

View Response

Response #1329704

From CPRE Derbyshire & Nottinghamshire

[Redacted]

Date Started: 16 Jun 2026 14:19. Last modified: 16 Jun 2026 14:19

Status Complete

Title Mr

First Name John

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Organisation CPRE Derbyshire & Nottinghamshire

Job Title Chair

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Visibility Unknown.

1.

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 fill out a separate questionnaire form for each element of the plan (i.e. policy, paragraph, site, document) that you wish to comment on.

If comments do not provide a reference, or are submitted on a single form and relate to multiple elements of the Plan, then the Council will assign and/or separate these points out as it considers most appropriate for submission to the Planning Inspectorate.

You must provide an answer to this question.

PM21

If 'other' please explain

PM16 Access to STRA 2 North of the site via the A516.

CPRE are concerned that the purpose and necessity of this access arrangement has not been clearly demonstrated and that alternative approaches have not been adequately assessed.

PM21 - A516-A38 Link Road

CPRE believe that the proposed link road would introduce a significant transport corridor through land identified for Green Infrastructure, Country Park and settlement-separation functions. We are concerned that significant additional transport will use this road as a cut through between the A516 and A38, in an area set aside for additional housing and young families and don't think it is suitable or required for the development. We would prefer to see access points into the estate off the A38, but not a complete road all the way through. Though recognising that the original STRA2 outline proposal did not highlight a need for a road, we still believe that STRA 2 does not need a link road. This in our view is being put forward for future further development opportunities and not for the benefit of delivering STRA2

We have been informed that Burnaston Parish Council have commissioned an independent review of the transport evidence and their conclusions were 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.

By reducing the road to access points into the estate from North and South, this should reduce the impact of the road upon areas set aside as the country park within the plan.

PM22 - Indicative Layout Map

Whilst the original STRA2 Outline plan was clearly laid out, the revised PM22 map is not very clear and is quite confusing. As this forms an important part of the consultation material it needs to be clear in its representations

Concerns have been raised regarding:

- the clarity of the mapping and legend;
- the distinction between Country Park land, Green Infrastructure, recreation land and retained separation land;
- the role and function of retained open land;
- the removal of the original Distance A and Distance B separation annotations; and
- the ability of consultees to understand the long-term function of retained countryside-transition and separation land.

CPRE considers that the issue is not merely one of presentation. It relates directly to the ability of consultees to properly understand 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.

AM73 - Sports Hub, Green Infrastructure and Separation Land

CPRE supports the principle of concentrating formal sports provision within a single, centralised sports hub.

However, concerns remain regarding:

- the absence of clearly defined limits to the sports hub;
- the absence of safeguards preventing the expansion of recreation infrastructure beyond the hub;

- the relationship between recreation provision and retained separation land;
- the protection of Green Infrastructure and Country Park land; and
- the long-term protection of countryside-transition land and settlement separation.

CPRE believes that open Countryside to the South and SouthWest of the site is really important for

- retaining undeveloped gaps;
- maintaining clear settlement edges;
- conserving countryside transition; and
- avoiding visual and physical coalescence between settlements.

As you are aware, the retained south and south western land between Burnaston village, the Pastures Estate (Swan Hill) and STRA2 performs an important settlement-separation, countryside-transition and anti-coalescence function. CPRE considers that this land contributes significantly to openness, settlement identity and the wider rural setting of Burnaston.

CPRE recognise 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 and should be protected from further development. CPRE considers that this Green Infrastructure land should remain capable of performing its intended landscape, separation and mitigation functions and should not be progressively altered through the expansion of formal recreation provision and associated infrastructure.

Illustrative promoter material previously shown to CPRE has identified informal recreation provision extending beyond the proposed sports hub and into retained south-western land. Whilst illustrative, this material demonstrates that concerns regarding future expansion are not hypothetical

and reinforces the need for clear containment and safeguarding within policy.

Many residents, including CPRE members, previously signed a petition objecting to the location of formal sports pitches within the retained south-western countryside-transition land. The petition supported recreation provision in principle but sought the protection of the open countryside and settlement-separation functions of this land.

2.

Do you consider the Local Plan is:

Please check one.

Select the most applicable option in each row.

	Yes	No
Legally Compliant	<input checked="" type="radio"/>	<input type="radio"/>
Sound	<input type="radio"/>	<input checked="" type="radio"/>

3.

If you checked 'No' to Sound at question 2 above, please confirm below which of the 'tests' the Local Plan fails to meet.

Please check the relevant box.

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

4.

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.

CPRE considers that PM16 and PM21 are 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. An independent study by Burnaston Parish Council does not support that the link road is necessary for STRA2 delivery.

5.

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.

Remove PM16 and PM21 from the local plan.

6.

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.

7.

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

Please write your answer in the box below.

«No response»