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Part A: Personal Details*

We will not be able to accept responses where personal details are not provided.

1. Please provide your contact details.

Respondent details	Agent details (where applicable)
Name*: JACQUI STORER	Name*:
Organisation: RIBNASTON PARISH COUNCIL	Organisation:
Address*: [REDACTED]	Address*:
Email: [REDACTED]	Email:

*indicates required field

Future notification

The District Council will retain your contact details to inform you of future consultations on the Local Plan. If you do not wish for your contact details to be added to the consultation database, please email local.plan@southderbyshire.gov.uk

Part B: Please use a separate sheet for each representation you wish to make

3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each Proposed Modification that you wish to comment on.

Comment being made against:	Please tick only one	
PM1		PM23
PM2		PM24
PM3		PM25
PM4		PM26
PM5		PM27
PM6		PM28
PM7		PM29
PM8		PM30
PM9		PM31
PM10		PM32
PM11		PM33
PM12		PM34
PM13		PM35
PM14		PM36
PM15		PM37
PM16		PM38
PM17		PM39
PM18		PM40
PM19		PM41
PM20		PM42
PM21	✓	Other (Please specify)
PM22		

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		✓
2) Sound		✓
(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		
a) Positively prepared		
b) Justified		✓
c) Effective		✓

d) Consistent with national policy		
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5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Local Plan does not comply with). If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

*Please see attached PM21 representation question 5
2 pages and appendix 1*

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached PM21 representation (1 page)

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please check the relevant box

No, I do not wish to participate in hearing sessions

Yes, I wish to participate in hearing sessions



Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Parish Council wishes to participate in the Examination hearing sessions in relation to PM21 and the associated STRA2 modifications.

The Parish Council's representation raises issues relating to legal compliance, the assessment of reasonable alternatives, the Sustainability Appraisal process, the transport evidence base and the justification for the proposed A516-A38 link road. The Parish Council has also submitted independent transport evidence prepared by Create Consulting Engineers.

The Parish Council therefore respectfully requests the opportunity to participate in any hearing sessions relating to PM21 and the associated STRA2 modifications.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Council Offices, Civic Way, Swadlincote, DE11 0AH

Forms must be received by **5pm on Tuesday 16th June 2026.**

PM21

Q5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Burnaston Parish Council considers that PM21 is unsound because the proposed link road has not been demonstrated to be necessary or justified, is not supported by an adequate assessment of reasonable alternatives and is not supported by sufficient evidence to demonstrate its effectiveness.

PM21 introduces a significant new transport intervention affecting the STRA2 allocation. The modification would result in the construction of a new transport corridor through land identified for Green Infrastructure, Country Park and settlement separation functions. It therefore has implications extending beyond transport matters alone.

The Council's stated justification for PM21 is that the Derby Housing Market Area transport modelling demonstrates that the link road is required to mitigate the impacts of development and support the wider transport network. However, the Parish Council's independent transport review prepared by Create Consulting¹ does not reach that conclusion. Create concludes that the available modelling does not demonstrate that a general traffic link between the A516 and A38 is required to facilitate the delivery of STRA2. In particular, Create identifies that the link road has not been tested in isolation, that the modelling combines multiple interventions within wider mitigation packages and that reasonable alternative access strategies have not been assessed. Consequently, whilst the Council relies upon the modelling as evidence that the road is required, the Parish Council considers that the modelling does not demonstrate the specific necessity of the proposed link road and therefore does not provide a sufficient evidential basis for PM21.

The Parish Council is concerned that the evidence base does not demonstrate that the proposed link road has been tested independently of other mitigation measures. In particular, the available modelling does not appear to assess:

- a scenario incorporating strategic network improvements without the link road;
- alternative access arrangements serving STRA2;
- alternative highway interventions in the vicinity of the A38 and A516 corridors; or
- whether comparable transport outcomes could be achieved through less harmful means

The Sustainability Appraisal states that no reasonable alternatives to the amended policies have been identified. However, PM21 introduces a significant change to the manner in which STRA2 would be accessed and developed. The Parish Council is concerned that the evidence presented does not adequately demonstrate why alternative approaches have been discounted.

The Parish Council is also concerned regarding the legal compliance of PM21. Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires the likely significant effects of reasonable alternatives to be identified, described and evaluated through the Sustainability Appraisal process. The Sustainability Appraisal records that no reasonable alternatives to the amended policies have been identified. However, the Parish Council considers that reasonable alternatives to the proposed link road are evident and have not been adequately assessed. The Parish Council therefore has concerns regarding compliance with the Sustainability Appraisal requirements under Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 and section 19(5) of the Planning and compulsory Purchase Act 2004.

¹ Appendix 1

The Parish Council wishes to be clear that its concern is with the proposed mandatory A516-A38 link road and not with the principle of the STRA2 allocation itself. The independent transport evidence prepared for the Parish Council indicates that the A38 remains the principal access to the development and does not demonstrate that the proposed link road is necessary to facilitate the delivery of STRA2. The Parish Council therefore considers that the deliverability of the housing allocation and the necessity of the proposed link road are separate questions and should be assessed independently. The evidence currently available does not demonstrate that the removal of the link road requirement would prevent STRA2 from being delivered.

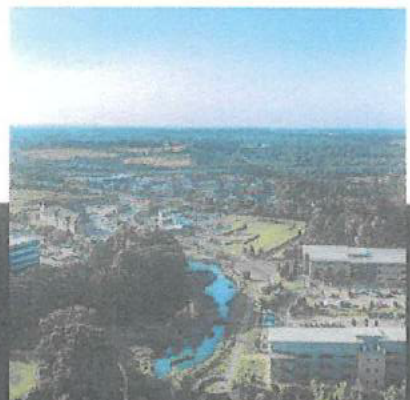
The proposed link road would also fragment land identified for Green Infrastructure and Country Park purposes, reduce the effectiveness of the countryside transition and settlement separation functions between the Pastures Estate, Burnaston village and the surrounding countryside. The Parish Council notes that these functions form part of the mitigation framework upon which the acceptability of STRA2 depends. The evidence does not demonstrate why those mitigation functions should be compromised in order to facilitate the proposed link road.

Furthermore, the Parish Council remains concerned regarding deliverability and viability. The proposed transport strategy appears dependent upon substantial strategic infrastructure investment, including wider highways improvements. The evidence does not clearly demonstrate that the link road is deliverable, funded and capable of being provided at the time required to support the development.

Accordingly, Burnaston Parish Council considers that PM21 is not legally compliant, has not been adequately justified, is not effective and that insufficient evidence has been provided to demonstrate that the proposed link road is necessary or to explain why alternative approaches have been discounted.

APPENDIX 1

- Create Consultants STRA2 Access Strategy Review 2026



Burnaston Parish Council

STRA2 ACCESS STRATEGY REVIEW

Transport Technical Note

|| Independent, multidisciplinary engineering
and environmental consultants

STRA2 ACCESS STRATEGY REVIEW

Transport Technical Note

Document Reference: MA/VL/P26-3787/01

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DOCUMENT AND QUALITY CONTROL

Revision/Date	Writer	Reviewer	Approver	Nature of Revision
First Issue June 2026	Mark Allen, BSc (Hons), MRTPI, MCIHT	Paul Zanna, BSc (Hons)	Paul Zanna, BSc (Hons)	

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- 2.0 TRANSPORT ASSESSMENT/MODELLING
- 3.0 SUMMARY

1.0 INTRODUCTION

- 1.1 Create Consulting Engineers Ltd has been instructed by Burnaston Parish Council (our Client) to help inform their response to the current Regulation 19 South Derbyshire District Council (SDDC) Local Plan consultation.
- 1.2 Our own input involves a review of transport evidence provided by (and relied upon by SDDC) to support their Local Plan process. Our Client has particular interest in the proposed STRA2 allocation put forward in the Local Plan and the associated link road between the A516 and A38 that would pass through the scheme.
- 1.3 The STRA2 Regulation 19 Local Plan schematic clearly indicates a potential road link for general traffic through the Site between the A516 and A38, as presented below:

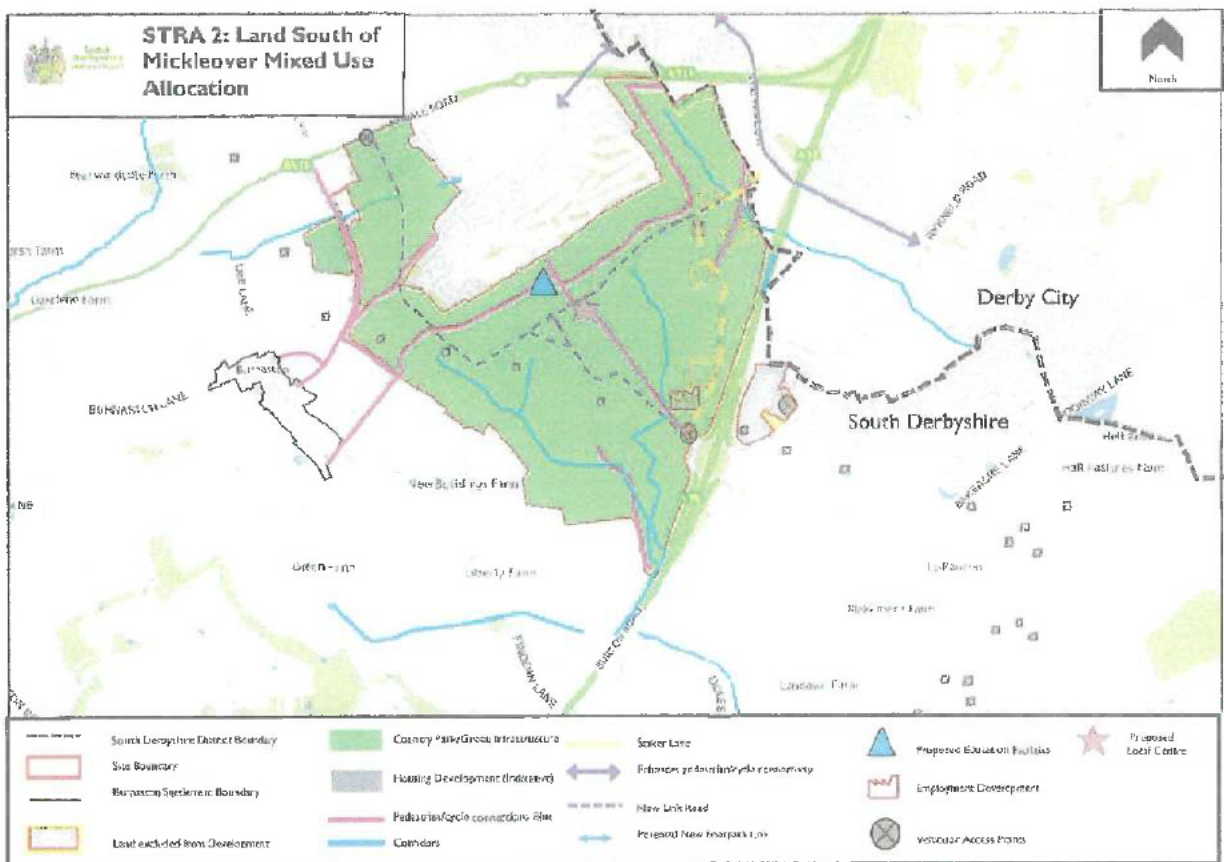


Figure 1.1: STRA2 Indicative Masterplan Layout (source: SDDC)

- 1.4 In advance of any formal allocation of STRA2, Parker Strategic Land have commissioned an Environmental Impact Assessment Scoping Report (November 2025), in which the overall scheme proposals are described as follows:

- Demolition of existing Watergo Farm and poultry farm building off Staker Lane;
- Up to 2,300 residential dwellings, including a mix of housing types and tenures to meet local needs;
- Land to support educational provision for new and existing communities, with neighbourhood centre;

- *Local centre comprising flexible uses for Use Class E (Commercial, Business and Service), Use Class F2 (Local Community Use) and Mobility Hub;*
- *Public open space, including formal and informal recreational areas, green infrastructure, landscaping and biodiversity enhancements;*
- *Two primary points of vehicular access from the A38 and A516 public highways, with internal road network and pedestrian/cycle connectivity; and*
- *Associated infrastructure, including drainage systems, utilities, sustainable transport measures, and community facilities.*

The proposed development will provide several access points, with the primary accesses from A516 Etwall Road to the north and A38 Findern interchange to the south. These will be connected by a primary street which will distribute traffic more evenly, enable new southbound movements from the A516 to the A38, reduce traffic through Burnaston, and facilitate bus access through the Site. A secondary access will be provided from Staker Lane.

- 1.5 It should be noted that the scheme outlined above only includes that component of the overall STRA2 area that Parker Strategic Land have control over.
- 1.6 Various transport-related submissions have been produced as evidence to support SDDC's Local Plan process and the proposed allocation of STRA2 within its Local Plan, including the following key documents prepared by SYSTRA.
- **DERBY HMA LOCAL PLAN APPRAISAL – Transport Modelling (January 2026)**
 - **DERBY HMA LOCAL PLAN - MODEL CALIBRATION & VALIDATION (November 2025)**
- 1.7 These documents and others have been reviewed by Create Consulting Engineers Ltd, with our findings outlined herein.

2.0 TRANSPORT ASSESSMENT/MODELLING

- 2.1 The indicative layout and scheme particulars for STRA2 outlined in Section 1.0 include for a new connection onto the A516 Etwall Road, a new arm of the A38 roundabout with a link road proposed in between passing through the scheme. Essentially, this would create a new East-West link between two A-roads, with the potential to introduce significant re-routing of local and more strategic, longer-distance traffic through STRA2.
- 2.2 The route between the A516 and A38 (through STRA2) could potentially form part of a more extensive "South Derbyshire Integrated Transport Link" (SDITL) which is a proposed dual-phased major infrastructure project designed to connect the A50 and A38 corridors.
- 2.3 STRA2 is one of only several development schemes being promoted locally. A new junction onto the A50 may be provided as part of STRA1 and other neighbouring developments and so ultimately, the SDITL may provide a complete route between the A50 and A516, and potentially then also further afield to the North forming something of a relief road from the A50 all the way across to the north-western extents of Derby.
- 2.4 A key component of evidence relied upon by SDDC to inform the potential allocation of STRA2 is the traffic modelling carried out by SYSTRA summarised in a suite of reports. The primary transport document prepared is the "DERBY HMA LOCAL PLAN APPRAISAL – Transport Modelling" (January 2026), which has been reviewed by Create Consulting Engineers Ltd.
- 2.5 The traffic modelling carried out by SYSTRA to inform the Local Plan evidence base builds upon the East Midlands Gateway Model originally produced in 2016 and tests various infrastructure/development scenarios, including:

2044 Do Minimum No HMA Local Plan – A "Baseline" scenario which includes built infrastructure and developments within the Local Plan Area and committed infrastructure and developments outside local plan area.

2044 With HMA Local Plan Developments (Do Something 1) – Provides an indication of traffic impacts of the Local Plan developments, in the absence of any mitigation.

2044 With HMA Local Plan and Known Mitigation (Do Something 2) – Assessment of the "Known Mitigation" measures including the new A50(T) Junction, South Derby Integrated Transport Link Phase 1, A50(T)/A38(T) Toyota Junction Improvement, and the A38 Derby Junctions Scheme to establish how much these measures mitigate the local plan impacts and identify what extra measures are required.

2044 With HMA Local Plan and Additional Mitigation (Do Something 3a PT and Active Mode Mitigation) – Building on Do Something 2, this scenario assesses the PT and active mode mitigation strategies.

2044 With HMA Local Plan and Additional Mitigation (Do Something 3b Additional Highway Mitigation) – Building on Do Something 3a, this scenario assesses the impact of additional highway mitigation measures.

2044 A38 Grade Separation (Do Something 4) – "Sensitivity Test" to understand how the A38 Junctions scheme (grade separation of the A5111 Kingsway junction, A52 Markeaton junction and A61 Little Eaton junction) affects local plan traffic.

- 2.6 Without full access to the underlying modelling that informs SYSTRA's reports, it is not possible to provide detailed comments or have full confidence in the outputs/conclusions arrived at by SYSTRA. That is not to say the review carried out by Create Consulting Engineers Ltd raises fundamental concerns with the overall modelling process, and we have no intention of picking over any minor details or inconsistencies there may be within SYSTRA's reports. Nevertheless, without full access to the modelling it is necessary to place an element of faith in the outputs and conclusions that have been arrived at by others. This would equally apply to SDDC who are using such information to support their Local Plan process as "evidence" – seemingly also without full access or understanding of the underlying modelling work.
- 2.7 Comments and queries arising from our review of SYSTRA's submissions are as follows:

East Midlands Gateway Model

- 2.8 The East Midlands Gateway Model (EMGM) is a multi-modal model built to assess the transport implications of development in the Derby Housing Market Area (HMA) which encompasses part of Derby City, South Derbyshire and Amber Valley. It is understood that the model has existed for many years and was calibrated and validated for a base year of 2016. Various growth rate estimates and growth scenarios have been applied thereafter.
- 2.9 The EMGM model was constructed in accordance with guidance issued by Department for Transport (DfT) in its Transport Analysis Guidance (TAG). The model has previously been assessed and found to be appropriate for modelling the Derby HMA area.
- 2.10 It should be noted, however, that the EMGM model is essentially reliant on historic traffic data from 2016 and has not been fully re-calibrated in more recent years. More recently the model's accuracy has been checked against updated traffic link flows at various check-points from March 2020 and September 2023. However, it appears that no journey time validation checks have been made since the model was originally signed off in 2016.
- 2.11 The data from the most recent traffic flow measurements (2020 and 2023) does not indicate the split of vehicle types and nor does it update the trip purpose. The flows measured are said to show a 3% drop in overall traffic flow in the morning peak between 2020 and 2023 while the pm peak shows a 4% fall in comparison to model predictions.
- 2.12 The nearest DfT automatic counter location on the A38 provided with data covering recent years is 89140 positioned at E431188, N333597. This counter location (and also other counter locations on the A38 and A50 etc.) include manual count information until at least 2024. In the case of counter location 89140, Average Annual Daily Flows between 2017 and 2024 are shown to have increased by approximately 9%.

Average Annual Daily Flow

Year	Count method	All motor vehicles	Cars & taxis	LGVs	HGVs	Pedal cycles	Motorcycles	Buses & coaches
2024	Manual count	53,199	40,100	8,710	4,101	0	181	107
2023	Manual count	52,493	38,895	8,819	4,476	0	195	108
2022	Manual count	49,672	36,746	8,407	4,238	0	189	92
2021	Manual count	45,234	32,739	7,671	4,530	2	207	87
2020	Manual count	38,682	26,909	7,617	3,894	0	186	75
2019	Manual count	53,392	40,189	7,926	4,785	0	342	151
2018	Estimated using AADF from previous year on this link	48,885	37,346	7,179	4,001	0	215	144
2017	Manual count	48,633	37,473	6,856	3,951	0	205	149

Figure 2.1: Count Site 89140 Traffic Flows

- 2.13 While the EMGM may still be regarded as largely compliant with DfT guidelines it is evident that the data underpinning it is dated and based to an extent on pre-pandemic behaviour whereby flexible/home-working was far less prevalent than it is now. Also, the extent of model cross-checking and calibration against recent traffic flows is not fully understood.
- 2.14 SYSTRA themselves acknowledge that reliance on the EMGM is somewhat compromised, stating in their DERBY HMA LOCAL PLAN – MODEL CALIBRATION & VALIDATION report (November 2025) that ‘due to time and monetary constraints, it was not possible to rebase the model for the HMA study to reflect a post-COVID base’.
- 2.15 It is assumed that any model outputs produced in support of the SDDC Local Plan review must, therefore, carry caveats regarding accuracy given that the EMGM may be under or over-accounting for traffic flows. This in turn might lead to an interpretation of the modelling results suggesting various infrastructure interventions may be necessary to support various Local Plan proposals, when actual future traffic conditions may not warrant such measures.

DERBY HMA LOCAL PLAN APPRAISAL – Transport Modelling Review

- 2.16 The SYSTRA report is essentially a high-level summary of the key impacts across the whole of Derby City, South Derbyshire and Amber Valley. Most of the references and statistics contained in the report refer to the whole area and as such the local impacts, in the case of the South of Mickleover development in isolation, are not clear and are not readily deduced from the information presented.
- 2.17 The modelling appears to account for STRA2 proposals as 2,500 houses with some 62,000sq.m of employment land fully built-out by 2044. It is not known what proportion of affordable housing has been allowed for on the site (noting that affordable housing is typically less trip-intensive in the AM and PM commuter peaks than open-market housing) or how the breakdown of 62,000sq.m of employment land is allocated (i.e. B1, B2, B8 etc.).
- 2.18 Consequently, SYSTRA have modelled a very broad-brush account of the STRA2 scheme and it is unclear why other land uses on the site (as outlined in the draft Local Plan text) have not been allowed for in the modelling. Additionally, while indicative *person* trip rates are presented in the SYSTRA report, it is unclear what *vehicular* trip rates have been applied.

- 2.19 Also, there is no indication of how trip-internalisation has been accounted for in the modelling given that a large-scale “community” scheme such as STRA2 would be expected to contain a proportion of trips within the Site between residential components and other land uses such as education and retail. In the case of STRA2, the level of internalisation could be significant enough to materially affect the results of SYSTRA’s modelling. This is a key consideration and SDDC should be keen to see that the scheme being promoted through the Local Plan can be highly sustainable in terms of transport, accessibility, internalisation etc. and not highly dependent on use the private car. However, the modelling carried out to date to support the potential allocation of STRA2 does not appear to adequately reflect this.

Scenarios

- 2.20 The “2044 Do Minimum No HMA Local Plan” and the “2044 With HMA Local Plan Developments (Do Something 1)” scenarios are essentially bench-marking to inform further modelling scenarios that test various infrastructure interventions.
- 2.21 Included in Do Something 2 scenario, amongst other things, is a new junction onto the A50 together with the SDITL Phase 1 – which is assumed to be an element of the link road that would serve STRA1, but, not the entirety of the link and with no connection to the A38 at the Findern grade-separated roundabout junction.
- 2.22 Included in Do Something 3b scenario, amongst other things are a link between the A516 and the A38 Findern junction, realignment of Staker Lane with stopping up the existing route and also an Integrated Transport Link Road at Brun Lane (Amber Valley). This scenario appears to be the only one in which a link road between the A516 and A38 Findern junction is tested and the section of link road between the A516 and A38 does not appear to be tested if other sections of this link road are not provided. Indeed, should STRA2 come forward in advance of other major infrastructure interventions, the effect of this section of link road (between the A516 and A38) would seem to be unknown at this stage. In this scenario (Do Something 3b) the modelling does not isolate the impacts arising from each of the measures tested and the modelling results consider the whole of the Derby HMA.
- 2.23 Across the HMA area, the Do Minimum benchmarking scenario predicts over capacity queues (the delay experienced by cars per hour) will increase by 111% in the am peak and 110% in the pm peak by 2044. These delays are forecast to reduce to 53% in both am peak and pm peak for scenario Do Something 2 i.e. the additional Local Plan development added and the known transport improvements factored in. The highway network delays arising from traffic growth and from the development set out in the Local Plans is considerable. The SYSTRA report identifies, amongst other things, that traffic flows along the A516 and A38 in particular increase significantly as a result of the extra development-generated traffic demands brought about by the HMA, regardless of whether a link between the A516 and A38 is provided.
- 2.24 SYSTRA’s report indicates that Public Transport improvements and opportunities to increase the take-up of walking and cycling would have little impact on overall network performance – presumably on account of the “strategic” main road nature of most of these routes in and around the Derby area. With respect to Public Transport improvements, there may be some benefits on a local level and within the central areas of Derby, however, on the periphery and close to A-roads i.e. where major developments such as STRA2 are proposed, then public transport interventions would appear to have little benefit – as borne out by SYSTRA’s conclusions.

- 2.25 The change in predicted over capacity queues between the Do Minimum scenario and the Do Something 3b scenario, which includes (amongst other things) a link between the A516 and the A38 Findern junction as well as changes to and stopping up of Staker Lane, show that in the AM peak period over capacity queues are reduced by 12% and the PM peak reduced by 2% (these reductions are forecast across the whole HMA and not all are immediately linked to the South of Mickleover (STRA2) development). However, in both peak periods the total travel distance increases, with the modelling indicating that drivers will travel further on the network to avoid congestion. It is not evidence that a new link between the A38 Findern roundabout and the A516 is necessary.
- 2.26 The SYSTRA report summarises from the Scenario 3b modelling that 'the link between the A516 and the A38 improves accessibility' of STRA2 'to the wider network providing the opportunity for development traffic to avoid the (A38) Findern roundabout'.
- 2.27 The SYSTRA report also states that 'the link road (between the A516 and A38) is primarily used as a development access road and helps mitigate the impact of the proposed strategic development on land to the South of Mickleover. Development traffic uses a combination of the A516 and A38 to access the highway network which causes reductions in traffic flow on local roads through Mickleover including The Hollow, Staker Lane, Havenbault Lane, Briarfield Way and Etwall Road'.
- 2.28 Their report goes on to say 'Despite the A516 connection, the A38 is still used as the primary route to access the strategic development site to the South of Mickleover. Furthermore, the improved accessibility of the development allows some previously suppressed demand to access the highway network at the A38 junction. This causes an increase in traffic along the A38 of around 150 Passenger Car Units (PCUs) two-way in each (AM and PM) peak'.
- 2.29 It would appear that the reductions in traffic flow on local roads through Mickleover identified by the modelling are not able to be directly attributed to the inclusion of a new link road. Indeed, the conflicting description of the likely use of any link road and the redistribution of trips across the highway network indicate that there is no clear evidence that a link road for general traffic between the A516 and A38 is either necessary or even beneficial.

- 2.30 The inclusion in the modelling Scenario 3b of the realignment and stopping up of Staker Lane has a material impact on the modelling results. Restricting use of Staker Lane for general traffic movements displaces traffic demand not associated with the South of Mickleover development. Indeed, it is possible that reductions in traffic flow and congestion within Mickleover, identified in the modelling outputs, arises directly from the suggested changes to Staker Lane rather than specifically from the inclusion of a link road between the A516 and A38.

DERBY HMA LOCAL PLAN APPRAISAL – Transport Modelling Review CONCLUSIONS

- 2.31 The transport modelling work undertaken to date is a high-level strategic overview of the transport impacts arising from various development and infrastructure scenarios across multiple authorities. The modelling work carried out is not considered detailed enough to assess whether a new link between the A38 and A516 is undoubtedly required to support the SDDC's Local Plan objectives of delivering a 2,500-home development on land to the South of Mickleover (referred to as STRA2).
- 2.32 There appear to be no isolated test runs considering with/without scenarios for the link road solely in connection with STRA2 potentially coming forward.
- 2.33 The transport modelling work that has been undertaken has not uniquely considered the impacts and consequences arising from a suggested link road if other infrastructure proposals in the HMA are not delivered or delayed.
- 2.34 The conclusions arrived at in SYSTRA's report about how such a link between the A516 and A38 would be used are not considered sufficient to demonstrate that a general use link road between these two A-roads is necessary.
- 2.35 Either in conjunction with other infrastructure measures or in isolation, a link road between the A516 and A38 for general traffic could essentially draw traffic in from other routes, meaning its function would be above and beyond that strictly required to facilitate STRA2. The knock-on effects of drawing traffic in from other routes to such a link road stretch beyond immediate concerns relating to traffic, but, also extend to matters of air quality, noise etc. affecting residents and habitat within STRA2, but, also in neighbouring settlements.

Alternative Access Options

- 2.36 Below are reasonable alternative options that should be considered in connection with any potential allocation of the STRA2 scheme in the SDDC Local Plan:

Alternative 1:

No A516 to A38 link through STRA2.

- 2.37 Testing and modelling the above could potentially reveal whether the "direct" A516 to A38 link road for general traffic (as currently proposed) is necessary at all, or whether it is being credited with benefits that flow from a different intervention.

Alternative 2: (See Figure 2.1 below)

New main junction on to the A516 Derby Mickleover Hotel junction

Secondary junction onto A516 to serve development parcel to the North-west within STRA2.

Active travel links between North-west parcel and education hubs and wider STRA2 development

Extended "Direct" A516 to A38 link through STRA2, with Staker Lane management



Figure 2.2: STRA2 Indicative Masterplan Layout with Alternative Option (original source: SDDC)

Section between A-B to be intensively traffic-calmed, but, still allowing for efficient bus movements.

- 2.38 This option essentially displaces the “direct” link between the A516 and the A38 with a new/re-configured all-movements junction at the Derby Mickleover Hotel. Various “bus-friendly” traffic calming features could be introduced between points “A” and “B” to discourage general “rat-running” through STRA2 itself in combination with bends/deflections and shuttle-working section etc. This new (displaced) link between the A516 and A38 (indicated above) could be also made longer than that alignment currently indicated in the Regulation 19 documentation (as per Figure 1.1), which in turn should make it less attractive as a through-route for general traffic. Additionally, a comprehensive package of new Traffic Regulation Orders could be Introduced along the section of Staker Lane between point “B” and the A38 roundabout to the South, to attenuate traffic with reduced speed limit(s) and restrict its use by larger vehicles such as HGVs.
- 2.39 The above route (as shown in Figure 2.2) would also bring the alignment closer to Mickleover amenities and existing bus routes.

3.0 SUMMARY

- 3.1 Create Consulting Engineers Ltd has been instructed by Burnaston Parish Council to help inform their response to the current Regulation 19 South Derbyshire District Council (SDDC) Local Plan consultation.
- 3.2 The key concern of our Client is not the potential allocation of STRA2, but the potential for a new link road between the A516 and A38 to draw in traffic from other routes and become a major route for through-traffic. It is accepted that major development proposals such as STRA2 must have good quality connections to key routes for all modes. However, a link for general traffic through STRA2 between the A516 and A38 does not appear to be warranted.
- 3.3 Key points are as follows:
- Without full access to the modelling, it is necessary to place an element of faith in the outputs and conclusions that have been arrived at by others. This would equally apply to SDDC who are using such information to support their Local Plan process as “evidence” – seemingly also without full access or understanding of the underlying modelling work.
 - The underlying EMGM model (upon which SYSTRA have tested various development and infrastructure scenarios) is essentially reliant on historic traffic data from 2016 and has not been fully re-calibrated in more recent years. SYSTRA themselves acknowledge that reliance on the EMGM is somewhat compromised.
 - SYSTRA have modelled a very broad-brush account of the STRA2 scheme and there are queries as to precisely what *vehicular* trip rates have been applied for the mixed-use STRA2 proposals and there is no indication of how trip-internalisation has been accounted for in the modelling for STRA2. In the case of STRA2, the level of internalisation could be significant enough to materially affect the results of SYSTRA’s modelling.
 - The SYSTRA report summarises that ‘the link between the A516 and the A38 improves accessibility’ of STRA2 ‘to the wider network providing the opportunity for development traffic to avoid the (A38) Findern roundabout’. However, the proposed route appears capable of attracting and redistributing wider traffic movements in a manner extending beyond the immediate mitigation requirements of STRA2 itself.
 - There appear to be no isolated test runs considering with/without scenarios for the link road solely in connection with STRA2 potentially coming forward. The modelling does not appear to robustly assess the operational consequences of the A516–A38 link road in circumstances where other wider HMA infrastructure interventions are delayed or not delivered.
 - The modelling scenarios tested by SYSTRA appear to go beyond exploring the immediate access requirements of STRA2 itself. This evidence, relied upon by SDDC, appears to be beyond the remit of what is required to inform the SDDC Local Plan process.
 - The transport modelling work that has been undertaken has not uniquely considered the impacts and consequences arising from a suggested link road if other infrastructure proposals in the HMA are not delivered or delayed. In the absence of isolated ‘with/without’ testing of the A516–A38 link road independently from wider intervention packages, it is difficult to robustly determine the specific necessity or contribution of the proposed route between the A516 and A38.

- 3.4 Consequently, in view of the above the transport evidence provided (and relied up by SDDC) does not sufficiently demonstrate that a new link road between the A516 and A38 (for general traffic) is required to facilitate the allocation of STRA2 in SDDC's Local Plan.
- 3.5 Consideration should be given to an alternative access strategy for STRA2 that amply satisfies the needs of the proposed mixed-use development, but does not create a "short-cut" link between the A516 and A38 for use by general traffic.
- 3.6 There would appear to be multiple, technically plausible access strategies (as indicated in this report) to serve STRA2, and this further reinforces the importance of properly assessing reasonable alternatives before concluding that a mandatory all-traffic "short-cut" link between the A516 and A38 through STRA2 is required.
- 3.7 STRA2 would clearly require good quality access (and this is not contested). However, the evidence presented to support its allocation in the Local Plan does not demonstrate that STRA2 requires a strategic "short-cut" corridor passing through the Site for general traffic.

Burnaston Parish Council

STRA2 ACCESS STRATEGY REVIEW

Transport Technical Note

The information contained within this report and any appendices or supporting information provided are to be treated as confidential.



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PM21

Q6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or unsoundness matters you have identified at 5 above.

Burnaston Parish Council requests that PM21 be deleted.

The Council considers that the evidence base does not demonstrate that the proposed link road is necessary or justified. The A38 remains the primary access into the development and the available evidence does not demonstrate that the delivery of STRA2 is dependent upon a mandatory A516-A38 link road. The Parish Council considers that the necessity of the proposed road and the deliverability of the housing allocation are separate questions and should be assessed independently.

If the Inspector is not minded to recommend deletion, Burnaston Parish Council requests that the Council undertake:

- a full assessment of reasonable alternatives;
- an updated Sustainability Appraisal assessing those alternatives;
- expansion of the transport evidence base to demonstrate the specific and independent benefit of the proposed link road;
- reassessment of the impacts upon Green Infrastructure, Country Park provision and settlement separation; and
- full public consultation before adoption of any revised proposal

Part B: Please use a separate sheet for each representation you wish to make

3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each Proposed Modification that you wish to comment on.

Comment being made against:	Please tick only one	
PM1		PM23
PM2		PM24
PM3		PM25
PM4		PM26
PM5		PM27
PM6		PM28
PM7		PM29
PM8		PM30
PM9		PM31
PM10		PM32
PM11		PM33
PM12		PM34
PM13		PM35
PM14		PM36
PM15		PM37
PM16	✓	PM38
PM17		PM39
PM18		PM40
PM19		PM41
PM20		PM42
PM21		Other (Please specify)
PM22		

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		
2) Sound (If you check 'No', please also confirm below which of the 'tests' it fails to meet)		✓
a) Positively prepared		
b) Justified		✓
c) Effective		✓

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Please check the relevant box

No, I do not wish to participate in hearing sessions

Yes, I wish to participate in hearing sessions



Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Parish Council wishes to participate in any Examination hearing sessions relating to PM16. The Parish Council's representation raises issues regarding the justification for the proposed A516 access requirement, the evidence relied upon in support of the modification, the role of the proposed access within the wider STRA2 transport strategy and the relationship between PM16 and PM21.

The Parish Council considers that these matters would benefit from oral examination and discussion and that participation in the hearing sessions would assist the Inspector in understanding the Parish Council's concerns regarding the proposed modification.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Council Offices, Civic Way, Swadlincote, DE11 0AH

Forms must be received by 5pm on Tuesday 16th June 2026.

PM16

Q5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Burnaston Parish Council considers that PM16 is unsound because the modification has not been adequately justified and its effectiveness has not been demonstrated.

PM16 introduces a requirement that access north of the site shall be taken from the A516. The Council's states this is to facilitate local bus services and support a wider integrated transport route. However, the evidence base does not clearly demonstrate that the proposed A516 access is necessary to achieve those objectives, nor that alternative approaches to providing public transport connectivity have been assessed. Nor does it clearly explain the role the proposed access is intended to perform within the wider transport strategy, or why a specific access arrangement via the A516 is required to fulfil that role.

The Parish Council notes that the modification relies substantially upon Design Midlands material. However, the Design Midlands review is not a transport assessment and the document repeatedly refers to potential access points, potential main streets and strategic approaches which require further testing and development. The Design Midlands illustration expressly states that it is not intended to fix a particular solution but is exploratory in nature.

The Parish Council considers that the evidence currently available does not adequately explain the operational role of the proposed A516 access within the wider STRA2 transport strategy. In particular, the evidence does not clearly demonstrate why a specific access arrangement via A516 is required, how the proposed access would contribute to the objectives relied upon in support of PM16, whether alternative approaches have been assessed, or why the proposed arrangement represents the most appropriate solution.

The Parish Council further notes that PM16 is consequential upon PM21. If the necessity of the wider A516-A38 transport corridor has not been demonstrated, the justification for safeguarding a specific access arrangement serving that corridor necessarily falls away. The Parish Council therefore considers that PM16 cannot properly be assessed in isolation from PM21 and has not been independently justified by the evidence base.

PM16

Q6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or unsoundness matters you have identified at 5 above.

Burnaston Parish Council requests that PM16 be deleted.

The Parish Council considers that the evidence currently available does not demonstrate that a specific access arrangement via the A516 is necessary or that it represents the most appropriate means of achieving the purpose relied upon by the Council in support of PM16.

Burnaston Parish Council requests that the Council undertake a proportionate assessment of reasonable alternatives and clearly demonstrate why the proposed access arrangement represents the most appropriate solution. The Council should also provide evidence demonstrating the purpose of the proposed access arrangement, how the benefits relied upon in support of PM16 would be achieved, and why alternative approaches would not achieve the same outcomes.

Any revised proposal should then be supported by an updated evidence base and be subject to full public consultation before being incorporated into the Local Plan.

Part B: Please use a separate sheet for each representation you wish to make

3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each Proposed Modification that you wish to comment on.

Comment being made against:	Please tick only one	
PM1		PM23
PM2		PM24
PM3		PM25
PM4		PM26
PM5		PM27
PM6		PM28
PM7		PM29
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PM14		PM36
PM15		PM37
PM16		PM38
PM17		PM39
PM18		PM40
PM19		PM41
PM20		PM42
PM21		Other (Please specify)
PM22	✓	

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		✓
2) Sound		
(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		
a) Positively prepared		
b) Justified		
c) Effective		

d) Consistent with national policy		
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5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Local Plan does not comply with). If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see attached sheet

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached sheet

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please check the relevant box

No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	✓

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Parish Council wishes to participate in any Examination Hearing sessions relating to PM22. The Parish Council's representation raises issues regarding the clarity, interpretation and effectiveness of the PM22 Addendum Map. The Parish Council considers that these matters would benefit from oral examination and discussion, particularly given the role of PM22 in informing consultees' understanding of the proposed modifications and the operation of the wider STRA2 framework. Participation in the hearing sessions would assist the Inspector in understanding the Parish Council's concerns regarding the clarity, effectiveness and justification of the proposed mapping changes.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Council Offices, Civic Way, Swadlincote, DE11 0AH

Forms must be received by 5pm on Tuesday 16th June 2026.

Q5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Burnaston Parish Council considers that PM22 is not legally compliant, is not justified and is not effective because the mapping material does not provide sufficient clarity, precision or certainty to enable consultees to properly understand the proposed modifications, their spatial relationships and their implications.

Policy 5.17 states that an indicative layout map is included to guide the development of the strategic allocation and identify the general proposed location of key features. PM22 therefore forms an important part of the consultation material and plays a significant role in helping consultees understand the operation of the wider STRA2 framework.

The Parish Council considers that the issue is not merely one of presentation. It relates directly to the ability of consultees to properly interpret and engage with the consultation material. Where key features are unclear, missing or open to multiple interpretations, there is a risk that consultation responses may not be fully informed.

The PM22 Addendum Map (Appendix 2) does not provide sufficient clarity regarding a number of important features. In particular:

- the mapping does not explain the purpose and meaning of symbols shown on the plan, including the square symbols which consultees would reasonably expect to be both identified and broadly correspond with their position on the ground.
- the purpose and meaning of the blue corridor features are not clearly explained;
- the distinction between Country Park land, Green Infrastructure, formal recreation provision and retained separation land and development land is unclear; and
- important spatial relationships between existing residential properties, proposed infrastructure and surrounding land uses are difficult to interpret.

The Parish Council is particularly concerned regarding the removal of the original Distance A and Distance B annotations. Whilst the retained land remains shown shaded green on the amended map, the removal of the distance arrows which were in the publication version of the Regulation 19 mapping (appendix 3) reduces consultees ability to understand the intended function of the retained separation land between Burnaston village, Pastures Estate and the proposed STRA2 development in the south and south-west.

The Parish Council further notes that AM73 anticipates some more limited development fronting the A516. This appears to represent a material spatial change to the indicative distribution of development within the allocation. However, neither PM22 nor the supporting evidence clearly explains the planning rationale for this change. Consultees are unable to properly understand the implications of this element, including the scale, densities, extent or form of the development or understand how it relates to the wider Green Infrastructure and Country Park. This reduces certainty regarding the intended spatial structure of the allocation and makes it difficult to understand how the various components of STRA2 are intended to operate together.

The Parish Council's AECOM Design Guide (appendix 4) identifies Open Countryside as a distinct character area and places significant emphasis upon retaining undeveloped gaps, maintaining clear settlement edges, conserving countryside transition and avoiding visual and physical coalescence between settlements. The Parish Council therefore considers that the retained south-western land performs an important settlement separation, countryside-transition and anti-coalescence function. However, PM22 does not clearly communicate that role, nor distinguish

sufficiently between retained separation land, Country Park land, Green Infrastructure and formal sports provision land.

The Parish Council understands that concerns regarding the clarity and interpretation of the mapping were acknowledged by South Derbyshire District Council. However, despite concerns being raised early on during the consultation period, these issues were not corrected and the plan was not republished during the consultation period.

The Parish Council is also concerned that PM22 does not accurately present all existing residential receptors. In particular an existing residential property and associated small holding of circa four acres does not appear to be clearly identified in the amended map. As presented, the mapping gives the impression that this land forms part of the surrounding open countryside, Country Park or Green Infrastructure network. This omission affects the ability of consultees to understand:

- boundaries and the relationship between private residential land and surrounding public land uses;
- the proximity of proposed infrastructure, including the link road; and
- the relationship between existing residential properties and proposed recreation uses.

The Parish Council therefore considers that PM22 does not provide sufficient clarity to enable fair public engagement or informed assessment of the proposed modifications. It is not justified because key land use relationships and functions are not adequately explained, and it is not effective because it does not clearly communicate how the retained land, Green Infrastructure, Country Park and recreation components of STRA2 are intended to operate together.

PM22

Q6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or unsoundness matters you have identified at 5 above.

Burnaston Parish Council requests that PM22 be amended to provide a revised indicative layout map and supporting explanation which clearly identifies the purpose, extent and intended function of the principal components of the STRA2 allocation.

In particular, the revised material should:

- clearly distinguish between Country Park land, Green Infrastructure, retained separation land, formal recreation provision and development land;
- clearly explain the purpose and function of all symbols, corridors and annotations shown on the plan;
- clearly communicate the intended role of the retained south-western land within the wider STRA2 framework, including its settlement-separation, countryside-transition and Green Infrastructure functions;
- correct the red site boundary line to clearly identify existing residential properties and their relationship to surrounding land uses, proposed infrastructure and formal recreation provision;
- clearly explain the extent, purpose and relationship of any development proposed along the A516 frontage to the wider allocation strategy;
- provide sufficient information to enable consultees to understand how the various components of STRA2 are intended to operate together; and
- be republished for public consultation following correction and clarification of the mapping and supporting material so that consultees are able to provide informed representations on the proposed modifications.

Appendix 2:

PM22 Addendum Map

Appendix 3:

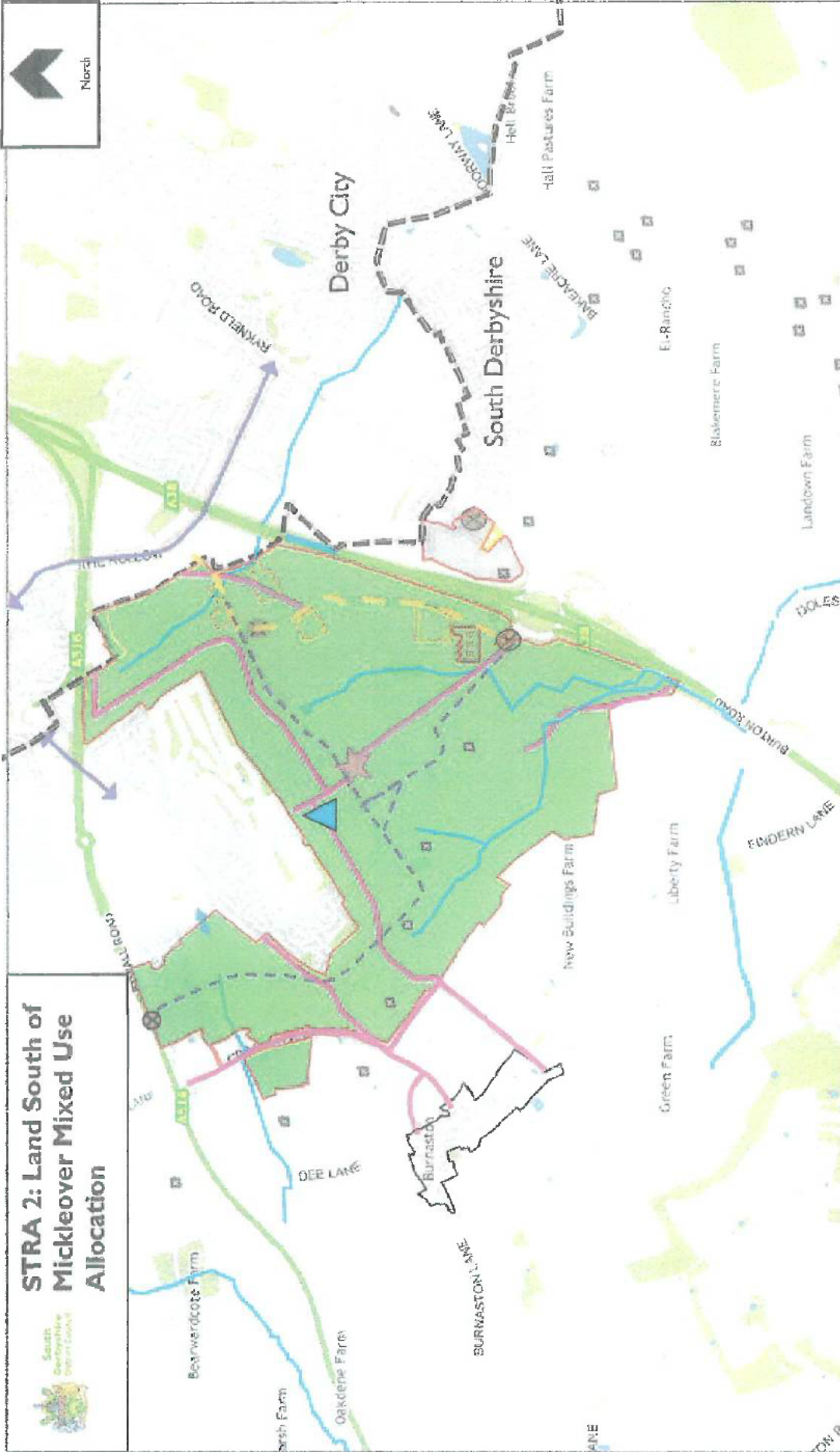
STRA2 Indicative Layout (Original Regulation 19 Allocation Framework)

Appendix 4:

AECOM: Burnaston Design Guide and Codes 2026

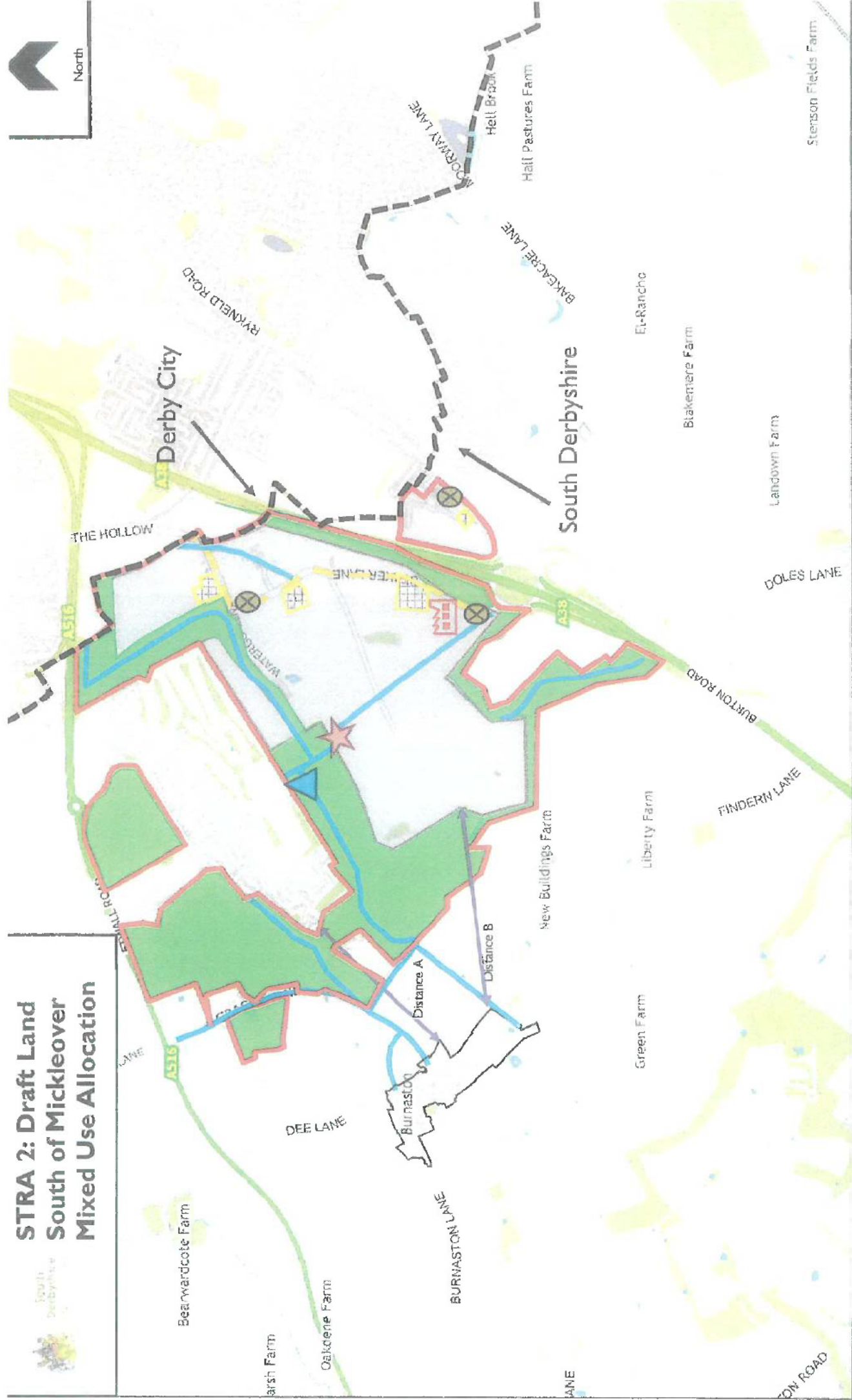


STRA 2: Land South of Mickleover Mixed Use Allocation



	South Derbyshire District Boundary		Country Park/Green Infrastructure		Stalker Lane		Proposed Local Centre
	Site Boundary		Housing Development (Indicative)		Enhances pedestrian/cycle connectivity		Proposed Education Facilities
	Burnaston Settlement Boundary		Pedestrian/cycle connections Size		New Link Road		Employment Development
	Land excluded from Development		Corridors		Potential New Footpath Link		Vehicular Access Points

STRA 2: Draft Land South of Mickleover Mixed Use Allocation



- South Derbyshire District Boundary
- Site Boundary
- Burmaston Settlement Boundary
- Pedestrian/cycle connections
- Staker Lane
- Housing Development
- Vehicular Access Points
- Country Park/Green Wedges
- Land excluded from development
- Proposed education facilities
- Proposed Local Centre
- Employment Development
- Distance A: Approximately 0.63 KM between Burmaston Settlement Boundary and existing development
- Distance B: Approximately 0.65 KM between Burmaston Settlement Boundary and proposed development

3. Area Type-specific Codes and Guide

It is important that all developments in the Burnaston NA respond to the existing character of the place and make a positive contribution to the identity of the neighbourhood area.

3.1 Introduction

The following section provides an appreciation of Burnaston's sense of place and defines the physical characteristics that make different areas of Burnaston distinctive. Some of these features are highlighted using the photographs taken on the site visit conducted on 29 January 2026.

Four main Area Types (AT) are identified in the Burnaston NA are:

AT 1 - Linear Village: this area type is characterised by settlements arranged along the main route.

AT 2 - Planned Development: this area type is defined by precise design standards that create a more cohesive development appearance. Plots and house-types are more regular.

AT 3 - Industrial Zone: this area type is characterised by large footprint-buildings, usually factories, including wide tarmac car parks around.

AT 4 - Open Countryside: this area type includes all the rural setting of Burnaston. Scattered farmsteads and houses can be observed.

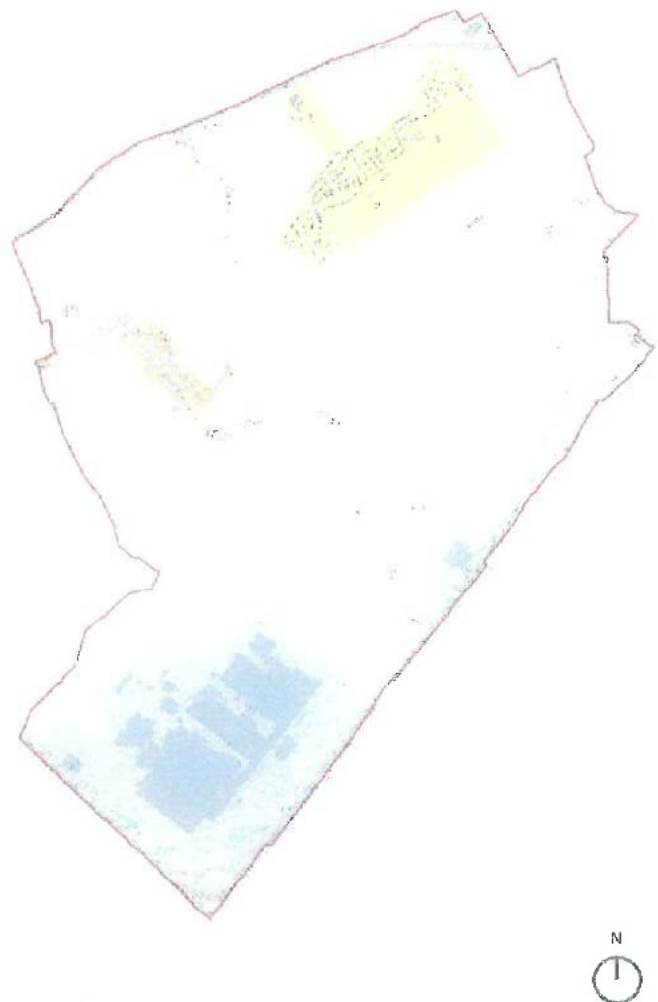


Figure 17: Area type location map

Part B: Please use a separate sheet for each representation you wish to make

3. To which part of the Local Plan does this representation relate?

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each Proposed Modification that you wish to comment on.

Comment being made against:	Please tick only one	
PM1		PM23
PM2		PM24
PM3		PM25
PM4		PM26
PM5		PM27
PM6		PM28
PM7		PM29
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PM12		PM34
PM13		PM35
PM14		PM36
PM15		PM37
PM16		PM38
PM17		PM39
PM18		PM40
PM19		PM41
PM20		PM42
PM21		Other (Please specify) ✓ AM73
PM22		

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		
2) Sound		✓
(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		
a) Positively prepared		
b) Justified		✓
c) Effective		✓

d) Consistent with national policy		
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5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Local Plan does not comply with). If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached sheet

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See attached sheet

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?
Please check the relevant box

No, I do not wish to participate in hearing sessions

Yes, I wish to participate in hearing sessions



Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Parish Council wishes to participate in any Examination Hearing sessions relating to AM73. The Parish Council's representation raises issues regarding the evidence base for the proposed sports provision, the extent and operation of the proposed sports hub, the relationship between formal recreation provision and retained operation land, and the protection of Green Infrastructure and Country Park functions within STRA2. The Parish Council considers that these matters would benefit from oral examination and discussion and participation in the hearing sessions would assist the Inspector in understanding the Parish Council's concerns regarding the justification and effectiveness of the proposed modification. **the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.**

Please return your completed representation form(s) by post to: Planning Policy Team, Council Offices, Civic Way, Swadlincote, DE11 0AH

Forms must be received by **5pm on Tuesday 16th June 2026.**

AM73

Q6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or unsoundness matters you have identified at 5 above.

Burnaston Parish Council requests that AM73 be amended to provide greater certainty regarding the scale, extent and operation of the proposed sports hub and to ensure that formal recreation provision and associated infrastructure remain appropriately contained.

In particular, the policy should:

- clearly define the extent of the sports hub and the scale and nature of formal sports provision intended to be accommodated within it;
- clearly explain how the proposed level of sports provision has been derived from the Playing Pitch Strategy, Built Facilities Strategy and other relevant evidence base documents;
- explain what consideration was given to the Sport England principles of Protect and Enhance existing facilities before identifying the need for additional formal sports provision within STRA2; and
- explain why enhancement of existing facilities or additional off-site capacity would be insufficient to address the identified deficiencies.
- clearly distinguish between formal sports provision, Country Park land, Green Infrastructure and retained separation land;
- ensure that formal recreation provision and associated infrastructure remain contained within the defined sports hub and do not progressively extend into retained south-western land;
- recognise that settlement-separation, countryside-transition, Green Infrastructure and rural-setting functions of the retained south-western land; and
- include safeguards to ensure that Green Infrastructure, Country Park land and retained separation land remain capable of performing their intended landscape, mitigation and separation functions.

The Parish Council considers that these amendments are necessary to ensure that AM73 is justified by the evidence base, provides sufficient certainty regarding the future extent of formal recreation provision and is effective in safeguarding the retained land functions upon which the wider acceptability of STRA2 depends.

AM73

Q5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Burnaston Parish Council supports the principle of providing formal sports facilities in a clearly defined and appropriately located sports hub. The Parish Council considers that, where formal sports provision is required to meet the needs generated by STRA2, a single, centrally focused sports hub provides greater certainty, reduces pressure upon retained Green Infrastructure and separation land, and is more capable of being planned, managed and accessed than a dispersed pattern of formal recreation provision across the wider allocation.

The Parish Council notes that the proposed sports hub location includes land historically associated with formal sports provision linked to the former Derby Grammar School playing fields and supports the principle of a Community Use Agreement. A centrally focused sports hub may also better support walkability, active travel and integration with the proposed residential community, schools and local services.

Policy C(vii) states development will contribute towards existing deficiencies in the availability of sports and recreation facilities. The level and nature of any provision should be informed by a robust evidence base, including the Playing Pitch Strategy and other relevant needs assessments.

The Parish Council notes that Policy C(vii) allows sporting deficiencies to be addressed through on-site provision and/or additional capacity off-site. Whilst the evidence identifies district-wide deficiencies, it does not clearly explain why the proposed level of formal sports provision must be accommodated within STRA2 itself, nor why alternative approaches involving enhancement of existing facilities or additional off-site capacity would be sufficient.

The Playing Pitch Strategy identifies existing sporting deficiencies across South Derbyshire together with future recreational requirements across a number of sporting categories. However, the evidence base does not clearly explain how those identified deficiencies translate into the scale, nature and extent of formal sports provision proposed within the STRA2 hub.

The Parish Council further notes that the Playing Pitch Strategy adopts the Sport England principles of Protect, Enhance and Provide. However, the evidence does not clearly explain what consideration was given to protecting and enhancing existing facilities before identifying the need for additional formal sports provision within STRA2.

The Parish Council's AECOM Design Guide (appendix 5) identifies Open Countryside as a distinct character area and places significant emphasis upon retaining undeveloped gaps, maintaining clear settlement edges, conserving countryside transition and avoiding visual and physical coalescence between settlements. The Parish Council therefore considers that the retained south-western land between Burnaston village, the Pastures Estate and the proposed STRA2 development performs an important settlement-separation, countryside-transition and anti-coalescence function. This land contributes significantly to openness, settlement identity and the wider rural setting of Burnaston.

The Parish Council is concerned that AM73 does not clearly define the extent, scale or operational limits of the proposed sports hub, nor provide sufficient safeguards to ensure that formal recreation provision and associated infrastructure remain contained within that location.

The Parish Council also notes that the explanatory text accompanying AM73 anticipates some more limited development fronting the A516. Whilst the principal concern of this representation relates to formal sports provision, the Parish Council considers this further illustrates the need for greater clarity regarding the intended spatial relationship between development land, Green

Infrastructure, Country Park land, retained separation land and formal recreation provision across the wider STRA2 allocation.

Whilst the modification refers to a single sports hub, the policy does not clearly define:

- the extent of the sports hub;
- the scale and nature of formal sports provision to be accommodated within in;
- the associated infrastructure capable of being provided; or
- the limits beyond which formal recreation provision should not extend

The Parish Council notes that illustrative promoter site maps previously presented to the Parish Council has illustrated formal and informal recreation provision extending beyond the central sports hub and into retained south-western land. Whilst such material is illustrative and not determinative of the final scheme, it highlights the need for greater policy certainty regarding the intended extent and containment of formal recreation provision.

The Parish Council therefore considers that the policy should ensure that formal recreation provision, ancillary buildings, lighting, parking, access arrangements and associated infrastructure remain contained within the defined sports hub and do not progressively extend into retained separation land. This is necessary to ensure that the south-western land continues to perform its settlement separation, countryside-transition and anti-coalescence functions and to safeguard the openness, settlement identity and rural setting of Burnaston village and the Pastures Estate.

The Parish Council is also concerned that the acceptability of STRA2 relies substantially upon Green Infrastructure and Country Park mitigation. The retained south-western land forms part of that wider Green Infrastructure framework. The policy should therefore ensure that Green Infrastructure land remains capable of performing its intended landscape, separation and mitigation functions and is not progressively altered through the expansion of formal recreation provision and associated infrastructure.

Accordingly, Burnaston Parish Council considers that AM73 is not sufficiently justified and is not effective because it does not clearly define the scale and extent of formal sports provision, does not adequately explain how the proposed provision has been derived from the evidence base and does not provide sufficient safeguards to protect retained separation land, Green Infrastructure and Country Park land from the progressive expansion of formal recreation provision and associated infrastructure.

Appendix 5:

AECOM: Burnaston Design Guide and Codes 2026 p.32 p38 &p39

Appendix 6:

Illustrative Masterplan Material presented to Burnaston Parish Council

3.3.4 AT2 - Planned Development: Design codes and guide

Settlement pattern and density

- Development should reinforce the planned, landscape-led settlement pattern characterised by loosely meandering streets arranged around, along or nearby overlooked green spaces.
- Development should avoid over-intensification that would undermine the spacious character of the area, creating a visual extension to the city of Derby within the Burnaston Neighbourhood Area.
- Development should avoid rigid grid layouts, maintaining an organic and informal structure.
- Development should define the edge of the settlement to avoid further sprawl and maintain a clear transition to the surrounding open countryside.



Figure 32: Lightly meandering road layout at the edge of the development, Wren Way.



Figure 33: Coherent building heights and set-backs, with various forms and detailing.

Building layout, form and scale

- Development should follow generally consistent building lines and setbacks to reinforce the cohesive character of the planned layout.
- Development should be of two-storey nature, with larger buildings limited to identified landmarks or focal points.
- Development must respect the prominence of existing landmark buildings, including the converted Pastures Hospital, church, and winter garden. New development could use building heights and layouts that allow scenic views onto these landmarks.
- Blank facades should be avoided on elevations facing streets, green spaces, or pedestrian routes, as these could create 'unwelcoming' sense of place.

A5 - Settlement edge and setting

Burnaston NA is set within an open agricultural landscape and its character is strongly influenced by the relationship between the built environment and the surrounding countryside.

- New development proposals should respect the clear distinction between the village and the rural landscape by being limited in scale and form, reflecting the existing settlement pattern and avoiding outward sprawl.
- Development must provide a clear and gradual transition to the surrounding landscape through appropriate planting, building density, and boundary treatments. Green vegetation buffers and pockets of woodland could be considered.
- Development must retain undeveloped gaps between Burnaston and nearby settlements to prevent coalescence and preserve distinct identity.
- Development proposals should demonstrate how the rural setting and distinct identity of the village will be conserved and enhanced.

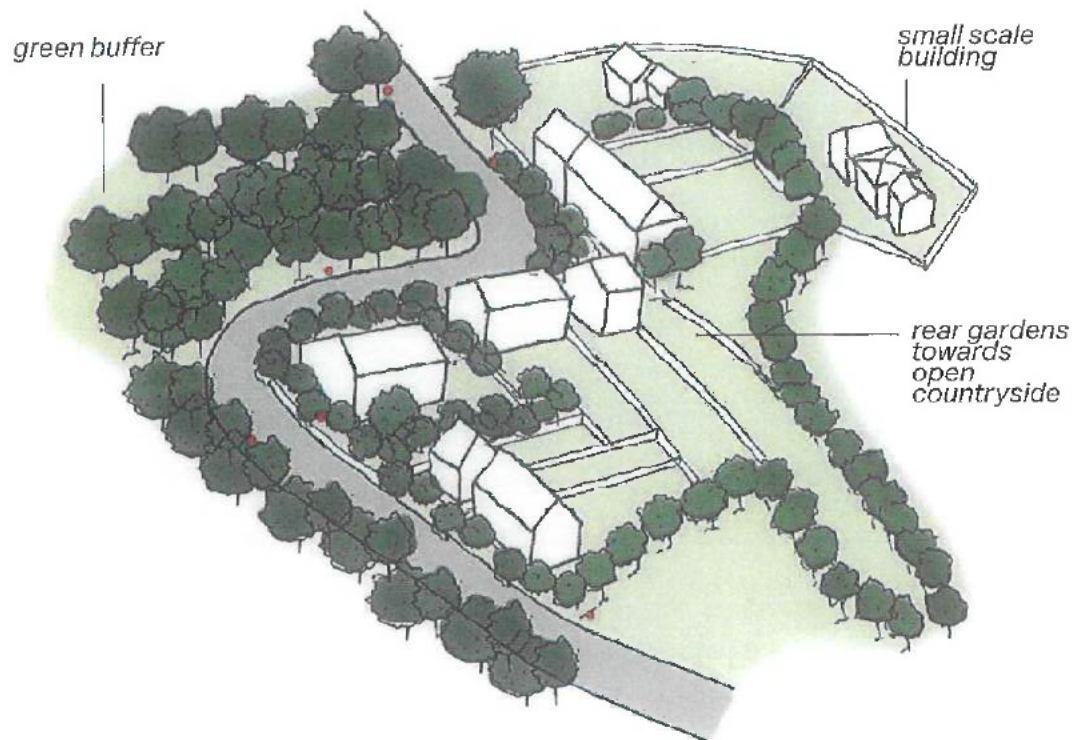


Figure 39: Illustrated strategies for positive edge of development.

A6 - Views and gateways

- Development should conserve important views, vistas, and the intrinsic qualities of the surrounding landscape.
- Development should retain and integrate existing landscape features as key components of local character to retain or enhance internal views.
- Development should avoid standardised layouts, excessive lighting, wide roads, and urban-style boundary treatments in rural settings, which would have negative impact on the village character and internal settlement views.
- Development should provide clear, welcoming, and village-like entrances that reinforce local identity and character.
- Consideration could also be given to identifying key views and approaches to the village which contribute to its character. Key approaches include Etwall Lane, north and south ends of Main Steer, approach from A516 to Etwall Road, Merlin Way and Hospital Lane, as well as rural footpath approaches to each settlement.

A7 - Utilities and storage

- Developers must design utilities and waste storage sensitively, using wooded enclosures or screening with vegetation.
- Utilities should be located discreetly and conveniently, not negatively impacting local traffic.

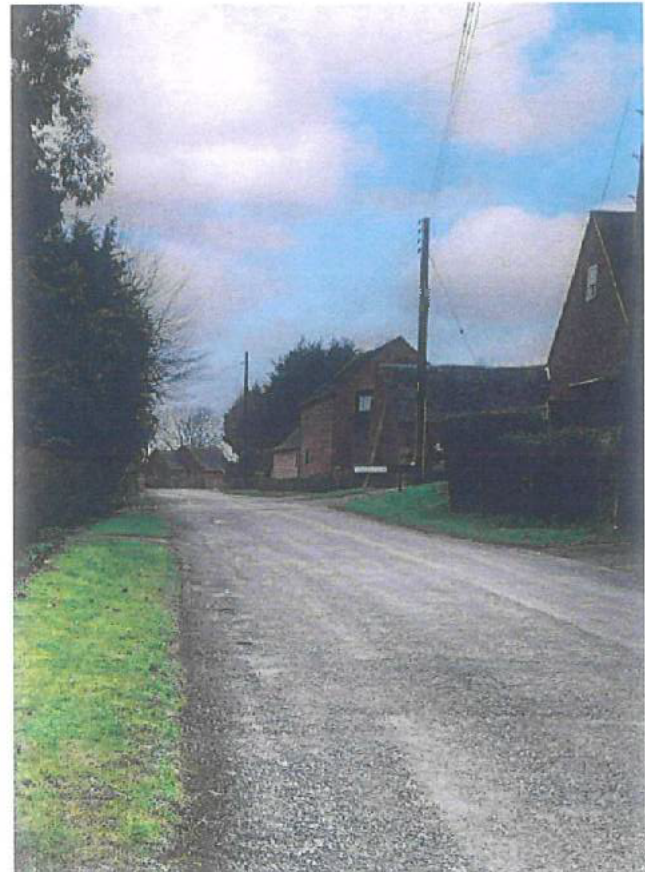


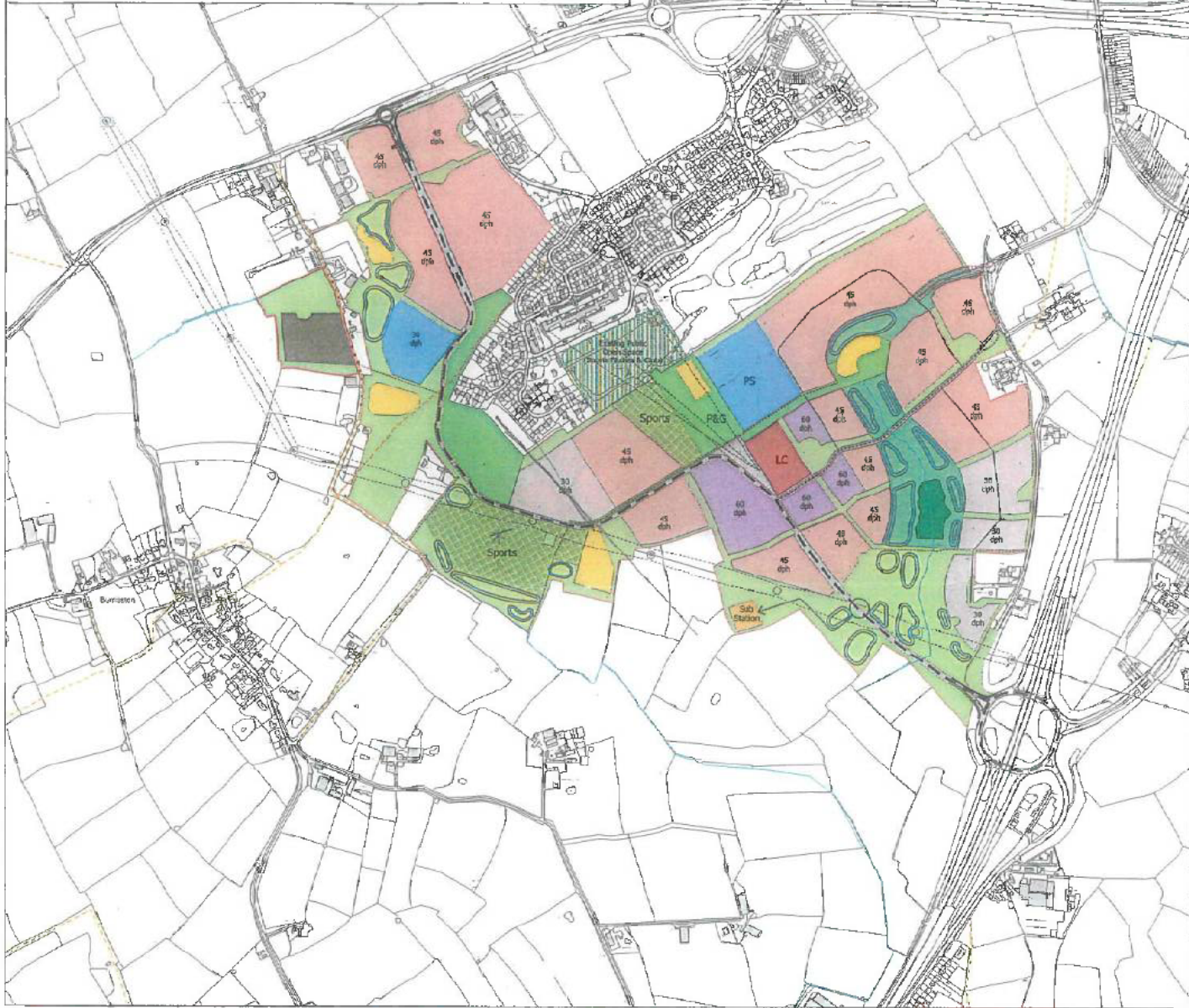
Figure 40: Gateway to Main Street with green vegetated street verges and harmonised material palette.



Figure 41: Discreet brown bins placed against a red brick wall near vegetation.

Fields in Trust Open Space Standards		
Type of Space	Requirement Standard (Ha per 1000 pop)	Requirement for Site (Ha)
Parks and Gardens	0.80	4.32
Amenity Green Space (including Courts, Greens, Tracks and Trails)	1.00	5.40
Natural and Semi Natural Open Space	1.80	9.72
Outdoor Sports Pitches	1.20	6.48
Equipped Designated Play Areas & Informal Play	0.55	2.97
Allotments (requirement taken from PPG17 Study (Derby.gov.uk))	0.90	4.62
Total	5.65	30.52

Dwellings = **2250**
 Population (assuming 2.4/dwelling) = **5401**



Parker Strategic Land			
Area	Ha	Ac	Density Units
Residential Area	49.87	123.22	
Residential 60dph	4.65	11.45	60 279
Residential 45dph	35.88	88.65	45 1614
Residential 30dph	9.34	23.09	30 280
Local Centre	1.28	3.17	60 77
Development Sub-total	51.15	126.39	
PS	3.10	7.66	
Primary School (PS)	3.10	7.66	
Infrastructure	4.69	11.58	
Sub-Station	0.36	0.89	
Parks and Gardens	7.11	17.58	
Amenity Green Space (Inc. Courts, Greens, Tracks, Trails)	6.25	15.45	
Natural and Semi Natural Open Space	28.27	69.86	
Outdoor Sports Pitches	6.61	16.32	
Play Areas & Informal Play	2.70	6.68	
Allotments	1.59	3.94	
Open Space Standards Sub Total	52.54	129.83	
Existing Woodland	0.79	1.96	
Total	112.63	278.32	2250

- Proposed Attenuation Basins and Flow Routes
- Existing Trees
- PRoW
- Active Travel Route
- Simplified Zone for Medium and High Risk Surface Water Flooding

WORK IN PROGRESS

Project: MICKLEOVER, SOUTH DERBYSHIRE
 Ground Use: LAND USE PLAN - PSL CORE AREA
 Date: 14.03.25 Scale: 1:5000
 Project No: 333101259 STN-GEN-SW-DR-MP-10
 Drawn by: P.L.D. Checked by: D.S.

