

## APPENDIX 2

### For Information Only – Summary of Previous Comments on the draft Regional Plan (December 2006)

- The Plan is grossly over-prescriptive and simplistic in directing new development, particularly housing, to the largest urban areas only. Flexibility must be allowed to enable the Council and others with a day-to-day understanding of the District to develop a sustainable vision through the Local Development Framework.
- The Plan is pre-occupied with urban area regeneration at the expense of the quality of life in neighbouring and rural areas. It does not recognise that South Derbyshire is largely a rural district with a large number of scattered villages and other settlements.
- The Strategy completely ignores the existence of two major brownfield sites in South Derbyshire at Willington and Drakelow and effectively renders them sterile for the lifetime of the Plan. The Regional Plan should make clear that the Local Development Framework should determine sustainable development options for these sites.
- The Plan hardly even begins to recognise the need to ensure growth in South Derbyshire is accompanied by necessary infrastructure including roads, public transport, schools, health facilities, emergency and voluntary services etc. It also fails to recognise the particular challenges posed by flooding in rural South Derbyshire.
- There is scant recognition of the need to address cross border and cross regional working with East Staffordshire and North West Leicestershire in particular. It is strangely silent on the East–West Midlands Multi-Modal Study and more recent feasibility work commissioned by *emda* and Advantage West Midlands into the need for a strategic road linking the A38 to the A511. This contrasts with the approach in other parts of the Three Cities area where schemes of equivalent or lesser importance are specifically named in the draft Plan.
- The Plan hints at, but does not spell out clearly, that the release of housing sites must be phased to ensure that greenfields on the edge of Derby are developed when, and only when, brownfield sites within the City have been taken up. A clear and specific policy is necessary to require this.

- The Plan is a charter for the de-coupling of homes and jobs and would lead to the creation of commuter settlements, unaccompanied by jobs and other essential services. It is essential that the LDF is able to provide sufficient employment development in appropriate locations.
- The Plan offers no assistance in providing affordable housing where it is needed across the rural villages in South Derbyshire.