

**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](http://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.**

<b>Respondent details</b>	<b>Agent details (where applicable)</b>
Name*: Rosemary Whitehouse	Name*:
Organisation:	Organisation:
[Redacted]	[Redacted]
[Redacted]	[Redacted]

\*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](mailto:local.plan@southderbyshire.gov.uk)

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

**Representation 1 ( of 3)**

**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.

<b>Comment being made against:</b>	<b>Please tick only one</b>		
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	TICK	PM38	
PM17		PM39	
PM18		PM40	
PM19		PM41	
PM20		PM42	
PM21		Other (Please specify)	
PM22			

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

c) Effective		<b>Tick</b>
d) Consistent with national policy		<b>Tick</b>

**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.

There is insufficient evidence to show the specific benefits that would be delivered by the local bus service accessing the north of the site via the A516 and whether alternative solutions have been fully assessed. The referenced HMA Transport Modelling does not give sufficient assurance that reasonable alternatives have been properly considered. Therefore this modification should be removed as it is unsound.

(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.

In order to make the Local Plan sound in relation to PM 16 all different alternatives should be considered and evidence provided, to justify the specific benefits that would be delivered by the local bus service accessing the north of the site via the A516

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	No
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:**

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.

## **Representation 2 ( of 3)**

### **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.

<b>Comment being made against:</b>	<b>Please tick only one</b>		
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	TICK	Other (Please specify)	
PM22			

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

d) Consistent with national policy		<b>Tick</b>
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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.

There is insufficient evidence to show the specific benefits that would be delivered by the vehicular road between the A516 and A38 and whether alternative solutions have been fully assessed.

SDDC has not clearly demonstrated that there is a genuine transport problem that can only be solved through the construction of a new link road. The Derby HMA Transport Modelling evidence does not support significant benefits and that these would outweigh its environmental, financial and community impacts.

The new proposed road would generate additional traffic rather than reduce it, leading to further congestion in Mickleover the longer term. The modifications do not adequately explain how this risk has been assessed or mitigated.

There is insufficient information in the proposed plan for the 'link road': speed limits and who is going to monitor it; there is no clear, accurate mapping of the proposed road we are being asked to Consult; the impact of the proposed road cutting through large swathe of worked farmed land in terms of food security does not appear to have been considered; the proposed road does not offer any justified arguments to not keep the integrity of County Park, including and surrounding the Pastures Estate; no justified arguments have been put forward for breaking through this farmland.

It has not been demonstrated in the HMA Transport Modelling or elsewhere that reasonable alternatives have been properly considered. Before allocating land and committing to a link road infrastructure, it has not been shown that options such as improvements to existing roads, better public transport, walking and cycling infrastructure, traffic management measures, and demand reduction strategies have been fully explored and assessed. Therefore this modification should be removed as it is unsound.

(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.

In order to make the Local Plan legally compliant and sound in relation to PM 21 all different alternatives should be considered and evidence provided to justify vehicular road between the A516 and A38 as part of a comprehensive development of the site .

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

No

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:**

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**Representation 3 ( of 3)**

### 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	TICK		

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

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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.

The New Indicative Layout as indicated by the map on page 10 of the Proposed Main Modifications is not clear in its scale ; use of colour ( especially the green colours) ; contains an inaccurate Legend ; and areas indicated without an explanation of what they are. In short it is not possible for a genuine “Consultation” on the new proposed layout based on the map provided .

(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.

In order to make the Proposed New Layout sound in relation to PM 22 a clearer map , to scale should form part of the Consultation.

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

No

Yes, I wish to participate in hearing sessions

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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.

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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 16<sup>th</sup> June 2026.**