

**Regulation 19 Addendum: Proposed Modifications to the South Derbyshire
Local Plan Part 1 Review 2022-2041**

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)

(ENGLAND) REGULATIONS 2012

Regulation 19 Addendum

REPRESENTATION FORM

The easiest way to **submit your comments is online** at <https://bit.ly/Part-1-Local-Plan-Review> or by scanning the QR code. We would encourage you to use the online form wherever possible. Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



Submission form

This form has two parts

Part A – Personal Details: need only to be completed once.

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

Part B – Your representation(s): **Please fill in a separate sheet for each representation you wish to make relating to each individual policy.**

You will be asked to give details on whether you think the plan is legally compliant and why you consider the proposed modifications to the policies of the Local Plan to be sound or unsound, please be as precise as possible.

You will also be asked to set out the modification(s) you consider necessary to make the Local Plan legally compliant and the policies sound in respect of any matters you have identified. You will need to say why each modification will make the Local Plan legally compliant or policy 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.

Privacy Notice

Representations (including your name) will be made publicly available following the close of the consultation however personal details (personal address, signature and contact details) will NOT be made publicly available but will be kept in a secure database and used to notify you of the Plan's progress.

Who has access to your information?

Personal details will be protected although it may be necessary to disclose these to a Planning Inspector appointed by the Secretary of State at a later date. For further information, please visit our Privacy section of our website at www.southderbyshire.gov.uk/privacy where you can see a full copy of our privacy notice.

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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*: Chris Rowley	Name*:
Organisation: Etwall Parish Council	Organisation:
Address*: [REDACTED]	[REDACTED]
[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	YES	Other (Please specify)	
PM22			

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

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.

Etwall Parish Council decided at its meeting on Monday 1st June to OBJECT to the Proposed Modifications to the South Derbyshire Local Plan Part 1 Review 2022 – 2041 (Publication Version March 2025).

The reasons for this objection are listed below, and are based on 3 sources:

1. The Parish Councillors' own understanding and knowledge of the traffic problems currently affecting Etwall
2. Feedback from residents provided during the consultation of residents during the compilation of the Etwall Neighbourhood Plan
3. Information contained in an independent Traffic Review commissioned by Burnaston Parish Council, carried out by Create Consulting, which has been reviewed by Etwall Parish Councillors

Conclusions and reasons for Etwall Parish Council's objection

STRA2 Report by Create Consulting regarding the Proposed Modifications

Create Consulting in their paragraph 3.7 state: "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"

We agree with Create Consulting's view that the proposed New Link Road appears to have no impact on non-local traffic movement, hence the benefits are questionable. We believe that the proposal to have an access onto the A516 as close to the boundary as possible is to try to extend their development site, and it is primarily to support future expansion towards Burnaston.

We understand that the developers have said that, to justify this extension to build the New Link Road to run from the proposed development to the A516 near Burnaston Garage on the A516, there will need to be a development site of an additional 150 houses near to the A516.

Results from Etwall Parish Council's Neighbourhood Plan Consultation

This additional development of an additional potential 150 homes would be completely unacceptable to Etwall residents who said in their responses to the

Neighbourhood Plan consultation, carried out as mentioned above, that they want to maintain separation between Etwall and the neighbouring villages. Another development of 150 houses along the A516 near Burnaston Garage would encroach significantly on the open spaces that currently maintain this feeling of separation.

Summary of our other considerations

We accept that a development of 2500 houses should have a minimum of two major access routes for emergency access and to support public transport¹, therefore a second access is necessary, logically at the opposite side of the development to the A38 such as the A516, this should be as suggested by Create Consulting at a junction between the A516 at the current roundabout to the south of Mickleover. The Developer suggests that the extra exit on to the A516 near to Burnaston Garage would be an extra benefit rather than being an appropriate requirement for a development of the size proposed.

In our opinion a link road should not be routed along residential roads, which are normally designed to discourage through traffic by creating circuitous routes with traffic calming measures. This would result in slow journey times and therefore be unpopular as a through route. A link road should be direct and wide enough for heavier traffic.

With the current major road layout, we cannot foresee non-local traffic using a link road through STRA2. We suspect the developer is using this to justify an access onto the A516 closer to Etwall, and in doing so extend the existing development site, with the potential for future development towards Burnaston and Etwall to feed onto this road.

We feel that the Create Consulting alternative suggestion, which proposes access to the site from the existing A516 junction at the roundabout to the south of Mickleover, is preferable to introducing an additional roundabout on the busy A516 trunk road.

Create Consulting Traffic Review contents

The Review includes the following 2 paragraphs:

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.

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,

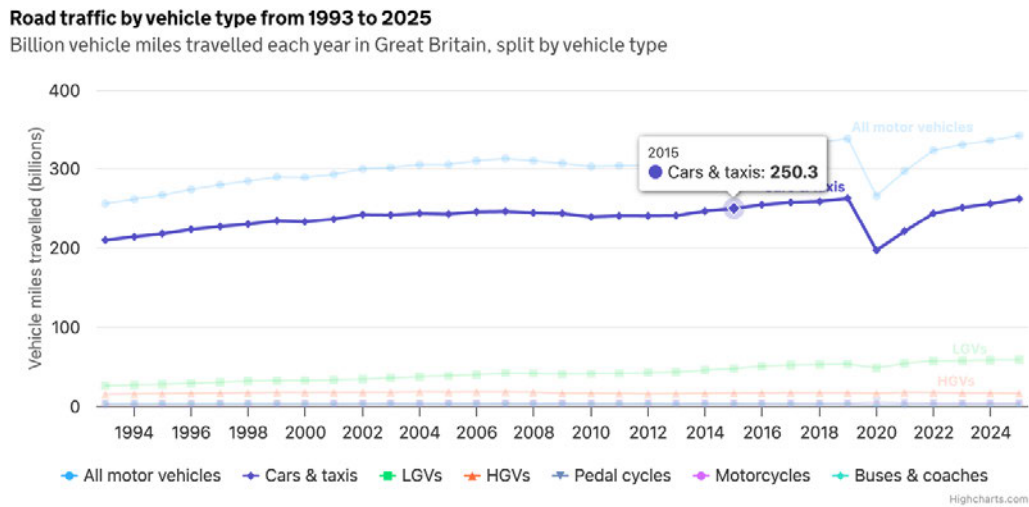
¹ Manual for Streets

We presume this para 2.3 refers to a link from the A50 to the West of Derby effectively bypassing Derby. Paragraph PM21 of the Proposed Modifications to the South Derbyshire Local Plan Part 1 Review 2022 – 2041 (Publication Version March 2025) states: “A vehicular road between the A516 and A38, this shall be provided as part of a comprehensive development of the site and forming part of the South Derby Integrated Transport Link.”

Any approach to connectivity should be holistic and not carried out in a piecemeal way.

The Parish Council does not support this New Link Road as proposed through STRA2 (with the new roundabout proposed on the A516 near to Burnaston Garage) unless it has full sight of any overall proposal, its implications and repercussions, which will significantly affect Etwall, such as the South Derby Integrated Transport Link.

In para 2.10 of their report Create Consulting raise concerns about assumptions on traffic flow, Government statistics, at a National and Regional Level (<https://roadtraffic.dft.gov.uk/>) show that vehicle journeys did not return to pre-Covid levels until 2024 and this data is often used for modelling future traffic flows, see chart below:



However, it is wrong to presume (as SYSTRA appear to do) that this applies to every road. In para 2.12 Create raise the issue regarding count point 89140, which confirms an increase of almost 9% between 2017 and 2024.

Data available at <https://roadtraffic.dft.gov.uk> confirms that car use in Derbyshire increased by around 11% between 2014 to 2024. The available data also illustrates the longer-term impact of the Covid pandemic in that, by 2023, car use was still less than in 2018, probably due to many workers continuing to work from home.

In Etwall village centre, the traffic flow along Main Street, between the Spread Eagle and Egginton Road, is recorded annually and reported on

<https://roadtraffic.dft.gov.uk>, count point 806070. In spite of the Covid impact, car movement along Main Street increased by 22% between 2018 and 2023.

A516 Traffic - count point 47226 records traffic on the A516 on the Derby side of the Heage Lane roundabout. Recorded traffic increased from 16,013 in 2018 to 19,008 in 2024, almost 20%.

These figures show that the SYSTRA acceptance is utterly wrong in the case of Etwall traffic, when they assume that traffic levels on the roads in the Etwall area did not recover to pre-covid levels until 2024.

Key traffic issues already of relevance to Etwall are:

- Two major schools accommodating nearly 3,000 young people to be protected from further traffic risk and pollutant effects
- Traffic issues already experienced, resulting in significant congestion and safety concerns, particularly around school start and finish times
- speeding as people already use Etwall as a cut through
- maintaining the semi-rurality of Etwall

We believe that this underestimate of traffic in Etwall means that SYSTRA's overall assumptions and conclusions cannot be relied on at all, and that SDDC should disregard SYSTA's conclusions regarding the effects on traffic on the roads in the Etwall area, as the traffic numbers are significantly underestimated.

(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.

(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

YES

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 traffic effects on the parish of Etwall are not correctly considered by the current proposals. Key traffic issues are not mentioned at all.

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.**