

Mr and Mrs T L Graves

9th June 2026

The Planning Inspector
c/o Planning Policy Team
South Derbyshire Local Plan Examination
South Derbyshire District Council
Civic Offices
Civic Way
Swadlincote
DE11 0AH

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

Dear Inspector,

Representation on Proposed Modifications to the South Derbyshire Local Plan – Land South of Mickleover (STRA2)

We are writing to submit our formal representation on the proposed modifications to the STRA2 allocation. We respectfully request that this representation be considered as part of your examination of the South Derbyshire District Council Local Plan.

While we do not oppose development in principle, we have **serious concerns** regarding the **soundness, justification and long-term implications** of several key elements of the STRA2 framework. These concerns relate specifically to:

- the proposed **A516–A38 all-traffic link road**
- the **protection of settlement separation** between Burnaston, The Pastures and the new development
- the **role, clarity and safeguarding** of retained open land and green infrastructure
- the **scale, siting and containment** of sports and recreation provision
- and the **failure to identify and assess reasonable alternatives**, as required by national planning policy.

The accompanying representation sets out these issues in detail. In summary, the evidence base presented to date does **not** demonstrate that the proposed link road is necessary, proportionate or limited to serving STRA2. Independent review indicates that the modelling is incomplete, bundles unrelated interventions, omits key developments and risks creating a wider through-route with significant adverse impacts on existing communities.

Furthermore, the Sustainability Appraisal does not appear to have tested realistic alternatives, including a “no through road” option. This raises fundamental concerns about whether the statutory requirement to assess reasonable alternatives has been met.

The cumulative effects of the proposed modifications on transport, settlement identity, countryside character and the long-term role of retained open land have not been adequately addressed. In our view, these issues go to the heart of whether the STRA2 allocation, as modified, can be considered **sound**.

We therefore respectfully request that you give careful consideration to these matters and require the South Derbyshire District Council to **reassess the proposals, supporting evidence and reasonable alternatives** before the modifications progress further through the examination process.

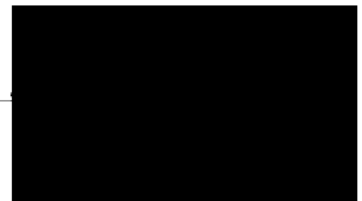
We would be grateful for confirmation that this representation has been accepted for consideration.

Yours faithfully,

Timothy L Graves



Marian E Graves



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Land South of Mickleover (STRA2) – Representation on Proposed Modifications

This representation sets out significant concerns regarding the **soundness, justification and long-term implications** of the current STRA2 proposals. While we do not object to development in principle, we object to several aspects of the STRA2 framework and its supporting evidence base.

Our concerns relate to:

- the justification for the proposed **A516–A38 all-traffic link road**
- the location, role and long-term protection of the **green infrastructure land between The Pastures and Burnaston**
- the safeguarding of **settlement separation** between Burnaston, The Pastures and the proposed development
- the long-term role and protection of **retained open land**
- the **scale, siting and containment** of sports and recreation facilities
- whether the supporting evidence **properly assesses reasonable alternatives**.

1. Reasonable Alternatives

Planning law requires the South Derbyshire District Council’s Local Plan to identify, assess and compare **realistic alternatives**, particularly where major strategic infrastructure is proposed.

We are concerned that:

- the Sustainability Appraisal does **not** assess alternatives to the proposed A516–A38 all-traffic link road
- no genuine “**no through road**” option appears to have been tested
- the evidence lacks clarity on the **scale, extent and containment** of sports provision.

The South Derbyshire District Council’s own consultation material states that “**no reasonable alternatives ... have been identified**”, which raises concern that important options have not been properly identified, assessed or compared.

2. A516–A38 Link Road

On the South Derbyshire District Council’s own evidence, the proposed all-traffic link road has **not** been shown to be:

- **necessary**
- limited to serving STRA2 rather than functioning as a wider through-route
- compatible with maintaining the **open land** separating Burnaston and The Pastures from the proposed urban extension

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The proposed alignment appears to **closely hug The Pastures**, creating:

- poor air quality
- excessive noise
- loss of privacy for existing residents.

In addition:

- Well-used public footpaths, including the route from The Pastures to Etwall via Burnaston (Route 7), would be **obliterated**, along with associated wildlife habitats.
- The existing agricultural land currently functions as a **green wedge**, maintaining the distinct identities of Burnaston and The Pastures. The current Local Plan proposals risk significantly weakening this function.

Concerns with the modelling

Community Representation review highlights that:

- no clear **with/without** testing of the road has been undertaken
- modelling bundles together several unrelated infrastructure interventions
- the route appears capable of attracting **wider traffic movements**
- plausible alternative access strategies have not been fully assessed
- modelling does not account for the **Cotchett Village** development and its new A516 roundabout
- introducing a **third roundabout** between the Seven Wells roundabout and the Cotchett Village roundabout, a distance circa 1.5 miles would significantly worsen congestion
- additional traffic would exacerbate the already well-documented congestion at **Markeaton Island'**

The South Derbyshire District Council's own modelling shows:

- congestion across the Derby HMA increases by **111%** without mitigation
- the "known mitigation" package reduces this to **53%**
- the additional highway package (including the link road) improves this by **59%**

This does **not** demonstrate that a strategic all-traffic corridor between the A516 and A38 is **necessary, justified or proportionate** as a policy requirement for STRA2.

3. Settlement Separation and Retained Open Land

The open land between Burnaston, The Pastures and STRA2 performs essential planning and landscape functions:

- maintaining **openness**

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- preserving **settlement distinction**
- preventing **coalescence**
- providing a **countryside transition** between communities

The evolving STRA2 framework increasingly assigns multiple, potentially conflicting functions to the same land—green infrastructure, recreation, active travel, strategic infrastructure and ecological enhancement. Greater clarity is required on the **long-term role, character and protection** of this land.

4. AM73 – Recreation and Sports Provision

We do not object to **appropriately scaled** sports and recreation facilities.

We support:

- a **single, centralised sports hub**
- use of land formerly associated with Derby Grammar School
- community use arrangements that ensure managed, concentrated provision.

However, we remain concerned that surrounding retained land could, over time, accommodate:

- additional pitches
- recreation uses
- ancillary buildings
- operational overspill.

Such uses could materially harm:

- openness
- settlement distinction
- countryside character
- the rural setting of Burnaston and The Pastures.

5. PM22 – Mapping and Consultation Concerns

The updated PM22 mapping lacks clarity, including:

- no clear legend or key
- unclear meaning of corridor areas and symbols
- insufficient distinction between green infrastructure, country parkland, recreation land and separation land
- omission of an existing receptor

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The plans do not yet provide sufficient clarity on the **long-term role, function and character** of retained land within STRA2.

6. Overall Soundness Concerns

We question whether the Local Plan has demonstrated that it:

- identifies needs
- is justified by robust evidence
- has considered relevant alternatives
- is deliverable
- complies with national planning policy and guidance.

Desired Outcomes

We respectfully request that South Derbyshire District Council and the independent Planning Inspector give careful weight to the **cumulative effects** of the STRA2 modifications on:

- transport
- green infrastructure
- settlement separation
- countryside character
- the long-term role of retained open land.

We further request that the current proposals, supporting evidence and reasonable alternatives be **reassessed** before the modifications progress further through the Local Plan examination.