

# View Response

## Response #1325136

**From** [Wheeldon 1867](#)

**Agent** [Caroline Large](#)

**Date** Started: 14 May 2026 14:35. Last modified: 14 May 2026 14:35

**Status** Complete

**First Name** The

**Last Name** Till

**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.

PM23

If 'other' please explain

Policy PM23 and supporting text insofar as it governs housing delivery at Key Service Villages and the circumstances in which deliverable housing adjoining settlement boundaries will be supported.

This representation also relates to the spatial strategy for meeting Derby City's unmet housing need through growth close to Derby (including the proposed Garden Village approach) and the extent to which the Plan provides sufficient flexibility and contingency to ensure early delivery.

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.

The primary concern is effectiveness. The Plan relies heavily on strategic growth close to Derby, including the proposed Garden Village approach, to address Derby City's unmet need. Strategic schemes can have long lead-in periods and depend on infrastructure, phasing and build-out assumptions, so the Plan needs a clearer delivery buffer of non-strategic sites in sustainable settlements.

This is particularly important given planned employment growth at the East Midlands Intermodal Park / Strategic Rail Freight Interchange / East Midlands Freeport at Egginton Common, which will increase demand for homes close to jobs along the A50 corridor.

PM23 is too restrictive for appropriately scaled housing adjoining Key Service Village boundaries, beyond rural exception schemes. This does not align with the NPPF, which requires plans to be positively prepared, deliverable, flexible and based on a realistic strategy for meeting housing needs. Etwall has strong links to Derby and the A50.

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.

Main Modification requested: amend Policy PM23 and/or supporting text to provide explicit flexibility for appropriately scaled, deliverable housing adjoining Key Service Village boundaries, beyond rural exception schemes, where proposals are supported by proportionate evidence of constraints and mitigation and where they make an early contribution to delivery. This would improve the effectiveness and resilience of the housing trajectory and reduce over-reliance on strategic lead-in times, while remaining aligned to the Plan's spatial strategy and the objective of locating growth close to Derby.

This modification is necessary to make the Plan sound because it introduces a controlled mechanism for additional deliverable sites to come forward in sustainable locations, strengthens early delivery and contingency, and aligns the Plan with national policy requirements on deliverability and maintaining supply

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.

To explain why the Plan's reliance on strategic Derby-related growth (including the Garden Village approach) requires a clear delivery buffer; why the current drafting of Policy PM23 restricts flexibility and undermines effectiveness; and how deliverable Key Service Village edge-of-settlement sites (including the Etwall southern parcel) support the Plan's "close to Derby" objective whilst improving the plan's resilience.