be captured, whilst the negative effects associated with out-of-centre retail parks could be an issue.</td>
<td></td>
</tr>
<tr>
<td>3. To minimise pollution.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternative 1 would help to ensure that the sale of comparison goods is directed towards City and district centres over the plan period. Dependent upon the delivery of other transport related policies in the core strategy, these locations are likely to be accessible via sustainable methods of transport (including public transport, walking and cycling). This should have an indirect positive effect in terms of maintaining air quality through encouraging people to use sustainable methods of transport when shopping for comparison goods. The implementation of alternative 3 would have the opposite effect to alternative 1 through increasing car usage when accessing out-of-centre retail parks. This could have a negative effect on air quality within Derby. However, this negative effect could be mitigated to a certain extent through the delivery of sustainable transport provisions in and around new out-of-centre retail parks. Alternative 2 is ranked second as it sets out an approach that would help to maintain the role of the City and district centres, whilst providing opportunities for out-of-centre retail. This would ensure that some of the positive effects relating to alternative 1 (as set out above) would be captured, whilst the negative effects associated with out-of-centre retail parks could be an issue.</td>
<td>1 2 3</td>
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<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Implementation of all of these options would contribute towards increasing job opportunities available to people living within Derby. However, the implementation of alternative 1 is likely to ensure that these opportunities are delivered in accessible locations that can be accessed via sustainable methods of transport (dependent upon the delivery of other transport related policies in the core strategy).</td>
<td>1 2 3</td>
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<tr>
<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
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<tr>
<td>Sustainability objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
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<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>Alt 1 Alt 2 Alt 3</td>
</tr>
<tr>
<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>9. To improve health, reduce health inequalities and increase levels of physical activity.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Provided that new development is designed appropriately, the implementation of alternatives 1 and 2 would both help to enhance the quality of the townscape within Derby City centre through the encouraging the sale of comparison goods in this area.</td>
<td>1 1 3</td>
</tr>
<tr>
<td>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Implementation of all of these options should contribute towards increasing job opportunities available to people living within Derby. However, the implementation of alternative 1 is likely to ensure that these opportunities are delivered in accessible locations that can be accessed via sustainable methods of transport (dependent upon the delivery of other transport related policies in the core strategy). Alternative 1 would also help to support the vitality and viability of the defined shopping areas throughout Derby. However, the approach set out in alternative 1 may not reflect retailer requirements. Alternative 2 sets out an increased level of flexibility which would offer some protection to the defined shopping areas throughout Derby.</td>
<td>1 2 3</td>
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</table>
### Discussion of significant effects (and discussion of relative merits in more general terms)

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<thead>
<tr>
<th>Sustainability objective</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td></td>
<td>Alt 1</td>
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<tr>
<td><strong>12. To maximise people’s accessibility to services and facilities.</strong></td>
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<td>whist also providing opportunities for attracting retailers into out-of-centre locations who are not currently represented in the City. However the implementation of this alternative may lead to an increase in the level of trade diversion from the City centre and District Centres and effect on their vitality and viability. The implementation of alternative 3 may lead to increased competition and a greater shopping choice for consumers. It could also attract retailers to the City who are not currently represented. However, the implementation of this alternative will provide the least level of protection to the City centre and District Centres and would effect on the viability and vitality of these areas It would detract from City centre regeneration and is inconsistent with guidance set out within the NPPF.</td>
<td>1</td>
</tr>
<tr>
<td><strong>13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.</strong></td>
<td></td>
</tr>
<tr>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of all of these options would contribute towards increasing access to shops selling comparison goods for people living within Derby. However, the implementation of alternative 1 is likely to ensure that shopping services are delivered in accessible locations that can be accessed via sustainable methods of transport (dependent upon the delivery of other transport related policies in the core strategy). The implementation of alternative 2 and 3 may pose a risk to areas of biodiversity, geodiversity and natural environment, dependent upon the location of new development on out-of-centre areas. If either of these options are pursued, there will be a need to consider the importance of protecting the natural environment in deciding upon locations for out-of-centre development. The implementation of alternatives 1 should help to ensure that areas of biodiversity, geodiversity and natural environment are protected through delivering new development within the existing built up areas.</td>
<td>1</td>
</tr>
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</table>

**Summary**

Implementation of all of these options would contribute towards increasing job opportunities available to people living within Derby. However, the implementation of alternative 1 is likely to ensure that these opportunities are delivered in accessible locations that can be accessed via sustainable methods of transport (dependent upon the delivery of other transport related policies in the core strategy). This will also help to ensure that the use of sustainable methods of transport when accessing shops selling comparison goods is encouraged. This will have a positive effect in terms of reducing greenhouse gas emissions. Alternative 1 would also help to support the vitality and viability of the defined shopping areas throughout Derby. However, the approach set out in alternative 1 may not reflect retailer requirements.

Alternative 2 sets out an increased level of flexibility which would offer some protection to the defined shopping areas throughout Derby, whilst also providing opportunities for attracting retailers into out-of-centre locations who are not currently represented in the City. However the implementation of this alternative may lead to an increase in the level of trade.
diversion from the City centre and District Centres and effect on their vitality and viability.

The implementation of alternative 3 may lead to increased competition and a greater shopping choice for consumers. It could also attract retailers to the City who are not currently represented. However, the implementation of this alternative will provide the least level of protection to the City centre and District Centres and would effect on the viability and vitality of these areas. It would detract from City centre regeneration and is inconsistent with guidance set out within the NPPF. The delivery of out-of-centre retail uses is also likely to increase car usage and may not be accessible via sustainable methods of transport. Although this negative effect would be mitigated to a certain extent through the delivery of sustainable transport provisions in and around new out-of-centre retail parks.

Alternative 1 is identified as the preferred approach as it will help to ensure that the vitality and viability of the City centre and district centres are protected over the plan period. This approach is consistent with guidance set out within the NPPF and would help to ensure that comparison goods retailing space is delivered in accessible locations throughout Derby.
APPENDIX 13: APPRAISAL OF ALTERNATIVES (TRANSPORT)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to addressing transport:

1) Maintenance of the existing Transport Asset: Make no provision to accommodate, or to influence mode of travel, for trips generated by new or existing development;

2) Demand Management: Accommodate travel demand generated by new and existing development by focussing on measures to reduce reliance on motorised travel, especially travel by car;

3) Measures to increase use of alternatives to the car: Accommodate travel demand generated by new and existing development by focusing on public transport and improvements for pedestrians and cyclists; and

4) Major works: accommodate travel generated by new and existing development by focussing on improved road infrastructure.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
## Appraisal findings: Transport

Table presenting an appraisal of the following alternative approaches:

1. Maintenance of the existing Transport Asset;
2. Demand management;
3. Measures to increase use of alternatives to the car; and

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>Alt 1</td>
</tr>
<tr>
<td>1. To reduce Derby's contribution to Climate Change and manage its effects, including flooding.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Alternatives 2 and 3 promote a reduction in travel by private car. Alternative 2 aims to achieve this through locating development in accessible locations to avoid the need to travel, whereas alternative 3 sets out the need to prioritise investment in public transport, walking and cycling. The implementation of these alternatives 2 and 3 would help to minimise greenhouse gas emissions resulting from travel, which would contribute towards tackling the effects of climate change. Alternative 1 prioritises investment in maintaining the existing transport network. Alternative 4 focusses on investment in new road schemes. Both of these are likely to maintain/increase reliance on the private car, which would not help to reduce greenhouse gas emissions resulting from travel.</td>
<td>3</td>
</tr>
<tr>
<td>2. To minimise traffic and the length of journeys travelled by people and goods.</td>
<td>It is considered that alternatives 2 and 3 would lead to significant positive effects on the baseline. Alternatives 2 and 3 promote a reduction in travel by private car. Alternative 2 aims to achieve this through locating development in accessible locations to avoid the need to travel and through promoting the potential for ‘Smarter Choices’(^{57}). The implementation of these alternatives are likely to increase the number of people using public transport, walking and cycling when travelling within and around the HMA. The location of development in accessible locations would also reduce the distance the local population have to travel in order to access key services. Alternative 1 prioritises investment in maintaining the existing transport network but does not set out any provision for investing in alternatives to the private car aside from improving existing footways.</td>
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\(^{57}\) ‘Smarter Choices’ are techniques for influencing people’s travel behaviour towards more sustainable options such as encouraging school, workplace and individualised or personal travel planning.
### Discussion of significant effects (and discussion of relative merits in more general terms)

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<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td>3. To minimise pollution.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Alternatives 2 and 3 promote a reduction in travel by private car. Alternative 2 aims to achieve this through locating development in accessible locations to avoid the need to travel, whereas alternative 3 sets out the need to prioritise investment in public transport, walking and cycling. The implementation of these two alternatives would help to minimise greenhouse gas emissions resulting from travel, which would contribute towards maintaining/improving air quality within the HMA. Alternative 1 prioritises investment in maintaining the existing transport network but does not set out any provision for investing in alternatives to the private car. Alternative 4 focusses on investment in new road schemes. Both of these are likely to maintain/increase reliance on the private car within and around the HMA. This would not help to reduce greenhouse gas emissions resulting from travel and may have an adverse effect on air quality within the HMA.</td>
<td>3 1 1 4</td>
</tr>
<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
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<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternative 2 is likely to ensure that key services are accessible to all communities across the HMA. Investment in public transport, walking and cycling (alternative 3) would also increase the opportunities for people living within the HMA who do not have access to a private car to access key services. It is unlikely that the implementation of alternatives 1 and 4 would have any effect on enhancing access to key services.</td>
<td>3 1 2 3</td>
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### Sustainability objective

| Discussion of significant effects (and discussion of relative merits in more general terms) | Rank of preference |
|---|---|---|---|---|
| **6. To reduce crime and promote safer and more cohesive communities.** It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms. | - | - | - | - |
| **7. To ensure that the existing and future housing supply meets the needs of the City.** It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:  
The implementation of alternative 2 is likely to ensure that new housing is delivered in accessible locations with good access to key services across the HMA. Investment in public transport, walking and cycling (alternative 3) would also help to ensure that key services are accessible to new and existing houses across the HMA.  
It is unlikely that the implementation of alternatives 1 and 4 would any effect on enhancing access to key services. | 3 | 1 | 2 | 3 |
| **8. To improve levels of education and skills and reduce education inequalities.** It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:  
The implementation of alternative 2 is likely to ensure that key services (including educational provision) are located in accessible locations across the HMA. Investment in public transport, walking and cycling (alternative 3) would also help to ensure that key services are accessible across the HMA.  
It is unlikely that the implementation of alternatives 1 and 4 would any effect on enhancing access to education provision. | 3 | 1 | 2 | 3 |
| **9. To improve health, reduce health inequalities and increase levels of physical activity.** It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:  
Alternatives 2 and 3 promote a reduction in travel by private car. Alternative 2 aims to achieve this through locating development in accessible locations to avoid the need to travel and through promoting the potential for ‘Smarter Choices’. Alternative 3 sets out the need to prioritise investment in public transport, walking and cycling. The implementation of these options are likely to increase the number of people walking and cycling when travelling within and around the HMA. This will contribute towards promoting healthy lifestyles over the plan period. | 3 | 1 | 1 | 4 |
### Discussion of significant effects
(and discussion of relative merits in more general terms)

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<thead>
<tr>
<th>Sustainability objective</th>
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<tbody>
<tr>
<td><strong>SA of the Derby City Local Plan</strong></td>
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<tr>
<td><strong>Part 1: The Core Strategy</strong></td>
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<tr>
<td><strong>Sustainability objective</strong></td>
<td><strong>Rank of preference</strong></td>
</tr>
<tr>
<td>Alternative 1 prioritises investment in maintaining the existing transport network but does not set out any provision for investing in alternatives to the private car aside from improving existing footways, cycleways and infrastructure on bus routes. Alternative 4 focuses on investment in new road schemes. Both of these are likely to maintain/increase reliance on the private car within the HMA area, which would not contribute towards promoting healthy lifestyles.</td>
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<tr>
<td><strong>10. To protect and enhance Derby's cultural heritage including its townscape and archaeology.</strong></td>
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<tr>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
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<tr>
<td><strong>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</strong></td>
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<tr>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:</td>
<td></td>
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<tr>
<td>The implementation of alternatives 2 and 3 would contribute towards reducing traffic congestion throughout the HMA. This would help to enhance the vitality of the area, which would encourage businesses to locate within the HMA. Furthermore, both alternatives would contribute towards ensuring employment opportunities are accessible through sustainable methods of transport.</td>
<td></td>
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<tr>
<td>Investment in the transport network (alternative 4) may be necessary in some instances in order to unlock the development potential of existing land for employment uses (e.g. the development of B8 uses may require upgrades to the road network to ensure it has sufficient capacity to cater for larger vehicles).</td>
<td>4 1 1 3</td>
</tr>
<tr>
<td><strong>12. To maximise people's accessibility to services and facilities.</strong></td>
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<tr>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:</td>
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<tr>
<td>The implementation of alternative 2 is likely to ensure that key services are located in accessible locations across the HMA. Investment in public transport, walking and cycling (alternative 3) would also help to ensure that key services are accessible across the HMA.</td>
<td></td>
</tr>
<tr>
<td>It is unlikely that the implementation of alternatives 1 and 4 would any effect on enhancing access to services.</td>
<td>3 1 2 3</td>
</tr>
</tbody>
</table>
13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:

The development of new road schemes (alternative 4) could potentially pose a threat to existing areas of ecological value and green infrastructure. This would need to be fully assessed through the development management process if this alternative is pursued.

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<tr>
<th>Sustainability objective</th>
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<tr>
<td></td>
<td></td>
<td>Alt 1</td>
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</table>

Summary
Alternatives 2 and 3 promote a reduction in travel by private car. Alternative 2 aims to achieve this through locating development in accessible locations to avoid the need to travel (and through promoting ‘Smarter Choices’), whereas alternative 3 sets out the need to prioritise investment in public transport, walking and cycling. The implementation of these two alternatives would help to:

- minimise greenhouse gas emissions resulting from travel, which would contribute towards tackling the effects of climate change and maintain/improve air quality;
- ensure that key services (including educational and employment opportunities) are accessible to all communities across the HMA; and
- contribute towards promoting healthy lifestyles over the plan period (through encouraging walking and cycling).

It is considered that alternatives 2 and 3 would lead to significant positive effects on the baseline associated with SA objective 2. The implementation of these alternatives are likely to increase the number of people using public transport, walking and cycling when travelling within and around the HMA.

Alternative 1 prioritises investment in maintaining the existing transport network but does not set out any provision for investing in alternatives to the private car aside from improving existing footways, cycleways and infrastructure on bus routes. Alternative 4 focusses on investment in new road schemes. Both of these are likely to maintain/increase reliance on the private car within the HMA area. Investment in the transport network may be necessary in some instances in order to unlock the development potential of existing land for employment uses.

In terms of the preferred approach, a combination of alternatives 2 and 3 would be the most sustainable approach as this would help to promote the use of sustainable travel and ensure that new development is located in areas that would avoid the need to travel. Provision for some targeted investment in the existing road infrastructure should also be integrated within the preferred approach, where this would unlock the potential of development land within the HMA.
APPENDIX 14: APPRAISAL OF ALTERNATIVES (PARKING)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to parking:

1) Continue to use City of Derby Local Plan Review policies;
2a) Relax parking standards in the City;
2b) Relax parking standards across the City;
3) Provide new public parking in the City centre; and
4) Flexible approach to parking taking into account the needs of the development and/or nature of the area.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
Appraisal findings: Parking

Table presenting an appraisal of the following alternative approaches:

1) Continue to use City of Derby Local Plan Review policies;
2a) Relax parking standards in the City;
2b) Relax parking standards across the City;
3) Provide new public parking in the City Centre and;
4) Flexible approach to parking taking into account the needs of the development and/or nature of the area.

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<thead>
<tr>
<th>Sustainability objective (and discussion of relative merits in more general terms)</th>
<th>Discussion of significant effects</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td><strong>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The continuation of more restrictive parking standards in the City Centre and limiting long stay parking is promoted as part of Alternative 1. The implementation of this alternative would have a positive effect in terms of minimising greenhouse gas emissions within Derby through promoting the use of public transport, walking and cycling as opposed to the private car. The implementation of alternatives 2a, 2b or 3 would potentially lead to increased parking provision within and around the Derby City Centre. This would encourage the use of the private car when accessing the City Centre, which is likely to increase greenhouse gas emissions. The flexible approach set out as part of alternative 4 aims to ensure that decisions relating to car parking provision would be based on the characteristics and needs of individual developments and/or locations. The alternative sets out the need for factors (including the public transport accessibility, availability of public parking and congestion) to be considered. This would contribute towards ensuring that greenhouse gas emissions are reduced through avoiding inappropriate parking provision as part of new development.</td>
<td>1 3 3 3 2</td>
</tr>
<tr>
<td><strong>2. To minimise traffic and the length of journeys travelled by people and goods.</strong></td>
<td>It is considered that alternatives 2a, 2b and 3 could lead to significant negative effects on the baseline. The implementation of alternatives 2a, 2b or 3 would potentially lead to increased parking provision within and around the Derby City Centre. This may contribute towards the existing traffic congestion issues (as indicated in the baseline information) that are present within and around Derby City Centre. Furthermore, these alternatives are unlikely to promote the use of sustainable methods of transport (walking, cycling, public transport and park and ride), which is not consistent with national policy guidance. The implementation of alternative 1 would help to ensure that the use of sustainable methods of transport are promoted through restricting the opportunities for parking within the City centre. This would also help to tackle congestion issues that are currently present within and around the City Centre. The flexible approach set out as part of alternative 4 aims to ensure that decisions relating to car parking provision would be based on the characteristics and needs of individual developments and/or locations. The alternative sets out the need for factors (including the</td>
<td>1 3 3 3 2</td>
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<td>Sustainability objective</td>
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<td></td>
<td>public transport accessibility, availability of public parking and congestion) to be considered. This would help to guard against inappropriate car parking provision where public transport alternatives are available.</td>
<td>Alt 1</td>
</tr>
</tbody>
</table>
| 3. To minimise pollution. | It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:  
The continuation of more restrictive parking standards in the City Centre and limiting long stay parking is promoted as part of Alternative 1. The implementation of this policy would have a positive effect in terms of minimising greenhouse gas emissions within Derby through promoting the use of public transport, walking and cycling as opposed to the private car. In turn, this would help minimise air pollution within Derby.  
The implementation of alternatives 2a, 2b or 3 would potentially lead to increased parking provision within and around Derby. This would encourage the use of the private car when accessing the City Centre, which is likely to increase greenhouse gas emissions. In turn, this could potentially increase air pollution within Derby.  
The flexible approach set out as part of alternative 4 aims to ensure that decisions relating to car parking provision would be based on the characteristics and needs of individual developments and/or locations. The alternative sets out the need for factors (including the public transport accessibility, availability of public parking and congestion) to be considered. This would contribute towards ensuring that greenhouse gas emissions are reduced through avoiding inappropriate parking provision as part of new development. | 3 | 3 | 3 | 2 |
| 4. To manage and conserve natural resources and minimise the production of waste. | It is considered that none of the alternatives would lead to significant effects on the baseline. Neither is it possible to conclude anything about the relative merits of the alternatives in more general terms. | - | - | - | - | - |
| 5. To reduce deprivation and inequalities. | It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:  
Restrictive parking standards (as identified as part of alternative 1) may lead to off-site parking problems and conflict with local road users and residents. The implementation of alternatives 2a, 2b, 3 and 4 may reduce the amount of land available for development and regeneration as this would be occupied by car parking. | - | - | - | - | - |
<p>| 6. To reduce crime and promote safer and more cohesive communities. | It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms. | - | - | - | - | - |</p>
<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
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<tbody>
<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - - - -</td>
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<tr>
<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - - - -</td>
</tr>
<tr>
<td>9. To improve health, reduce health inequalities and increase levels of physical activity.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The continuation of more restrictive parking standards in the City Centre and limiting long stay parking is promoted as part of Alternative 1. The implementation of this alternative would have a positive effect in terms of minimising greenhouse gas emissions within Derby through promoting the use of public transport, walking and cycling as opposed to the private car. In turn, this would have a positive effect in terms of maintaining the health of the local population through maintaining air quality throughout Derby. Furthermore, the increased use of walking and cycling as a means of transport through this alternative would also lead to additional health benefits for the local population. The implementation of alternatives 2a, 2b or 3 would potentially lead to increased parking provision within and around the Derby City Centre. This would encourage the use of the private car when accessing the City Centre, which is likely to increase greenhouse gas emissions. This could potentially increase health inequalities throughout Derby through deterioration in air quality. The flexible approach set out as part of alternative 4 aims to ensure that decisions relating to car parking provision would be based on the characteristics and needs of individual developments and/or locations. The alternative sets out the need for factors (including the public transport accessibility, availability of public parking and congestion) to be considered. This would contribute towards ensuring that greenhouse gas emissions are reduced through avoiding inappropriate parking provision as part of new development. In turn, this is likely to ensure that the health of the local population is not adversely affected within Derby as a result of increased car parking.</td>
<td>1 3 3 3 2</td>
</tr>
<tr>
<td>10. To protect and enhance Derby’s cultural heritage</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternatives 2a, 2b and 4 may have urban</td>
<td>- - - - -</td>
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</tbody>
</table>
### Discussion of significant effects

**Sustainability objective**
- Including its townscape and archaeology.

**Discussion of significant effects**
- Design implications (in terms of scale and layout of buildings) resulting from the delivery of parking provision. This would need to be controlled through the development management process if these alternative alternatives are pursued.

**Rank of preference**

<table>
<thead>
<tr>
<th></th>
<th>Alt 1</th>
<th>Alt 2a</th>
<th>Alt 2b</th>
<th>Alt 3</th>
<th>Alt 4</th>
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#### 11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:

- The relaxing of parking standards in the City Centre (predominantly in alternative 2a but also as part of alternatives 2b and 3) may allow it to compete for investment with other locations (including Nottingham, Chesterfield and Loughborough). In turn this could help to attract investment into the City and persuade businesses to relocate and establish themselves in Derby.

- However, there would be a need to balance this with the need to create an attractive urban environment that is not dominated by car parking/usage. Alternative 4 reflects this need as it sets out a flexible approach to parking that takes account of the needs of the development and/or the nature of the area.

- The restrictive nature of alternative 1 may not always be responsive to the needs of businesses and users. The implementation of this alternative could discourage investors from developing in the City Centre due to the lack of potential for delivering sufficient parking to meet the needs of businesses.

#### 12. To maximise people’s accessibility to services and facilities.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:

- The continuation of more restrictive parking standards in the City Centre and limiting long stay parking is promoted as part of Alternative 1. The implementation of this policy would help to protect and enhance the vitality of the City Centre.

- In contrast, the relaxation of parking standards in the City Centre (predominantly in alternative 2a but also as part of alternatives 2b and 3) could potentially adversely affect the vitality of the City Centre.

- The flexible approach set out as part of alternative 4 aims to ensure that decisions relating to car parking provision would be based on the characteristics and needs of individual developments and/or

#### 13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:

- The implementation of alternatives 2a, 2b or 3 would potentially lead to increased parking provision within and around the Derby City Centre. This would encourage the use of the private car when accessing the City Centre, which is likely to increase greenhouse gas emissions. This could have an indirect adverse effect on the condition and quality of the natural environment in and around Derby. This would need to be assessed in more detail as part of the development management process if these alternatives are pursued.

- The restriction of parking (alternative 1) would help to ensure that any adverse effects on the natural environment as a result of greenhouse gas emissions are reduced.

- The flexible approach set out as part of alternative 4 aims to ensure
### Sustainability objective

| Discussion of significant effects (and discussion of relative merits in more general terms) | Rank of preference |
|---|---|---|---|---|
| that decisions relating to car parking provision would be based on the characteristics and needs of individual developments and/or locations. The alternative sets out the need for factors (including the public transport accessibility, availability of public parking and congestion) to be considered. This would contribute towards ensuring that greenhouse gas emissions are reduced through avoiding inappropriate parking provision as part of new development. The need to protect the natural environment would need to be considered as a factor when considering parking proposals if this alternative is taken forward. | Alt 1 | Alt 2a | Alt 2b | Alt 3 | Alt 4 |

### Summary:

The continuation of more restrictive parking standards in the City Centre and limiting long stay parking is promoted as part of Alternative 1. The implementation of this alternative would have a positive effect in terms of:

- minimising greenhouse gas emissions within Derby;
- promoting the use of public transport, walking and cycling as opposed to the private car;
- tackling congestion issues that are currently present within and around the City Centre; and
- protecting and enhancing the vitality of the City Centre.

However, the restrictive nature of alternative 1 may not always be responsive to the needs of businesses and users. The implementation of this alternative could discourage investors from developing in the City Centre due to the lack of potential for delivering sufficient parking to meet the needs of businesses.

It is considered that alternatives 2a, 2b and 3 could lead to significant negative effects on the baseline associated with SA objective 2. The implementation of these alternatives would potentially lead to increased parking provision within and around Derby City Centre. This may contribute towards the existing traffic congestion issues (as indicated in the baseline information) that are present within and around Derby City Centre.

The implementation of alternatives 2a, 2b or 3 would potentially lead to increased parking provision within and around the Derby City Centre. This would encourage the use of the private car when accessing the City Centre, which is likely to: increase greenhouse gas emissions; and discourage the use of sustainable methods of transport (including public transport, walking and cycling). However, the relaxing of parking standards in the City Centre may allow it to compete for investment with other locations (including Nottingham, Chesterfield and Loughborough). In turn this could help to attract investment into the City and persuade businesses to relocate and establish themselves in Derby.

The flexible approach set out as part of alternative 4 aims to ensure that decisions relating to car parking provision would be based on the characteristics and needs of individual developments and/or locations. The alternative sets out the need for factors (including the public transport accessibility, availability of public parking and congestion) to be considered. This alternative represents a balanced approach that would ensure that the need to meet the parking requirements of businesses and local residents alongside avoiding adverse effects relating to increased carbon emissions and traffic congestion. The need to protect the natural environment would need to be considered as a factor when considering parking proposals if this alternative is taken forward.

Alternative 4 is identified as the most ‘sustainable approach’ as it provides a flexible approach, which would help to ensure that sufficient parking is delivered within Derby that meets the needs of local businesses and residents whilst protecting the local environment and vitality of the City.
APPENDIX 15: APPRAISAL OF ALTERNATIVES (SUSTAINABLE BUILDINGS)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to making buildings more sustainable:

1) Use the incremental increase in building regulations as local targets for sustainable construction;
2) Set targets for sustainable construction in advance of the changes to Building Regulations; and
3) Expect all new buildings to meet the standards set out in Option J1 but also identify strategic sites where standards can be exceeded and environmental sustainability exemplified.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 3, above.
### Appraisal findings: Sustainable Buildings

A table presenting an appraisal of the following alternative approaches:

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alt 1</td>
<td>1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding. It is considered that all of the alternatives would lead to significant positive effects on the baseline. All of the alternatives set targets (of varying levels) for the delivery of sustainable buildings across the HMA through the achievement of specific Code for Sustainable Homes (CSH) levels over the plan period and a zero carbon target for non-domestic buildings. A category used when undertaking a CSH assessment is ‘Energy and CO₂ emissions’. New homes are required to reduce dwelling emission rates, which would have a significant positive effect in terms of reducing greenhouse gas emissions throughout the HMA. Each alternative also sets a target for all new non-domestic buildings to be zero carbon by a specified year, which further contributes towards the significant positive effect. Furthermore, CSH also requires new dwellings to consider the management of surface water run-off from developments and flood risk. The consideration of these measures through each of the alternatives would help to ensure that flood risk issues are considered when delivering new dwellings throughout the HMA. Alternative 2 sets the most stringent targets, with the achievement of CSH level 4 up to 2013, CSH level 4 for smaller development and 5 for larger development and zero carbon for all buildings by 2016. The implementation of this alternative would help to ensure that carbon emissions are reduced within a shorter timeframe in comparison to alternatives 1 and 3. Alternative 3 is ranked as number 2 as it sets out the need for new development to meet targets identified in alternative 1, but also highlights that strategic sites would be identified where these targets can be exceeded.</td>
<td>3 1 2</td>
</tr>
<tr>
<td>Alt 2</td>
<td>2. To minimise traffic and the length of journeys travelled by people and goods. It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: A category used when undertaking a CSH assessment is ‘Energy and CO₂ emissions’. This includes assessing the proposed delivery of cycle storage as part of new dwellings within the HMA. The delivery of cycle storage would help to promote cycling within the HMA. Alternative 2 sets the most stringent CSH targets. Therefore, it is anticipated that the implementation of this alternative would help to ensure that higher levels of cycle storage are delivered in a shorter timeframe than alternatives 1 and 3. Alternative 3 sets out the need for new development to meet targets identified in alternative 1, but also highlights that strategic sites would be identified where these targets can be exceeded. This could lead to the delivery of higher levels of cycle storage on strategic sites.</td>
<td>3 1 2</td>
</tr>
<tr>
<td>Sustainability objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
<td>Rank of preference</td>
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<tr>
<td>3. To minimise pollution.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: A category used when undertaking a CSH assessment is ‘Pollution’. This includes assessing the potential NOx emissions and global warming potential of insulants from the delivery of new dwellings within the HMA. The assessment of new dwellings against this category will help to ensure that the importance of minimising air pollution is considered at the design stage. Alternative 2 sets the most stringent CSH targets. Therefore, it is anticipated that the implementation of this alternative would help to ensure that air pollution is minimised within a shorter timeframe as part of delivering new dwellings within the HMA. Alternative 3 is ranked as number 2 as it sets out the need for new development to meet targets identified in alternative 1, but also highlights that strategic sites would be identified where these targets can be exceeded. This could help to ensure that air pollution is minimised to a greater extent on strategic sites.</td>
<td>3 1 2</td>
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<tr>
<td>4. To manage and conserve natural resources and minimise the production of waste.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Two category used when undertaking a CSH assessment are ‘Waste’ and ‘Water’. New homes are required to provide sufficient storage of non-recyclable waste and recyclable household waste and to provide provisions for internal and external water use. The inclusion of these measures as part of new dwellings within the HMA will help encourage re-use and recycling and efficient use of water over the plan period. Alternative 2 sets the most stringent CSH targets. Therefore, it is anticipated that the implementation of this alternative would help to ensure that: sufficient storage of non-recyclable and recyclable household waste; and appropriate provision of internal and external water use is provided within a shorter timeframe than the other two alternatives. Alternative 3 is ranked as number 2 as it sets out the need for new development to meet targets identified in alternative 1, but also highlights that strategic sites would be identified where these targets can be exceeded. This could help to ensure that higher targets for waste reduction are set on strategic sites.</td>
<td>3 1 2</td>
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<tr>
<td>5. To reduce deprivation and inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>6. To reduce crime and promote safer and more cohesive communities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
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<tr>
<td>Sustainability objective</td>
<td>Discussion of significant effects (and discussion of relative merits in more general terms)</td>
<td>Rank of preference</td>
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<tr>
<td>7. To ensure that the existing and future housing supply meets the needs of the City.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The stringent targets set out within alternative 2 would place greater onus/costs on developers throughout the HMA, which may affect the viability of delivering new housing. This could potentially restrict the potential for meeting the housing needs within the HMA. Alternative 3 recognises that higher targets can affect the viability of smaller sites and therefore only seeks higher standards for specific strategic sites. This would contribute towards ensuring that sufficient housing is delivered across the HMA.</td>
<td>1 3 2</td>
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<tr>
<td>8. To improve levels of education and skills and reduce education inequalities.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>- - -</td>
</tr>
<tr>
<td>9. To improve health, reduce health inequalities and increase levels of physical activity.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: All of the alternatives set targets (of varying levels) for the delivery of sustainable buildings across the HMA through the achievement of specific Code for Sustainable Homes (CSH) levels over the plan period and a zero carbon target for non-domestic buildings. A category used when undertaking a CSH assessment is ‘Energy and CO2 emissions’. New homes are required to reduce dwelling emission rates, which would have an indirect positive effect in terms of improving the health of the local population (through reducing air pollution). Alternative 2 sets the most stringent CSH targets. Therefore, it is anticipated that the implementation of this alternative would help to ensure that air pollution is reduced and in turn, the health of the local population is improved. The implementation of alternative 3 would help to ensure that higher standards are met on the larger strategic sites, which would help ensure that air pollution is minimised. This would have additional benefits in terms of improving health and wellbeing.</td>
<td>3 1 2</td>
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<tr>
<td>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
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</table>
### Sustainability objective

<table>
<thead>
<tr>
<th>Objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The stringent targets set out within alternative 2 would place greater onus/costs on developers throughout the HMA, which may affect the viability of delivering new employment uses. This could potentially restrict the potential for providing new employment opportunities within the HMA. Alternative 3 recognises that higher targets can affect the viability of smaller sites and therefore only seeks higher standards for specific strategic sites. This would contribute towards ensuring that sufficient employment opportunities are delivered the HMA.</td>
<td>2</td>
</tr>
<tr>
<td>12. To maximise people’s accessibility to services and facilities</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>-</td>
</tr>
<tr>
<td>13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: A category used when undertaking a CSH assessment is ‘Ecology’. This includes assessing the ecological value of sites and the potential for ecological enhancement. The assessment of new dwellings against this category will ensure that areas of ecological value are protected and enhanced as part of delivering new residential development. Alternative 2 sets the most stringent CSH targets. Therefore, it is anticipated that the implementation of this alternative would help to ensure that a higher level of protection/enhancement of areas of ecological value is delivered within a shorter timeframe as part of delivering new dwellings within the HMA. Alternative 3 is ranked as number 2 as it sets out the need for new development to meet targets identified in alternative 1, but also highlights that strategic sites would be identified where these targets can be exceeded. This should help to ensure that areas of ecological value are protected / enhanced to a greater extent on strategic sites.</td>
<td>3</td>
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</table>

**Summary:** All of the alternatives set targets (of varying levels) for the delivery of sustainable buildings across the HMA through the achievement of specific Code for Sustainable Homes (CSH) levels over the plan period and a zero carbon target for non-domestic buildings. A CSH assessment entails assessing new residential development against a series of categories, including: energy and CO2 emissions; water; surface water run-off; pollution; health and wellbeing; and ecology. The implementation of each of the alternatives should help ensure a significant positive effect on the baseline relating to SA objectives 1 and a positive effect on the baseline relating to SA objectives 2, 3, 4, 7, 9, 11 and 13.

Alternative 2 sets the most stringent targets, with the achievement of CSH level 4 up to 2013, CSH level 4 for smaller development and 5 for larger development and zero carbon for all buildings by 2016. The implementation of this alternative would help to ensure a positive effect on the baseline associated with the SA objectives mentioned above within a within a shorter timeframe in comparison to alternatives 2 and 3.

Alternative 3 represents a more flexible approach as it sets out the need for new development to meet targets identified in alternative 1, but also highlights that strategic sites would be identified where these targets can be exceeded. Alternative 3 recognises that higher targets can affect the viability of smaller sites. Therefore, the implementation of this alternative would help to ensure that employment and residential development is not restricted through overly-stringent targets, which may restrict the viability of new development.

Alternative 3 is identified as the preferred approach in terms of the appraisal as it would set realistic CSH targets for smaller sites whilst identifying higher targets for the strategic sites.
APPENDIX 16: APPRAISAL OF ALTERNATIVES (OPEN SPACE)

Introduction
As described within Part 2 of the main SA Report document, an interim stage of plan-making / SA involved appraising the following alternative approaches to open space policy:

1) Continue to use City of Derby Local Plan Review policies;

2) Allow greater flexibility for the development of existing public open space; and

3) Reduce the overall amount of new open space identified as part of new development and at the same time seek more financial contribution to improving the quality of existing public open space.

The interim appraisal findings are presented in full within this Appendix. The appraisal table should be read alongside the corresponding section of Part 2, where an explanation can be found of the degree to which the Council took on-board SA findings when determining the preferred approach as set out in the Core Strategy.

Methodology
See discussion within Appendix 2.
**Appraisal findings: Open Space**

Table presenting an appraisal of the following alternative approaches:

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Discussion of significant effects (and discussion of relative merits in more general terms)</th>
<th>Rank of preference</th>
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<tbody>
<tr>
<td>(1) Continue to use the City of Derby Local Plan Review policies;</td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The protection of existing public open space provision as part of the implementation of alternative 1 could help to encourage walking and cycling within Derby. This would have an indirect positive effect on minimising greenhouse gas emissions through reducing the reliance on the private car. Furthermore, the maintenance of existing open space is also likely to ensure any flood risk that could arise as result of the potential loss of open space is avoided. In contrast, the implementation of alternatives 2 and 3 could lead to the loss of open space, which would reduce the potential for walking and cycling within Derby. The implementation of these alternatives may also lead to increased flood risk as a result of new development on open space. This would need to be monitored through the development management process.</td>
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<tr>
<td>(2) Allow greater flexibility for the development of existing public open space; and</td>
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<tr>
<td>(3) Reduce the overall amount of new open space identified as part of new development and at the same time seek more financial contributions to improving the quality of existing public open space.</td>
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</tbody>
</table>

1. To reduce Derby’s contribution to Climate Change and manage its effects, including flooding.  
2. To minimise traffic and the length of journeys travelled by people and goods.  
3. To minimise pollution.  
4. To manage and conserve natural resources and minimise the production of waste.  
5. To reduce deprivation and inequalities.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The protection of existing public open space provision as part of the implementation of alternative 1 could help to encourage walking and cycling within Derby. This would have an indirect positive effect on minimising greenhouse gas emissions through reducing the reliance on the private car. Furthermore, the maintenance of existing open space is also likely to ensure any flood risk that could arise as result of the potential loss of open space is avoided. In contrast, the implementation of alternatives 2 and 3 could lead to the loss of open space, which would reduce the potential for walking and cycling within Derby. The implementation of these alternatives may also lead to increased flood risk as a result of new development on open space. This would need to be monitored through the development management process.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The protection of existing public open space provision as part of the implementation of alternative 1 could help to encourage walking and cycling within Derby. This would have an indirect positive effect on minimising pollution through reducing the reliance on the private car. The implementation of this policy would also contribute towards reducing traffic congestion within Derby. In contrast, the implementation of alternatives 2 and 3 could lead to the loss of open space, which would reduce the potential for walking and cycling within Derby. This may increase air pollution through increasing the use of the private car.

It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: Alternative 1 sets out the need to maintain the existing provision of open space located throughout Derby. The protection of existing areas of open space will contribute towards promoting social cohesion through encouraging interaction.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:
### Discussion of significant effects (and discussion of relative merits in more general terms)

<table>
<thead>
<tr>
<th>Sustainability objective</th>
<th>Expected Effects</th>
<th>Rank of preference</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>6. To reduce crime and promote safer and more cohesive communities.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>-</td>
</tr>
<tr>
<td><strong>7. To ensure that the existing and future housing supply meets the needs of the City.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternatives 2 and 3 would enable the release of open space within Derby for the development of housing where required. This would contribute toward ensuring that a sufficient amount of housing is delivered throughout Derby over the plan period. Alternative 1 sets out stringent measures for protecting open space located throughout Derby. The implementation of this alternative would restrict the potential for the delivery of new housing on existing areas of open space throughout the City.</td>
<td>3</td>
</tr>
<tr>
<td><strong>8. To improve levels of education and skills and reduce education inequalities.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>-</td>
</tr>
<tr>
<td><strong>9. To improve health, reduce health inequalities and increase levels of physical activity.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The protection of existing public open space provision as part of implementing option 1 could help to encourage walking and cycling in Derby. This would have a positive effect on the health and well-being of the local population through encouraging healthy and active lifestyles throughout the City. In contrast, the implementation of alternatives 2 and 3 could lead to the loss of public open space, which would provide fewer opportunities for the local population to adopt healthy lifestyles.</td>
<td>1</td>
</tr>
<tr>
<td><strong>10. To protect and enhance Derby’s cultural heritage including its townscape and archaeology.</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline, neither is it possible to conclude anything about the relative merits of the alternatives in more general terms.</td>
<td>-</td>
</tr>
<tr>
<td><strong>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of</strong></td>
<td>It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted: The implementation of alternatives 2 and 3 would enable the release of open space within Derby for the development of employment uses where required. This would contribute toward providing new employment opportunities within Derby and encouraging inward investment to establish new businesses within the City.</td>
<td>2</td>
</tr>
</tbody>
</table>
Alternative 1 sets out stringent measures for protecting open space located throughout Derby. The implementation of this alternative would restrict the potential for the delivery of employment uses on existing areas of open space throughout the City.

It is considered that none of the alternatives would lead to significant effects on the baseline. In terms of the relative merits of the alternatives, the following is noted:

The protection of open space over the plan period (alternative 1) would help to ensure that the local population have good access to recreational opportunities. If areas of open space are developed (alternatives 2 and 3), then access to these facilities would become restricted.

However, it is noted that alternative 3 provides the potential for seeking financial contributions, which could be used to improve the quality of existing open space close to new residential developments.

It is considered that alternatives 2 and 3 would lead to significant negative effects on the baseline. The implementation of both of these alternatives could potentially lead to the loss of open space throughout Derby, which would make it challenging to deliver the minimum standard of 3.8 hectares of open space for every 1000 people. Furthermore, the loss of open space would also restrict the potential for conserving and enhancing the green infrastructure, biodiversity, geodiversity and the natural environment within Derby.

However, it is noted that alternative 3 provides the potential for seeking financial contributions, which could be used to improve the quality of existing open space close to new residential developments. This would help to improve the quality of the existing green infrastructure located within Derby.

In contrast, the implementation of alternative 1 would contribute towards: ensuring that people living within Derby have good access to open space; and protecting and enhancing the natural environment throughout the City.

Summary
The continuation of the City of Derby Local Plan Review policies (Alternative 1 – protect all open space unless an assessment has been undertaken, which has clearly shown it is more than what is needed) would:

- help to ensure that the local population have good access to recreational opportunities over the plan period. This would also contribute towards boosting health and well-being throughout the City;
- have an indirect positive effect on minimising greenhouse gas emissions through reducing the reliance on the private car. In turn this would help to reduce traffic congestion in and around Derby;
- help to ensure any flood risk that could arise as result of the potential loss of open space is avoided; and
- encourage walking and cycling within Derby, which represents a more sustainable method of travel than the use of the private car.

Alternatives 2 and 3 provide greater flexibility as they would enable the delivery of new development on existing open space located throughout Derby. This would help to ensure that sufficient housing, employment and community facilities are delivered throughout Derby. However, the loss of open space would have negative effects, including:

- it could have an indirect negative effect on air quality through reducing the potential for people to walk and cycle as opposed to the use of the private car (which may increase greenhouse gas emissions); and
- reduce the amount of open space accessible to the local population.

It is considered that alternatives 2 and 3 would lead to significant negative effects on the baseline associated with SA objective 13. The implementation of both of these alternatives could potentially lead to the loss of open space throughout Derby, which would make it challenging to deliver the minimum standard of 3.8 hectares of open space for every 1000 people. Furthermore, the loss of open space would also restrict the potential for conserving and enhancing the green infrastructure, biodiversity, geodiversity and the natural environment within Derby.
It is noted that alternative 3 provides the potential for seeking financial contributions, which could be used to improve the quality of existing open space close to new residential developments. This would help to improve the quality of the existing green infrastructure located within Derby.

Alternative 1 is proposed as the preferred approach, as it would have the most positive effects across a wider range of sustainability objectives. However, it would be useful to include some of the flexibility of alternative 3 by allowing for financial contributions where this is most beneficial.