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Dear Local Plan team,

SOUTH DERBYSHIRE DISTRICT COUNCIL - PART 2 LOCAL PLAN REVIEW: ISSUES AND OPTIONS

Please find attached to this email submissions to the above listed Local Plan consultation on behalf of Miller Homes Ltd. with reference to its land interests at Land south of Burton Road, Repton.

Please may I also request confirmation of the safe receipt of this email and its attachment.

Kind regards

[REDACTED]

[REDACTED]

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SOUTH DERBYSHIRE DISTRICT COUNCIL

PART 2 LOCAL PLAN REVIEW: ISSUES AND OPTIONS

Miller Homes Ltd.

January 2026

Carter Jonas

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APPENDIX A: VISION DOCUMENT

1.0 INTRODUCTION

- 1.1 Carter Jonas is instructed by Miller Homes Ltd. ('Miller'), to respond to the South Derbyshire District Council ('the Council') in respect of its Regulation 18 – Issues & Options – consultation on the Part 2 Local Plan Review ('Local Plan').
- 1.2 Miller has land interests at 'Land south of Burton Road, Repton' which is included in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA), with the reference number SHELAA 033.
- 1.3 Miller would like to confirm that the site is **available, suitable and achievable** for the development of new homes. Miller notes that the assessment of the site in the SHELAA is summarised as:

"The site is considered available, achievable, and suitable. However, a number of suitability criteria would need to be overcome/require mitigation"

- 1.4 The principal positions is agreed, and any outstanding constraints – primarily these are related to landscape and visual effects - can be managed and mitigated as appropriate through design, layout, and landscaping associated with a new scheme. The SHELAA also notes that the site is more than 1000m from the nearest primary school (it is 1,500m by road, or 1,200m by public footpath). This is accepted, but the journey to the primary school, and other services and facilities in Repton can be taken by foot on pavements and footpaths in a safe manner.
- 1.5 Miller is generally of the view that the Council should take the opportunity to review the strategy of its whole Local Plan (parts 1 and 2) to engage with the latest local housing needs, and neighbouring unmet housing needs to ensure the development plan has the greatest chance of longevity. The general basis of the Local Plan and the themes it contains are appropriate, therefore to review the scope and spatial strategy is the most important exercise which should not precipitate a long exercise and could support the most robust and effective Local Plan.
- 1.6 There is an important opportunity for the Council to create a positive and proactive strategy to meet the needs of its communities. This strategy should include a range of site types including smaller and medium sized sites that can deliver in the short term, which can provide an early housing supply which can allow for larger sites to deliver in the longer term.
- 1.7 The consultation document and the supporting evidence has been reviewed, and Miller is pleased to be able to comment on the Local Plan.

Land south of Burton Road, Repton

- 1.8 Land south of Burton Road, Repton extends to 7.97ha (19.69 acres) and comprises arable farmland to the west of Repton and south of Burton Road.
- 1.9 Existing residential development on Burton Road adjoins the north-eastern boundary of the site, and further residential development on Chestnut Way lie to the northwest. An existing large dwelling and its curtilage also adjoins the site to the north-west. A slither of agricultural land lies to the south-east and south-west of the site.
- 1.10 Repton is classed as a Key Service Village by the South Derbyshire Local Plan. The site is in close proximity to a number of local services and facilities including public houses, Repton village hall, primary school, post

office, health centre and a convenience store. Bus stops immediately adjoining the site on Burton Road provide links to higher order facilities in Derby and Burton upon Trent.

- 1.11 Access to the site is currently achieved via a gated access located on the northern boundary with Burton Road.
- 1.12 Access to the village from the site on foot can currently be achieved via an existing footway on the northern side of Burton Road. An existing Public Right of Way (PRoW) crosses the site and provides pedestrian access to Chestnut Way and Well Lane which connect directly into the centre of the village. The site therefore benefits from strong links to the village centre.
- 1.13 Junction 4 of the A50/A38 is approximately a five-minute drive from the site. This junction provides a strategic east-west connection to Junction 24 of the M1. The A38 also provides a connection to Derby and Mansfield in the north and Burton upon Trent and Birmingham to the south.
- 1.14 A vision document for the site has been produced and can be read at **Appendix A** of these submissions. The vision document demonstrates how the site can support the delivery of new sustainable residential development.

2.0 APPROACH TO THE LOCAL PLAN

- 2.1 Miller notes that the Council has set out in the consultation document the recent, and proposed, changes to the planning system, as well as the prospect of Local Government Reorganisation and devolution.
- 2.2 Miller is also aware that the extant Local Plan is aged, having been adopted nearly 10 years ago (and 9 years for the Local Plan part 2). Miller supports the Council's aspiration to have full Local Plan coverage (i.e. an adopted Local Plan Part 1 Review and an adopted Local Plan Part 2 Review) prior to Council reorganisation, however, the plan should be as robust as it can be, and have the greatest possible 'life span,' for it to be effective. Therefore, given the changes (and proposed changes) to national planning policy, and the plan making system Miller suggest that the Council should take the opportunity to review its entire Local Plan; engage with the latest local housing needs – and those of its neighbours – and create one comprehensive development plan document.
- 2.3 Moreover, if the Council is successful in adopting new local plan documents under the current plan making system, it is likely that an "early review" will be required in any event, so pragmatically it makes sense for the Council to get ahead of that necessary review and begin the comprehensive exercise now.

Question 1: Should the Council produce a Local Plan Part 2 Review under the existing planning system, or should a single full Local Plan Review be undertaken under the new system?

- 2.4 Considering the above Miller is of the view that the Council should start the process of a single full Local Plan Review under the new system. Enough is known about the new system for the Council to make that start, and in any event, much of the evidence that will be required for plan making remains the same, so little time would be lost, and a new comprehensive plan created through the new system would have greater longevity, albeit, if the Council continues with the preparation of a Part 2 plan, the site at Land south of Burton Road, Repton should be allocated for residential development.

3.0 HOUSING ALLOCATIONS

- 3.1 Miller accepts that the spatial strategy for delivering new homes is currently set out in the emerging (and well advanced) Local Plan part 1.
- 3.2 Miller reiterates its comments above that there is a good (and necessary) opportunity for the Council to review its whole development plan strategy in the face of increasing housing needs and changing national planning policy. Miller is concerned about the principle of the spatial strategy, which is based on out-of-date housing needs calculations (from the previous version of the Standard Methodology) and as such does not allocate enough sites, in the right places (it relies too heavily on urban extensions to Derby).
- 3.3 That said, Miller broadly supports the settlement hierarchy, as drafted. The focus on settlements with the greatest level of existing services and facilities is appropriate, however, there is the potential, and capacity, for more development to be delivered in some of the lower order settlements – including Repton (a “Key Service Village” based upon facilities and amenities) – across the plan area. The Council will need to be sure that the level of development which is proposed will properly and effectively support existing communities to thrive. Sustainable settlements like Repton are suitable to accommodate new development.
- 3.4 Therefore, Miller expects to see an appropriately ambitious level of level of growth planned for Repton, if not in this emerging Local Plan, then in an early review, which can be delivered, in part, on Land south of Burton Road.

Housing supply and need

- 3.5 Miller notes that the housing target in the Local Plan part 1 comprises the housing needs for South Derbyshire derived from the standard method local housing need figure of 507 dwellings per annum (dpa) that applied to the December 2023 NPPF and a proportion of the unmet housing needs from Derby.
- 3.6 The revised Standard Method, introduced at the end of 2024 identifies an increased housing need for South Derbyshire of 581 dpa and a slight reduction in Derby of 906 dpa.
- 3.7 These might only be modest changes to housing needs, but they should be properly explored to ensure the Local Plan is still proposing the most appropriate, and deliverable strategy.
- 3.8 It should also be noted that the housing need figure derived from the standard method is to “...*determine the minimum number of homes needed...*” as set out in paragraph 62 of the NPPF
- 3.9 The Council has identified that there are affordability challenges in the district. These needs could call for an increase in the housing figure to help deliver more homes, and as a proportion of these - more affordable homes. There could also be arguments for an “economic uplift” to the housing target which supports ambitious economic growth plans.
- 3.10 The Council should also build into its housing requirement a buffer in case of non-delivery, or slow delivery, on residential sites. A plan without some sort of contingency is neither effective nor positive in its outlook.
- 3.11 Miller encourages the Council to review its work in this regard and will comment on it at the appropriate time.

Unmet housing needs

- 3.12 Miller notes that The Derby Housing Market Area Councils have produced evidence base documents which have helped guide the distribution of Derby's unmet need and proposed strategy for the Local Plan Part 1 Review. This was set out in a Statement of Common Ground to assist with the Amber Valley Local Plan Examination.
- 3.13 Miller also notes that the Written Ministerial Statement (WMS) made by Matthew Pennycook MP, Minister of State for Housing and Planning on 27 November 2025 states that the Duty to Cooperate ("the Duty") requirement will be removed from plans in the current system, and the letter of 27 November 2025 from the Minister to Paul Morrison, the Chief Executive of the Planning Inspectorate states that the Duty will cease to apply when the Regulations come into force early next year.
- 3.14 It is not clear what will replace the Duty (for example whether 'aligned policies' will be required, or if Spatial Development Strategies will manage housing targets over a wider geography), but housing needs are unlikely to change significantly and the National Landscape will have some constraint on development capacity, but not perhaps to the extent presented in the consultation document.
- 3.15 The draft 2026 NPPF at its proposed policies PM10 and PM11 continues to promote cooperation across authority borders on 'strategic' and/or 'cross-border' housing needs and the Council (in whatever form it exists in the wake of Local Government Reform) will need to step up to the challenge. Changes to national policies, or processes should be fully engaged with in the plan making process, but most importantly should not stall discussions between neighbouring authorities who will need to work collaboratively to help to resolve the housing crisis.

Shortfall

- 3.16 Miller notes that the Council has identified a "shortfall" in its proposed housing supply for the local plan, of some 57 homes. Notwithstanding that there is an increase in the housing need in the district – as briefly explored above – this demonstrates that the Council needs to do more to meet its local housing needs in the emerging development plan. The Council should not have a shortfall in its proposed housing supply, and in fact it should be planning for some 'headroom' (or buffer, as mentioned above) above the *minimum* housing requirement figure in case of development sites stalling or failing to deliver.
- 3.17 There is capacity – as set out in the Council's SHELAA – for more housing allocations, and the Council should make the most of those – now – to help meet its increasing housing needs. New housing site allocations should include Land south of Burton Road, Repton.

Five-year Housing Land Supply

- 3.18 Miller notes that first, the make-up of South Derbyshire housing requirement is quite complicated – the Local Plan (adopted 2016) requirement includes the district's housing needs, and some agreed needs from Derby. This gave an annualised target of 742 dwellings. A plan that is nearly 10 years old however, is out of date and the housing requirement must become the Local Housing Need (LHN) derived from the most recent version of the standard methodology. The latest LHN figure for South Derbyshire is 592 dwellings per year, which on the face of it would favour the Council, but this is not the end of the story, because it does not include any unmet need for Derby.
- 3.19 Miller acknowledges that PPG does not explicitly explain what is to be done with agreed, or potential unmet needs if a Council reverts to using the LHN if their Local Plan is out of date. However, Miller suggests that it is illogical, and unreasonable to simply disregard identified unmet needs. Indeed, the emerging Part 1 South

Derbyshire Local Plan suggests that the Council is planning to provide 256 dwellings per year to help meet Derby City's unmet need (from 2022 – 2041).

- 3.20 Moreover, Miller notes that in reporting at the appeal reference: APP/F1040/W/25/3368728 Land South of Kings Newton Lane, Melbourne, the inspector concluded (at paragraph 49) that:

“...the Council has failed to demonstrate a five-year supply of deliverable housing sites. Moreover, the wider evidence indicates that there is not currently a Framework compliant supply of deliverable housing sites.”

- 3.21 Miller also reads with interest in the Inspector's report that some doubt was raised about the timely delivery of homes on Drakelow Power Station. The principle of allocating the site for new homes is not disputed, but the complexities of delivering new homes on such a site needs to be properly reflected in the council's land supply, and the emerging plan strategy. Large sites can help to deliver significant numbers of new homes but require longer 'lead-in' times.
- 3.22 The Council's Local Plan delivery strategy should therefore include more small and medium scale sites to support early delivery of new home which will allow larger sites more time to deliver later in the plan period.

Question 2: Where should the housing needs be met?

- 3.23 It is Miller's firm view that housing needs will need to be met across all levels of the settlement hierarchy, especially at settlements like Repton – a “Key Service Village,” in “Tier 2” – with levels of facilities and amenities that demonstrate that it is suitable to accommodate new development.
- 3.24 There are a range of sites available across South Derbyshire, and many of these should be allocated to provide a diverse “portfolio” of development sites which will support the most robust development trajectory. Circumspection should direct the trajectory of larger sites – and especially the proposed Drakelow Park – and smaller sites should be allocated to create a strong supply that can allow for slower delivery on larger sites.
- 3.25 There is capacity in settlements, including Repton, for proportionally more development, and specifically, the full extent of available land at Land south of Burton Road, Repton should be allocated for new homes.

Question 3: Are there other mechanisms that the plan should consider to securing housing delivery in addition to allocating specific sites?

(e.g. identifying indicative broad locations/areas for future growth adjacent to existing settlements, extending settlement boundaries, supporting certain Changes of Use)

- 3.26 The Council has set out some reasonable strategies for securing 'additional' land for delivering new homes, but it should not be forgotten that insufficient sites are allocated to meet the identified need (hence the shortfall considered above – and that is setting aside the increase housing needs of the district). Therefore, the Council should focus first on allocating more sites – including Land south of Burton Road, Repton – for the delivery of new homes.
- 3.27 Miller sets out below how 'settlement boundaries' are an unsound and ineffective way to manage development, so removing these would be the most effective step to helping the sustainable delivery of new homes generally and adding additional flexibility to the Local Plan.

Question 4: Are there any other issues that the Council should consider when ensuring the timely delivery of the right homes in the right places?

(e.g. policy criteria for looked after children, re-allocating unimplemented employment allocations)

- 3.28 The Council needs to ensure that there is a diverse “portfolio” of development sites in the Local Plan, of different sizes, and in different locations across the settlement hierarchy. This will support the most robust development trajectory. Circumspection, and the reality of lead-in times, and build out rates, should direct the trajectory of larger sites, for example at the proposed Drakelow Park. Smaller sites should be allocated to create a strong supply in the early years of the local plan, that can allow for the slower delivery on larger sites, which will account for the housing supply in later years.

Question 5: What specific accommodation needs should the Local Plan address through allocations?

(e.g. extra care accommodation for older people, care home provision for looked after children etc.)

- 3.29 A local plan should include diverse housing types addressing market failures and specific needs, covering general market homes plus affordable housing (social/affordable rent, shared ownership), specialist housing (elderly, disabled, students, self-build), and varied sizes (family homes, starter homes) to meet demand from different demographics like homeless, overcrowded, and young people unable to afford market rates, ensuring inclusivity and accessibility for all.
- 3.30 The Council will need to review its evidence regarding housing needs for the whole community. The Local Plan should include specific (and separate) targets for specific housing needs, and the Council should consider allocating specific sites to meet these needs where they are the greatest – e.g. for an aging population.

4.0 ACCELERATING HOUSING DELIVERY

- 4.1 The timely delivery of new homes should be at the heart of the Local Plan; the Council will need to work in partnership with various stakeholders including the development industry to ensure a robust trajectory in the plan, and effective monitoring after adoption of the Local Plan. Miller would welcome the opportunity to discuss the opportunities presented by their land interests with the Council and strongly supports the Council using its agency to bring together various statutory undertakers and service providers to ensure that the content of the Local Plan is deliverable. This could be in the form of further evidence for delivery – e.g. viability and feasibility studies – but it should also be a commitment to a collaborative and efficient development consent process especially for allocated development sites.

Question 6: What could the Council do to speed up delivery on strategic allocations?

- 4.2 The Council should commit to using its agency to bring together various statutory undertakers and service providers to ensure that the content of the Local Plan is deliverable. This can include viability and feasibility studies, but must also include exploring utility capacity, and the solution to any ‘bottle necks’ which emerge.
- 4.3 Effective and continued monitoring of delivery on sites – in partnership with site owners and developers must be part of the Local Plan.

Question 7: Should the Council allocate land South of Mackworth for development within the plan period?

- 4.4 Miller is firmly of the view that the Council should not allocate land south of Mackworth. It became clear during the examination of the Amber Valley Local Plan that land at Mackworth on that side of the border is **not available** for development.
- 4.5 Therefore, if the Council wants to support development at Mackworth, this should be in the form of an 'indicative broad location/area for future growth' at most and should not be triggered for development until land in Amber Valley is available for development and can be proven to be feasible for new homes. Development at Mackworth is only sustainable if it can be delivered in both South Derbyshire and Amber Valley.
- 4.6 Given the increased need for new housing which Miller has set out in these submissions, the Council should be allocating more sites that it knows are available and suitable for development now – and this should include Land south of Burton Road, Repton.

5.0 SETTLEMENT BOUNDARIES

- 5.1 Miller understands the appeal of settlement boundaries and accepts that they can be an easy way to understand the difference between the built form of a settlement, and its more rural hinterland. However, settlement boundaries can be an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements. In terms of impact on amenity and the local landscape it might be preferable to locate new homes in edge of village locations which technically, might sit outside the arbitrary boundaries. It is therefore suggested that the philosophy and operation of settlement boundaries is negative and not necessarily generally fit for purpose. It is right to review their role in strategic planning.

- 5.2 Settlement boundaries have the potential to conflict with the Planning Practice Guidance as follows:

"The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness."

Paragraph: 009 Reference ID: 67-009-20190722

- 5.3 Having a more flexible approach to settlement edges allows for a value judgement to be made, and a balance struck between the impacts of new development, and its benefits.
- 5.4 It is unlikely that a specific policy will be required to manage development at the edge of settlements because it would likely repeat general development management policies which protect valued landscapes, and character and manage/mitigate environmental effects.

Question 9: Do you agree that settlement boundaries should be drawn around the urban edge of Derby, Drakelow, and Stanton and any new allocations?

- 5.5 In light of its comments above, Miller does not support the drawing of settlement boundaries as part of the Local Plan.

- 5.6 Moreover, Miller suggests that the Council should consider removing them from the local Plan to allow for a more flexible and positive approach to delivering new sustainable development.
- 5.7 However, if the Council does persist with settlement boundaries, they must be flexible in response to development proposals demonstrating a sustainable location, a criteria based policy which outlines the way in which development at the edge of settlement will be managed would be more appropriate. This is an alternative to simply preventing development beyond a red line boundary.

Question 10: Do you agree with the principles for assessing the settlement boundaries, as set out in Appendix 1?

- 5.8 Miller suggests that settlement boundaries are unnecessary, restrictive, and ineffective in managing sustainable development. Therefore, the methodology is flawed from the outset and should not form part of the Council's development strategy.

Question 11: What issues regarding the settlement boundaries should the Council consider?

- 5.9 As is set out above, Miller is firmly of the view that settlement boundaries are unsound and could well conflict with PPG. Therefore, the Council should carefully, and critically, assess whether such boundaries remain fit for purpose and whether they should be included in a positive Local Plan.

6.0 DEVELOPMENT MANAGEMENT POLICIES

- 6.1 The Levelling Up and Regeneration Act 2023 has laid the provisions for the introduction of National Development Management Policies (NDMPs) by the Government. NDMPs will implement a suite of national policy provisions for decision making with a view to streamlining Local Plans, enabling plan-makers to focus on matters that are genuinely local whilst also supporting consistent local decisions.
- 6.2 NDMPs have been included in the current (live) consultation on the National Planning Policy Framework. While it is suggested in that consultation that NDMPs will not be 'statutory' requirements; once adopted, Local Plans must not contradict or duplicate national policy – as per Section 15C(7)(b) of the Planning and Compulsory Purchase Act 2004.
- 6.3 Therefore, Miller recommends that the Council closely monitors NDMP developments and considers their implications carefully when drafting and reviewing development management policies.

7.0 INFRASTRUCTURE

- 7.1 Infrastructure needs are a vital part of any Local Plan strategy and the Council will need to produce evidence which identifies where and when infrastructure is needed, and how it can be viably delivered.
- 7.2 Miller supports the principle of infrastructure supporting growth. However, infrastructure requirements must be proportional to the scale of development proposed and viable. More work is required to ensure a sufficient level of development and infrastructure is robustly planned: There is a critical need for viability testing. During the next stages of plan preparations, and consultation, Miller would expect any aspirational policy targets to be fully evidenced and costed, in accordance with National Planning Policy (in particular the Framework at paragraph 35, and Planning Practice Guidance at Paragraph: 001 Reference ID: 10-001-20190509).

Question 23: Are there better/alternative mechanisms that the Council should use to secure the required infrastructure?

- 7.3 It is the role of plan making bodies to create robust plans, in partnership with infrastructure and utility providers, and other statutory undertakers, which ensure that there is the capacity in the various systems to support the necessary (and/or desired) growth set out in a given plan. It cannot be left to the development management process to deal with infrastructure challenges, the proposed approach is neither positive, nor effective.
- 7.4 At the Local Plan making stage the onus is on the Local Planning Authority to work with the statutory undertakers to ensure that their investment programmes are taking account of the proposed levels of growth to deliver capacity when it is needed to prevent delays to the delivery of development once planning permission has been secured (see PPG Paragraph: 020 Reference ID: 34-020-20140306).
- 7.5 Miller awaits with interest an updated Infrastructure Delivery Plan (IDP) and is ready to support further work in this area. It is clear that development in locations like Repton, and specifically Land south of Burton Road, can aid, in the delivery infrastructure which will in turn support sustainable communities.

8.0 CONCLUSION

- 8.1 Miller is pleased to have had the opportunity to comment on the emerging Part 2 Local Plan Review. However, the Council would be best placed if it was to concentrate now on reviewing its overall planning and spatial strategy to engage with increasing housing needs, and the shifting national policy framework. The Council should turn its focus to producing a single Full Local Plan under the new system.
- 8.2 There is a greater capacity for development in the district than the Council prefers to plan for at this time. If there is any residual unmet housing needs this should not be overlooked, and evidence relating to the Duty to Cooperate and/or whatever replaces it will be needed to support the submission of the Local Plan.
- 8.3 Land south of Burton Road, Repton, is identified in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) as site reference SHELAA 033, and it is **suitable, available, and achievable for development**. The full extent of the site should be allocated for development in the Local Plan.
- 8.4 Miller hopes that the comments in these submissions are helpful to the Council, and it would welcome further discussions about the deliverability of development on its land interests as the plan progresses to the next stage of drafting.

APPENDIX A: VISION DOCUMENT



LAND SOUTH OF BURTON ROAD, REPTON



Emerging Illustrative Layout



The Consultant Team assisting Miller Homes with these proposals consists;



Urban Design



Town Planning



Flood, Drainage and Ecology



Landscape and Arboriculture



Heritage



Highways

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1. Introduction

This Vision Document has been prepared by Miller Homes, who control land south of Burton Road in Repton. The site is suitable, available, and deliverable and provides an opportunity to deliver new homes and areas of open space in an accessible and sustainable location.



Over the last 85 years Miller Homes have built thousands of new homes and created communities for families to grow and thrive.

Miller Homes have delivered several developments in the local area, including the recent development at Longlands (Somergate).





1.1 PURPOSE OF THIS DOCUMENT

This Vision Document brings together the initial technical and environmental studies of the land and its context, which have been undertaken by Miller Homes and their Consultant Team and presents high-level summaries of the initial findings which have been used to inform the emerging Concept Layout.

There is capacity to deliver approximately 160 new homes

The Concept Plan presented in this document has been prepared to respond to the outcomes of the assessment work and demonstrates the site's sustainable credentials and suitability for development. It shows how a high quality and sympathetic scheme could be brought forward with strong place-making principles. The work presented represents our initial thinking, shows the potential capacity and is intended to provide the basis for discussions with South Derbyshire District Council and other stakeholders.

1.1.1 Document Structure

The Vision Document is structured as follows:

Section 2: Site and Surrounding Context

Includes a description of the site and a brief overview of the local area.

Section 3: Planning Context

Outlines the planning policy of relevance to the site and confirms how the development of the site would comprise an appropriate and logical sustainable development

Section 4: Environmental Considerations

Provides an overview of surveys and assessments which have been undertaken in relation to Landscape and Visual Impact, Ecology, Heritage and the Local Built Form Context.

Section 5: Technical Considerations

Provides a summary of surveys and assessments which have been undertaken in relation to Accessibility, Highways and Flood Risk Assessment.

Section 6: Summary of Site Assessment

Bringing together Sections 2, 3 and 4 and presenting a summary of the current understanding of the site and its context

Section 7: The Emerging Concept Layout

Explains the emerging illustrative proposals and how they respond to the known planning, environmental and technical considerations.

Section 8: Conclusions

Summarises the positive case for residential development of the site.

2. The Site and Surrounding Context

Miller Homes previously promoted the site during the preparation of the current South Derbyshire Local Plan, the Repton Neighbourhood Plan and the South Derbyshire Strategic Housing Land Availability Assessment and remain committed to promoting the site through the emerging South Derbyshire Local Plan Review.

The site extends to 7.97ha (19.69 acres) and comprises arable farmland to the west of Repton and south of Burton Road.

Existing residential development on Burton Road adjoins the north-eastern boundary of the site, and further residential development on Chestnut Way lie to the north-west. An existing large dwelling and its curtilage also adjoins the site to the north-west. A slither of agricultural land lies to the south-east and south-west of the site.

Repton is classed as a Key Service Village by the South Derbyshire Local Plan. The site is in close proximity to a number of local services and facilities including public houses, Repton village hall, primary school, post office, health centre and a convenience store. Bus stops immediately adjoining the site on Burton Road provide links to higher order facilities in Derby and Burton upon Trent.

Access to the site is currently achieved via a gated access located on the northern boundary with Burton Road.



Wider Context Plan

Access to the village from the site on foot can currently be achieved via an existing footway on the northern side of Burton Road. An existing Public Right of Way (PROW) crosses the site and provides pedestrian access to Chestnut Way and Well Lane which connect directly into the centre of the village. The site therefore benefits from strong links to the village centre.

Junction 4 of the A50/A38 is approximately a five-minute drive from the site. This junction provides a strategic east-west connection to Junction 24 of the M1. The A38 also provides a connection to Derby and Mansfield in the north and Burton upon Trent and Birmingham to the south.



Existing residential development on Burton Road



Existing residential development on Chestnut Way

Existing large dwelling and its curtilage



Agricultural land to the south west



Agricultural land to the south east



3. Planning Background

The Development Plan for South Derbyshire currently comprises the South Derbyshire Local Plan Part 1 (June 2016) and the Local Plan Part 2 (September 2017). Additionally, a Neighbourhood Plan for Repton (including Milton) was formally 'made' in January 2020.

As a Key Service Village, the Local Plan identifies Repton as a sustainable location for housing growth due to the range of everyday services and facilities available within it. Key Service Villages lie within the second tier of the Settlement Hierarchy, below only the Urban Areas of Swadlincote, the edge of Derby and Burton upon Trent. The existing Plan generally directs larger development to areas which offer a degree of self-containment in terms of availability of everyday services and facilities. It also supports growth in locations with good public transport links to employment and higher-order service destinations.

Consequently, housing growth was directed to Repton in both parts of the Local Plan. Land at Longlands was allocated for around 124 dwellings within the Part 1 Local Plan and two further sites were allocated within the Part 2 Local Plan at Milton Road and Mount Pleasant Road (for 25 and 24 dwellings respectively). Following their allocation within the Local Plan, these sites have all come forward for development in recent years, demonstrating strong demand for new housing within the village.

Whilst the Repton Neighbourhood Plan does not specifically allocate any additional housing sites, it does outline specific requirements which housing proposals in

the Parish should consider. In particular, Policy H3 sets out that wherever feasible, housing developments should contribute towards meeting recognised housing needs in the Parish. This includes the provision of affordable smaller homes for young families and older people.

Policy H4 also sets out criteria for the design of new developments in Repton, it outlines that:

"Proposals for new housing must be of high quality and designed to reflect the character and distinctiveness of the villages of Repton and Milton. They must demonstrate how they meet the following:

- Reflect the design principles in the Village Design Statement.
- Identify with the local character to create a sense of place appropriate to the location.
- Consideration of context and character.
- Appropriateness of the building styles to the historic context as a listed building and/or within the Conservation Areas.
- Integration of new proposals into the village and landscape setting, including the provision of grass verges or open spaces, where appropriate".

The requirements of Neighbourhood Plan Policy OS2 also seek to ensure that the views to and from proposed developments are considered and any negative visual

impacts are minimised through the design of the site location, layout, buildings and landscaping.

In terms of trees and hedgerows, Neighbourhood Plan Policy OS3, existing trees and hedgerows, of good arboricultural, biodiversity and amenity value are required to be protected from loss/damage.

Due to the requirements of the National Planning Policy Framework (NPPF), which requires Local Plans to be reviewed at least once every five years, and the age of the Local Plan Part 1 being more than five years old, South Derbyshire District Council are due to undertake a review of their Local Plan shortly.

In a report to the Council's November 2021 Environment & Development Services Committee, it was outlined that a timetable for the preparation of a new South Derbyshire Local Plan will be published at the start of 2022. At the time of writing, the timetable for the Local Plan review is yet to be confirmed, the need to commence work on a new Local Plan is nevertheless evident.

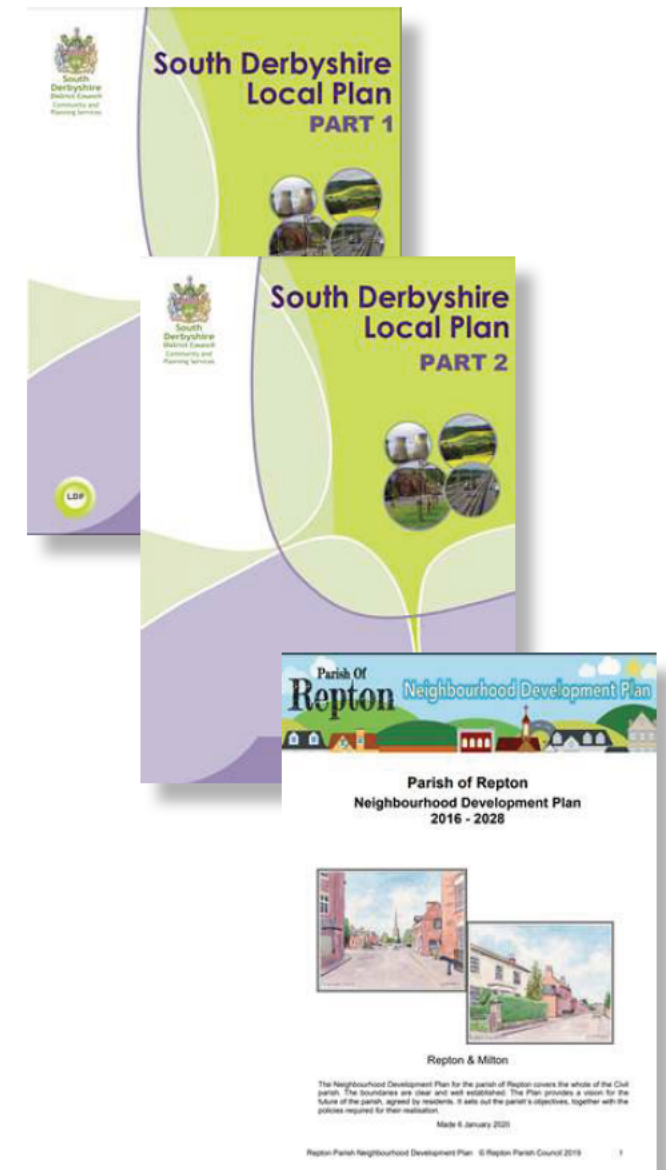
To demonstrate compliance with the Duty to Cooperate, the Council need to agree a number of matters, including the distribution of any unmet need arising from Derby City, with other authorities within the Derby Housing Market Area (HMA). As a result of the Government's most recent change to the standard method for calculating housing need, Derby City needs to provide a 35% uplift to its housing numbers. In this context, it is considered highly likely that South Derbyshire will need to accommodate

additional housing growth, over and above its own need, to help meet the needs of the wider HMA.

Given the clear suitability and sustainability of Repton to accommodate housing growth, it is considered that it would be wholly logical and appropriate for the Council to look to accommodate future growth in Repton, as part of the preparation of a new Local Plan.

The land south of Burton Road, Repton, was most recently promoted to the South Derbyshire Strategic Housing Land Availability Assessment (SHLAA) Call for Sites 2019 and prior to this, it was historically assessed by the SHLAA under site reference S/O134. Whilst this submission relates to a slightly altered site area, the findings of the previous SHLAA assessment recognise that the site is "potentially suitable" for housing, but that the only reason why it was not suitable was because it is "currently restricted by local planning policy as the site within an area protected by countryside policy".

The site comprises a logical location for development to extend Repton to the west. This document has been prepared to demonstrate how the site can comfortably accommodate a sensitively designed development which will complement the character and distinctiveness of Repton.



DCLP 1 Part 1, DCLP Part 2, Repton NDP

4. Environmental Considerations

4.1 SERVICES AND FACILITIES

The plan opposite shows the location of the available nearby services and facilities. A list of these and their distances to the site are provided in the table below;

Amenity	Location	Approximate distance from the site (km)
The Den and Equipped Play Area	Burton Road	0.5
SPAR Convenient Store	High Street	0.73
Hight Street Retail Area	High Street	0.73
St Wystans School	High Street	0.77
Repton Health Centre	Askew Grove	0.7
Repton Primary School	Willington Road	1.2

Additional facilities and amenities can be accessed in Willington including the Co-operative Food and Willington Pharmacy.

This demonstrates that there is good access to a range of local services and facilities within walking distance of the site, making it a sustainable location for the provision of housing growth.



Repton School

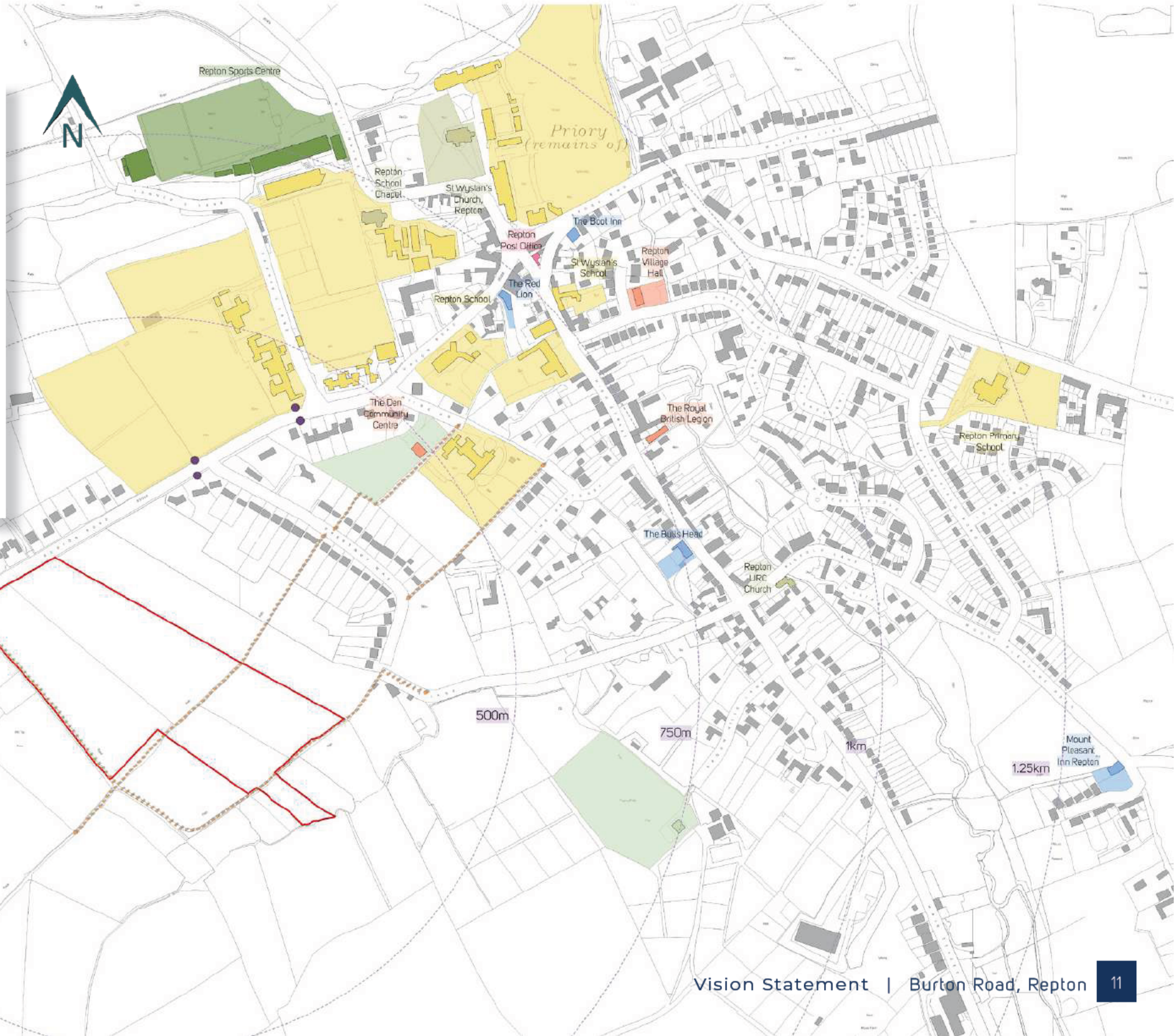


Repton Post Office



Repton Village Hall

-  Application site boundary
-  Pubs & Eateries
-  Community Services
-  Places of Worship
-  Hotels
-  Sports Facilities
-  Playing Fields / Play Parks
-  Education
-  Other
-  Existing bus stops
-  Existing PRoW



4.2 LANDSCAPE AND VISUAL ASSESSMENT

4.2.1 Repton Village Design Statement

The Repton Village Design Statement sets out a number of guidelines to development, including how the separation of Repton, Milton and Newton Solney should be maintained, how the approaches and entrances to Repton should retain their open nature and development on one side of the road, to avoid high-density developments on the edges of settlements and how new buildings should not encroach significantly, visually or physically upon open spaces that fill gaps that afford views of the surrounding landscape and rural skyline.

It further sets out how tree planting should be encouraged to soften and integrate new developments and how footpaths should be incorporated where possible. It also sets out how species such as Oak, Beech, Sweet Chestnut, Horse Chestnut and Willow should be included as characteristic of the area.

4.2.2 Parish of Repton Neighbourhood Development Plan 2016-2028

The Parish of Repton Neighbourhood Development Plan 2016 – 2028, made 6th January 2020 forms part of the Development Plan for South Derbyshire, sets out a number of guiding principles, including to 'preserve and enhance the landscape setting and historic character of the villages within the parish, by minimising any negative visual impact of new development' and 'To ensure that all development is provided in the right location and the scale to be in sympathy with the area's rural aspect and heritage, respecting the area's character and environment'.

4.2.3 Landscape Character

The site is situated within Landscape Character Type (LCT) Melbourne Parklands: Estate Farmlands, summarised as, 'a broad, gently rolling lowland mixed farming landscape with occasional red brick villages, scattered estate farmsteads and country houses. Tree cover is well represented with small estate woodlands, dense watercourse trees, scattered hedgerow trees and localised parkland trees.'

The document sets out a number of planting and management guidelines which include thinly scattered small plantations/hedgerow trees and localised amenity tree groups/small scale woodland planting. It promotes

linked extensions to ancient woodland by natural regeneration and planting and to re-establish and enhance physical links between existing isolated woodland hedgerows.

The 'Primary Aims' for the LCT are to conserve the rural character, settlement pattern, vernacular character, historic features, manage the field margins and conserve the primary field boundaries.

The site contains no features either nationally or locally designated as 'notable'. The topography falls from c.65m AOD (Above Ordnance Datum) in the north west to c.60m AOD in the south east.

The site comprises a number a field parcels of arable land, divided by existing hedgerows and trees. Dense tree cover is situated in the south along Bridleway Repton-SD37 51/3 and a veteran tree situated within a hedgerow in the centre of the site.

A review of the MAGIC website reveals that there are no landscape designations covering the site, although there are two listed buildings approximately 237m and 272m north east of Site. The Site is not situated within an area designated for its landscape value, such as an Area of Outstanding Natural Beauty (AONB) and it does not contain ancient woodland, nor is it a Site of Special Scientific Interest or Special Area of Conservation.

4.2.4 Visual Context

The visual envelope is localised and limited to those immediately surrounding the site: Burton Road to the north in which access is gained, views to the west, south and east gained from PRoW footpath (Repton-SD37 32/2) and Bridleway (Repton-SD37 51/4). From here the site is seen in the context of the existing settlement edge of Repton and new development would not introduce incongruous elements into the view.

Within the Landscape Character and Visual Amenity Document, a supporting document to the Neighbourhood Plan, it identifies a number of areas of sensitivity, including views which are considered important to the area. Of relevance to the site is View 19 (from PRoW Repton-SD37 32/2) faces towards the site and the western edge of Repton, as well as View 20 (from Burton Road to the north facing towards the wooded edge of Repton).

The design should consider a development set back along the western boundary to allow for new tree planting to soften views of built form from View 19, as well as a rounding-off of development at the site's north eastern tip to retain the view on the approach to Repton.



View toward the site from the public right of way beyond Chestnut Way to the north east



View toward the site from the public right of way south east of the site



View toward the site from the public right of way west of the site

4.2.5 Landscape and Visual Recommendations

The effects of the scheme proposals upon the character of the landscape have been considered for the site and its setting within the local landscape. These reflect the key recommendations and sensitivities from the review of the published studies and Tyler Grange's Site-specific appraisal of valued components of the landscape. The site contains no features either nationally or locally designated as 'notable'.

The visual envelope is localised and limited to those immediately surrounding the Site such as Burton Road to the north in which access is gained and views to the west, south and east from PRoW (Repton-SD37 32/2) and Bridleway (Repton-SD37 51/4).

With suitable mitigation, implications upon the local landscape and visual receptors could be reduced, for example, new tree planting within areas of Public Open Space as well as enhancing the retained hedgerows. Species such as Oak, Beech, Sweet Chestnut, Horse Chestnut and Willow are included as characteristic of the area; compliant with the Village Design Statement guidelines.

Retaining the hedgerow along the site frontage will assist with assimilating the scheme into the surrounding context (except where required for visibility splays).

Frontage on the approach from the west (Newton Solney) has been given consideration; a large development set back replicates that of the existing houses to the north for compliance with the Village Design Statement guidelines.

A development set back from the site's western boundary allows for the retention and enhancement of the existing hedgerow. New tree planting incorporated should soften views of the new built form from the west (Representative View 19 of the Landscape Character and Visual Amenity Assessment Document). PRoW (Repton-SD37 32/2)

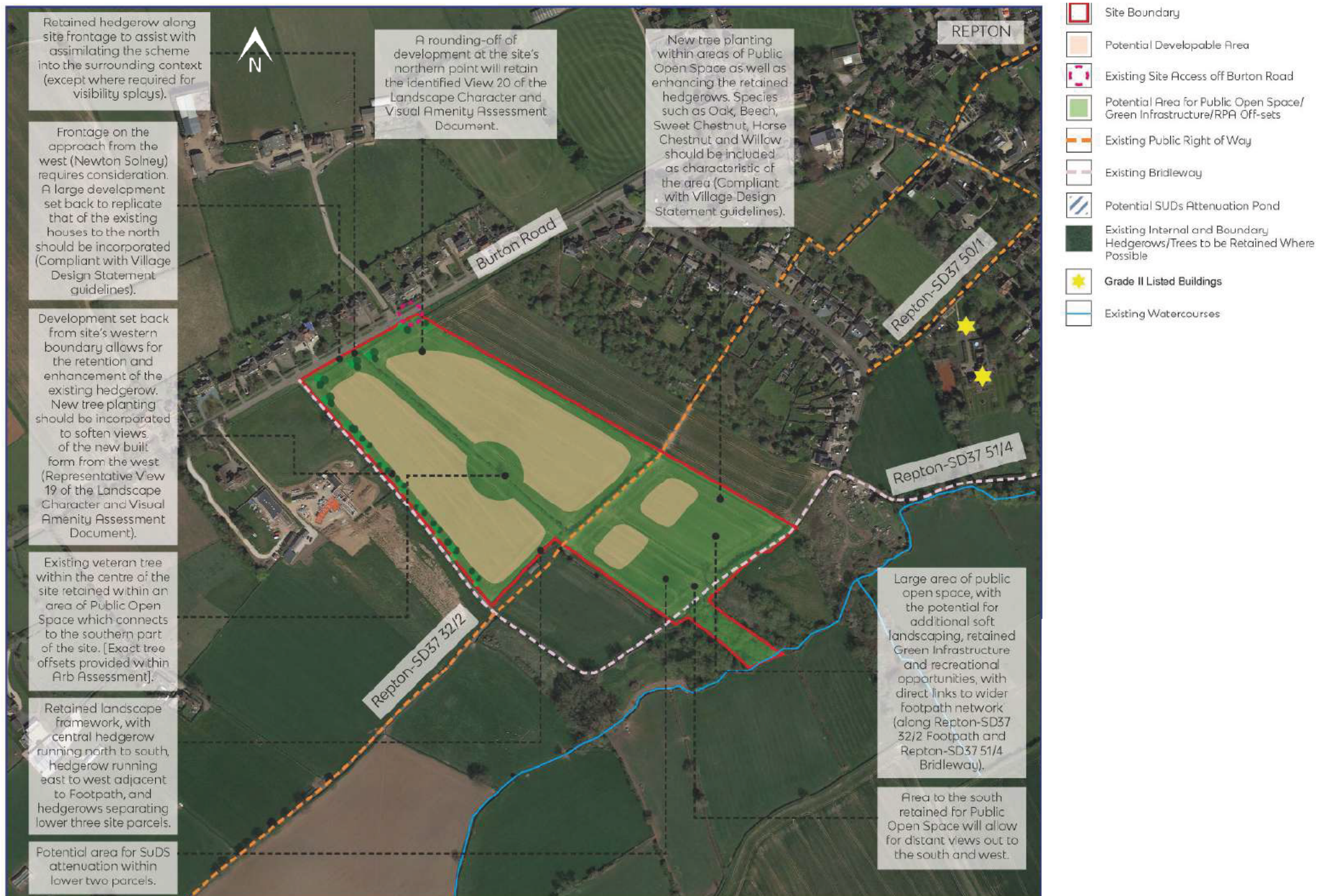
The existing veteran tree within the centre of the site should be retained within an area of Public Open Space which connects to the southern part of the site improving the visual amenity of the scheme.

Retaining the framework will maintain legibility with the existing landscape; a central hedgerow running north to south, a hedgerow running east to west adjacent to the Footpath, and hedgerows separating the lower site parcels.

There is a potential area for SuDS attenuation within lower parcels. A rounding-off of development at the site's northern point will retain the identified View 20 of the Landscape Character and Visual Amenity Assessment Document.

A large area of public open space in the south east, with the potential for additional soft landscaping, retained Green Infrastructure and recreational opportunities, with direct links to wider footpath network (along Repton-SD37 32/2 Footpath and Repton-SD37 51/4 Bridleway).

Area to the south retained for Public Open Space will allow for distant views out to the south and west.



4.3 ARBORICULTURE

The site's fields are defined by mature hedgerows which have been intensively maintained by a flail cutter over time. In some instances, this has preserved robustness of the hedges however in areas it has led to some decline in the hedges. There is therefore an opportunity to strengthen and create more green linkages through the site.

Given that the site is largely devoid of trees, there is an opportunity to improve the site's arboricultural resource via new tree planting as part of a residential development with associated soft-landscaping and habitat creation.

Three veteran trees have been identified, including one located centrally and two others at the southern boundary of the site. Veteran trees require a buffer zone from development to ensure they remain as key arboricultural and habitat features in the long-term.



Hedgerow parallel to PRow footpath (Repton-SD37 32/2)



Central veteran ash tree



Hedgerow and central veteran ash tree between northern field parcels



Woodland edge at the southern boundary of the site

4.4 ECOLOGY

The habitats on-site are dominated by arable crop, which is considered to be of low ecological importance. There are three areas of modified grassland on-site along the western peripheries and along the bridle way to the south of the site. These areas are of limited value to conservation due to the lack of species diversity present within the swards and the small size of the areas. There is a patch of tall ruderal vegetation along the southern boundary of the site, with a patch of mixed scrub located to the south of the hedgerow adjacent to the public right of way, and a patch of hawthorn scrub along the western boundary. Again, due to the size of these areas they are considered to be of limited ecological value.

The hedgerows on-site are subject to varied management regimes, with some of the hedgerows managed so intensively they are considered to have lost the majority of their value as suitable habitat for faunal species. The hedgerows which have been managed more sympathetically are considered to be of value to nature conservation and provide links to the wider habitat for species.

An area of non-priority broadleaved woodland is present on the southern boundary. The woodland is dominated by crack willow, with some ash trees recorded. The woodland understory comprises dense bramble, common nettle and cleavers with hawthorn and holly is also present. The woodland is considered to be the most valuable habitat for nature conservation as it offered the most suitable habitat for a range of species. The two semi mature ash trees and one mature ash tree present within the site and are considered to be of value to nature conservation.

The baseline information for the site was put into the Natural England Biodiversity Net Gain Metric (Version 3.0) to calculate the baseline scores for the site. The site has a baseline score of 17.42 habitat units, 4.00 hedgerow units and 0.12 river units. The calculator will be used to ensure the future development proposals secure a 10% net gain for biodiversity.

The site is considered to offer some limited suitability to amphibians and reptiles due to the absence of suitable aquatic habitat and limited terrestrial habitat. The woodland is considered to offer the most suitable habitat for these species. It is considered unlikely that great crested newts be present within the application area.

The trees on site and adjacent to the site have been assessed for their potential to support roosting bats. Features such as limb failures and woodpecker holes are recorded on numerous trees.

The site is assessed as being of moderate foraging and commuting habitat for bats due to the presence of woodland, mature and semi mature trees and hedgerows. The site is also considered to be linked to the wider environment through the hedgerows and woodland.



Habitat Plan



4.5 HERITAGE

4.5.1 Introduction

There are no built heritage assets within the site. There are three designated built heritage assets within the vicinity of the site that require consideration in bringing forward the site for development;

- Easton House (NHLE 1096507) and Engine House at Easton House (NHLE 1054796), both grade II listed buildings.
- The Repton Conservation Area.

A search of the Derbyshire Historic Environment Record via Heritage Gateway in October 2021 did not identify any other buildings/structures in the area, which have the potential to be considered non-designated heritage assets for the purposes of the NPPF.

4.5.2 Easton House and Engine House (Grade II listed buildings)

Easton House and the Engine House were constructed in 1907 to designs by the renowned architect, Sir Edwin Lutyens.

The Site is located c.250m from the listed buildings. At this stage, it seems that the Site did not have functional historic relationships with the listed buildings. There is very limited inter-visibility between the Site and the listed buildings due to the interposing built form and mature trees. Only limited views are available of Easton House, primarily via glimpsed views of a single chimney stack, such that the building's architectural value (and overall heritage significance) cannot be appreciated. Due to the intervening development and the private, enclosed character of the grounds of Easton House, there is no inter-visibility between the Site and the listed building, such that it does not contribute to its particular significance.



Heritage Plan depicting conservation area, Easton House and Engine House



Engine House



Images of buildings within the Conservation Area

4.5.3 Repton Conservation Area

The Repton Conservation Area was designated in 1969 and extended in 1982, to include Mitre Drive and further properties on Burton Road and The Pastures. A Conservation Area Character Appraisal was adopted in 2013.

The conservation area (focussed on the historic core of the village) is centred to the north of Repton, around the Church of St Wysten. The village retains its historic (likely medieval) street pattern, which may date, in part, to Anglo Saxon settlement. Many of the most significant listed buildings in the conservation area are positioned to the north of the settlement. There are also a number of historic buildings distributed along the High Street.

Repton School, founded over 450 years ago and still educating pupils, is an important and enduring element of the conservation area's use character. The school dominates the conservation area, owning and operating many of the notable historic buildings within Repton. The conservation area retains high quality individual and distinctive buildings from the late 19th and 20th century, many designed by architects with a national reputation, such as Sir Edwin Luytens. The 19th and 20th century expansion of the village is characterised by enclosed spaces that provided their properties with an element of privacy.

Character Area 3, identified in the adopted conservation area appraisal, is closest to the Site. It is characterised by 19th and 20th century school buildings and residential properties. Many of the properties have Arts and Crafts characteristics and are laid out in what the area appraisal describes as "Garden Suburbs". These areas to the west of the Repton Conservation Area, do not have a strong historical relationship with the agricultural land to the west.

The Site is located c.270m to the west of the conservation area, outside of the designated boundaries. The closest part of the conservation area to the Site is Mitre Drive, although there doesn't appear to be a strong or important visual relationship due to established tree planting and the interposing houses on Chestnut Way, which are located between the Site and conservation area.

The Site does not feature as an element in the important views identified in the conservation area appraisal.

The Site forms an element a small part of the rural setting of Repton and does not contain any significant historical agricultural features i.e. remains of ridge and furrow, which would provide a tangible connection to the historic functions of the settlement. In addition, the conservation area does not derive significance from a visual relationship with the Site. Moreover, the experience of the Site is influenced by the 20th century ribbon development on the north side of Burton Road; the interposing late 20th century suburban townscape area of Chestnut Way; and the recreational character of the school playing fields. Accordingly, in overall terms, there are other areas surrounding the conservation area that provide a better and more legible historic & functional linkages and associations as elements of setting.

4.5.4 Key Built Heritage Considerations

- Retention of an area of land to the east of the Site, along with the established landscaped area to the west of The Chestnuts, provides a spatial and visual buffer to the conservation area.
- A landscape-led approach to development, reflecting the character of the 'garden suburb' character area that typifies the western elements of the conservation area:
 - Landscape features have been retained as far as possible, including field boundary hedgerows and tree belts, mature trees, and the plantation between the Site and Chestnut Way.
 - A green landscape buffer has been retained to the southeast, south, and west boundaries of the Site. This will help to maintain the rural quality of views into the Site, and the rural character of the approach to the conservation area.
 - The existing generous grass verge and hedgerow to Burton Road as positive elements of the rural context in the approach to Repton have been retained and elements such as street lighting, pavements etc. to minimise any perceived impacts have been incorporated.
- Careful consideration has been given to the siting and height of proposed buildings relative to the topography of the Site to minimise visual impacts in longer distance views towards the conservation area.
- A generous area of open space to the south-eastern corner of the Site to maintain rural qualities of a pedestrian route into the conservation and maintain spatial separation with Easton House.
- Road access has been carefully designed to maintain the rural character of this part of Burton Road as only one route through the verge has been designated.



Key Built Heritage Considerations

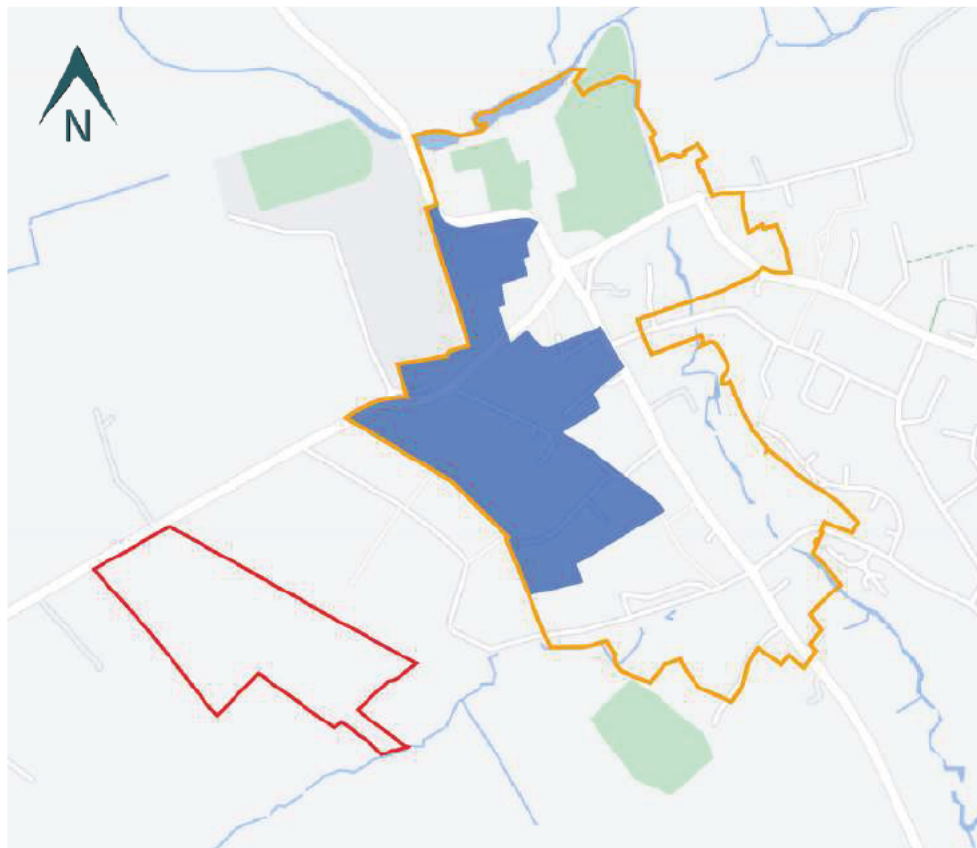
- Site Boundary
- Conservation area

- Visual landscape buffer adjacent to The Chestnuts
- Open space

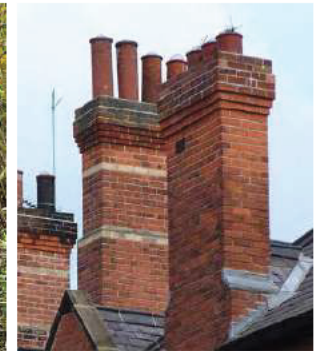
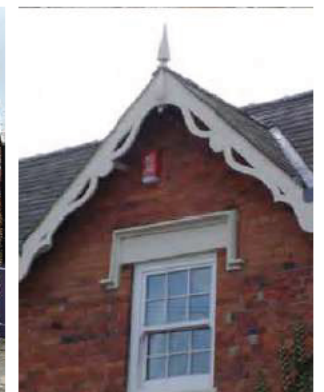
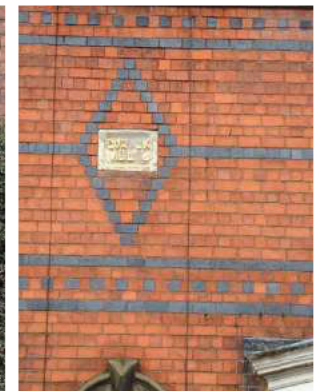
- Retention of field boundary hedgerow and tree belts
- Grass verge and hedgerow to Burton Road

4.5.5 Local Character

As noted earlier, the Repton Conservation Area Character Statement identifies four distinct character areas. Area 3 is positioned closest to the site and is focused on the western side of the village core. It is characterised by 19th and 20th century school buildings and residential properties. Many of the properties have Arts and Crafts characteristics and are laid out in what the area appraisal describes as “Garden Suburbs”. The Conservation Area Character Statement identifies a significant palette of locally distinctive materials and architectural details from within the conservation area, which it states “may prove useful in providing inspiration for new development, whether traditional or contemporary, if used with care”.



Conservation Character Areas



4.5.6 Chestnut Way

Chestnut Way is located between the site and the edge of Area 3 of the Repton Conservation Area. It is addressed on both sides by large 2-storey detached dwellings with on-plot car parking located either to the side of the house in a garage, or integrally. There is a dominance of a brown brick along this street, interspersed with red brick and elements of white or cream render. Roof coverings are predominantly a grey/brown tile. The street itself consists of a narrow carriageway with a narrow grass verge either side and narrow footpath beyond. Private frontages are then defined by a variety of hedges, shrub or flower beds, and low brick walls.



Plan title



The site



Study Area



Dwellings on Chestnut Way

4.5.7 Burton Road

In the vicinity of the site, Burton Road is addressed by ribbon development along its northern side. Houses here are all two storeys tall, detached and of a significant size, within large plots. They follow a reasonably consistent and substantial set-back from Burton Road, with private frontages defined by hedges and often inclusive of large mature trees. Red brick is the predominant material, with white and cream rendering also experienced, occasionally set within timber boarding. Grey and red roof tiles are equally present in this street scene, which also features chimneys and roof forms that are both gable-ended and hipped. On-plot car parking for these dwellings usually includes garages which are either located to the side of the house or integral, with driveways regularly used as areas of frontage parking.

In the vicinity of the site, Burton Road consists of a wide carriageway. There is wide a grass verge beyond the carriageway on the northern side, with a footpath and further narrow grass verge beyond. There is no footpath present on the southern side of the carriageway, where instead there is a wide grass verge up to field boundary hedgerows or fences.



Plan title



5. Technical Considerations

5.1 HIGHWAYS & ACCESSIBILITY

5.1.1 Local Highway Network

The site is located on Burton Road; which caters for east-west movements between Repton and Newton Solney. The single carriageway is approximately 6.0m in width and is subject to a 40mph speed limit near the site. The speed limit reduces to 30mph circa 200m to the east of the site, towards Repton village. Burton Road contains street lighting and footway provision on the northern side of the carriageway offset by grass verge.

The site is approximately a five-minute drive from Junction 4 of the A50/ A38 Burton Road. The junction, known as Toyota Island provides a strategic east-west connection between Junction 24 of the M1 in Leicestershire and Stoke. The A38, known locally as Burton Road is a major trunk road which provides a connection to Derby and Mansfield to the north and Burton Upon Trent and Birmingham to the south.

A review of accident data shows that the local road network has a good safety record.



Burton Road site frontage

5.1.2 Public Transport

The nearest bus stops to the site are located along Burton Road and are within 250m of the centre of the site. Both stops are marked with a flag and pole and are served by service V3, which connects the village with Derby and Burton upon Trent at an hourly frequency Monday to Sundays.

As part of the development it is proposed to improve these to a high quality pair of bus stops including shelters.

The nearest rail station is Willington Railway Station, situated 2.7km north of the site. The station is accessible via bus service V3 stopping at the station. The travel time from the bus stop nearest the site and the railway station is approximately 6 minutes.



Bus stops adjacent to the site frontage to Burton Road

5.1.3 Pedestrians & Cyclists

The existing footway runs along the northern side of Burton Road and continues east into the village. The southern footway starts at the junction of Repton Road and Chestnut Way.

PRoW footpath (Repton-SD37 32/2) runs through the site and connects to Chestnut Way. From here, Footpath 49 links to a network of PRoW's, providing off road connections to the village. West of the site, Bridleway (Repton-SD37 51/4) runs along the sites western border and travels south and east around the site towards Well Lane.

Cycling is considered appropriate on carriageway given the nearby roads are lightly trafficked. National Cycle Network (NCN) Route 54 lies approximately 4km to the west of the site and connects Derby with Burton upon Trent.



PRoW footpath (Repton-SD37 32/2)

5.2 FLOOD RISK ASSESSMENT

The site is located entirely within Flood Zone 1 (low Probability), this is land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding. The nearest flood zone extents are located 400m north and 500m east of the site and are associated with the River Trent and Old Trent Water, (a tributary of the River Trent), respectively. There is an unnamed ordinary watercourse (UOW) which is located on the site's southern boundary. However, the main development area is elevated approximately 2m above this watercourse, decreasing any associated flood risk.

The fluvial source is not considered to constrain the proposed development, with the main development area being raised above surrounding watercourses and being wholly within Flood Zone 1.

The site is predominantly at very low risk of flooding from pluvial sources except for a pluvial flow route of low to high risk which is shown to be present to the south of the site, associated with the UOW. There are minor areas of low (1 in 1000 year) surface water risk along the south west and southern boundaries of the site. These extents are considered to coincide with existing service road that runs along the western boundary of the site and the Public Right of Way that runs along the sites southern boundary.

The pluvial source is not considered to constrain the proposed development due to the main development area being at very low risk. Areas associated with the UOW in the south is to remain undeveloped. Therefore, the pluvial flow routes shown in this area will remain as existing.

British Geological Survey (BGS) mapping shows that the site is underlain by Tarpoley Siltstone Formation (Siltstone, Mudstone and Sandstone) in the north and south of the site with two bands of Helsby Sandstone Formation within the centre of the site. Derbyshire County Council's SFRA identifies areas susceptible to groundwater flooding in a strategic scale map showing areas susceptible to groundwater in a 1-kilometre square grid. The site is located within an area considered to be at less than 25% susceptibility to groundwater flooding.

The groundwater source is not considered to be a constraint on development due to the general low risk posed. The impermeable areas within the site will also act as barrier in the unlikely event that groundwater levels rise significantly.

A review of sewer, canal and reservoir sources have also been undertaken, all of which are considered to pose a low risk and not constrain the development proposals.



Environment Agency surface water map

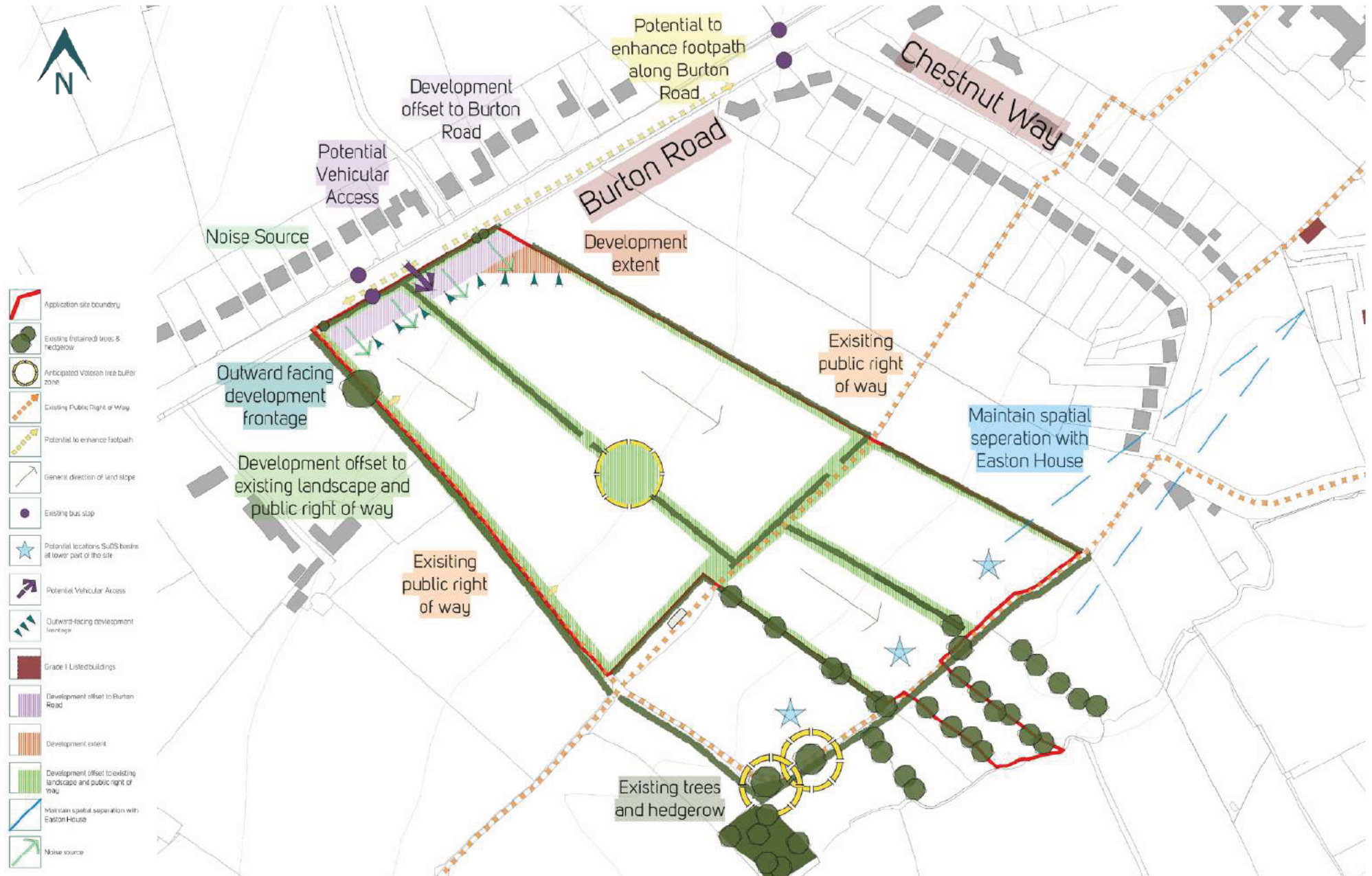


6. Summary of Site Assessment

Initial Planning, Landscape, Ecology, Heritage, Local Character, Highways, Drainage, and Noise and Air Quality studies and assessments and have been produced by Miller Homes and their consultant team and it has been demonstrated that there are no overriding constraints that would preclude development at land at Burton Road, Repton.

The main known considerations that the emerging development proposals should address are;

- Retention and enhancement of existing mature landscape features, including existing hedgerows and veteran trees;
- The potential for a landscape-led approach to development, reflecting the character of the 'garden suburb' character area that typifies the western elements of the conservation area;
- Anticipated requirement for ecological offsets to existing habitat and creation of new areas of habitat
- Formation of an appropriate response to existing PRoW's within the site and it's context, potentially utilising them as the basis for a vehicle-free movement network linked to the village centre;
- Retention of an area of land to the east of the site, along with the established landscaped area to the west of The Chestnuts, to provide a spatial and visual buffer to the conservation area.
- A need to respond to the identified View 20 of the Landscape Character and Visual Amenity Assessment Document in the northern part of the site.
- Formation of a green landscape buffer to the southeast, south, and west boundaries of the site to maintain the rural quality of views into the site;
- The potential for reservation of a generous area of open space to the south-eastern corner of the site to maintain rural qualities of a PRoW footpath leading to the conservation and maintain spatial separation with Easton House.
- Careful design of any new vehicular access to the site from Burton Road to maintain the rural character of this part of it.
- General fall of the land form from the north toward the south could inform a sustainable drainage strategy inclusive of attenuation basins at the lower part of the site.
- It is been assumed that in order to shelter rear garden areas from road traffic noise, buildings should be positioned to address Burton Road, utilising the built form and massing to reduce noise beyond (behind) them.

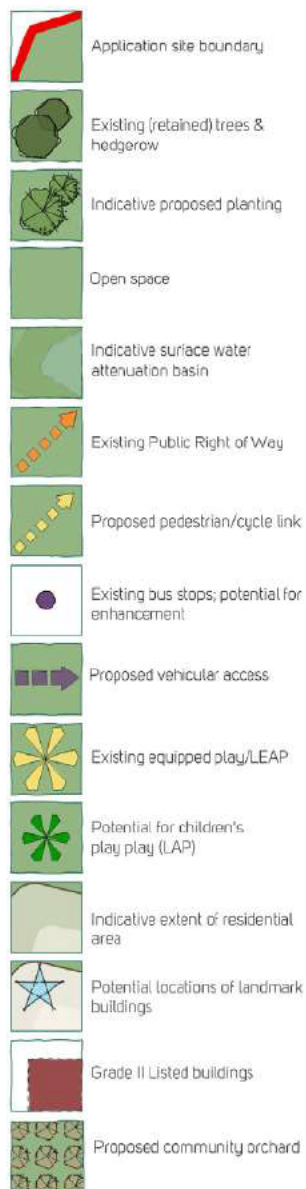


Constraints and Opportunities Plan

7. The Emerging Illustrative Layout



Emerging Illustrative Layout



7.1 THE DESIGN CONCEPT

The early assessment work undertaken by the team and summarised in the preceding sections of this document define the context within which sensitive and appropriate development proposals could be brought forward. It is shown that the site has the potential to deliver approximately 160 dwellings within the structure of a sound development concept that;

- Responds positively to the character of Repton;
- Creates a strong and meaningful green infrastructure network that retains and enhances existing trees and hedgerows, incorporates opportunities for play and recreation, includes a sustainable drainage system, and achieves biodiversity enhancements;
- Retains the functionality of the public right of ways adjacent to and within the site, using them as part of a considered and sustainable non-vehicular movement network.



1 Existing set-back detached dwellings fronting Burton Road



4 Existing central hedgerow with mature ash visible



2 Site frontage to Burton Road



5 Existing PROW crossing the site; looking north-east



3 PROW adjacent to the western boundary



6 View across the south-eastern corner of the site from the PROW

7.2 LAYOUT & FORM

Care has been taken in the preparation of the emerging Concept Plan to demonstrate how the anticipated residential capacity can be appropriately accommodated.

A key element of the emerging proposals is the retention of the central hedgerow and veteran ash tree within the site, using these mature features to define a sense of place and provide legibility. The layout structure uses perimeter blocks which ensures that front doors address the street and areas of open space and creates secure rear gardens. The resultant design response is therefore outward-facing, with active frontages presented to all boundaries of the site.

A development set back is shown along the Burton Road frontage to replicate that of the existing houses on the northern side of the street and which is in compliance with the Village Design Statement guidelines.

A rounding-off of development is shown at the northern corner of the site, along Burton Road which retains the identified View 20 of the Landscape Character and Visual Amenity Assessment Document.

A development set back is also proposed along the western boundary of the site, allowing for the retention and enhancement of the existing hedgerow and formation of a suitable frontage to the PRow footpath. Tree planting along this edge could be provided to soften views of the new built form from the west.



Layout and Form Plan

7.3 CHARACTER

As proposals progress for residential development in this location, Miller Homes would welcome opportunities to consult with the local community, planning officers and key stakeholders such that their local knowledge informs and shapes the detailed scheme.

The emerging proposals show how several buildings across the emerging layout could become landmark features, enhanced to provide legibility and reinforce a character which is locally-inspired. This could include reference to the elements of character briefly described in the previous section of this document, including the potential for a contemporary re-interpretation of arts and crafts characteristics which could embrace elements of the Garden Suburbs identified by the Repton Conservation Area Character Statement.

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The principal building materials in the village are red brick, blue clay tiles, slates and sandstone, with some rendered, timber framed and thatched buildings.

Repton Village Design Statement



7.4 GREEN INFRASTRUCTURE

With suitable mitigation, it is possible to limit the impact of development of the site upon the local landscape and visual receptors. It is also possible to respond positively to the context and to policy positions;

- Retaining the majority of the hedgerow along the site frontage to Burton Road will assist with assimilating the scheme into the surrounding context.
- Retaining the existing hedgerow framework within and around the site will maintain legibility with the existing landscape; a central hedgerow running north to south, a hedgerow running east to west adjacent to the footpath, and hedgerows separating the lower site parcels.
- Retention of the existing veteran tree within the centre of the site within an area of public open space which connects to the southern part of the site would provide visual amenity.
- New tree planting within areas of new public open space and as part of enhancements of retained hedgerows could include species such as Oak, Beech, Sweet Chestnut, Horse Chestnut and Willow, which are characteristic of the area and compliant with the Village Design Statement guidelines.
- The large area of public open space proposed in the south-east of the site has the potential for additional soft landscaping and recreational opportunities.

No tree removals are currently anticipated in order to accommodate residential development on the site, however some removal of hedgerows will be required to facilitate access from individual development parcels and from Burton Road. The sections of hedgerow currently identified are of limited value and the impact will be localised and compensated accordingly via new hedgerow planting and enhancement.



7.5 ECOLOGY

The landscaping concept for the site seeks to define new areas of high-quality open space as a key feature of the structure of the layout, which could lead to the provision of a range of suitable habitats previously absent on site and leading to an increase in biodiversity.

The creation of grassland and pond habitats within the site, in conjunction with woodland enhancement, hedgerow enhancement and planting of additional trees will provide gains in biodiversity, whilst also increasing available suitable habitats for species. A new pond would provide suitable aquatic habitat for Great Crested Newts, common amphibians and aquatic invertebrates, whilst new areas of grassland and woodland will provide suitable foraging and hibernation habitat.

The potential inclusion of a new community orchard within the emerging proposals would provide further suitable habitat for faunal species whilst also helping to connect people with nature.



Retention and enhancement of the hedgerows will provide more suitable hibernation and refuge habitat for this species than is currently present at the site. The development could also incorporate a hedgehog highway through new gardens to retain foraging and commuting habitats for this species on site.

Native species will be specified across detailed planting proposals, with areas of suitable wetland grasses, wildflower grassland and flowering lawn mixes in areas of amenity planting. In conjunction native shrub planting will be undertaken within areas of newly planted trees and along the enhanced hedgerows. Seed mixes will be floristically diverse and will be managed for the benefit of species, including specified management regimes to develop microclimates within the swards and allow for the continuation of species diversity through timed mowing regimes. It is anticipated that this will result in an improvement in biodiversity at the site.



7.6 SUSTAINABLE DRAINAGE STRATEGY

As part of any proposed development there is a requirement by the Lead Local Flood Authority, (Derbyshire County Council) to ensure that surface water runoff is appropriately managed, with runoff from the site mimicking where possible the existing scenario. In order to achieve this a Sustainable Drainage Systems (SuDS) is proposed within the green infrastructure of the emerging proposals.

Derbyshire County Council requires that site surface water drainage is designed in line with DEFRA's Non-statutory technical standards for sustainable drainage systems, including restricting developed discharge of surface water to greenfield runoff rates, making suitable allowances for climate change (in line with the latest guidance from DEFRA) and urban creep.

National policy and guidance identify that surface water runoff should be disposed of as high up the following hierarchy as possible:

- i. Infiltration into the Ground
- ii. Discharge to a Watercourse
- iii. Discharge to a Surface Water Sewer or Highway Drainage
- iv. Discharge to a Combined Sewer

The site is shown to be underlain by Tarporley Siltstone Formation (Siltstone, Mudstone and Sandstone) and Helsby Formation. Soakaway testing to the BRE 365 standards, would be undertaken at the appropriate juncture, in order to confirm whether infiltration is a viable option for the development. At this time it has been



assumed that infiltration is not viable, in order to provide a worst-case scenario.

Due to the presence of the unnamed ordinary watercourse located approximately 100m south of the site, it has been proposed to restrict runoff from the site to the existing greenfield rate, with an outfall to the UOW, as part of the initial concept drainage work. In order to achieve this a series of surface water attenuation basins are currently proposed within the southern portion of the site.

For the purposes of this stage of work, the basin has been designed to have a depth of 1m and 1:4 side slopes. The basins have been designed with a 300mm freeboard during the 1 in 100-year +40% storm event. At this time and based upon the proposed development quantum and a restricted greenfield rate from the site of 18 l/s, it is expected that a total volume of approximately 2,800m³ will be required within the basins.

As the drainage strategy develops, measures to improve water quality could also be considered to capture any potential pollutants in the runoff from the development. The detention basin will provide the primary stage of treatment; however, to supply a minimum two stage treatment train, further features such as conveyance swales, bioretention areas and pervious pavements are to be explored within the proposed layout. Where possible, the detention basin should be enhanced with low flow channels, variable depths and forebays.

Water quantity, recreation and biodiversity are also to be considered within the developing layout, as various SuDS features are further reviewed.

7.7 ACCESS & MOVEMENT

It is currently proposed that a single point of vehicular access to the site will be achieved from Burton Road in the form of simple priority junction. Suitable visibility can be achieved at the new junction, but this will require the removal of some of the existing hedgerow. It is anticipated that this will be required to have a 5.5m wide carriageway with appropriate radii to enable service and delivery vehicles to manoeuvre in and out of the site.

A new footway is also proposed along the southern side of Burton Road that will extend eastward to link up with the existing footway at the Chestnut Way junction. To the west, a new footway will also be provided on the southern side of Burton Road linking the site to the existing bus stop. This provision will increase the availability of more sustainable transport options to the users of the site.

The layout structure shows how development could be set out to positively respond to the existing footpaths and bridleways that cross and run parallel to the boundaries of the site. Opportunities have been identified for positive connections to these routes so that future residents have opportunities to walk to the centre of the village and leave the car at home. There is also the potential for new routes to be created within the site that provide options for circular walks within and around the site and further afield.

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“Repton is unusually well provided with footpaths both within the village environment and in the neighbouring farmland. These are extensively used, the accessibility encouraging people to walk from home.”

Repton Village Design Statement



8. Conclusions

In demonstrating the site's suitability for development, this Vision Document has summarised the findings and recommendations of the consultant team appointed to assist Miller homes, including input on Planning, Landscape, Ecology, Heritage, Highways, Drainage, and Masterplanning.

As a Key Service Village, Repton is established as a sustainable and suitable location for housing growth. It is therefore considered that it would be wholly logical and appropriate for the Council to accommodate future growth in Repton, as part of the preparation of a new South Derbyshire Local Plan. As has been demonstrated throughout this document, the site can deliver a sensitively designed scheme that responds to the character and distinctiveness of Repton.

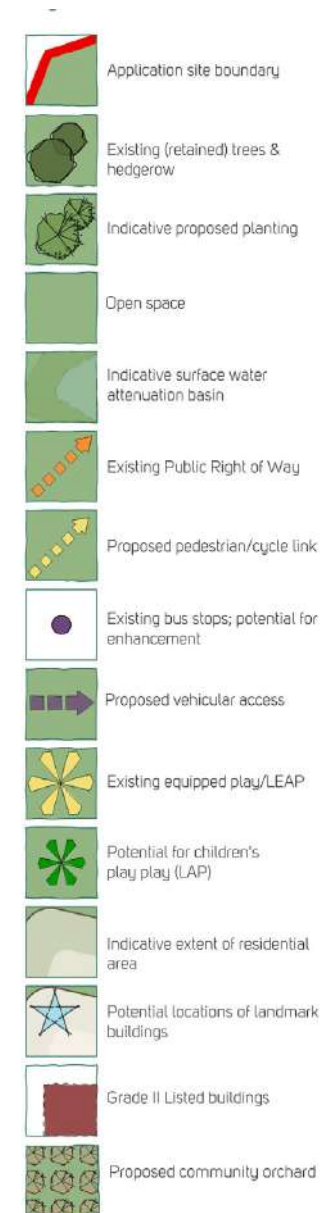
As demonstrated by initial technical work the site is not subject to any significant environmental constraints or any other insurmountable constraints to development. The proposals respond to the site-specific constraints that are currently known, such as the need to protect trees and hedges, views of the site and surrounding context, the potential for ecological and wildlife features and the presence of nearby heritage assets.

There are no technical constraints that would cause harm to the surrounding area or highway network. The proposed access from Burton Road is technically feasible and deliverable.

Several potential benefits have been identified for future residents of the site. These include access to a range of house types and sizes - including affordable homes, close proximity to the facilities and services of Repton via existing footpath routes and convenient accessibility to public transport in the form of bus services which currently stop adjacent to the site.

The emerging green infrastructure strategy outlined in this document includes the retention and enhancement of existing landscape assets and an intent to ensure development proposals achieve biodiversity net gains. Landscape proposals outlined include measures such as new planting of native species to supplement the existing hedges and trees, the creation of new habitats, the laying out of informal green space, the provision of children's play space and the definition of leisure footpaths linking to the existing PRoW network.

This site is promoted by a locally-based, highly respected and responsible housebuilding company and overall, is considered to provide the opportunity for a positive and sustainable addition to Repton to meet housing need.



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