

South Derbyshire Local Plan Part 1 Review 2022-2041:  
Representations in Response to Proposed Modifications

On behalf of Wilson Bowden Developments ltd. and  
Harrow Estates (part of Barratt Redrow Plc)

**Date:** June 2026

**Name of Person Responding:** Chris Webber – Senior Planning Manager – Harrow  
Estates

## PERSONAL DETAILS

<b>Name</b>	Chris Webber
<b>Organisation</b>	Barratt Redrow (Harrow Estates)
<b>Address</b>	[REDACTED]
<b>Email:</b>	[REDACTED]

## EXECUTIVE SUMMARY

- Harrow Estates and Wilson Bowden (Barratt Redrow) support SDDC’s continued progression of the Local Plan Part 1 Review and welcomes a number of Main Modifications which move the Plan closer to a sound and deliverable framework.
- In particular, we welcome amendments that a) extend the plan period to 2042, b) increase the housing requirement to reflect the longer plan period, and c) reduce the affordable housing requirement from 40% to 30% in response to viability concerns.
- However, several important issues remain. Certain requirements affecting strategic allocations continue to appear overly prescriptive and/or insufficiently evidenced, especially where they could affect viability, developability, infrastructure sequencing and delivery timing.
- Accordingly, Barratt Redrow supports the Main Modifications in part, but requests amendments to these modifications to ensure that the Plan is justified, effective and consistent with national policy. Barratt Redrow will continue to reiterate our previous concerns, some of which are mentioned again in this response, at any further Examination of the South Derbyshire Local Plan.

### 1. INTRODUCTION

- 1.1 These representations have been submitted by Barratt Redrow Plc, on behalf of two of its constituent entities Wilson Bowden Developments Ltd. and Harrow Estates (collectively referred to throughout this document as ‘Barratt Redrow’ or ‘our’), in response to South Derbyshire’s consultation on the Local Plan Part 1 Review 2022-2041 Proposed Modifications.
- 1.2 Barratt Redrow is an industry leading housebuilder having built over 680,000 homes since 1958, having maintained a 5-star rating in the HBF customer satisfaction survey every year since 2009 – meaning 90% of our customers would recommend us to a friend. We have significant growth plans with a medium-term target to build 22,000 homes – a 28% increase on the 17,200 homes we are forecasting to deliver in the 12 months to July 2026. We support over 68,000 jobs through our supply chain and invest circa £1 billion into local communities to fund affordable homes, transport infrastructure, community facilities and environmental improvements.
- 1.3 Wilson Bowden Developments was originally established in 1982 and has been owned by Barratt Redrow since 2007. Wilson Bowden specialises in industrial and logistics development, in particular delivering Build to Suit developments for clients. Much of its work focusses on the delivery of long-term industrial developments across the country.

- 1.4 Harrow Estates specialises in planning promotion, land acquisition and infrastructure delivery for some of the more complex sites in the Barratt Redrow portfolio. Harrow Estates have delivered dozens of strategic scale sites across the country since its inception, ranging from traditional greenfield promotion, to brownfield regeneration. Harrow Estates have taken a lead planning and project management role, in the delivery of the housing element of IGV within Barratt Redrow's control, since January 2026 and are committed to working with Wilson Bowden, as well as SDDC and its partners, to deliver IGV.
- 1.5 These representations are made in relation to our land interests within the Infinity Garden Village ('IGV' or 'the site') proposals, draft allocated as STRA1 in the Local Plan and sited as per the Site Location Plan at Appendix 1. These representations are framed principally through the lens of IGV, given the strategic significance of the allocation and the direct relevance of a number of proposed modifications to Policy STRA1. However, it also comments on whether the proposed modifications may have wider implications for the effectiveness, flexibility and deliverability of policy across the Local Plan as a whole.
- 1.6 The Government announced its support for IGV on 2 January 2017, which straddles South Derbyshire District Council (SDDC) and Derby City Council (DCC) administrative areas. IGV sits within the area known as the South Derby Growth Zone (SDGZ).
- 1.7 The SDGZ is a strategic initiative that received £49.6m from the UK Government's Levelling Up Fund (LUF) to unlock land along the A50 corridor for large scale mixed used developments including the residential and employment development associated with IGV. This funding is predicated on the uplift of additional homes and jobs being created in and adjoining the existing allocations in SDDC and DCC. It is this additional land that Wilson Bowden Developments and Barratt Redrow have a legal interest in and that these representations are based upon.
- 1.8 Wilson Bowden Developments Ltd. and Barratt Redrow have previously engaged in various stages of South Derbyshire's Local Plan preparation including making submissions to the Strategic Housing and Employment Land Availability Assessment (SHELAA) Call for Sites and Local Plan Viability review. In the SHELAA, IGV was found to be potentially available, achievable, and suitable.
- 1.9 The site comprises predominately agricultural land. The area within SDDC extends to approximately 185ha. This includes the land associated with the existing Policy E4 allocation alongside the potential to accommodate an approximate additional 47ha of employment land and 95ha for residential development, local centre, secondary school, primary school and open space.
- 1.10 The site offers an opportunity to deliver up to 2,000 new additional homes and up to 47 ha of additional employment land for new jobs in the area. It would also provide a range of other benefits including:
- 2 Form Entry Primary School
  - Secondary School;
  - Local Centre;
  - Sports facilities and play areas for all ages;
  - Community Hall;

- A range of green and blue infrastructure improvements (including community orchards/allotments);
- Mix of housing types including affordable housing provision;
- Excellent walking and cycling routes into the city; and
- Public transport links including frequent bus links connecting to other employment areas including the city centre and Infinity Park.

- 1.11 The strategic scale of the development and the Garden Village status of the site will provide greater opportunities to deliver healthy, sustainable and viable development, which is comprehensively planned to meet the day to days needs of residents with excellent links to the city.
- 1.12 It will benefit from the existing infrastructure of the main urban area whilst contributing to the delivery of new and improved infrastructure such as a new secondary school, junction improvements on the A50, community hall, community orchards/allotments, health centre and sports facilities for the benefit of both new and existing residents as well the provision of a variety of jobs.
- 1.13 The strategic scale and comprehensive planning of the Garden Village provides an opportunity to make biodiversity net gains, extend the benefits of the City’s Green Wedges through the development with the provision of green infrastructure such as parkland, wetlands, allotments and community orchards and ensure sustainable drainage systems create blue infrastructure as part of the scheme, making it a development which benefits the environment as well as the residents of the area.

## 2. RESPONSE

### PM1 – Policy REV1: Review of the Development Plan

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		<b>X</b>
2) Sound		<b>X</b>
a) Positively prepared		
b) Justified		
c) Effective		<b>X</b>
d) Consistent with national policy		

*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*

- 2.1 The revised policy direction is noted and the clearer commitment to preparing a new Local Plan is welcomed in principle. However, it would be helpful for the Council to provide as much certainty as possible within supporting text regarding the intended programme for plan review, the future Local Development Scheme and the way in which cross-boundary issues within the Derby Housing Market Area will be addressed.

*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*

- 2.2 We would suggest text is added to confirm that SDDC will also maintain an up-to-date Local Development Scheme.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
We have made significant comments on the policy which require our participation at the hearing sessions.	

**PM2, PM3, PM4 and PM42 – Plan period, housing requirement and trajectory**

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant	<b>X</b>	
2) Sound	<b>X</b>	
a) Positively prepared		
b) Justified		
c) Effective		
d) Consistent with national policy		

*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*

- 2.3 The extension of the plan period to 2042 and the uplift in the housing requirement are welcomed. This largely addresses the concern that the Plan should secure a robust long-term horizon from adoption.
- 2.4 The updated trajectory is also notable in recognising that strategic allocations such STRA1 will continue to deliver beyond the plan period – recognition of the scale and complexity of such projects. In this regard, we confirm our position that due to the size and complexity of STRA1 meaning a proportion of delivery is beyond 2042, this does not undermine the soundness of this strategic allocation and that phased delivery mechanisms are supported where appropriately justified.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
Given the significance of our proposals to the Local Plan, we would wish to participate in the hearing sessions.	

**PM5 and PM8 – Retail provision, local centres and anchor store wording**

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant	<b>X</b>	
2) Sound	<b>X</b>	

a) Positively prepared		
b) Justified		
c) Effective		
d) Consistent with national policy		

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

- 2.5 Barratt Redrow supports the principle of appropriately scaled local centres within strategic urban extensions, including IGV, and welcomes recognition and action of earlier representations from Wilson Bowden.
- 2.6 Whilst the use of 'approximately' in PM5 allows some flexibility, we would urge SDDC officers, as and when proposals come forward, to ensure sufficient flexibility is given regarding the size of proposed retail stores (whilst best trying to deliver c. 1000sqm of floorspace) in response to market and occupier demands.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
We have made significant comments on the policy which require our participation at the hearing sessions.	

#### PM6 and PM11 – Existing sport / recreation facilities and replacement provision

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant		<b>X</b>
2) Sound		<b>X</b>
a) Positively prepared		
b) Justified		
c) Effective		<b>X</b>
d) Consistent with national policy		

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

- 2.7 The factual clarification regarding the clay shooting ground in PM6 is noted as accurate.

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

- 2.8 However we would raise significant concern as to the deliverability of alternative clay shooting facilities given the nature of the sport. Barratt Redrow have had significant difficulty elsewhere in the country relocating highly specific sports businesses (i.e. clay shooting or hunting) which has delayed the delivery of strategic sites. This requirement

will need to be further discussed with SDDC in pre-application discussions, and we would suggest flexibility is added to allow contributions to be made should an identified facility elsewhere in the district be improved instead.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
We have made significant comments on the policy which require our participation at the hearing sessions.	

#### PM7 – Older persons / specialist housing within STRA1

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant	<b>X</b>	
2) Sound	<b>X</b>	
a) Positively prepared		
b) Justified		
c) Effective		
d) Consistent with national policy		

*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*

- 2.9 The revised wording is an improvement on the earlier formulation, given it allows the delivery of either a retirement village or specialist housing for older people. Thus giving more flexibility for Barratt Redrow to find a delivery partner for this element of the allocation.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
Given the significance of our proposals to the Local Plan, we would wish to participate in the hearing sessions.	

#### PM9 – Healthcare as a separate STRA1 criterion

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant	<b>X</b>	
2) Sound	<b>X</b>	
a) Positively prepared		
b) Justified		
c) Effective		
d) Consistent with national policy		

*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*

- 2.10 The creation of a standalone healthcare criterion is welcomed and together with the explanatory text is AM72 allows for sufficient flexibility if, for whatever reason, Sinfin Health Centre is unable to be improved. This change reflects an issue raised in earlier representations and is a more coherent drafting approach than ‘bundling’ healthcare within wider local centre wording.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
Given the significance of our proposals to the Local Plan, we would wish to participate in the hearing sessions.	

#### PM10 – Primary education provision

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant	<b>X</b>	
2) Sound	<b>X</b>	
a) Positively prepared		
b) Justified		
c) Effective		
d) Consistent with national policy		

*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*

- 2.11 The increase in the expected scale of primary school provision from 2 to 2.5 form entry is noted and will need to be accounted for in Barratt Redrow’s iterative masterplanning of our interests in STRA1.

*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*

- 2.12 Barratt Redrow continues to consider that the policy should clearly distinguish between land reservation / safeguarding, financial contributions and ultimate delivery responsibility. We consider that PM10 should clarify that the development will provide land and proportionate contributions for education infrastructure, in accordance with the education authority’s evidenced requirements and agreed delivery strategy.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
We have made significant comments on the policy which require our participation at the hearing sessions.	

#### PM12 – Canal

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		<b>X</b>
2) Sound		<b>X</b>
a) Positively prepared		<b>X</b>
b) Justified		<b>X</b>
c) Effective		<b>X</b>
d) Consistent with national policy		<b>X</b>

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

2.13 Where developer contributions or mitigation are required, the Local Plan should make clear that any such requirements must be necessary, relevant and proportionate – the latter two terms are currently missing from PM12.

2.14 The requirement in PM12 regarding utilising the canal for sustainable drainage where appropriate, would however appear to run contrary to the national SuDS standards which sets out a hierarchy for surface water discharge:

- *priority 1: collected for non-potable use*
- *priority 2: infiltrated to ground*
- *priority 3: discharged to an above ground surface water body*
- *priority 4: discharged to a surface water sewer, or another piped surface water drainage system*
- *priority 5: discharged to a combined sewer*

*Note 1: priority 1 is the highest priority and priority 5 is the lowest.<sup>1</sup>*

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

2.15 It would appear at odds with national policy for a development plan policy to explicitly state that priority 3 in the national hierarchy should somehow be given preference over priorities 1 and 2. Whilst ‘*where appropriate*’ affords some flexibility and this option will be explored by Barratt Redrow at the appropriate time to see if it is viable, if this wording is to be retained, explanatory wording should be inserted to ensure that the national SuDS hierarchy should be followed in the first instance.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>

<sup>1</sup> <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds#principles>

We have made significant comments on the policy which require our participation at the hearing sessions.

**PM12 – Rail**

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant		<b>X</b>
2) Sound		<b>X</b>
a) Positively prepared		<b>X</b>
b) Justified		<b>X</b>
c) Effective		<b>X</b>
d) Consistent with national policy		

*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*

- 2.16 On PM14 and the unilateral insertion of the need to consider the impacts on a level crossing far south of IGV and which is separated from IGV by the canal. We consider it would have been positive to have bilateral discussions between ourselves and National Rail regarding any concerns or request for contributions which at the current stage, do not appear to be necessary, relevant or proportionate given the distance from IGV.
- 2.17 More widely we would also reiterate our earlier comments that it is completely outside of our control to deliver recreational routes south of the A50 unless these are already adopted by the County and capable of being improved through contributions deemed relevant and necessary. We would therefore continue to object to this requirement remaining in STRA1 D viii) as these are not wholly deliverable and remains associated with land outside of Barratt Redrow control.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
We have made significant comments on the policy which require our participation at the hearing sessions.	

**PM24, PM25, PM26 and PM27 – Policy H20: housing mix, accessibility and self/custom build**

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant	<b>X</b>	
2) Sound	<b>X</b>	
a) Positively prepared		
b) Justified		
c) Effective		
d) Consistent with national policy		

*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*

- 2.18 The amendments to Policy H20 are welcomed in principle. In particular, the clarification on wheelchair-user dwellings and the insertion of a new flexibility criterion allowing written justification where a proposal departs from prescribed requirements are both positive changes.
- 2.19 These modifications better reflect the reality of delivering a housing led site that needs to be able to respond to market signals, local needs, site characteristics and viability. That is particularly important on strategic sites such as IGV, but the same logic has wider application across the district.
- 2.20 Barratt Redrow continues to welcome the flexibility H20 offers by ensuring self-build or custom build can be delivered to meet policy requirements.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
Given the significance of our proposals to the Local Plan, we would wish to participate in the hearing sessions.	

**PM28 – Policy H21: affordable housing**

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant	<b>X</b>	
2) Sound	<b>X</b>	
a) Positively prepared		
b) Justified		
c) Effective		
d) Consistent with national policy		

*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*

- 2.21 The reduction in the headline affordable housing requirement from 40% to 30% is welcomed as a constructive and pragmatic response to viability concerns.
- 2.22 Nevertheless, strategic sites (in particular IGV) often carry unusually significant infrastructure burdens and, in the case of IGV, significant abnormalities in expected ground conditions. Barratt Redrow therefore reserves the right to seek site-specific viability flexibility, where justified by up-to-date evidence, at the application stage.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>

Given the significance of our proposals to the Local Plan, we would wish to participate in the hearing sessions.

**PM29 – Policy H22: Gypsy and Traveller pitches on strategic sites**

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		<b>X</b>
2) Sound		<b>X</b>
a) Positively prepared		<b>X</b>
b) Justified		<b>X</b>
c) Effective		<b>X</b>
d) Consistent with national policy		

*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*

- 2.23 Barratt Redrow continues to object to the modified strategic-site requirement in Policy H22. The revised wording strengthens rather than resolves the concerns previously raised, by requiring 5 serviced pitches per 1,000 dwellings “*or part thereof*” and by requiring those pitches to be delivered concurrently with, or prior to, residential completion.
- 2.24 In Barratt Redrow’s view, this remains insufficiently justified, insufficiently supported by viability evidence and ineffective as a strategy for meeting district-wide need. It places a disproportionate burden on strategic sites and appears liable to create practical delivery difficulties without demonstrating that it is the most appropriate or preferred form of provision.
- 2.25 That objection applies directly to Infinity Garden Village but also raises a wider issue of principle. Where the Council is seeking to meet district-wide need, the strategy should be evidence-based, proportionate and deliverable across the district as a whole rather than concentrated in this way on strategic allocations.
- 2.26 In our criticism of this policy, we would also highlight that the Aspinall Verdi ‘Interim Viability Statement’ does not appear to take any account as to the burden borne by strategic sites in the Plan to provide Gypsy and Traveller provision – which has a viability impact. Indeed the Statement itself suggests “*This assessment is necessarily high-level and does not seek to replicate a full plan-wide viability assessment. Instead, it provides an early-stage “sense check” of viability*”. It is therefore our continued assertion that this policy requirement does not appear, from a review of the evidence base, to have been subject to any kind of viability assessment or testing and as a result it is not justified nor evidenced.

*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*

- 2.27 Further to any justification / evidencing, Barratt Redrow’s suggestion is that all major housing schemes allocated for development in this Plan should financially contribute to

the identified need, with South Derbyshire then delivering sites, rather than an arbitrary requirement being placed on strategic sites only.

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
We have made significant comments on the policy which require our participation at the hearing sessions.	

#### Additional Modification AM72 – STRA1 Justification Text

<b>4. Do you consider the Local Plan is:</b>		
	<b>Please tick the relevant box</b>	
	Yes	No
1) Legally compliant		<b>X</b>
2) Sound		<b>X</b>
a) Positively prepared		<b>X</b>
b) Justified		<b>X</b>
c) Effective		<b>X</b>
d) Consistent with national policy		

*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*

- 2.27 This explanatory text is generally supported to provide clarity to the deliverability of STRA1, but we consider the following changes are required to not create challenges during this delivery:
- 2.28 *The population of the district is aging and demand for retirement provision will increase over the lifetime of the development. Sufficient numbers of new homes to meet the identified needs of people with disabilities, including housing with support, housing with care and residential care bed spaces should be provided in accordance with policy H20.*
- 2.29 This additional justification appears a) conflated and b) to conflict with earlier wording inserted under modification reference PM7 which allows for ‘a retirement village or specialist housing for older people’.
- 2.30 Under a) the initial sentence is ‘scene setting’ for retirement provision, but the second sentence then discusses the need to meet needs of those with disabilities. The two should generally be seen, in the context of new home provision, to be mutually exclusive to some degree. With disability needs being met through compliance with Building Regulation Part M as detailed elsewhere in the Plan, and retirement housing delivered through the requirements of STRA1 A iii.
- 2.31 We would therefore suggest this wording is altered to read as the following to ensure consistency throughout the Plan.
- 2.32 *The population of the district is aging and demand for retirement provision will increase over the lifetime of the development. Sufficient numbers of new homes to meet the*

*identified needs of older people, should be provided in accordance with the requirements under STRA1 A iii). Sufficient numbers of new homes to meet the identified needs of those with disabilities, including housing with appropriate accessibility adaptations, support, housing with care and residential care bed spaces should be provided in accordance with policy H20.*

- 2.33 *Primary vehicle access is expected to be off the A50. This is required to serve both employment and residential traffic and it is expected that safe pedestrian and cycle crossing points are provided. The development should address the conclusions in the Design Review: Shaping Streets*
- 2.34 This new justification appears inconsistent with the wording of the actual STRA1 policy which states “*Primary vehicle accesses via a new junction on the A50 and junctions via Infinity Park Way*”. Whilst primary vehicular access being via a new junction on the A50 and junctions via Infinity Park Way is our intention and ultimate aim, the above wording explicitly setting out an access from the A50 is unhelpful and risks delaying the delivery of homes, employment provision and infrastructure on site should the junction improvements be delayed for reasons beyond our control i.e. wider funding. Given the spatial strategy of the Local Plan relies on strategic sites delivering significant numbers of new homes through the Plan period, we suggest replacing this wording with a measurable and clear requirement such as the submission of an access strategy and/ or phasing plan to be provided to demonstrate at the application stage how the Site can appropriately come forward in a phased manner.
- 2.35 A first phase could reasonably come forward before the A50 junction is established, subject to the appropriate assessment and testing. Allowing the phasing of development through enabling flexibility in access, will support the viability and deliverability of the site and its range of other infrastructure.
- 2.36 This wording should be amended to ensure consistency with STRA1 and to allow flexibility in delivery:
- 2.37 *Primary vehicle access is expected to be off the A50 and junctions via Infinity Park Way. This is required to serve both employment and residential traffic and it is expected that safe pedestrian and cycle crossing points are provided. The development should address the conclusions in the Design Review: Shaping Streets*
- 2.38 *Green infrastructure and active travel routes should connect new residents within the infinity garden boundary (as shown on the indicative plan) to existing green infrastructure corridors (e.g. Green Wedges and the Derby and Sandiacre Canal towpath) and residential areas in Derby City and to the countryside south of the A50. It is expected that BNG requirements are met on site and that existing hedges and trees are retained where possible.*
- 2.39 It is unexpectedly onerous to require that BNG is expected to be delivered on-site. There is no national legislative basis to mandate this and whilst it is entirely agreed that Local Authorities and applicants should seek to ensure that on-site mitigation is preferred over off-site provision paying for biodiversity credits (and which indeed Barratt Redrow will adhere to), flexibility is required should off-site credits be required in the delivery of STRA1.

- 2.40 The wording should be amended to ensure flexibility:
- 2.41 *Green infrastructure and active travel routes should connect new residents within the infinity garden boundary (as shown on the indicative plan) to existing green infrastructure corridors (e.g. Green Wedges and the Derby and Sandiacre Canal towpath) and residential areas in Derby City and to the countryside south of the A50. It is expected that BNG requirements are met on site **as far as reasonably possible** and that existing hedges and trees are retained where possible.*
- 2.42 *There is currently a clay shooting sports facility located within the site. It is expected that a replacement clay shooting sports facility would be provided at an alternative location off-site (given the impact of noise on existing and future residents). The provision of new sports and recreation facilities should be in accordance with the Councils Playing Pitch Strategy and Built Facilities Strategy.*
- 2.43 Barratt Redrow would reiterate our earlier comments with regard to the amendments included at Sport England’s request. It is extremely difficult to relocate a shooting ground given the nature of the sport and this would undoubtedly cause a delay to the delivery of the development. Flexibility should be secured to allow for the improvement of equivalent facilities elsewhere in the district, over arbitrary replacement, given the little to no evidence provided by Sport England as to the financial viability of the existing facility.
- 2.44 The wording should be amended to ensure flexibility:
- 2.45 *There is currently a clay shooting sports facility located within the site. It is expected that a replacement clay shooting sports facility would be provided at an alternative location off-site (given the impact of noise on existing and future residents) **or reasonable contributions are secured to enable the delivery or improvement of similar facilities elsewhere in the district.** The provision of new sports and recreation facilities should be in accordance with the Councils Playing Pitch Strategy and Built Facilities Strategy.*

<b>7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?</b>	
No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	<b>X</b>
We have made significant comments on the policy which require our participation at the hearing sessions.	

**Miscellaneous**

*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*

- 2.46 Secondary School Provision on STRA1 - Barratt Redrow would also continue to question the continued requirement for a secondary school on IGV. Notwithstanding a reference in the Sustainability Appraisal to a ‘shortfall in primary and secondary school places’, there appears to have been no concrete evidence provided to either Barratt Redrow or SDDC on the continued need for a secondary school as part of the STRA1 requirements. Barratt Redrow are aware of the changing demographic profile of the country and that elsewhere this is leading to a decline in school rolls – meaning many education authorities are looking at consolidating and expanding existing schools rather than

constructing new ones. Whilst Barratt Redrow are not adverse to adhering to this requirement as part of STRA1, we would request that dialogue is facilitated between us, SDDC and Derby County Education to ensure this need is evidenced.

- 2.47 A50 Junction Improvements and Link Road Delivery – Barratt Redrow would reiterate our comments made throughout other stages of this Local Plan process in that there appears to remain a substantial shortfall in funding for the delivery of the link road / junction improvements. It remains our suggestion that if the financial shortfall is to be picked up by the developers of IGV, as well as other sites through potentially some form of roof tax mechanism, this needs to be fully costed and set out (through its own Policy) before the Local Plan is submitted to the Inspectorate. Noting that Barratt Redrow has already delivered a portion of the new link road to the north separately and thus should be seen to have paid any contribution to the financing of the link road ‘in kind’. We would welcome further discussion with SDDC on these points.