



DERBY CITY COUNCIL

City Centre Eastern Fringes Area Action Plan

Draft Regulation 25 Consultation Statement (to be finalised)

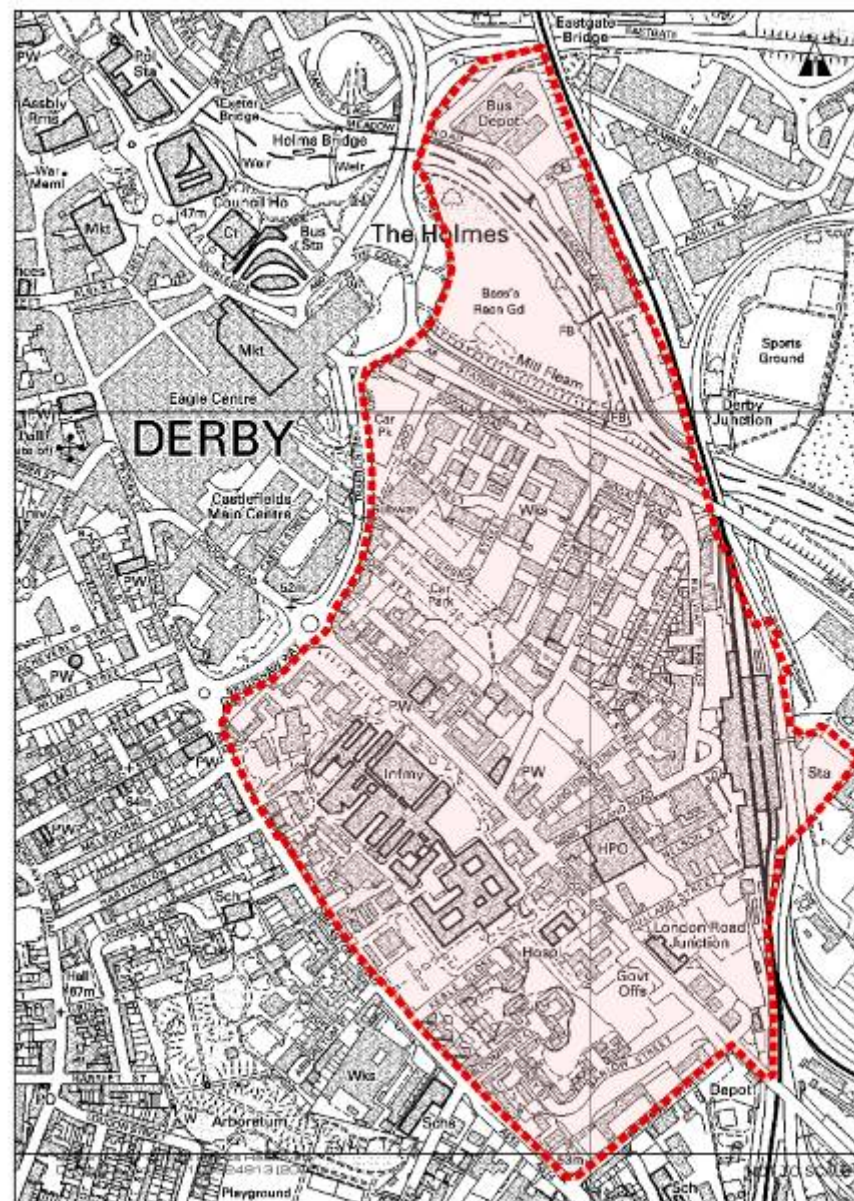
Draft Summary of Informal Consultation Exercises –
Representations and Responses (to be finalised)

September 2005 & April 2006

Regulation 25 Consultation Statement

Contents

Page: 4	Introduction
Page: 4	Phase 1 Consultation
Page: 5	Phase 2 Consultation
Page: 7	Supplementary Consultation
Page: 8	Diagram 1 – Timescale of Key AAP Activities
Page: 10	APPENDIX A – Summary of Representations and Responses



City Centre Eastern Fringes Area Action Plan

Introduction - Preferred Options Consultation Statement

The Eastern Fringes Area Action Plan (AAP) will form part of the new Local Development Framework (LDF) replacing the City of Derby Local Plan Review for this area. The AAP is intended to provide a comprehensive vision for the future of the area, enabling development to take place in a coordinated fashion.

Under the requirements of the new planning system, consultation on DPDs should be ongoing and continuous through a process known as 'front loading'.

The issues and options consultation (Regulation 25) began in Autumn 2005 following the publishing of the Draft Sustainability Appraisal Scoping Report and initial consideration of 'reasonable' options. Two options were put forward for scrutiny, the City of Derby Local Plan Review (a reactive approach) and the Derby Cityscape Masterplan (a proactive approach). Both of these options had already been subject to consultation and refinement at earlier stages before their respective adoption and endorsement by the City Council. Consultation on the Masterplan included a collaborative design workshop in February 2004, a feedback and review session in April 2004 and a three 'launch' events that enabled people to comment on the Plan in January 2005. The two distinct options therefore represented two logical and reasonable options to be put forward as a starting point for discussion and debate.

In parallel to the consultation detailed in this document, a Project Advisory Group (PAG) met, and continues to meet, to discuss the issues, options and concerns that are apparent. The PAG consists of representatives from the major stakeholders in the AAP process including, Network Rail, Midland Mainline, the NHS Trust, Derbyshire Wildlife Trust, Derbyshire Chamber and Business Link, Derby

Cityscape (URC), the City Council, and a representative from the local community..

Regulation 25 Consultation – Phase 1

Who was consulted?

To meet the requirements of the then emerging draft of the Statement of Community Involvement (SCI) the following bodies were consulted:

Specific consultation bodies: GOEM, EMDA, EMRA, British Gas, BT, English Nature, English Heritage, The Environment Agency, Highways Agency, Severn Trent Water, Network Rail, NHS Trust and the Countryside Agency.

NB. Adjoining Borough Councils and Parish Councils were not consulted at this stage because it is thought that the impact of the Plan will be negligible upon surrounding Councils and the AAP boundary does not adjoin any other district. There are no parish councils in Derby.

General consultation bodies: A number of local voluntary and community groups were also consulted including, Derby Association for the Blind, Derby Deaf Club, Derby Gypsy Liaison Group, Derby Civic Society, Derby Racial Equality Council, Disability Direct and Forums for Faith for Derby and other organisations.

Others: All local residents within the Eastern Fringes area were given the opportunity to comment on the 'issues and options'. All businesses with an interest in the area were also given the opportunity to comment.

To gather their views on the issues and options the bodies listed above were:

- Sent an information leaflet in October 2005 asking for their views on the initial options (Local Plan and Derby Cityscape Masterplan

options) and an explanation of the processes involved. They were asked which aspects of the two options should be carried forward to the 'Preferred Options' stage and what other alternatives should be considered. There were approximately 100 responses to the information leaflet. All representations and responses can be viewed in the document '*Representations and Responses*' attached as Appendix A to this report.

- Invited to two workshop events (19th October 2005, 5-7pm and 7-9pm) facilitated by the East Midlands Planning Aid Service (EMPAS) to discuss issues, options and concerns in an impartial forum. Approximately 60 people attended the two sessions

In conjunction with these activities, a PDF version of the information leaflet was available on the City Council's website (www.derby.gov.uk) and copies were made available at the Minority Ethnic Communities Advisory Committee (MECAC), the Disabled Persons Advisory Committee (DPAC) and the Womens Advisory Committee (WAC). On these committees there are representatives from the following groups:

MECAC

- Bosnian Community Centre
- Derby West Indian Centre Association
- Indian Community Centre
- Kurdish Community
- Somalian Education Welfare Foundation
- Derby Racial Equality Council
- Pakistani Community Centre
- Amnesty Congo Support Group
- Derby Irish Association
- Derby Chinese Welfare Association
- Derby African Association
- Derby Persian Cultural Association
- Iraqi Kurdish Community
- Asian Over 60's

Derby Farsi Association

DPAC

- Freedom Forum
- DCIL
- Derbyshire Association for the Blind
- Disability Direct
- Derby Deaf Forum
- Derby Access Group
- CamTAD
- Derwent Sheltered Housing Forum
- Derby Shopmobility Scheme
- Support into Work

WAC

- Hummari Manzil
- Derby War Widows
- Raunak
- Women in Neighbourhood Communities
- Domestic Violence Partnership

The consultation process was also advertised on the City Council's internal 'Weekly Bulletin' and information leaflets were made available from local libraries, community centres and leisure centres. A press release with information on the emerging Plan and the consultation was sent to the Derby Evening Telegraph.

Regulation 25 Consultation – Phase 2

Following guidance from the Government Office (GOEM), a second round of informal consultation was carried out in Spring 2006. A third 'hybrid' option was put forward that encompassed the 'positive' (according to Stage 1 responses) aspects of the two original options plus some new policies or proposals that emerged through

consultation. Areas where there was still uncertainty over the best course of action were identified as 'grey areas' and various options for these sites were suggested. Alternatives the Council didn't think were appropriate were also noted so that people had a chance to comment on them.

The requirements of the submission version of the SCI were once again adhered to and the following groups were consulted:

Specific consultation bodies: GOEM, EMDA, EMRA, British Gas, BT, English Nature, English Heritage, The Environment Agency, Highways Agency, Severn Trent Water, Network Rail, NHS Trust, Countryside Agency.

NB. Adjoining Borough Councils and Parish Councils were not consulted at this stage because it is thought that the impact of the Plan will be negligible upon surrounding Councils and the AAP boundary does not adjoin any other district. There are no parish councils in Derby.

General consultation bodies: A number of local voluntary and community groups were also consulted including, Derby Association for the Blind, Derby Deaf Club, Derby Gypsy Liaison Group, Derby Civic Society, Derby Racial Equality Council, Disability Direct, Forums for Faith for Derby and other organisations.

Others: All local residents within the Eastern Fringes area were given the opportunity to comment on the issues and options. All businesses with an interest in the area were also given the opportunity to comment. Every individual / organisation that had commented on the phase 1 proposals were once again given the opportunity to comment. Individuals/organisations that had registered interest in being kept up to date with the progress of DPDs were logged into a database which allowed them to also be consulted.

To gather their views on the ideas and options the bodies listed above were:

- Sent an information leaflet in April 2006 asking for their views on the third 'refined' option. People were asked to comment on the whole Plan but particularly concentrating on the 'grey areas' of most uncertainty. The original options (Derby Cityscape Masterplan and Local Plan options) were still available for comment. The proposals from the phase 1 consultation that were not being pursued were also detailed on the leaflet so that people could still lend support or rule them out. It was made clear that all options were available for consideration. Approximately 25 individuals and organisations responded to the leaflet. The consultation information was made available on the internet in PDF format on the Council's website (www.derby.gov.uk).
- Invited to workshop events on Friday 21st April (10am-1pm and 2pm-5pm), Monday 24th April (2pm-5pm and 5.30-8.30pm) and Wednesday 3rd May (5.30pm-8.30pm). The event on the 3rd May was facilitated by the East Midlands Planning Aid Service (EMPAS) and involved a walkabout and a 'place check', 'planning for real' exercise. White Young Green (WYG) consultants helped facilitate three of the events which helped to inform the Sustainability Appraisal that they are currently undertaking on behalf of the Council.

The EMPAS led event was advertised in the Derby Evening Telegraph on the 30th April (page 55). Approximately 70 people attended the four workshops in total.

Leaflets were once again sent to the MECAC, DPAC and WAC committees. Copies were also sent to the Derby Seniors Forum and the AAP was discussed at the Conservation Areas Advisory Committee (CAAC). Large print leaflets were made available for the Derby Seniors Forum as requested.

In order to engage younger people in the process, a discussion forum was posted on the Council run 'Youthlink' website (www.youthlinkderby.org.uk/YouthForum/Discussions). A PDF copy of the information leaflet was available for download and people were encouraged to discuss the issues that it raised. One person (to date) has posted comments on the site.

The Project Advisory Group (PAG) met to discuss the second stage of consultation and the City Council and Derby Cityscape continue to meet on a monthly basis to discuss the progress of the AAP.

The consultation process was also advertised on the City Council's internal 'Weekly Bulletin' and information leaflets were made available from local libraries, community centres and leisure centres.

A press release with information on the emerging Plan and the consultation procedure was sent to the Derby Evening Telegraph. One article relating to the AAP appeared on the front page in April 2006.

In parallel to the consultation process a series of 'one to one' meetings have also been held between Council Officers / members of the Derby Cityscape team and business/land owners in the Castle Ward area. These meetings have been centred on the implementation of the emerging Plan and have taken place sporadically throughout the front loading process. Meetings have also been held with a number of potential developers to outline what the Council and Derby Cityscape would expect from them if they were to be chosen as the 'preferred developer' or were to be involved in any construction projects within the Eastern Fringes area.

Supplementary Consultation

In order to supplement the consultation that had already been carried out it was felt appropriate to run another workshop specifically aimed at potential developers, concentrating on the implementation of the Plan. The 'developer day' was held on the 13th July and was led by members of the Derby Cityscape team. Officers from the City Council attended, as did the Executive Member for Planning and Transportation.

Consultation on the Sustainability Appraisal Process

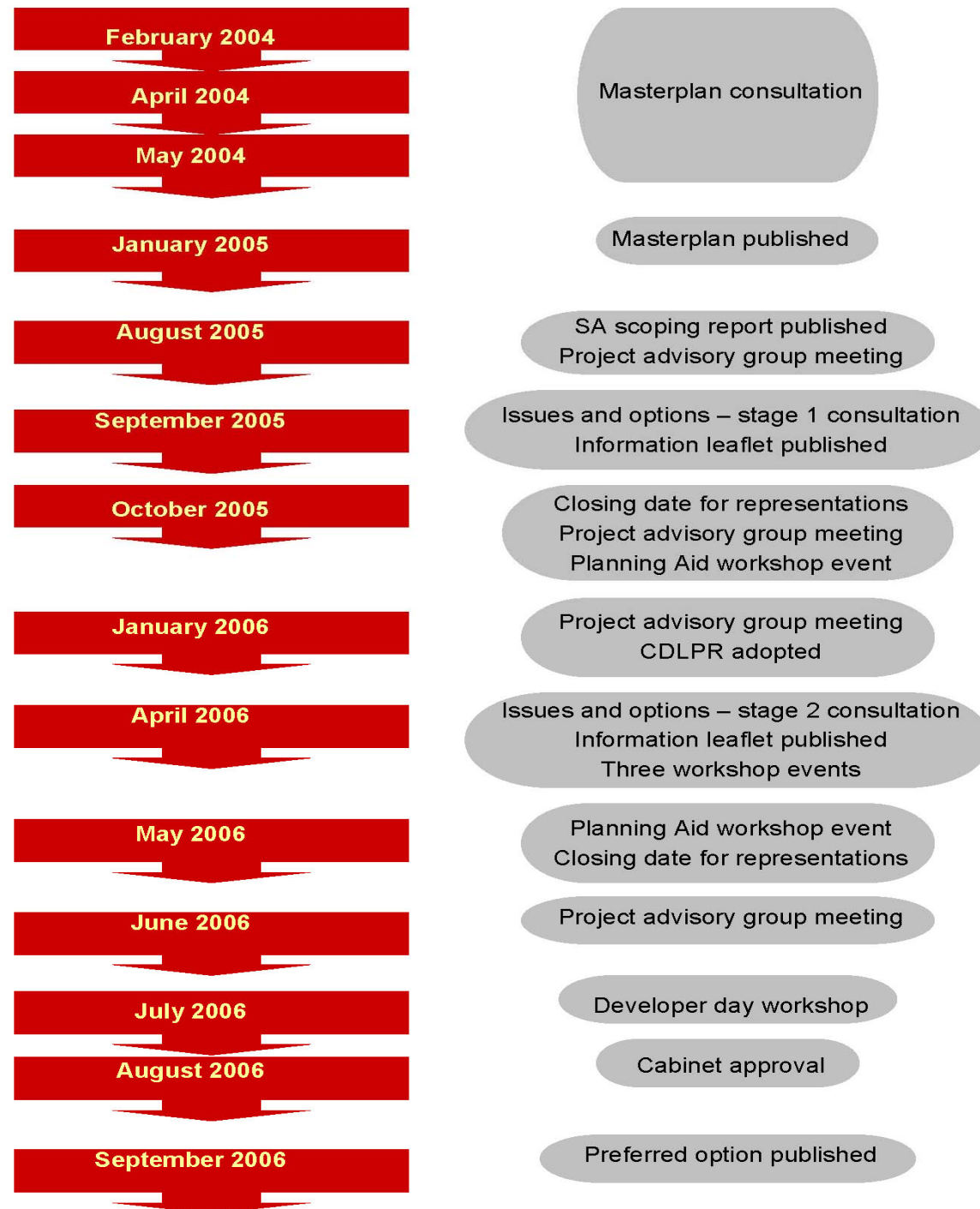
In parallel to the AAP process the Sustainability Appraisal (SA) has also been emerging. The Sustainability Appraisal (SA) has been carried out by the consultants White Young Green Environmental (WYG). The initial SA Scoping Report was compiled by the City Council in August 2005 and was made available on the Council website. It was also sent out to the statutory consultees, the Environment Agency, English Heritage, Countryside Agency, English Nature, EMRA (East Midlands Regional Assembly) and GOEM (Government Office for the East Midlands). The Scoping Report was also discussed at the Project Advisory Group (PAG).

As part of the SA process WYG attended and helped facilitate 3 of the workshops in order to help inform the SA matrices. The initial option comparisons were then circulated to the statutory consultees and members of the Project Advisory Group (PAG). The 'Options Appraisal' is due to be published in conjunction with the Preferred Option Report.

All of the representations that have been made to date have been summarised in the document in Appendix A; '*Representations and Responses*'. The document is split into two sections outlining the representations made at each stage of the Regulation 25 consultation procedure. Alongside each (or group of) representation(s) is an officer level response to the representation(s).

Diagram 1

Timescale of Key AAP
Activities



APPENDIX A

Part 1

City Centre Eastern Fringes Area Action Plan

Consultation Leaflet Representations and Responses

First Round Informal Consultation – Autumn
2005

Representations and Responses Document

Contents

Introduction

Page: 14 Aims and Purpose

Page: 15 The Process

Part 1: First Consultation Exercise

Page: 16 Plan Wide Issues

Page: 18 Visions and Objectives

Page: 20 Boundary Issues

Land Use Proposals:

Page: 22 Derbyshire Royal Infirmary

Page: 25 Bass's Rec and its Environs

Page: 26 Barlow Street and its Environs

Page: 28 London Road

Page: 28 North of the River

Page: 29 Castle Ward Boulevard and Surrounding Area

Page: 32 Railway Conservation Area and its Environs

Page: 38 Midland Road – Royal Mail

Page: 39 North Castle Ward

Page: 39 Open Space and Public Realm

Page: 43 Traffic, Transportation and Movement

Page: 44 Parking

Page: 46 Delivery and Implementation

Page: 49 Design

Page: 51 Consultation

Page: 52 General Points

Page: 54 Conclusions

Part 2: Second Consultation Exercise

Page: 57 Introduction

Land Use Proposals:

Page: 58 Derbyshire Royal Infirmary

Page: 60 Royal Mail

Page: 62 South Car Park

Page: 63 Gala Bingo

Page: 65 North Car Park

Page: 66 Siddals Road

Page: 67	Terrace in Front of the Station
Page: 68	Bass's Recreation Ground
Page: 69	The Boulevard
Page: 70	North of the River
Page: 70	North Castle Ward
Page: 70	General Land Use Comments
Page: 73	Traffic, Transportation and Movement
Page: 76	Parking
Page: 79	Conservation and Environment
Page: 82	Delivery and Implementation
Page: 86	Design Principles
Page: 90	Consultation
Page: 91	General Points
Page: 94	Conclusions

Introduction

Aims and Purpose of this Document

The Council is preparing an 'Area Action Plan' (AAP) for the 'Eastern Fringes' of Derby City Centre. The AAP will form part of the new 'Local Development Framework' (LDF) replacing the City of Derby Local Plan Review for this area (CDLPR). The AAP will provide a vision for the future of the area, enabling development to take place in a comprehensive and coordinated fashion.

This document summarises the comments made during the informal consultation on the Eastern Fringes Area Action Plan. The new planning system dictates that prior to publishing a 'Preferred Option' there must be a period of 'front-loading'. This is the term given to a period of continual informal consultation on issues and potential options for the area.

Although a range of informal consultation activity with key stakeholders has taken place throughout the preparation period thus far, two periods of full public consultation; one in September 2005 and one in April 2006 punctuated this. This report provides summaries of the key issues made during these exercises and provides officer level responses to them.

This report is split up, therefore, into two sections – one that covers the first exercise and one which covers the second. This should help identify the evolution of a number of the proposals in the Plan and provides an easier to follow audit trail. The stage one representations initially looks at plan wide issues before moving on to more site specific points. The second stage representations are all prefixed with an 'X' to designate that they were submitted at the additional front loading stage. Many of the representations were made at the workshop discussion forums and were therefore recorded in the minutes, rather than being submitted as a written representation.

The first informal stages of the public consultation process started in September 2005. Approximately 100 representations were received during this stage. A dual approach was used to illicit comments from the public and other interested parties. The primary means of consultation was through an information leaflet. This was subsequently reinforced through a community workshop session supported by the East Midlands Planning Aid Service (EMPAS), a charitable organisation supported by the RTP1 providing free and independent advice to local communities.

Approximately 1000 leaflets were distributed within the Action Plan area and to relevant stakeholders. Over 70 residents and/or business representatives from the AAP area attended the workshop. A summary of all consultation activities can be read in the 'Statement of Consultation'.

To support the preparation of the Plan, a **Draft Conservation Area Appraisal** for the **Railway Conservation Area** was also produced. This was also available for public scrutiny and consultation. The information in the Draft of the Appraisal was also factored into our consideration of responses to the first consultation exercise and into the amended proposals as presented elsewhere.

Following the initial consultation carried out in September 2005 a second stage was carried out in April 2006 to generate comments on the 'third option' which included the positive aspects of the initial options put forward in September. This option included 'grey areas' where further clarification was most needed in terms of the most appropriate allocations. The second stage of informal consultation was led by four workshop events held at the Stuart Hotel, the last of which was once again facilitated by EMPAS. The events were supplemented by an information leaflet that was distributed to all stakeholders with an interest in the area and all residents and businesses in the locality. Approximately 60 people attended the four workshops and approximately 25 written responses were received.

In parallel with the second stage consultation on the AAP, further consultation was carried out on the Draft Conservation Area Appraisal. The workshops were also used by the consultants White Young Green Environmental (WYG) to consult on the Sustainability Appraisal (SA) which they have been commissioned to produce in order to investigate the sustainability of the proposals for the Eastern Fringes area. The Sustainability Appraisal Report will be published in conjunction with the Preferred Option in September/October.

The Preparation Process

Once the informal consultation process has been completed, the Council has to go through a number of further stages to prepare the AAP. These include:

- *Publication of 'Preferred Options'*: As the name suggests, the 'Preferred Options' document will set out the Council's preferred way forward for the Eastern Fringes area. This will be subject to a six week statutory public consultation exercise. It is hoped that this will be published in September/October 2006.
- Following consideration of responses to this consultation, we will prepare the 'Submission Document'. This will be submitted to the Secretary of State. There will be another statutory 6 week consultation period within which people will be able to make their feelings known.
- The third stage is the independent 'Examination' of the submitted document. The purpose of this is to consider representations on the AAP and whether it is consistent with Government policies. An Inspector will be appointed by the Secretary of State to conduct the examination.
- The Inspector will produce a binding report that sets out the final version of the AAP. This will then be 'adopted' by the Council and incorporated in the 'Local Development Framework' (LDF).

Summary of Representations – Plan Wide Issues

(1) Masterplan or Local Plan?

The first consultation exercise presented two broad options for change for the 'Eastern Fringes' area; 'The Local Plan' Option and the 'Cityscape Masterplan' Option.

The Council asked people for their views on which aspects of these options should be taken forward, how each option could be improved and what alternatives there might be.

The *Local Plan Option* constituted the 'do nothing' approach in that these would be the policies that are in place now and would continue to be in place if the AAP did not proceed. Site-specific Local Plan policies for the 'Eastern Fringes' area are generally 'reactive' and do not propose significant development or change in the area.

The Local Plan sets out the criteria that would be used to determine any planning applications made in the area and identifies a range of land-uses that would be acceptable. In terms of specific proposals, the Local Plan (whilst permitting a range of uses in the area) only *proposes* around 160 new dwellings. Land is also safeguarded for a multi-storey car park. The remaining area is either identified as Conservation Area and public open space, or subject to criteria-based policies.

Rep 1.1: There were those who do not wish to see any change and do not wish the Council to pursue any option for development. This has particularly been the view of some local businesses and people objecting to the Derby Cityscape proposal to redevelop the Victoria Inn. Although not necessarily expressed as such, to all intents and purposes these views are best characterised as being support for the 'Local Plan' option (as, although it does not necessarily preclude

development, it doesn't specifically promote large-scale redevelopment).

Rep 1.2: There was also one suggestion that the Local Plan option should be pursued as it is able to react better to the market and so would not preclude alternative developments in the future, should the markets change.

Although there are undoubtedly parts of the AAP area where the Local Plan approach will be the most appropriate, it is not felt that it would be for the whole area. While it could be argued that the Local Plan policies would permit most of what is proposed by the Masterplan, its limitations mean that development would likely be piecemeal, incremental, incomprehensive and uncoordinated. The Local Plan is not a sufficient 'driver' for change in its own right.

The 'Eastern Fringes' represents a key opportunity for sustainable regeneration. It has been identified by Derby Cityscape as a major opportunity for change, which has been supported by the Council. The relocation of acute services from the DRI site also means that a large area of land will become available for development in the near future. It is imperative that a policy framework is put in place to manage this development so that it properly meets the aspirations and planning policy objectives of the Council.

This also provides the Council with an opportunity to breathe new life into Castle Ward. This is an area characterised by large expanses of inefficient surface car parking, low-density industrial uses and poor quality townscape. Owing to its location, what should be an area of vibrancy, activity and community is, to a degree, dormant and not fulfilling its potential. The development of the new Eagle Centre will shift the retail emphasis of the city centre towards Castle Ward, therefore supporting the renewed importance of the area and the need for a comprehensive planning framework.

Furthermore, the AAP should lead to the increased use and quality of Bass's Recreation Ground and other areas of open space, thus improving the quality of life for local residents. It is not considered

appropriate to leave the market to dictate what happens in this area. This would likely lead to the kind of piecemeal uncoordinated development that the AAP hopes to avoid.

It is fair to say that the AAP will create disruption for some people and it will not be able to please everyone affected by it. However, it is felt that the overall benefits for the City far outweigh the costs.

The *Cityscape Masterplan Option* constituted one possible strategic 'reasonable' alternative to the Local Plan. The Masterplan is a more pro-active document that outlines a strategic land use 'vision' for the area. It specifically identifies areas for development and proposes specific uses within them.

In total the Masterplan proposes over 3,500 new dwellings, over 40,000 square metres of commercial floorspace, a new primary school, two multi-storey car parks and various other environmental improvements. This represents a 'step-change' from the Local Plan in terms of the scale of proposed development. It also represents a major shift in approach. Rather than indicate what can be done, it shows what will be done.

Rep 1.3: Apart from those people affected by the plan who, understandably, do not want to see any change, the principle of regenerating this area drew broad support. The details of some proposals did raise concern (which is highlighted throughout the document) but the potential of the area for change was recognised. In addition, the lack of an existing community and the benefits of creating a new one were acknowledged.

Rep 1.4: Residential development did seem to be widely supported. At the current time there is very little feeling of community, which new residential developments could engender. It has become clear that people want the area to feel 'alive' all of the time which would make the area safer and generate vibrancy. The area is currently seen as soulless with little to offer.

As a result of the general thrust of comments received, the concept of providing a pro-active framework for residential-led mixed-use development will be carried forward, with the recognition that more needs to be done regarding the fine detail and location of proposals. It has always been the intention of the AAP to increase the vibrancy of the 'Eastern Fringes' area and create more of a sense of community than already exists. This does not mean that all Masterplan proposals will be carried forward and all Local Plan policies dropped.

It was never likely that one option in its entirety would be chosen over the other or that a consensus would be reached. The Council will seek to amalgamate those aspects and principles of each option that can work together for the most effective and successful plan possible. This will be guided by consultation, discussion and further research. However, any policy outcome must be consistent with the 'Vision' and 'Objectives' that underpin the AAP. The proactive 'Masterplan' approach to things is far more appropriate to achieve this than the Local Plan approach.

Of course, another dimension to this will be the amendments that are made to proposals to reflect suggestions from consultees and the outcomes of research. The second round of informal consultation provides an opportunity to begin to bring these different elements together. The second stage of consultation will present a third option amalgamating the positive aspects of the two options presented at this stage and taking on board other comments and representations. Within the third option will be 'grey areas' where there is still no consensus on the best way forward. These areas are recognised as areas of potential change but that still require further discussion and debate. Options that have been rejected will also be listed in the consultation leaflet to allow further comments.

(2) Visions and Objectives

Although there were no specific comments on the AAP's 'Vision' (other than general comments of support for what it hopes to achieve), there were a small number relating to the 11 Objectives. These are summarised below.

Rep 2.1: A further objective should be added to the AAP as follows, 'To support the educational, health, safety, recreation and community building of the new housing area'.

Objective '3' already encompasses the ideas of ensuring provision and access to all key services and facilities that the 'Eastern Fringes' community will need. It is not considered that this additional Objective would add significant value to what has already been published.

Rep 2.2: Within the objectives of the AAP the word *sustainable* should be prefixed by the words *environmentally* and *socially* sustainable.

The term 'sustainability' encompasses 'social', 'environmental' and 'economic' sustainability. These are the areas which are expected to be addressed by a Local Development Framework and associated 'Sustainability Appraisal'. It would be inappropriate to exclude 'economic' sustainability from consideration. The term 'sustainability' and all of the Objectives make it clear that the environment and the people who will work and live in the area are of extreme importance to the plan.

Rep 2.3: Within the objectives the word 'mobility' should be replaced by 'accessibility'.

*'Mobility' needs and 'accessibility' needs are not necessarily the same things and are not necessarily interchangeable. Rather than replacing one term with the other, it may be more appropriate to simply include 'accessibility' within Objective 3. Objective 3 will, therefore, be amended to read; "that the mobility **and accessibility** needs of the neighbourhood are met"*

Rep 2.4: Objective '6' suggests that design is purely about aesthetic value. Functionality should also be considered in terms of 'home zones' etc. This could be a key part of raising the quality of life in the area.

It is agreed that the concept of 'high quality design' should encompass both the aesthetic and functional qualities of buildings and space. It is considered that this is implicit within the Objective and, as such, no amendment needs to be made.

Rep 2.5: Stronger emphasis should be placed on the need to provide community facilities and support, alongside the proposed new residential development.

These issues and requirements are already expressed in Objective 3 and no amendment is necessary.

Rep 2.6: The objectives should place stronger emphasis upon promoting safety and creating a safe environment for everyone to enjoy.

Objectives 10 and 11 both refer to creating a 'safe' environment. These should be sufficient to satisfy the concerns of the respondent.

Rep 2.7: The Chamber of Commerce has voiced support for Objective 9 but another respondent has suggested that Objective 9 should be reworded to read, '...improving linkages that encourage walking, cycling and public transport use'.

The AAP is fully committed to encouraging sustainable transport methods such as walking, cycling and public transport use. This is supported by the 'Vision' of the AAP which states that it will, '...establish a framework for the creation of a sustainable neighbourhood...' Although the principle of what the respondent wants is already within the vision and objectives, it might be appropriate to make walking, cycling and public transport more explicit within Objective 9, The revised Objective 9 should read;

“To improve linkages between the Eastern Fringes and the City Centre, that encourage walking, cycling and public transport use, particularly focussing on the links between the Railway and the Bus Stations”

Rep 2.8: Wealth being generated in the City is currently leaking away to surrounding areas. The objectives included in the AAP must actively encourage this wealth to be retained.

Objective 5 supports the need for continued economic prosperity and encompasses the concerns of the respondent. There is no need to make any amendments to the Objectives on this basis.

(3) The AAP Boundary

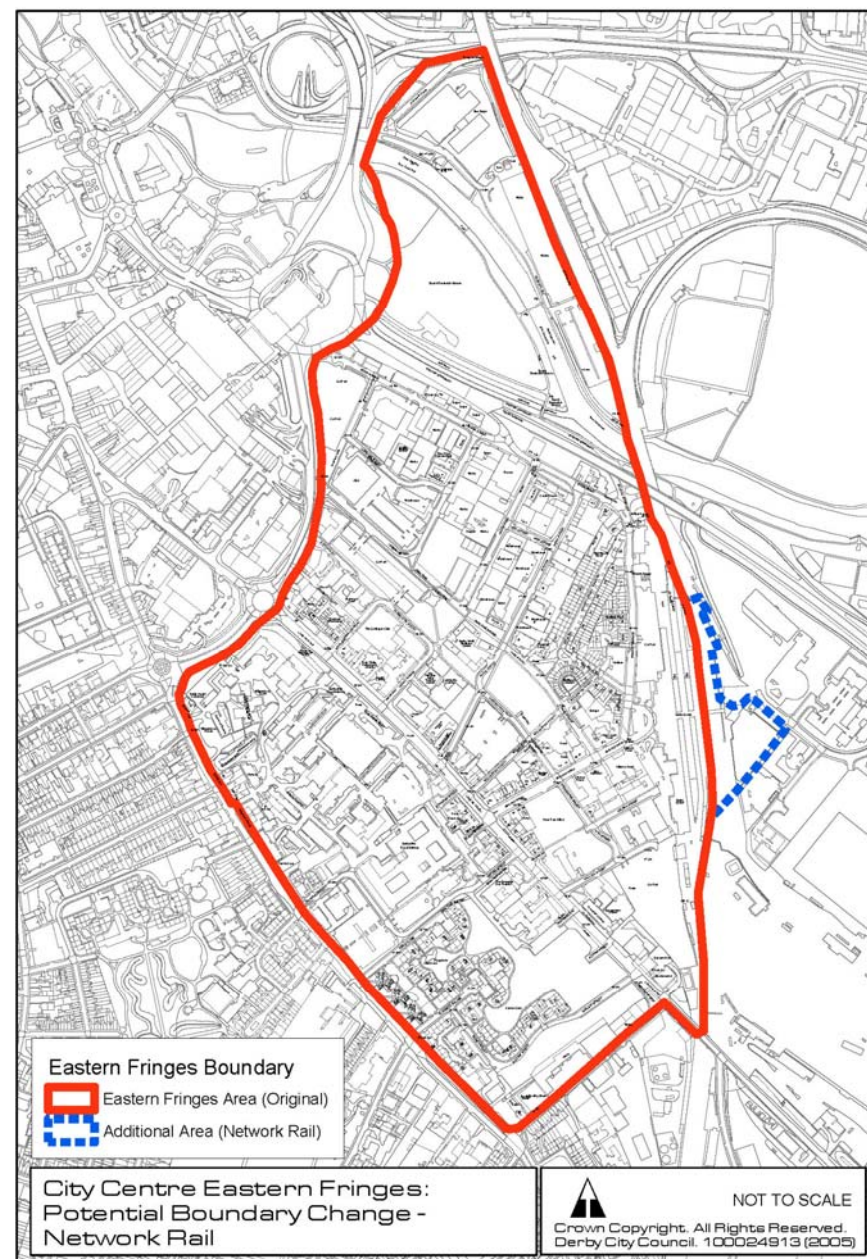
Two representations have requested changes to be made to the boundary of the AAP area.

Rep 3.1: Network Rail requested that the boundary be extended to include the station itself and the car park on Pride Park. This would, in their opinion, allow for a comprehensive 'Station Masterplan' to be developed. They argued that it would seem sensible to include these areas, as proposals within the AAP area will have an impact on the land in question.

Rep 3.2: Derby Cityscape strongly support the principle of extending the AAP boundary to incorporate the land in the vicinity of Derby station. Surplus land should be used to improve facilities at the station through commercial development and through providing the rationale to investigate the provision of innovative transport links into the City centre.

Up to now the eastern boundary has been the railway line. However, it is considered logical to include the whole of Railway Station and the Pride Park station car park within the 'City Centre Eastern Fringes' Action Plan area. The reason for this is that it will enable the Plan to deal with the Railway Station and its associated land holdings in a more comprehensive way than at present. It will allow the potential interrelationships between the different 'railway' sites to be properly considered and dealt with. For this reason, an amended boundary will be put forward at the next consultation exercise. Any changes to the boundary will need to be included in a revised Local Development Scheme submission (LDS), which will be submitted to the Government Office.

It is not considered appropriate for this to extend to the Roundhouse site. Whereas the future of the Pride Park car park is intrinsically linked to what happens on the western side of the station, the Roundhouse site can be treated independently. Development within



the site would not necessarily have implications for the Area Action Plan and can happen in isolation.

It will, however, be important for AAP policies to have regard to the setting of the Listed Buildings on the Roundhouse site. This can be formalised through policy.

Rep 3.3: The Chamber of Commerce also made a representation calling for changes to be made to the boundary of the AAP. They commented that Derby City Council should state exactly why it has prioritised the 'Eastern Fringes' and give full justification for the 'arbitrary' boundary at the southern section of the AAP. The Chamber also recommends that the boundary be revised to also include the Railway Technical Centre (RTC) on London Road (presumably, they see this area as being one that is in need of regeneration and that the AAP could help to achieve this).

It is not considered appropriate, to include the Railway Technical Centre within the AAP area. Although the Chamber considers the southern boundary of the area to be 'arbitrary', it is felt that the railway line / railway bridge which separates the existing Eastern Fringes area from their proposed extension is a natural and logical break.

The Railway Technical Centre does not relate well to the Eastern Fringes area either in terms of location or character and its inclusion is unlikely to add value to the Area Action Plan.

The Eastern Fringes area is seen as a priority for developing an AAP because significant changes to the DRI site are already underway (i.e. the development of the City Hospital site is on-going and the move of the acute services there will occur in the foreseeable future). An AAP is needed sooner, rather than later, to ensure that the necessary framework for the site's redevelopment is in place. It would not be sensible to leave the Castle Ward area out of these considerations.

(4) Land Use Proposals

Derbyshire Royal Infirmary

It is well established that acute services at the DRI are in the process of being relocated to the Derby City General Hospital site in Mickleover. This opens up significant development potential at the DRI site.

The DRI site will play a major role in the development of the Eastern Fringes area and the City Centre as a whole. The NHS Hospitals Trust are also the largest land owner within the Eastern Fringes area. It is therefore imperative that a comprehensive approach is adopted for the whole site to avoid poor quality, fragmented development.

The views and aspirations of the Trust are obviously important in this process. The comments / proposals they have made are as follows (4.1 – 4.8);

Rep 4.1: Identification of land / buildings to be retained for healthcare uses (including a 'Community Hospital' and health 'drop in centre');

Rep 4.2: Retention of the Victorian 'leaded towers' fronting London Road, with sympathetic redevelopment of remainder;

Rep 4.3: Retention of other statutory and locally listed features (including Wilderslowe House, the walls and railings on London Road, the Florence Nightingale Statue and the Queen Victoria Statue);

Rep 4.4: Retention of Devonshire House for healthcare uses;

Rep 4.5: Identification and development of 'Stage 1' surplus land for residential (50%) and retail (50%);

Rep 4.6: Removal from redevelopment proposals of land to north of DRI site (so-called, Stage 2 land) and identification for 'health' uses. It

is unclear as to *whether* this land will be surplus to the requirements of the Trust or *when* it may become available. Development could be deferred to a later date;

Rep 4.7: Open space provision on site to be associated with 'Stage 1' development, with no allowances made for any deferred development (i.e. 'Stage 2');

Rep 4.8: A physical link between Osmaston Road and London Road to be created.

Rep 4.9: A different respondent suggested that several of the DRI buildings could be converted to residential units with the remainder of the residential development taking a cue from the development format in the Oriel Court area. This type of development could be incrementally implemented to measure its level of success in terms of 'social consequence'. It has also been suggested that public open space could be provided on the DRI site as part of the residential development.

Rep 4.10: The same respondent also suggested that if Bass's Rec were to be developed then the open space could be alternatively provided on the DRI site. An area of parkland could be provided alongside the proposed London Road boulevard with some of the Victorian buildings retained and utilised for retail uses. A covered walkway could then be provided leading pedestrians from the parkland and the Eastern Fringes area directly into the first floor of the Westfield development over Traffic Street. This would happen in conjunction with Bass's Rec. being developed for housing / commercial uses.

As noted above, the NHS Hospitals Trust's views and aspirations are important and the AAP will try to satisfy them as much as it is appropriate and possible to do so. However, these views cannot override good planning practice or the objectives of the AAP.

The suggestions made to retain the buildings of historic or architectural importance on the site are welcomed and should certainly form part of the AAP policy for the DRI site. It also fits in well with the potential for

a new 'London Road Policy Area' designation for the London Road frontage that may take in part of the DRI site. The one area of debate may be to consider whether the whole of the original Victorian Infirmary buildings should be retained (as is suggested in the Cityscape Masterplan) or whether only the leaded 'domes' should be retained (as appears to be suggested by the Trust).

For completeness, it would be appropriate to identify these buildings and structures on any Proposals Map for retention (in the case of the listed walls, railings and statues) or opportunities for sympathetic conversion to residential, or other compatible, uses (in the case of listed buildings, parts of the original infirmary and Devonshire House, it is ultimately considered appropriate to retain).

As a result of the NHS Trust's requirements for the retained parts of the DRI, it will also be necessary to identify a 'health use' policy in the Plan that can deal with any health-related development proposals within the proportion of the site not being made available for redevelopment.

The support for some form of residential development on the surplus parts of the DRI site is welcomed. However, the potential development of a supermarket somewhere on the DRI site raises a number of policy issues. National guidance in PPS6 and in Local Plan policies both point to the requirement for retail proposals in out-of-centre locations to be supported by evidence demonstrating;

- A 'need' for development;
- A 'sequential approach' to site selection,
- Evidence that the proposal would not impact on the City Centre's vitality and viability,
- That the site is accessible by a range of means of transport.

No evidence has been put forward relating to these issues and, if such evidence cannot be provided, it is unlikely that this proposal will be seen as appropriate for the DRI site. However, as it has been put forward as an alternative to either the Local Plan or Masterplan

options, the Council is required to give it further consideration. As this is one of the few 'strategic' alternatives to be put forward, it is appropriate to put this forward as an alternative option for consultation and debate. Therefore the area indicated by the Trust for retail development will be allocated as a 'grey area' at the next stage of consultation, with residential and retail as potential alternative options.

This does provide an opportunity, however, to consider the whole issue of retail provision in the Eastern Fringes area. Further thought is needed regarding the scale, nature and location of any retail that may be needed to support the larger community that will result from development.

The Masterplan proposals already identify the 'boulevard' between the railway station and City centre as a location for new small-scale shops and facilities. This could be seen as an appropriate location for shops and services serving a local need. The relative merits of the DRI site, versus the 'boulevard' will need careful thought and consideration.

Although no information has been provided by the respondents on the scale or nature of retail envisaged, it is likely to have a larger catchment area than the Eastern Fringes. The implications of this will need further investigation and research. The views of respondents to the next round of consultation will also be important factors in whether this proposal is taken forward.

In terms of 'Stage 2' land, it is recognised that there is uncertainty over when or if this will become surplus to the requirements of the Trust or not. It is accepted that the AAP should reflect this uncertainty. However, rather than removing the possibility of redevelopment, it is felt it would be more appropriate to identify the area referred to as a 'longer term' opportunity but also that residential development would be the most appropriate alternative.

The aim of the AAP is to set out a framework within which development can come forward. If there is any chance that 'Stage 2' could come forward then the AAP should identify what the most appropriate alternative is and what form it should take. It would be

inappropriate to rely on a planning application and criteria based policy for this important site. It would be hoped that this compromise position might be acceptable to the Trust. The Plan must be flexible enough to react to market changes as this is one of the tests of 'soundness'.

There are other parts of the DRI that might also benefit from this policy. There is an area just to the north of what will be retained as the 'community hospital (this includes a short stay car park and parts of the hospital buildings). These areas are identified in the Cityscape Masterplan for residential development. However, they are in an area that the Trust would like to retain. These plots actually relate quite well to the 'regeneration' area and could make a significant contribution to the overall success of the redevelopment proposals. Obviously, however, it is not in the immediate plans of the Trust to release these sites but – considering that one site is a surface car park (and subject to other parking solutions and strategies may become surplus to requirements over time) and the other contains parts of buildings that the Trust have already identified in the 'surplus' area – there may be more scope for these sites to come forward than other parts of the 'retained' area. For this reason, it may be appropriate to identify these as 'long term' opportunities for residential redevelopment.

Finally, as is discussed later in the document, a suggestion has been made to redevelop Bass's Rec. and create a new park in either Castle Ward or the DRI. Although the Council does not necessarily support this option, it will be mentioned at the next stage of consultation in order for people comment and /or lend support.

If the proposal to redevelop Bass's Rec did have any merit, then the Castle Ward option is the more appropriate location for the replacement park. Firstly, it would be more centrally located and thus would relate better to the population it would be serving. Secondly, the DRI site is actually quite close to the Arboretum and so a new large park would not make as much impact as if located in Castle Ward. Thirdly, the DRI site does contain a number of listed or locally listed structures. As indicated above, it would be the aspiration of the Council to retain these where it can. While this wouldn't necessarily

preclude the creation of a park, it might make its siting and layout more difficult to achieve satisfactorily.

This will, of course, not preclude the inclusion of open space within any development and the AAP policies will ensure that an appropriate amount, of appropriate types, is provided. The Trust have requested that open space provision on site is linked directly to each phase of development (i.e. additional open space is not required as part of 'Stage 1' to satisfy requirements for 'Stage 2'). This seems reasonable. However, provision would probably have to be made in terms of the layout and design of any public space to ensure that, if desirable, provision from the two phases of development could be combined. This is something which can be considered at later stages or at the detailed planning application stage.

It will also be necessary for any development to ensure attractive, safe and convenient east-west and north-south pedestrian links through the site. Whether such links could be covered is unlikely, but would be something to be dealt with at the detailed planning application stage. The Trust's support for such policies is, however, noted and welcomed.

In conclusion, the third option to be put forward at the next stage of consultation will identify those areas and buildings to be retained, and those areas that should be available for predominantly residential development. The areas considered to be longer term opportunities will also be identified. The area identified by the Trust for retail will be shown as a 'grey area' with residential or retail as the alternatives.

Bass's Recreation Ground and its Environs

Bass's Recreation Ground located in the northern area of the Eastern Fringes is an area of open ground surrounded by mature trees and bounded by the River Derwent, the Inner Ring Road and Station Approach. The land was left to Derby Corporation by Michael Thomas Bass in 1866 and the land is subsequently covered by the Charities Act (1993).

Improvements

Various representations have been received regarding the future format of Bass's Recreation Ground. Numerous responses have called for the enhancement of the area, recognising that current access routes and amenity value need improving.

Rep 4.11: Enhancement options for Bass's Rec have included the provision of sports pitches, improved access routes, redesign of the road system, changing facilities, toilets, a refreshment area and a skate park. It has also been suggested that Bass's Rec could be used for open-air concerts, theatrical presentations or as an 'Ecology Park'.

Rep 4.12: Improvements to the existing 'Rail Trail' and alterations to the phasing of the traffic lights on Traffic Street could provide short term gains by enabling improved pedestrian and cycle permeability in the 'Eastern Fringes' area. These 'softer' options could be tackled in the shorter term and not through the AAP process, but would help make Bass's Rec more accessible. It has been suggested that the use of subways / underpasses should be categorically avoided when improving access to Bass's Rec.

Redevelopment

Rep 4.13: The most radical of the representations has argued that the park has fallen out of use due to its marginalized location. Therefore it has been proposed that Bass's Rec is used for residential and / or

commercial uses and that the open space is provided elsewhere in the AAP area. This could include total redevelopment or instead a balance of different uses / configurations could be considered with the partial development of Bass's Rec for commercial / residential development.

DCC recognise that Bass's Rec is an underused and undervalued asset that needs to be brought back into use. How this is done, will be decided through the AAP policy development process.

The redevelopment option was suggested by a member of the public and therefore must be examined. We understand that there has, in the past, been a great deal of discussion over Bass's Rec and we aware that its redevelopment may not be a popular option. However, this does not mean that it can be ignored and it does not mean that the public should not be given a chance to share their opinions with us.

However, the Council is fully aware of the constraints that exist to developing the site. For example, the majority of Bass's Rec falls within the Environment Agency's 'Flood Zone 3' and potential development could be constrained. This could, however, be negated by the implementation of appropriate mitigation methods.

The site is also constrained by mature woodland, topography, covenants, access issues and its historical value. Owing to these constraints - even if it turns out to be the preferred option from a planning perspective - it is by no means certain that it would be viable.

Derby Cityscape support the retention of Bass's Rec in its current form and support the promotion of improved access. In principle Cityscape have no objection to the idea of an Ecology Park. They have also suggested an option that would include providing playing fields for any newly established educational facilities in the area (if appropriate).

If Bass's Rec. is retained then both access and facilities on the site will need improvement. The Masterplan proposes a pedestrian footbridge crossing Station Approach. While not an ideal solution for everybody, a new bridge link would provide an additional access point that currently does not exist.

The new facilities that would be needed on the park are still a matter for debate and, to a certain extent, depend on the requirements generated through the development of Castle Ward and the additional open space provided within that site. However, a mixture of playing fields and wildlife / ecology features would not be inappropriate.

In conclusion, due to the number of obvious constraints, Bass's Rec will be continue to be identified for retention at the next stage of consultation. However, the redevelopment option will still be highlighted so that people can lend support to the idea or argue against it, if they so wish.

Barlow Street and its Environs

Proposals for the area, located in the south-western part of the 'Eastern Fringes', generated a number of comments, particularly in relation to the Derby Cityscape Masterplan proposals.

Open Space, Amenity, Wildlife and Development Form

Rep 4.14: The Masterplan option proposes the construction of residential terraces on land that it is currently open space. Concerns were expressed over the possible loss of the open space. It was stated that the open space provides a high level of amenity for local people. It also potentially provides a habitat for local wildlife.

Rep 4.15: The terraced residential development proposed in the Masterplan is seen as highly inappropriate and not sensitive to the existing surrounding area. There are also worries over the change in social mix that new development could generate and the extra noise.

It is felt that a residential scheme would still be appropriate on this site. However, there is an opportunity to include the industrial area to the south of the open space within a potential housing scheme. This would provide an opportunity to provide residential development, but in a more sensitive format than that offered in the Derby Cityscape Masterplan.

While it is unlikely that all of the open space could be retained, development in the form suggested would help to retain the generally open characteristics that currently exist.

In terms of losing open space, it must be remembered that the green strip is not identified as 'open space' in the Local Plan. The land in question was originally held in reserve for potential highways improvements and is not recognised as a formal piece of open space.

This, in itself, does not justify its loss and it is recognised that this strip does provide some 'amenity' open space for nearby residents. It is considered, however, that as the residential properties to the north of Barlow Street are situated within a relatively open setting (with existing amenity space), there is some scope for releasing the land to the south of Barlow Street.

The proposed style of housing development should also lessen the impact on the open space and the open character of the area (hopefully reducing the concerns of nearby residents).

In terms of wildlife, the site has not been identified by the Derbyshire Wildlife Trust (DWT) as a site with nature conservation significance. However, if it can be demonstrated that there are wildlife interests on the site, then these will be taken into account. It should be possible to mitigate any environmental issues that may arise from the development of this site. Policy E5 of the Adopted CDLP Review provides a 'catchall' policy, which protects biodiversity interests throughout the City. This policy would need to be taken into account when considering any planning application or proposal on this site.

In conclusion, the site will continue to be identified for residential use at the next stage of consultation but it will be made clear that development should attempt to respect the openness of the green area.

Access and Parking

Rep 4.16: Concerns have also been revealed relating to the problems of access and parking that new development could generate. The area around Barlow Street is currently viewed as a 'little oasis' that is now under threat.

Rep 4.17: Another issue raised was that the existing parking areas at the DRI could be utilised in order to operate a 'park and walk' scheme into the City. A 'park and walk' scheme could generate passing trade for the proposed retail units along London Road.

Rep 4.18: By re-routing Barlow Street onto Bateman Street (across the front of the existing industrial site) it would free up more parking land, reduce the need for MSCPs within the AAP area and create a safer junction than the existing one. Parking problems in the area have been intensified by the implementation of parking meters in the surrounding streets. This must be considered in the overall strategy and as part of the holistic approach.

Potential developments will have to be assessed in terms of access and their effect on parking in the area, (as with all development). It is felt that the re-routing of Barlow Street might have benefits but could be constrained by cost implications. This improvement could however be secured through developer obligations, if ultimately considered an appropriate course of action. It will therefore be detailed as an option at the next stage of consultation.

The possibility of retaining the existing car park as some form of 'park and walk' facility is not supported. It is considered too far to walk from this location into the City Centre to be an effective alternative to existing City Centre car parks or proposed car parks in the Eastern Fringes area.

Dovedale Unit

Rep 4.19: It has been pointed out by the NHS Hospitals Trust that the Dovedale Unit will be retained for health uses once the acute services are relocated to the City Hospital site. The Cityscape 'Masterplan option' identifies this building for residential development.

Alterations will be made to the options in order to take the aspirations of the NHS Trust into account. These will be incorporated into the further proposals for consultation.

London Road Retail

Rep 4.20: The Derby Cityscape Masterplan identifies a row of retail units at the southern end of London Road, between Barlow Street and Keeble Close (these would be situated on the ground floor of the proposed apartment block). It has been suggested that this would not be an ideal location for retail activity and would elongate commercial activity reducing the vitality and viability of other facilities along London Road. The marketability of any units built here has also been questioned.

DCC agree that the location of the proposed retail units are not in an optimum location to serve the existing and proposed residential communities. These retail units should be located in a more accessible and central location. It is accepted that increasing the number of retail units along the London Road frontage might have an adverse impact on other units in the area and could dilute the effectiveness of any 'proper' neighbourhood retail facilities that may be developed elsewhere. Therefore, it is proposed to put forward an amended proposal that does not show any 'active frontages' on this site. It is felt this area should be solely allocated for residential development.

London Road

The Derby Cityscape Masterplan proposes significant public realm improvements along London Road in order to enhance the pedestrian experience. It is not proposed to restrict vehicular access or activity but will improve the pedestrian environment – hopefully making it a more attractive route to the City Centre and promote walking.

Rep 4.21: London Road was recognised as an asset of the area that should be maintained and enhanced. This is consistent with the Cityscape vision for the area. Comments were received, however, that differ from the Masterplan option. One suggestion was to pedestrianise a section of London Road. Traffic would be diverted through Canal Street and onto Station Approach under this proposal, therefore freeing up the north eastern end of London Road. This would, it was argued, compliment the idea of the 'Park and Walk' scheme which has also been proposed at the southern end of London Road (see comments on Barlow Street).

Partial pedestrianisation of London Road is completely unacceptable. Station Approach is already very busy. Adding London Road traffic to it would further compound this. This would, in all likelihood, lead to increased congestion (and potentially pollution) without any significant benefit to the area as a whole. It would also mean that traffic that would usually use London Road then Bradshaw Way would have to make a much longer journey, which is considered unsustainable.

London Road Conservation

Rep 4.22: Some comments raised at the consultation seminar indicated that London Road has a number of important architectural features that should be protected.

London Road is a unique corridor into the City centre with its own character and identity. Assets such as these need to be retained and should form a key part of the emerging AAP. It is felt that a specific 'London Road' policy which sets out guidelines for new development is

worthy of consideration. It is felt that such a policy would be able to ensure that the quality of the 'streetscene' as a whole is not undermined. Therefore, a 'London Road Policy Area' will be indicated as a potential policy in the second round of consultation.

Rep 4.23: The NHS Hospitals Trust have indicated that the Nightingale Macmillan Hospital and Trinity Street properties/land may become available for reuse in 2009. At this time, they will be marketed for residential and / or commercial use. The Trust have asked that the AAP reflects this.

It is unclear whether the Trust are suggesting that the buildings or the land will be available for reuse in 2009. At the time of this consultation exercise, there were no proposals to redevelop any buildings on this part of the London Road frontage so therefore these buildings will be identified for retention and re-use for the purposes of the next consultation stage. Although they are not listed, or locally listed buildings, it may be that the AAP could eventually provide some protection to these buildings if they are deemed to have architectural merit.

North of the River

Rep 4.24: Only one response was received regarding the land to the North of the River Derwent. This area currently houses the Derby Evening Telegraph offices, the Smithfield pub and the Trent bus depot. Derby Cityscape identifies the area for residential apartments. The Environment Agency responded to this issue pointing out that the development would be in an area of flood risk and therefore if the development is to proceed then mitigation measures must be taken.

It can be assumed that as only one response has been received that there is general support for residential development in this location. Any potential developments located within areas of flood risk in the AAP area will be determined in line with Policy GD7 of the CDLP Review, which requires DCC to take advice from the Environment Agency to ensure that any compensatory measures will fully mitigate

potential flood problems. Development, which fails to satisfy existing flooding policies, would fail to get planning permission. This principle will be carried through to the AAP.

Castle Ward Boulevard and Surrounding Area

The Derby Cityscape Masterplan proposes a 'boulevard' through the centre of Castle Ward, including a 'civic square' and exemplar streetscape. This will create an improved visual link between the City Centre and the railway station. The new pedestrian and cycle friendly street environment would mix commercial, retail and residential uses enhancing the direct link between the railway station and the City Centre. The public square would be fronted at ground level by retail, bar and café uses.

Surrounding the boulevard and civic area would be neighbourhood scale services and facilities to serve the residential community, (including the development of a primary school and community public open spaces). The wider Castle Ward Area will be made up of residential development (incorporating a mixture of terraces and apartment developments).

Rep 4.25: During the initial stage of informal public consultation, comments were registered relating to the Castle Ward area and in particular the form and uses along the proposed 'boulevard'. The general principle of the boulevard would seem to be supported in terms of the potential to improve links between the City Centre and the railway station. It is the detail of the proposal that needs to be refined before the next stage of informal consultation begins.

Rep 4.26: It has been stated that the Derby Cityscape Masterplan proposes too much residential development, which will lead to high densities and 'cramming'. It has also been mentioned that too much of the proposed development will involve the construction of apartments.

*The general support for the Castle Ward 'boulevard' is welcomed and this principle will be carried through to the next stage of consultation. The improvement of links between the City centre and rail station is a key aim of the Local Transport Plan and various other strategies, such as the emerging **City Growth** Strategy.*

*The exact nature of uses that will be on the boulevard is yet to be fully determined and will be the subject of further debate. However, a principle of '**active frontages**' along the majority of its length will be an important part of the proposals (which also seems to have gained some public support). Another important element will be the creation of **open space** (or spaces) somewhere along the boulevard that can act as a sort of 'civic square'. The exact nature and location of this space can be decided later in the process.*

It would appear that the creation of a new residential community is also generally welcomed in principle; the detail of the proposals has raised concern, however – in this instance related to the level of housing proposed.

Concerns over 'town cramming' are recognised and understood. However, it is possible to achieve high densities of dwellings while still maintaining a satisfactory living environment. Indeed, proposals for residential schemes which could not achieve this, in terms of amenity, privacy, security and environment, would not be permitted to come forward.

As this is a City Centre location, it would be expected that densities would be higher than in more suburban locations. Indeed, the residential properties that already exist in the area are at a high density. Recent draft Government Guidance on housing specified that minimum densities for City Centre development should be 70 dwellings per hectare. This would be expected to be the minimum for proposals in the area. However, it does not mean that there will be no flexibility over house-types, layouts or design. The overall aim for the area is to create an urban environment of the highest quality for people to live. This objective will not be compromised by over intensive development. High density urban living has been achieved successfully in cities such

as Manchester, Newcastle and Glasgow so there is no reason why it cannot be achieved in Derby.

The exact nature of the concern over the number of apartments has not been made clear. However, no decisions on the precise make-up of residential areas have been made. What we are specifically concerned about at this stage is establishing the land-use principles for the area. Once these are established, we will try to create suitable design and layout policies that are flexible enough to accommodate different dwelling types, dependent on the market and the needs of the area.

Rep 4.27: The existing Castle Nursery School have stated their aspiration to remain in the Castle Ward vicinity. They argued that a facility such as this could clearly be beneficial within the new residential community and contribute to the creation of a 'sustainable community'.

It is an Objective of the AAP that all necessary facilities that are needed to service development within the AAP will be catered for. Educational facilities are an important part of this. There is no reason to assume at this stage that a nursery school would not be an appropriate use within the area. The issue to consider is exactly where within the AAP area should this facility be provided? One potential location would be somewhere along the 'boulevard' or, perhaps, it could be accommodated with the primary school. Perhaps there is another solution?

Rep 4.28: It has been suggested that Castle Ward needs something iconic to put it on the map at a local and also regional level. An impressive, large-scale public art installation could help achieve this. It was suggested that a piece of artwork on the same scale as the Angel of the North in Gateshead, could be appropriate to help re-image and revitalise the area.

*It is an idea with merit. The draft **City Growth Strategy** published late last year also suggested that an iconic piece of public art, albeit it located somewhere along the A52 at the gateway to the City would be*

the best location. This strategy also states, however, that the 'A52' artwork could be supplemented by a series of related pieces throughout the City. The Eastern Fringes could be an ideal location for one of these pieces of art. It could also help to provide an identity and focal point for the area. The policy principles for Castle Ward put forward at the next consultation stage will include provision for such art. Whether it could be of the scale of the 'Angel of the North' is debateable, however, as it may be completely out of character with the rest of the area.

Rep 4.29: The safety of pedestrians using the boulevard will be of key importance. It must be ensured that the route is made as safe as possible so that it becomes the main thoroughfare linking the railway station and the City Centre.

Safety will be promoted through appropriate design and lighting and through the creation of vibrancy by active ground floor uses. This will encourage natural surveillance. Objective 10 requires the creation of 'safe routes'. Any policy for the 'boulevard' must be tested against, and satisfy, this objective.

Rep 4.30: One respondent commented that they object to any form of high rise living within Castle Ward or the wider AAP area.

What is meant by 'high-rise' living has not been made clear by the respondent (i.e. they have not specified at what point an apartment block would become 'high-rise') nor have they stated why they would object. However, the objectives of the AAP would not allow development that would either create an unsatisfactory living environment for either existing or new residents in the area or development that would be unacceptable in terms of design. 'High-rise' living is not in itself a 'bad' thing. Poorly designed and poorly located 'high-rise' living could be (as it would be with any form of housing development). Poorly designed development will not be permitted. In any event, the exact form or nature of housing in the area has not been decided as yet.

Rep 4.31: The scale and massing of the new development along the boulevard should be appropriately designed and respect the character of the surrounding 'railway' environment.

This point is noted. The importance of the Railway Conservation Area on setting the character for this area cannot be underestimated. Certainly development within or adjacent to the Conservation Area would be expected to draw on the character and detailing of the railway related buildings in the Conservation Area, but they would also be expected to demonstrate the best of contemporary design.

There must also be a recognition, however, that the sphere of influence of the Conservation Area does not extend over the whole Castle Ward area and, in areas closer to the City Centre, different forms of development could be provided that create a new and distinctive urban form in this part of the City.

Rep 4.32: There needs to be clearer information regarding which areas of Castle Ward are to be pedestrianised and which areas will be pedestrian priority zones.

This comment is noted. Within Castle Ward, the Council will promote the concept of 'home zones', whereby pedestrians are given priority throughout. This could be done through the implementation of appropriate road design techniques (build-outs, chicanes, landscaping etc) and speed limits.

It is envisaged that the 'boulevard' will be fully pedestrianised at least from Canal Street onwards (taking in Liversage Walk and Liversage Street).

It is inevitable that parts of the Castle Ward area will have to remain open to the car to enable adequate access.

Rep 4.33: The boulevard should include community uses so that it can develop into a vibrant and viable centre for the local residential community to use. Localised service provision will enable the area to become a sustainable urban community.

See above comments. The 'boulevard' could well include community uses as well as retail, food & drink or leisure uses. This would give it an additional role more akin to a 'neighbourhood centre', which could be another beneficial feature of the boulevard.

Rep 4.34: The NHS Hospitals Trust have made representations on the 'Bemrose' and 'Sovereign' Car Parks (off Wellington Street). They have suggested that these car parks, which are currently used for staff parking, may still be required for hospital staff after the acute services have relocated to the City General Hospital if the necessary levels of parking needed at the City Hospital cannot be provided. They have suggested, therefore, that these car parks are removed from the redevelopment / regeneration proposals and are identified as being retained for surface parking.

These two car parks represent 1.32 hectares of prime development land in the centre of Castle Ward. They are already identified in the City of Derby Local Plan Review for housing or business development and are identified in the Cityscape Masterplan for residential development (it is also seen as a potential location for a multi-storey car park). Identifying these sites as being retained for surface parking would, therefore, be an alternative strategy to either the 'Local Plan' option or the 'Masterplan' option.

In many ways, following the suggestion of the Trust would be a backward step in terms of the comprehensive regeneration of the area. The presence of so much inefficient surface car parking in this area is one of the reasons why the AAP is needed and it would seem perverse to persevere with surface parking on this site in the long term. In any event, proposals in the AAP must be able to satisfy the 'vision' and 'objectives' that have been adopted for the Plan. Retaining this site for staff parking would, on the face of it, fail to meet these objectives.

It is also not clear that, in the long term, retaining these car parks is the preferred option of the Trust – rather it is a contingency plan if other opportunities do not materialise. For this reason, it would seem sensible to identify what the alternative uses will be should the sites become available over time. The AAP should be a pro-active

document which reflects long term hopes and aspirations, not short term contingencies and requirements.

In conclusion, it is not felt appropriate for this proposal to be given significant weight in future consultation as it is a proposal that would fail the objectives of the AAP.

Railway Conservation Area and its Environs

The Railway Station

The railway station is a citywide facility located within the AAP area. It is paramount that the station and the surrounding areas provide a quality environment to 'welcome' people into the City. For many, a station is the first and last impression a town or city makes. Therefore it is foremost that the station is included as an integral part of the overall vision and that it forms a cornerstone of the AAP.

Relocation of the Railway Station

Rep 4.35: One representation relating to the railway station has suggested a 'lateral approach' to solving the problems that exist in Castle Ward. It is suggested that the station is entirely relocated nearer to the City centre, close to the Eastgate Bridge. This would improve vehicular and pedestrian access, would create a modern purpose built gateway into the City, would make Derby more 'user friendly' and would be a positive move towards improving public transport. The new station could be one of Network Rail's flagship stations, which would be an advert for a modern and vibrant City.

The Council has put this suggestion to Network Rail for their views. Whilst realising that there may be benefits from relocating the station, Network Rail do not believe that it is a viable solution. They have stated that the station works, whether it be an upgrade of the existing station, or a completely new one, would have to be justified through a viable business case. Unfortunately, in the absence of any third party funds, there is likely to be a shortfall in funding.

In any event, finding a site for a new station outside the 'Eastern Fringes' area would be outside the scope of the AAP. As Network Rail do not appear to support the idea of relocation, it is probably more appropriate at this stage to consider ways of improving existing facilities.

Access

Rep 4.36: Disabled access to and from the station is limited, as is the access in and around the station. Further areas that need to be looked at for improvement include, improving vehicular circulation and access around the station, improving the location of parking facilities, improving station facilities and related retail and also improving the level of residential and office development in the vicinity.

Rep 4.37: Network Rail and Derbyshire Transport 2000 have pointed out that many of these areas for improvement could be partially resolved by using the Pride Park side as the main entry and / or exit point. This could reduce congestion on Midland Road and London Road and would tie in with the public realm improvements that are planned for the London Road area.

Rep 4.38: It became clear at the public consultation event that there are concerns regarding this potential option due to the possible impacts upon congestion at the Cockpitt Island.

DCC recognise that current access and circulation layouts at the station are inadequate and will need to be improved through the AAP process. DCC's influence is partially restricted around the station area due to the operational requirements of the railway station; it is therefore imperative that a strong relationship is developed between Network Rail, DCC and the AAP. DCC will actively work in partnership with Network Rail to develop strategies to improve the station and the surrounding area.

Potential new proposals for making more efficient use of Network Rail land holdings in the area may help achieve these aims (see below).

Facilities

Rep 4.39: A very specific point that was flagged up during the consultation was that the railway station would benefit from the provision of a tourist information point.

Comment has been noted; however the AAP cannot necessarily influence the internal arrangements of the station.

Links

Rep 4.40: The idea to improve public transport links between the railway station and the City centre is widely supported. A dedicated light rail system as well as improved (cheaper and more frequent) bus services have received public backing.

Comments have been noted. Improving links between the City Centre and the Station is a key objective of the Plan (Objective 9). .

The prospect of developing a light rail system is not necessarily within the scope of the AAP. However, what it can achieve is the assurance that the potential for a LRT system is not prejudiced by development within Castle Ward . Other proposals, such as the creation of a dedicated bus link along Siddals Road and environmental improvements along major routes into the City Centre (e.g. the 'boulevard') may also be part of the Plan. These measures should all serve to improve the links.

Proposals for the Redevelopment of Railway Station Car Parks

In relation to the Station area and land connected to station use, a number of new proposals have been put forward by Network Rail for consideration. These are outlined below, along with justifications made for them.

Proposal 1 – Multi Storey Car Parking located on Pride Park:

Rep 4.41: This proposal could provide parking spaces across 3 to 4 storeys to cater for future increases in station usage and to replace capacity being lost at the front of the station (see Proposal 3). Design principles detailed in the AAP should ensure that the structure was of the highest quality and of a 'robust' nature to integrate with the character of the existing railway surroundings. The Draft Conservation Area Appraisal recognises that the view of the Roundhouse from the railway Station is an important vista that should be protected and / or enhanced. This must be considered for developments in this sensitive area.

Access would be from Pride Park and therefore could potentially reduce congestion on the primary routes within the Eastern Fringes area. The impacts on the highway network of this proposal will need further analysis if carried forward to the preferred options stage.

Proposal 2 – Multi Storey Car Parking located on the existing South car park:

Rep 4.42: Existing surface level parking does not make efficient use of the land. An MSCP on the northern most section of the car park would release development land to the south. Platform 1 would be directly accessible from the new MSCP and secure parking could be provided for tenants of Midland House. Once again it should be ensured that the development met all the design criteria detailed in the AAP to guarantee a high quality design standard and that its relationship with the adjacent Listed Building would have to be acceptable. An access point from London Road (across the existing vacant land) could be created. This could reduce traffic movements within the core of the 'Eastern Fringes' area and help facilitate the pedestrian friendly environment being proposed.

Proposal 3 – Re-organisation of parking area at the front of the station to allow for the development of an efficient and sustainable transport interchange:

Rep 4.43: The proposed MSCPs in peripheral areas could release land at the front of the station for the development of improved transport links / interchange and public realm improvements. The existing North car park could be released for the development of a mixed use scheme and / or integrated with the potential refurbishment of Wyvern House. The locally listed Wyvern clock and pediment could be relocated back to the primary station area.

The new transport interchange would provide space for a dedicated bus service, a taxi drop off area, improved vehicular circulation and a cycle park area. There could be the potential to integrate an ULTRA (light transport) system in the future.

These proposals are some of the few that are significantly different from either the Masterplan or Local Plan options. This alone means that they merit further consideration.

There is some obvious logic in trying to make the most efficient use of land that is currently being used as surface parking. On the three car parks being considered, there are currently 561 parking spaces covering approximately 1.85 hectares of land. Providing two multi-storey car parks on the Pride Park and South car park sites could accommodate the same levels of parking on approximately 0.75 hectares – thus providing over a hectare of land for other beneficial uses. This also does not include potential changes / improvements to the short stay parking situation in front of the station.

Increasing parking on the Pride Park side of the site could also move a significant amount of traffic from Station Approach and the station frontage. This could be a significant advantage of this option.

This does not mean that the proposals are not without their issues. It is accepted that MSCPs can be unpopular structures and people are wary over both their sustainability and design credentials.

In terms of sustainability, it is not anticipated that the new car parks would dramatically increase the number of spaces currently anticipated to be needed at the station. The 'land-savings' made by the car parks could, however, provide new 'brownfield' housing land – which will ultimately reduce pressure on greenfield resources on the edge of the City or new employment possibilities. If an increase in overall levels of parking is required, the multi-storey option is the most efficient way of catering for that extra demand. It is not felt that developing multi-storey car parks will necessarily promote additional car use. Owing to the Eastern Fringes' proximity to the City Centre, increasing the population of this part of the City is also likely to be able to reduce the overall 'need to travel' by putting people nearer to their places of work and their leisure needs thus facilitating linked trips.

In terms of design, Network Rail recognise that the proximity of the car parks to listed buildings and the Railway conservation area mean that they will have to be designed to very exacting standards. The AAP will contain detailed policies designed to ensure that the quality and character of listed buildings would not be harmed by new developments. The Draft Conservation Area Appraisal notes that consideration must be given to the scale and massing of any development in the vicinity of the Roundhouse complex.

The potential redevelopment of the North car park also raises significant issues in relation to design and layout as it sits entirely within the Railway Conservation Area. If the redevelopment proposal were to go forward, the AAP would set out guidance on how any buildings on that site should be designed so as to not impact on the character of the terraced buildings opposite.

The suggestion to move the locally listed clock-tower from Wyvern House to somewhere more prevalent in the railway area is also worthy of further consideration. Any redevelopment of the North car park

would hide this significant feature and moving it could be of benefit to the whole Conservation area.

The land-uses that could go on the site does need further consideration. For the sake of consultation, the Council will allocate the area as a 'grey area' and ask what sort of land use should be developed. The Council will also look to Network Rail to make further representations relating to the end uses for these new development opportunity.

A similar situation exists for the remainder of the South car park. The development potential of the site is clear but, again, the potential land-use needs further consideration. Again, for the purposes of the next stage of consultation, the remainder of the South car park will be allocated as a 'grey area' to discover the favoured land use.

A final benefit of following this course of action is that it will open up the potential to improve the front of the station, not only aesthetically but also functionally. Removing conflicts between pedestrians and cars (including taxis) would be extremely beneficial, as would improving public transport access to the site (which is currently very poor). Again, the Council will look to Network Rail to suggest how this would be achieved in practice. However, in order to facilitate these changes the AAP will need to include a pro-active policy that facilitates such improvements. Again, owing to its location within the Conservation Area, detailed design guidelines will be in place to ensure appropriate alterations are made.

Railway Conservation Area

Two Conservation Areas; the 'Railway Conservation Area' and the 'Hartington Street Conservation Area' overlap the 'Eastern Fringes' area. The latter of the two intrudes very minimally into the AAP area, at the western perimeter and no comments have been received relating to it.

The Railway Conservation Area (CA) covers a large section of the land surrounding the station and is almost entirely within the AAP area. This, along with the large number of comments received relating to the Conservation Area, has prompted the Council to carry out a 'Conservation Area Appraisal' (CAA). This has highlighted the fact that the Railway CA houses a wealth of Victorian railway heritage, through its buildings and urban form. The area is an expression of Derby's railway legacy.

The CAA will be used to guide AAP policies and its findings will be important in setting out options and responding to comments made during consultation. In addition, the Draft CAA makes certain recommendations for AAP policies. The Draft CAA should be read in conjunction with this and other AAP documents. Its content will be important to the final form of the Plan.

Conservation Area Boundary

Rep 4.44: In general, feedback has suggested that the Conservation Area should be maintained and in places extended and / or enhanced. It has been suggested that the Railway Conservation Area could be extended to include the Roundhouse and the buildings in the vicinity of the Brunswick public house. The Draft Conservation Area Appraisal highlights further potential extensions to the Railway Conservation Area. These include the inclusion of the Roundhouse engine shed complex, the Alexandra Inn Public House and the disused buildings adjacent to the Station and behind Midland House.

The Draft CAA also sets out the principles it would expect to see for development on the edge of the Conservation Area, but particularly for sites proposed for potential change and / or development within the Conservation Area including:

- North Car Park, Railway Terrace;
- Land off Roundhouse Road, across the tracks from the railway station

- South Car Park, off Hulland Street
- Land off Wellington Street (space behind buildings within the Conservation Area)
- Railway Terrace opposite the main station entrance
- Building group at corner of Nelson Street and Carrington Street

The AAP will identify the parts of the Railway and Hartington Street Conservation Areas that fall within its boundary. However, the AAP cannot extend a Conservation Area boundary. This can only be done through specific legislation.

What the AAP can ensure, however, is that policies exist to maintain the character of the Conservation Area and ensure development on its periphery would not have an adverse impact. The guidance in the CAA will be invaluable in setting out the policy principles that the AAP will need to include to ensure that this protection is in place.

Architectural Value

Rep 4.45: Provision should be made in the AAP for the retention of historic buildings that have historical and/or aesthetic value. The Draft Conservation Area Appraisal recognises that Amber House, Churnet House, the former Railway Institute and the Victoria Inn are all key unlisted buildings within the AAP area. It would therefore be detrimental to the character of the area if these buildings were to be lost.

The Draft CAA recommends policies which;

- Set out what the character of the Conservation Area is and which identify what local architectural details and materials should be given attention;
- Retain and enhance the building group at the corner of Nelson Street and Carrington Street;
- Ensure that the inherent Victorian character of buildings on Railway Terrace (opposite the station) is retained
- Propose street tree planting along Midland Road

It is a key objective of the AAP to maintain and enhance the best elements of the built environment in the Action Plan area. Buildings with historical and/or architectural interest add to the unique identity of the 'fringes' area that will form a constituent part of the overall redevelopment of the area.

The Draft Conservation Area Appraisal makes recommendations as to how the Railway Conservation Area could be enhanced in the future. The recommendations are very specific, some too specific for the AAP to deal with, but are non the less important to consider in the broader context of enhancement. Future enhancements could include bringing disused properties on Nelson Street back into full use, improving surfaces, setts and kerbs, repainting of window frames and facades and the planting of Plane trees along Midland Road to mirror those on London Road.

All of these proposals appear sensible and appropriate. The general policy principles set out in the appraisal will be carried through to the next stage of consultation and debate.

In terms of specific buildings mentioned in the appraisal, it seems appropriate to identify Churnet House, Amber House and Wyvern House as buildings of architectural importance which should be retained and refurbished for beneficial use.

Multi Storey Car Parks (MSCPs)

Rep 4.46: Numerous representations have commented upon the inappropriateness of locating a multi storey car park (MSCP) within or adjacent to the Conservation Area. MSCPs are not traditionally viewed as aesthetically sensitive buildings and it is felt that the construction of an MSCP, either at the station or on Park Street, would have detrimental effects upon the overall character of the Conservation Area.

DCC feel that public parking provision will be essential in the 'Eastern Fringes' area. In order to use land in an efficient and sustainable

manner it will be necessary to utilise MSCPs. All new development within the AAP will be subject to strict design policies to ensure that development is of the highest quality. This will apply to the development of new MSCPs. There are various examples of where MSCPs have been designed to a high and robust standard, which could be applied within the AAP area. High quality design standards should, therefore, mitigate any adverse effects upon the character of the Conservation Area.

In any event, existing Conservation Area policy would not permit development on its periphery that could have a detrimental impact on its setting or character. Responses such as this do, however, re-affirm the need to ensure that development is of a high quality design that respects its surroundings.

The Merry Widows and the Victoria Inn

Rep 4.47: A degree of concern has been highlighted regarding the future of the Merry Widows Public House, located opposite the Railway Station on the corner of Midland Place and Railway Terrace. The building forms part of the terrace that is earmarked for commercial development in the Cityscape Masterplan. Representation has been received from the landlord who has stated that a 500-name petition has been signed objecting to the loss of the pub. It is argued that the pub is one of the few remaining traditional pubs in the City centre and that more and more pubs are being converted into 'commercialised eating-houses' rather than providing the basic traditional pub that still appeals to many people.

The Draft Conservation Area Appraisal notes that the terrace opposite the main entrance to the station (inclusive of the Merry Widows) makes a 'moderate contribution' to the character of the area, but has been damaged by unsympathetic additions. The Appraisal goes on to state that the 'character' of these buildings should be retained, although there is potential for enhancement (through the refurbishment and reinstatement of traditional shop fronts at ground floor level and timber sliding sash windows at first floor level). It argues that any further loss

of Victorian character within the area would be detrimental. The architecturally coherent group of Victorian buildings with integrated public house were a common theme in Victorian Derby.

The Draft CAA indicates, therefore, that retention and refurbishment of these buildings would be the preferred option from a conservation perspective. However, it does recognise that these buildings have lost some of their character and that enhancement is possible. What appears to be important is that the Victorian character of the area is not undermined. For this reason, the terrace will be identified as a 'grey area' for the purposes of the next round of consultation. It is sensible to consider two options for these buildings; one which promotes retention and refurbishment and one which promotes sympathetic redevelopment. What is clear is that the Conservation Area would benefit from improvements to this terrace. Whether refurbishment or redevelopment is the most appropriate way to bring these benefits can be put to the test.

The future of the Victoria Inn has generated the highest level of public concern and media interest in response to the Derby Cityscape Masterplan option. The Masterplan proposes the development of an office complex on the parade opposite to the railway station and partially along Midland Place, inclusive of the Victoria Inn. Numerous responses (approximately 50 percent of all responses and a 3000 name petition) have objected to the proposed loss of the venue in a potential redevelopment scheme.

Rep 4.48: Objections have been based around the argument that the 'Vic' is the epicentre of the City's music scene, which in turn supports the development of local bands and attracts musicians and custom from all over the country. The 'Vic' therefore plays a major citywide role as a community facility and cultural asset. The 'Vic' provides vital trade for other local operators such as hotels, taxi firms, takeaways, bus operators and local promoters. The loss of the Vic could therefore be potentially damaging to the local economy.

Rep 4.49: It has been explained that very few venues in the surrounding area provide the same amenity that allows unsigned

performers to appear regardless of genre or age. Without the 'Vic', Derby would be seriously limited in terms of alternative music venues. It has also been argued that this would be to the detriment of the creativity of future generations. A venue such as this simply cannot be moved without losing its unique atmosphere, amenity and identity.

Rep 4.50: One of the aims of the Derby Cityscape Masterplan is to make the City a more 'vibrant' and 'exciting' place. It has been indicated that by "destroying" one of Derby's few live music venues, the Cityscape option would achieve the opposite. The 'Vic' adds to the City's vibrancy as well as providing an important social function.

Rep 4.51: It has also been made apparent that on top of the intangible benefits that have been mentioned in the responses, the 'Vic' has important architectural qualities that should be retained. The Draft Conservation Area Appraisal confirms that the Victoria Inn, along with the Waterfall, significantly contribute to the identity of the Conservation Area as a whole.

Rep 4.52: Only one respondent has shown direct support for the loss of the Victoria Inn.

There are two overriding issues to consider when dealing with responses to the Victoria Inn. One relates to the function of the building and one relates to the form of the building.

The pub is an important and popular venue. However, this alone would not merit its retention. The venue could be replaced elsewhere in an alternative location and / or building. In circumstances where the retention of the building contradicted the Objectives of the AAP, providing a new location for the venue may have been the preferable option.

One objective of the AAP is to protect the best elements of the built environment. Therefore, we have to consider whether this building constitutes one of the 'best elements' of the area or not.

The Draft CAA notes that the Victoria Inn (along with 'The Waterfall') frame a historic corridor along Midland Place and contribute 'significantly' to the overall identity of the conservation area, in terms of their quality and age. The Victoria Inn shares architectural features with the listed railway cottages and it is thought that further loss of this Victorian character would be 'extremely harmful' to the Railway Conservation Area. The Draft Conservation Area Appraisal lists the Victoria Inn as a 'key unlisted building' within the conservation area and recommends its retention.

It is clear that the Draft CAA is in direct conflict with the aspirations Derby Cityscape in this regard. However, the Council must have regard to its own appraisal and it would not be proper to continue to identify the Victoria Inn for redevelopment in light of its recommendations. For this reason, the next stage of consultation will remove the 'redevelopment' option from consideration. This will not stop people proposing redevelopment of the Victoria Inn. However, any such proposal will now have to be backed up by evidence which either refutes the Draft CAA and PPG 15 or which raises material considerations that would outweigh the conservation benefits of retaining the building.

Midland Road – Royal Mail

Rep 4.53: The Royal Mail have raised some concerns over the impact the Action Plan could have on their business activity. Their site on Midland Road is active 24 hours a day and involves a lot of traffic movement, including lorries. They are concerned that significant levels of new housing development in the area could inhibit their business activity.

The comment is noted. The Royal Mail site will be put forward at the next stage of consultation as a 'grey area'. It is uncertain whether the Royal Mail wish to move away from Midland Road, but if the scenario was ever to occur a land allocation will be needed. At the next stage of consultation people will be asked what they think the most appropriate land use is for the site.

North Castle Ward

Rep 4.54: Few comments were actually received relating to the North Castle Ward area. The Cityscape Masterplan envisages a 20,000 sqm office development and no 'objections' to this were received. Derby Cityscape have also indicated that the amount of office space could increase on the site to 40,000 sqm.

Rep 4.55: The Council would also like to propose a direct bus link between the railway station and the City Centre, using Siddals Road. Derby Cityscape have raised concern that this might prejudice the office scheme.

As there has been no significant objection (or comment) on this area, it would seem appropriate to continue to identify it for major office development. In terms of increasing the amount of floorspace suggested, provided it can be accommodated in transport and design terms, there is no reason why this shouldn't be put forward as a proposal at the next stage of consultation.

A response is provided later in the document about the potential conflicts between the bus route and office development. However, there is no reason – considering flexibility of design – why both the Council's and Cityscape's objectives cannot be met.

Rep 4.56: It has been commented that the North Castle Ward area should not be used for residential development as it is within the boundary of an Air Quality Management Area (AQMA).

The AQMA does mean that office development may be more appropriate in North Castle Ward location. For similar reasons, it may be appropriate to amend the proposals for buildings to the north of Siddals Road from residential to commercial uses. However, the land at Siddals Road will be identified as a 'grey area' where the residential or commercial options can be tested. The presence of an AQMA adjacent to the site does not necessarily mean that housing development cannot take place. The Council has produced

Supplementary Planning Guidance (SPG) on 'Air Quality and New Developments', which sets out both what assessments of air quality need to be undertaken when proposing development, but also mitigation measures (such as vertical separation) that can be used to minimise any potential impacts on residents. In areas where air quality may be an issue, the policy principles set out in this SPG will be used.

Open Space, Public Realm and Green Infrastructure

Rep 4.57: Questions have been raised regarding what the term 'public realm improvement' actually refers to and exactly what the improvements will constitute.

The term 'public realm' refers to communal areas predominantly used by pedestrians and cyclists. These include footpaths, pavements and squares. The improvements as suggested in the Derby Cityscape Masterplan refer to improving the quality of the pedestrian environment by giving the needs of the pedestrian a higher priority. The 'public realm' will also be improved through effective landscaping, the planting of trees, the upgrading / enhancement of street furniture and improved paving.

Rep 4.58: In terms of open space within the AAP area, there were a number of comments that highlighted the need to maintain and enhance provision. The Masterplan option proposes the retention of Bass's Rec and also designates areas of open space on the DRI site and at the eastern end of Siddals Road.

Rep 4.59: It has been suggested that the mixed-use development that is being proposed should be anchored around walking, cycling and public transport. The development should be built around existing open spaces which should be preserved and enhanced to maintain their ecological and community value. Responses have commented upon the ability of local infrastructure to support more residential development. It has been suggested that some of the proposed development should be replaced with open space / parkland.

Consideration should also be given to the design and layout of open spaces to avoid their potential misuse.

Rep 4.60: The CDLP Review policies and PPG17 both aim to protect areas of open space. Comments have suggested that DCC should work towards creating more open space and should not be destroying any areas within the City. Derby Friends of the Earth (FoE) have stated that enhancements to open space that involve large amounts of concrete (paths, access, parking etc) will be vehemently opposed.

Rep 5.61: The Local Plan mentions that one of its aims is to maintain areas of open space used for leisure, sporting and other outdoor activities. It was felt that it would be a mistake to maintain areas in the plan “for their own sake”. They have value at present but their future existence may frustrate effective master planning. These should be seen as tradable / negotiable resources.

DCC recognises the need to maintain and enhance the level of open space provision in the City centre. Policies will ensure that an adequate level of open space is provided on new residential developments based on the policies set out in the CDLP Review. There are potentially many different ways to develop the ‘space’ within Castle Ward and the DRI. Different options will create different types of open space, different locations of open space and depending what is developed, different quantities of open space. However the AAP will ensure that there is sufficient quality and quantity to meet the needs of residents in the area.

Within these considerations it must be remembered that there are two areas of major open space within easy reach of residents in the ‘fringes’ area (i.e. Bass’s Rec and the Arboretum). This will be factored into any calculations relating to open space provision. The nature of the open space will also be determined by the nature of the proposals put forward and the needs generated by the development.

Rep 4.62: Normanton and the DRI area are currently low in provision in terms of green infrastructure. Connecting these areas to the river will be essential in order to meet guidance relating to communities and the

natural environment. There is an opportunity to enhance the quality of existing natural areas and contribute towards the green network in the City. This must be implemented as part of a modern urban design strategy.

It would be appropriate to further improve the quality of public realm in the area in conjunction with the improved linkages between key areas. An improved link between the Arboretum and Bass’s Rec should be a key development principle to improve east to west connections. This may involve bridging Station Approach or some other form of satisfactory link. Pedestrianising Liversage Walk, Liversage Street and Park Street will also be put forward as part of the proposed public realm improvements.

(5) Traffic, Transportation and Movement

Congestion & Sustainability

Rep 5.1: There is concern that the proposed residential and commercial developments will have detrimental impacts upon congestion within the City. In particular, problems are expected to occur at the Cock Pitt Island, London Road, Station Approach and Traffic Street. The proposed office developments appear to be of particular concern due to their traffic generating potential.

Rep 5.2: Questions have been raised as to whether the current road system has the capacity to deal with the proposed development and that this should be investigated. It has been stated that the AAP proposals take little account of the traffic generating impacts that may occur and the cumulative environmental effects.

Rep 5.3: In terms of combating congestion in the City it was also suggested that travel plans should become mandatory for all new business developments in the AAP area.

Rep 5.4: It has been mentioned that parking provision should be limited to reduce car dependency as well as providing secure cycle parking, office changing rooms and high quality walking routes.

Rep 5.5: One suggestion that was lodged was to make a bold statement and make the City completely car free.

It is accepted that the AAP will have significant impacts upon the traffic flows and patterns in the 'Eastern Fringes' area. Major changes will occur even without the AAP due to the relocation of acute services from the DRI site. The demand for car borne travel should be lower owing to the proximity of all major services and facilities. DCC's aim is to create an area that places the needs of pedestrians, cyclists and public transport above those of the motor vehicle, whilst still providing adequate provision for motorised vehicles.

Final development options will be thoroughly appraised by the Derby Area Transport Study (DATS) transport model before the Plan is submitted. This will help to determine the potential traffic impacts and what is needed to mitigate them. Outputs from this process will be fed into the AAP in order to ensure that options that are put forward are as sustainable as possible with minimised effects on congestion and traffic. These measures will become part of the final AAP policy.

Options will also be tested through the Sustainability Appraisal (SA) process to ensure that proposals are as sustainable as possible. As mentioned earlier, the traffic generating impacts will be addressed using the DATS model.

Furthermore, the location of the 'Eastern Fringes', (so close to the City Centre, the railway Station and the bus Station) should actually reduce the need to travel by car (thus helping to reduce congestion).

The idea of a car free City is not realistic because access by car is essential to the viability of the City. The Connecting Derby project has already allowed many important pedestrian areas to become car free. Extending these areas would have detrimental effects upon the viability of the City.

Accessibility

Rep 5.6: It has been suggested that the AAP should ensure that existing cycle routes are maintained and that further cycle routes are provided to contribute towards the sustainability of the area.

Rep 5.7: In order to complement these ideas it has also been proposed that all roads within the area are limited to 20mph to make the area more cycle and pedestrian friendly.

The AAP will promote sustainable forms of transport including cycling and will look to protect existing cycle networks, to service the new developments.

DCC are keen to implement the principals of 'Home zone' initiatives within the new residential neighbourhoods, with the needs of pedestrians and cyclists taking priority. This could be done through the implementation of appropriate road design techniques (build-outs, chicanes, landscaping etc); these aims are firmly explained in Objectives 9 and 10. Speed limits are not an issue for the AAP, but a 20mph limit within the area would seem to meet the Plan's objectives and the final urban form of the area is likely to be able to facilitate such limitations.

Rep 5.8: One suggestion that has been made to improve permeability is a 'pedestrian fly over' over Traffic Street from London Road to stop Traffic Street acting as a barrier to movement.

The principle of a 'pedestrian flyover' may be sensible one (although pedestrian bridges are not suitable for everyone). The difficulty would be finding space on either side of London Road to accommodate the bridge. There is very little space and the gradients required to get the necessary heights over Traffic Street make this a highly unlikely proposal. Improved surface level links can be just as effective.

Siddals Road Bus Lane

Rep 5.9: It has been suggested that Siddals Road should be identified as a priority bus link to reflect aims set out in the Local Transport Plan (LTP). Siddals Road itself does not need 'protecting' as it is part of the highway. However, there would need to be an access point at the end of Siddals Road onto the Cock Pitt roundabout. The AAP would have to ensure that this was not prejudiced. The policy for this route will also have regard to the potential to upgrade this route for ULTRA (this is a public transport system that involves the running of 'pods' on dedicated rails) or other LRT systems.

DCC consider that it is important to safeguard the Siddals Road bus link. In future this route could be adapted to create a higher spec system such as ULTRA. Derby Cityscape have registered their concerns regarding the proposed creation of a dedicated bus lane

along Siddals Road. They state that this proposal may be detrimental to the delivery of the proposed office scheme in 'North Castle Ward' and that the land take for the bus lane may compromise the creation of a landmark scheme. They suggest that alternative solutions to the priority bus route should be examined.

However, it may be just as appropriate to consider alternative layouts for the office development in order to incorporate the dedicated bus lane and 'bus gate'. It may, for example, be possible to build an archway through which buses (or other vehicles) could pass. Whatever the solution, the AAP should provide for both aims (office and bus link), rather than prioritising one in favour of the other.

The bus route will be included as a new proposal for consultation.

Surrounding Developments

Rep 5.10: It has been commented that the consultation leaflet makes no reference to development in surrounding areas that could have positive / negative impacts upon the 'fringes' area. In particular reference should be made to the Riverlights development. The impacts of this development must be factored into the AAP, such as the proposed highways changes and effects upon access and permeability into the fringes area.

When the proposals are tested through DATS before the submission stage, the effects of all surrounding developments will be factored into the modelling process.

Railway Station Links

Rep 5.11: There appears to be wide support for 'Objective 9' regarding improving links between the railway and bus stations and the City Centre. It is generally accepted that current access provisions are inadequate and that a pedestrian and cyclist friendly thoroughfare needs to be provided, with a possible light transit system to complement this. In addition to these ideas it has also been suggested

that 'softer' solutions should be provided in the shorter term, such as cheaper, more frequent bus services and the adaptation of pedestrian crossings in the surrounding area to make them more responsive and pedestrian friendly.

This support for Objective 9 is welcomed. The AAP will do what it can to improve the 'physical' linkages that exist between the Station and the City Centre. There will be two main links to the City Centre (both of which will benefit from environmental improvements); Midland Road / London Road and through a pedestrianised / pedestrian priority route along Park Street, Liversage Street and Liversage Walk (the 'boulevard'). This will have 'active frontages' at ground floor level to draw people along it that will make the route more attractive and more functional.

As mentioned above, there will also be a dedicated bus route between the station and the city centre. It is also anticipated that the railway station itself will benefit from substantial improvements in terms of public transport access.

The AAP cannot necessarily influence the frequency or cost of public transport.

(6) Parking

There were a considerable number of objections to the proposals for MSCPs within the 'Eastern Fringes' area. The opposition has centred upon the general principles of providing MSCPs, as well as their proposed locations.

Principles

Rep 6.1: It was suggested that MSCPs are not appropriate solutions for all car users as they can be difficult to negotiate for disabled users. It has subsequently been indicated that there should be a mix of parking solutions with on street, single level and MSCPs all provided to cater for different users.

Rep 6.2: It was also suggested that the principle of providing MSCPs would seem to run contrary to government policy regarding sustainability. Subsequently it has also been questioned as to how MSCPs could add to the enhanced 'sense of arrival' around the station area that is being proposed.

It must be understood that car parking capacity will not substantially change due to the implementation of AAP proposals. The proposed MSCPs will replace capacity that is being lost due to the redevelopment of surface level parking on Liversage Street and Siddals Road. MSCPs use land more efficiently allowing for the development of, amongst other things, brownfield housing, which consequently safeguards greenfield locations on the edge of the City. The MSCP proposals are thought to be sustainable options.

The aesthetic impact of MSCPs can be mitigated through the implementation of strict design policies/guidance that will ensure high quality development. There are a number of examples of where this has been achieved in other UK cities.

Within new MSCPs, disabled parking bays would be provided in a way which satisfied the requirements of the City of Derby Local Plan Review.

Importantly, Derby Cityscape strongly support the rationalisation of car parking facilities across the AAP area in order to maximise the development of key sites. The current car park sites have the capability of providing highly sustainable mixed use developments. The Sustainability Appraisal will flag up any options that will have a detrimental effect upon the sustainability of the area.

Locations

Rep 6.3: Questions have been raised regarding the location of proposed MSCPs in the Derby Cityscape Masterplan option. It was suggested in various responses that the most appropriate location for the provision of extra parking is behind the station on Pride Park (as has been suggested by Network Rail). The visually intrusive nature of an MSCP on Pride Park would be less critical as it would be away from the residential area, but would create issues regarding its proximity to the listed Roundhouse. Any development in this sensitive area would have to meet strict design criteria. The provision of more parking for the railway on Pride Park would release some of the pressure on the central AAP area.

Rep 6.4: It was felt by some people that the proposed locations for the MSCPs in the Masterplan option are buried within a maze of streets. It was suggested that the MSCP location proposed in the Local Plan (Liversage Street) seems more appropriate and less circuitous for serving the Traffic Street and railway station areas.

Rep 6.5: Another suggestion was that MSCPs could be provided on the DRI site. Visitors could then enter the City along London Road which currently provides an impressive gateway into the City, (compared to the routes that would have to be taken from the proposed sites in the Masterplan). It was felt that greater justification of the proposed locations of the MSCPs must be provided.

It is important that the AAP makes provision for MSCPs in order to adequately service the proposed neighbourhood and use land in a more efficient manner. DCC support the MSCP proposed in the Masterplan for North Castle Ward. This would serve the proposed office complex. A further MSCP is required to replace public places to be lost at Liversage Street and Siddals Road. At present, it has been suggested that this should be located on Park Street (behind residential units). This location has been criticised.

A car parking strategy study is currently being carried out by the consultants Atkins, which will provide further evidence and justification for MSCPs and provide further information on the number of spaces needed and where the best location would be. The exact location of this car park has not, therefore, been confirmed and is open to further debate at the next stage of consultation. MSCP locations will be continued to be discussed in the second stage of consultation.

Provision

Rep 6.6: A number of respondents have requested that the AAP limits the number of available parking spaces in the area in order to reduce car dependency.

At a national level PPG13 reflects the aspiration to limit parking in order to influence travel patterns. The City of Derby Local Plan Review already sets out parking standards based on PPG13 and it is anticipated that the AAP will reflect these. The Eastern Fringes locality does, however, provide a highly sustainable, inner city location and therefore lower parking standards may be considered where appropriate.

Cost

Rep 6.7: The cost of on and off street parking within the AAP area has generated concern and reference has been made to the cumulative effects that highly priced parking can have. It has been suggested that parking solutions stated in the AAP must be affordable to halt the

haemorrhaging of money from the City (i.e. people visiting other locations with cheaper parking).

Rep 6.8: Some have suggested that since the introduction of on street parking meters within the AAP area parking problems have been intensified. Streets without meters are suffering from illegal parking which has put pressures upon residents' parking areas. The AAP should look to tackle these issues and provide more parking for residents of the area and their visitors.

Rep 6.9: It has also been argued that pressure on parking spaces is having detrimental effects upon the functioning of local businesses. It has been expressed that parking issues will be further exacerbated through the introduction of new residential communities. Therefore the AAP must look to provide appropriate, affordable solutions.

The cost of on and off street parking is entirely outside of the remit of the planning process and therefore the cost implications of parking cannot be tackled by the emerging AAP.

Underground Parking

Rep 6.10: Underground parking has been suggested as a solution to parking issues in the AAP area. It would use land in the most efficient manner and have minimal visual impact.

All alternative options for the AAP area will be considered in terms of their viability and desirability. Whether underground / undercroft parking is desirable or practical for specific schemes can be dealt with through detailed planning applications. This possibility will not be ruled out.

(7) Delivery and Implementation

Strategy

Derby Cityscape and the Government Office for the East Midlands (GOEM) submitted comments regarding the delivery and implementation of AAP policies. The key points raised by GOEM are as follows:

Rep 7.1: Future consultation should make reference to the drivers for change in the area and the possible opportunities that these will present. Future material should also be more explicit about how the vision will be delivered, by who and the basic timescales involved.

Rep 7.2: When taking the plan forward, management and investment policies as well as development control policies should be included.

Derby Cityscape outlined their 'vision' for how the proposals of the AAP should be delivered. These included the following comments.

Rep 7.3: The need for a 'planning and acquisition' led delivery strategy, which will require the Council to make use of their Compulsory Purchase (CPO) powers (where required);

Rep 7.4: The preferred delivery vehicle would consist of a selection of a private sector development partner (preferred developer) who will undertake necessary land assembly supported by a CPO led approach, if needed. The selected partner will be obligated to provide up-front infrastructure, affordable housing, public open space and key services through a phased development process.

Rep 7.5: In the absence of a single partner, a delivery strategy will need to be devised which secures the same outcome. The AAP must contain policies supporting an effective comprehensive approach to the development of the areas and Cityscape can identify a key role for their partners in this approach.

Rep 7.6: Cityscape envisage the Council providing up-front public realm provision, specifically within the creation of the central public boulevard. The AAP will need to provide robust policies enabling the claw-back of costs for up-front public realm provision via developer contributions (i.e. S106). This should take the form of ring-fencing developer contributions for schemes within the AAP area, thereby ensuring provision through localised development. Contributions should recover the public realm costs as well as providing for education, affordable housing, highways and transport improvements.

There are two aspects to the 'implementation' comments. One is related to the need for further information to be supplied on how the AAP will be delivered and the other, from Cityscape, outlines a potential delivery mechanism.

The focus of an Area Action Plan should be on implementation. It is accepted that the initial consultation did not include enough information on how the proposals were to be implemented or the timescales involved. This has, perhaps, caused some concern and confusion. This will be rectified in future consultation stages, and through the development of a relocation strategy.

*Cityscape's suggested delivery mechanisms will be considered as part of the Plan's implementation policies and will be subject to consultation. The use of CPO powers will be a 'last resort'. However, it is important to highlight that the powers **will** be used if necessary and to explain the processes involved if this course of action were required. Providing this type of information will, if nothing else, help to demystify the process and may give some comfort.*

It is also important to note that while S106 agreements will be an important part of the delivery mechanism, not all developer contributions will be able to be directly 'ring-fenced' for use in the local area. Contributions for highways improvements, for example, may need to be used in surrounding areas to mitigate the effects of development within the 'fringes' area.

The general principles of Cityscape's delivery mechanism will, however, be put forward for consultation.

Economic Impact

Particular concerns were voiced regarding the adverse effects that the Masterplan option may have upon small businesses in the Castle Ward area. These issues were particularly prevalent at the workshop event held on the 19th October 2005. The majority of business representatives at this seminar were against any proposals for change.

Rep 7.7: Comments received have made it clear that DCC and Cityscape must consider the potential impacts of the AAP upon local businesses and keep them fully informed. There must be an appreciation that businesses need time to plan for relocation as it is uncertainty that is most damaging to trade.

Every effort will be made to keep local businesses informed about the development of the AAP and fully engaged with the planning process. The AAP process requires full consultation to be carried out and businesses will have a number of opportunities to make their feelings known.

Rep 7.8: Businesses who attended the workshop event were concerned about possible CPO powers. In general there seems to be a lack of understanding and concern within the business community regarding CPOs, which needs to be addressed.

It must be stressed to businesses that CPOs will only be used as a last resort option after all other negotiating avenues have been exhausted.

Rep 7.9: There is a feeling that some commercial activity / light industry should be retained in the area as part of the overall 'mixed use' strategy. This would help form a 'sustainable neighbourhood'. Independent / small niche retailers must be promoted and supported to

increase the retail offer in the City. This is where identity and character can be developed and where competitive advantage can be achieved over other cities in the region. The mix of commercial / light industrial and residential developments must be carefully monitored to ensure that only 'clean', socially responsible businesses are allowed to operate in the residential area.

Rep 7.10: The AAP area currently houses a variety of businesses which cannot be found elsewhere in the City Centre. They should look to be retained in the area and mixed into the new developments as a sustainable option, in order to reduce travel distances and facilitate linked trips. It was argued that businesses falling into this category could include small vehicle repair centres and service centres.

The retention of individual businesses 'in-situ' has the potential to undermine the overall comprehensive strategy that the AAP is aiming to achieve. It may be possible to retain or relocate some businesses within the AAP area. For example the proposed 'boulevard' may provide a home for some of the niche retailers mentioned above or there may be scope to allocate a small amount of land within the area to house some businesses. This needs to be investigated in more detail.

It is likely, however, that there will be some businesses that will have to be relocated in order to deliver the strategy properly. As such, it is likely that a relocation strategy will form part of the overall implementation plan. As much help as possible will be given by Cityscape and the City Council to find appropriate accommodation for any businesses affected by the plan.

DCC respect that within the Eastern Fringes area there are a number of existing businesses who may not wish to move. Although CPO powers will be used as a last resort, the City Council have these powers available to them and they will be used if necessary.

Rep 7.11: It was commented that during relocation, certain businesses will struggle to gain planning permission for specific uses / activities. This must be carefully considered and addressed.

Owing to other planning policies (e.g. the retail strategy), there are uses, particularly the retail / quasi retail uses, in the AAP area that could be difficult to accommodate in other parts of the City. As mentioned elsewhere, the Council and Cityscape will do their best to find 'appropriate' accommodation for disrupted businesses. What is considered 'appropriate' will be influenced by these planning policies.

It would be hoped that the number of instances where conflict exists can be kept to a minimum, but where problems do arise each case will have to be judged on its merits. No commitments can be made for setting aside policies at this stage.

(8) Design

Numerous comments and responses were received regarding the future design of the built environment in the Eastern Fringes area. A selection of the main points raised can be seen below:

Rep 8.1: In terms of design proposals it should be remembered that design not only includes the aesthetics of the development but also the functionality.

Rep 8.2: Apartment developments should be domestic in style (low to medium rise).

Rep 8.3: The area has huge potential to be sustainable; renewable energy should be harnessed and energy efficient building designs, home zones, cycling, recycling and reductions in car dependency should all be promoted.

Rep 8.4: There seems to be general agreement that first class urban design and architectural quality must be promoted as a priority issue in order to help mitigate mistakes that have been made in the past.

Rep 8.5: In terms of design and architecture, the quality must be improved and natural materials should look to be utilised, so that the buildings are sustainable and 'stand the test of time'

Rep 8.6: A more open approach to land use allocations should be adopted, limiting the specificity to single / mixed use designations. Urban design policies relating to specific street blocks would also contribute to the plan whilst not stipulating land use.

Rep 8.7: The area should be enhanced through the use of public art which should look to compliment and enhance existing artwork and monuments such as the war memorial (Midland Road), the Florence Nightingale statue and the Queen Victoria monument (London Road).

Rep 8.8: The plan should promote 'mixed active uses' within Castle Ward that are housed within buildings that have character and identity.

Rep 8.9: Buildings must be sustainable, with future usage considered into the construction, allowing flexibility.

Rep 8.10: More detailed proposals need to become apparent at an early stage with reference to densities, building heights and housing types etc.

Rep 8.11: A clearer definition of what an 'urban village' actually constitutes must be made clear. Attempts must be made to avoid the poor 'urban village' type developments that litter many cities, where little regard has been paid to design principles or the true urban fabric that constitutes a successful community.

Rep 8.12: The proposed development will be significant and will pose further challenges to the local police. Therefore someone from the police force should be involved in any 'design workshops' to help 'design out crime' and help inform on 'secured by design' principles.

There are a number of the AAP's Objectives that relate to the design and layout of public places and buildings and which relate to the way buildings are constructed in order to reduce energy consumption and promote sustainability. It would be hoped, therefore, that the policies of the final Plan will be able to satisfy the aspirations of the representors who have commented on this issue.

The Council is in the process of preparing a Supplementary Planning Document (SPD) on 'Design Guidance'. This will provide guidance on the design of new built development, including energy efficiency and flood protection issues. At the same time, Derby Cityscape are preparing a 'Public Realm Strategy'. Although this will focus on the City Centre itself, it should set out broad principles for the treatment of public realm. These principles could be carried forward into the Action Plan.

In addition to these strategies, the City Council is producing a Conservation Area Appraisal for the Railway Conservation Area. Not only will this provide useful background information into the quality of the Conservation Area, it will also provide policy recommendations to ensure that development within, or on the edge of, the Conservation Area is appropriate.

There is also a whole range of design guidance held in various Government guidance documents that will be taken into account. There are also CABE Good Practice Guides which provide advice on 'best practice'. It is the aim of the AAP that development in the 'fringes' area will always constitute 'best practice' and will, hopefully, be seen as an exemplar regeneration scheme nationally.

It would be beneficial for a member of the Derbyshire Constabulary to be involved in the formation of design principles and efforts will be made to involve and consult the police force at all appropriate opportunities.

(9) Consultation

Various comments were received regarding the consultation methods used in the initial stage of front loading, rather than the content. These comments can be taken into consideration before the next stage of informal consultation begins. Comments included the following:

Rep 9.1: There is a need for a 'three dimensional vision' of the area, as the Masterplan and CDLP options only give an indication of basic land uses;

Rep 9.2: There needs to be greater clarity on the Masterplan option particularly in the area around London Road where the proposals are unclear;

Rep 9.3: Further consultation material should be reader friendly, with fewer acronyms, larger print and higher contrast;

Rep 9.4: There is a definite need for further and on going consultation to occur, specifically with the business community in the area. Businesses need to be kept up date with current progress and be given the opportunity to ask questions to alleviate some uncertainty;

Rep 9.5: There is a need to clearly distinguish between buildings that are being retained and newly proposed buildings in the Masterplan and any alternative options.

It is accepted that the consultation material provided at the first stage was not particularly detailed. This was deliberate, as the purpose of the leaflet was to introduce the Action Plan and to give an indication of the broad land-use options that were already in the public domain. To give greater detail may have been mis-leading in that people could have assumed that the proposals were more definite than is the case. The Council wanted to ensure that consultees understood that this was the first stage in a long process and that no firm decisions had yet been made.

At future stages, the use of 3D imaging may well be a very useful way of illustrating how the area is likely to change. However, the resource implications of this (and deciding on what is the most appropriate time to use such a methodology) needs further consideration.

The Council always tries to produce information in a clear and understandable manner. Unfortunately, this is not always achieved to everybody's satisfaction and is not always possible due to the nature of the information being presented. Unfortunately, the planning system is quite complicated and does use a certain amount of jargon. One of the purposes of the consultation leaflet was to introduce the Plan preparation process and, as such, it was inevitable that some of the phrasing used was of a technical nature. To make this information too simplistic would be counter-productive as it may mis-lead people and could cause confusion at later stages. However, the Council will endeavour to produce any future material in as simple and 'plain English' style as is practicable and appropriate.

It is felt that the Council has already been relatively successful in consulting with local businesses, through the leaflet and through the 'Planning Aid Event'. The input and involvement of local business concerns is a crucial element of the plan preparation process and their participation will, hopefully, increase over time.

(10) General Points

Miscellaneous comments that have been received cover a varied range of topics with diverse levels of detail. A selection of the constructive points that have been made are described below, divided into broad issue areas.

Justification

Rep 10.1: There needs to be some form of justification detailing why certain uses have been placed in certain locations within the Masterplan option.

The nature of the initial consultation leaflet did not really allow full justification of the proposals that were in either the Local Plan Review or Masterplan 'options'. The purpose of the leaflet was to introduce the Area Action Plan process and to outline some of the broad strategic options that were already in the public domain. It was not a policy document in its own right and it would have been overly detailed and inappropriate to include additional detail.

Further information and justification was available in both the Local Plan Review documents and the Cityscape Masterplan itself. The leaflet did refer people to these documents for further information if they needed it.

It is a requirement of all Planning Documents that the policies they contain are fully justified. As the Plan progresses, the detail relating to proposals and policies will increase.

Air Quality, Flooding and Contamination

Rep 10.2: Respondents have questioned the sustainability of introducing residential areas into Air Quality Management Areas (AQMA) and putting pressure on the floodplain and washland.

Rep 10.3: Current industrial uses in the area may lead to issues of ground contamination which will need to be investigated.

In terms of sustainability, the Area Action Plan will be subject to a 'Sustainability Appraisal'. This will assess the policies of the Plan to ensure that they are as sustainable as possible. It will also highlight where mitigation is necessary and what should be done to remove or reduce any problems that might exist. Furthermore, at the 'Examination' of the Plan, an independent Inspector will consider whether the Plan is 'sound'. This, amongst other things, will investigate whether the Plan is consistent with Government policy. Any policies or proposals which are deemed to be inconsistent with these policies (in terms of sustainability, air quality, flooding, etc) would be removed or amended by the Inspector.

No evidence has been provided that ground contamination exists in the 'fringes' area. However, this will be confirmed through consultation with colleagues in the Environmental Health section of the Council. In any event, Policy E15 of the CDLP Review, expects developers to carry out an independent investigation of ground conditions where there is any suspicion of contamination or unstable land. Policy E15 will still be relevant for all proposals in the Action Plan area.

It is accepted that the 'fringes' area does interact with an identified AQMA. Proposals within the AAP will take account of this. The Council has already published Supplementary Planning Guidance in relation to 'Air Quality and New Development'. The AAP will adhere to this guidance.

In relation to 'washland', it is also accepted that parts of the 'fringes' area are within the Environment Agency's 'Flood Zones'. Again, the effects of development on these will be addressed against existing Local Plan policy on flooding and PPG25. The Environment Agency will also be consulted at all stages through the plan preparation process.

Education Facilities

Rep 10.4: Derby Cityscape support the idea of locating a secondary school / 'academy' in the Eastern Fringes area, subject to further research indicating a need. It also supported the retention of the foundation stage Castle Nursery. Other respondents indicated that the plan should make provision for adult education facilities.

Increasing the residential population of an area naturally increases demand for additional services and facilities. In order for the Plan to be sustainable, it must ensure that those demands are catered for.

If increased housing development creates a need for improved education facilities, then these will have to be provided (either within the area or in an area that is accessible to 'Eastern Fringes' residents).

The Masterplan 'option' already identifies a primary school and this will be retained as an option (although the exact location is still open for discussion). It may also be appropriate to consider the retention / relocation of Castle Nursery to an appropriate location within the area.

We are currently continuing to investigate the secondary education requirements for the area generated by the AAP and whether a site needs to be identified for a secondary school to serve this and the other central areas of the City. This work will continue through the Plan preparation process.

Other Facilities

Rep 10.5: The Eastern Fringes area currently lacks crucial amenities for its residents. Numerous representations have called for the provision of a small supermarket in the London Road / Castle Ward area.

Rep 10.6: It has been suggested that the AAP should provide a venue within the area for Derby's amateur theatrical groups

Rep 10.7: Comments included the assertion that the plan should ensure that it considers health issues in particularly addressing the health inequalities that exist in the City.

It is important to note that, as this is a City Centre location, there are already a large number of services and facilities in the area that would be available to the local population. Facilities that exist outside the AAP area, but are accessible to residents within it, will be taken into account when considering whether additional facilities should be provided.

Retail facilities are obviously important. The proximity of the City Centre already means the residents of this area have excellent access to shopping facilities, particularly non-food, comparison shopping. In terms of 'convenience' or food shopping, provision is less extensive, though there is a Sainsbury's Supermarket in the City Centre, plus various other food shops including Marks & Spencer's, Farm Foods, and the smaller stores such as 'Spar'. Proposals have been made for two general locations for shopping facilities in the 'fringes' area – one along a 'boulevard' to be created in Castle Ward and one on the DRI site. Both of these areas could probably contain a small supermarket. The question that needs to be answered is whether such a facility is needed and, if it is, what would be the most appropriate location for it to be sited. This is an area of uncertainty that will be raised at the next round of public consultation for discussion and debate.

The provision of a specific facility for amateur theatrics groups is one which crosses the boundary of the 'Eastern Fringes' Area Action Plan, as such a facility would serve the City / City Centre as a whole. Whether the Eastern Fringes is the most appropriate location for such a facility, whether a site could be found and how it would be implemented all need further consideration. The Cityscape Masterplan, for example, already proposes a Performing Arts centre on the North Riverside area and it may be that this could accommodate the proposal the representor would like to see.

(11) Conclusions

The first consultation exercise raised a number of issues, some of which have been resolved, some of which have not. Further 'front-loading' informal consultation is required for refinements, amendments and new proposals to be fed back to the public and for new options and alternatives to be tested.

It is proposed to put forward a new option that embraces the positive aspects of the initial options presented at the first stage of consultation. It will demonstrate how proposals have moved forward and indicate alternative proposals for various plots of land allocated as 'grey areas'.

The third option will not be set in stone and people will still be able to comment on the initial options and present entirely new proposals and options relating to all areas and aspects of the Plan.

In broad terms, the main characteristics of the new option are listed below;

Proposals / Principles Carried Forward from Cityscape Masterplan:

- Retention of Bass' Recreation Ground as public open space;
- North of the River allocated for residential development and new pedestrian footbridge linking site to Bass' Recreation Ground;
- North Castle Ward allocated for major office development, MSCP and residential development;
- Retention of part of the DRI site for health uses;
- Development of 'boulevard' through the centre of Castle Ward with active frontages, open areas and public art;
- Pedestrian footbridge over Station Approach linking Siddals Road and Bass' Recreation Ground;

- Public realm improvements along London Road and Midland Road;
- Principle of improving 'green links' between the Arboretum and Bass' Recreation Ground;
- Improved links from the railway station to the City Centre;
- Retention of Devonshire House, Wilderslowe House and the domed buildings on the DRI site
- Allocation of land for primary school;
- Comprehensive residential development in the centre of Castle Ward;
- Retention of frontages and listed buildings along London Road;
- Provision of MSCP within Castle Ward;
- Residential development to south of Barlow Street and on London Road frontage;
- Retention of Oriel Court / Centre Court housing area;
- Improved transport interchange at railway station;
- Improvement of railway station buildings;

Carried Forward from City of Derby Local Plan Review:

- Identification of Conservation Areas;
- Retention of Strategic Cycle Network
- Identification of land for MSCP (although in different location);
- Identification of River Derwent as Site of Importance for Nature Conservation (SINC);
- Identification of Wildlife Corridor along banks of Derwent and the Mill Fleam;
- Identification of areas of 'no proposed change' – which would be subject to 'criteria based' development control policies (similar approach to Local Plan).

Additional Refinements / New Proposals;

- Extension of AAP Boundary Area to include Pride Park Railway Station car park;
- Identification of Amber House, Wyvern House, Railway Terrace (part), Churnet House and the Nightingale Macmillan Unit as 'retain and refurbish options'
- Extension to 'retained hospital' area to include Dovedale Unit on London Road;
- Changed layout of development along Barlow Street to be more sympathetic to surrounding area (lower density and any development to have regard to retention of open space and character of the area);
- Potential re-routing of Barlow Street to link into Bateman Street;
- Identification of dedicated bus route along Siddals Road with access point onto Cock Pitt roundabout.
- Allocation of Pride Park Railway Station car park for MSCP;
- New access point on London Road into new MSCP on railway station 'South' car park;
- Identification of south-east end of London Road as development opportunity;
- Northern DRI area retained as health purposes (short term) but identified as a long term opportunity for residential redevelopment;
- Identification of location for 'iconic' public art in the civic square (along the 'boulevard');
- Identification of a 'London Road Policy Area'
- Removal of retail allocation / active frontage requirement from southern end of London Road;
- Retention of the Victoria Inn;

- Identification of 'gateway' sites – where environmental improvements will be made.

Grey Areas

'Grey Areas' will be identified for the sites where there is still no consensus on the best way forward. These areas are recognised as areas of potential change but that still require further discussion and debate of potential options. Sites include:

- a) DRI site, fronting London Road
- b) Royal Mail sorting office, Midland Road
- c) South car park
- d) Gala Bingo site, North Castle Ward
- e) North Car Park, railway station
- f) Siddals Road site
- g) Terrace in front of the railway station

There are also a number of other uncertainties that will be highlighted in the material. These include;

- Exact location of multi-storey car park within Castle Ward;
- Exact location of primary school and nursery school;
- Whether secondary school provision is required;

Alongside the land-use proposals, the consultation material will provide information on options not being pursued and information about the workshop events. It is to be hoped that the next round of consultation will resolve a number of outstanding issues and help the Council move toward a consensus and the 'Preferred Option'.

Part 2

City Centre Eastern Fringes Area Action Plan

Consultation Representations and Responses

Second Round Informal
Consultation - April
2006

Second Stage – Informal Consultation – April 2006

Introduction

Having listened to the responses and opinions put forward at the first consultation stage, a new option was put forward that represented the positive aspects of the Derby Cityscape Masterplan, The Local Plan option and brand new proposals that were suggested. The second stage of this document summarises the responses that were put forward through written representations and from general discussion at the workshop events.

Comments are written in the style and format that they were submitted (minutes from workshop events and written representations). The document initially summarises the comments with regard to the 'grey areas' in the consultation leaflet and then moves on to look at wider issues.

All representations made at this extra supplementary consultation stage have been numbered and prefixed with an 'X' to distinguish them from representations made at the first stage in October last year.

(1) Land Use Proposals

Derbyshire Royal Infirmary Site (Grey Area 'a')

Retail Development on the DRI site

Rep X1.1: If the DRI is allocated for retail purposes it must be ensured that consideration is given to PPS6 – Planning for Town Centres (2005). The DRI site falls outside of the defined city centre shopping area so the need for new floorspace must be assessed alongside existing capacity in accordance with PPS6, paragraphs 2.15 – 2.18.

Rep X1.2: The siting of a large superstore on the DRI site is strongly opposed. There is a need for a small number of local shops. A major retail allocation would create serious traffic concerns.

Rep X1.3: Only small scale shopping facilities are needed due to the proximity of the city centre.

Rep X1.4: Retail development is not required on the DRI site as it would elongate the shopping area too much.

Rep X1.5: Retail development is not needed on the DRI site as there is plenty of good shops within easy walking distance.

Rep X1.6: The DRI, being on the edge of the city centre is not a place for major retail development. Once the Westfield development is completed it is unlikely that the city centre could support major retail led development in the next few years. Any retail provision should cater for local need only and not serve the wider area.

Rep X1.7: The NHS support the potential for 'some' retail development along the London Road frontage.

Rep X1.8: Further retail development is not needed because of the major extension to the Westfield Eagle Centre.

Rep X1.9: More retail outlets are needed, mainly in the form of general stores as there are no local grocery stores.

Rep X1.10: Some types of goods are not easily accessible for people who do not own a car. These include electrical and white goods. The DRI site could be utilised to develop retail space of this type.

Rep X1.11: Residential development on the DRI site interspersed with open space is fully supported. Retail development is not needed.

Rather than respond to each of these comments individually, it is more sensible to provide an overall response to the issue of retail development on the DRI site.

The Government Office for the East Midlands indicated that any retail development would need to be justified in terms of PPS6 and the CDLP Review. In response to this a technical paper has been produced which examines the issue of 'need', sequential approach and impact. This has concluded that the AAP is likely to create enough new capacity to accommodate a mid-sized convenience store of around 1500 sqm. In terms of location, it has also concluded that the most appropriate location is somewhere along the central 'boulevard'. It is considered that that site would be more centrally located, and more accessible, to a greater population. It would also anchor the boulevard and give a focus for the neighbourhood.

Notwithstanding this, it is still important to address all of the other points raised about retailing on the DRI, as some are still important in considering the nature of retail that should be provided on the 'boulevard'.

In relation to comparison retailing, the new Westfield development will provide a significant amount of new comparison shopping facilities and it is accepted that the AAP should not be making provision for any large scale comparison floorspace. However, it may be that further convenience retailing will be needed to serve the increasing population. It is clear that any retail allocation within the Eastern Fringes should cater for local need only. The city centre should provide

ample comparison shopping facilities. It should be ensured that the scale and nature of the retail allocation does not impact upon retail within the city centre.

The vision of the AAP is to create a sustainable neighbourhood and is supported by objectives that attempt to promote walking, cycling and public transport. By allocating land for white goods and electrical retail, it will undoubtedly attract car borne travel due to the nature of the goods being sold. The DRI site would be wholly inappropriate for this kind of retail and would be in conflict with the objectives and vision of the Plan.

It is also unlikely that a large superstore would be proposed or would be appropriate for the Eastern Fringes area due to the proximity of the Sainsbury's store and the new Marks and Spencer store (which will be part of the Eagle Centre extension). Any retail allocation will be tested through the DATS system to determine the traffic impacts.

Alternative locations than DRI for retail / general retail issues

Rep X1.12: Instead of allocating retail space on the DRI site, the North car park could be developed into a small mall in conjunction with the redevelopment of the terrace opposite the railway station. Shopping facilities in the area will need to include a pharmacy, a Tesco Metro, doctor, dentist, post office and larger WHSmith.

Rep X1.13: Land should be allocated for specialised independent retailers. Small scale corner shops are needed in the area.

Rep X1.14: The retail element of the new development should be located either on the DRI, the boulevard or on the North car park. A Tesco Express / Metro would be most appropriate.

Rep X1.15: There are mixed opinions as to whether retail facilities should be centralised in a hub or dispersed throughout the development. The hub would create a meeting place and vibrancy but dispersal would cause people to move around, meet new people and contribute to natural surveillance in the area. There is some consensus

that retail facilities would be well suited located along the length of the boulevard in the 'active frontages'.

Rep X1.16: Derby Cityscape have stated that their preferred location for a basket retail use would be along the central boulevard. This would be at the heart of the pedestrianised area. The store should be approximately 1500 sqm to adequately serve the neighbourhood. The boulevard is preferable to the DRI site because the London road site would generate more car borne custom.

Rep X1.17: Consideration should be given to the potential of allocating retail facilities on the Bemrose and Sovereign car park sites across London Road. If the retail were to be located on these sites, it would release further land on the DRI site for housing or, for example, a multi-storey car park to serve the Westfield site and negate the need for other sites.

As mentioned earlier, the research that has taken place has indicated that the 'boulevard' may be most appropriate location for a mid-sized convenience store. Comments that have seemingly supported the allocation of a site along the boulevard are welcomed.

The Railway Terrace and North Car Park are not thought to be the most appropriate locations for any significant levels of retail. They are not particularly central to the area and would not, therefore, serve the local population satisfactorily.

It is noted that convenience retail will be required. The Derby Cityscape Masterplan aims to provide an improved area around Sadler Gate specifically for independent and niche retailers. By attracting these retailers into the Eastern Fringes it would dilute the vision of the Masterplan and could have a detrimental impact on the vitality and viability of the City centre.

The proposal to allocate an MSCP on the DRI site, London Road frontage, would be highly inappropriate. The Westfield development will have sufficient parking facilities within the new development (2331 spaces). The location proposed would be too far from the boulevard or

railway station to serve either of these uses and the pedestrian link to the Eagle Centre would not be as good as sites already proposed for the MSCP.

Rep X1.18: A developer has suggested that independent and specialist retail uses would be welcomed in the Eastern Fringes area.

The AAP will permit A1 uses along the length of the boulevard; however, the AAP cannot stipulate the type of A1 uses that choose to locate on the boulevard. As already stated, this could undermine other Cityscape strategies in the Sadlergate and St George's area.

General DRI

Rep X1.19: A clear statement is needed from the NHS Trust detailing which services are being retained on the DRI site and which will be transferred to the DCGH. It is paramount that this information is available at the preferred option stage. There are particular concerns about whether the boiler house and incinerator will be retained.

Information is gradually filtering through to the AAP from the NHS Trust. Disposal of the site could begin as early as Spring 2009. A clear understanding of the phasing of development and what will be retained at the DRI will be detailed in the Preferred Option Report.

Rep X1.20: Mention should be made of the green link for pedestrians and cyclists through the DRI site. The current designation only proposes improvements to the pedestrian environment rather than the establishment of a new green link between Bass's Rec and Arboretum.

The information leaflet allocates 'possible pedestrian routes' through the DRI site. This is a different allocation to the pedestrian environment improvements allocated for London Road. The symbols look similar so it is possible that the respondent has confused the two. The Preferred Option will make a clearer distinction.

Rep X1.21: The NHS Trust have made it clear that there are still many options in relation to the re-use and redevelopment of surplus land and

buildings at the DRI site. It is in the best interests of the Trust to maximise land values whilst retaining corporate responsibility to the benefit of the City of Derby.

The aspirations of the NHS Trust are very important because they are the largest land holder in the Eastern Fringes area and need to develop vacant areas of the DRI to facilitate the move to the DCGH. It is important that the AAP accounts for their aspirations without compromising good planning practice.

Rep X1.22: English Heritage have pointed out that there are a number of buildings worthy of retention and re-use on the DRI site, which are currently not shown for retention. The future of the site should be consistent with the retention of these buildings alongside the listed buildings and features.

Any development of the DRI site will, as an absolute minimum need to maintain the leaded domes facing London Road. If a developer wishes to demolish other parts of the old infirmary building they will need to demonstrate that refurbishment and conversion is not a viable option.

Rep X1.23: A developer has shown support for the aspirations for the DRI but has commented that reference to family housing must be made.

Comments are noted. The Preferred Option Report will make reference to family housing as well as apartments. The AAP aims to achieve a mix of housing to attract a diverse and varied community. It will also be important to provide a mixed range of housing in order to be flexible in light of changing market conditions.

Royal Mail Site (Grey Area 'b')

Rep X1.24: The activities associated with the functioning of the Royal Mail site are inappropriate within a residential area. The site could be better used as a superstore.

Comments are noted. It is agreed that the Royal Mail sorting office may be an inappropriate use in a predominantly residential area. However, the respondents' suggestion of a superstore is equally inappropriate in a residential area due to the traffic implications. A large superstore would be contrary to the objectives and vision for the area.

Rep X1.25: The post office counter service should be retained in the area.

Comments are noted. Unfortunately the AAP cannot dictate to the Royal Mail and cannot force them to retain counter facilities in the area, should the Royal Mail buildings be redeveloped. Obviously, it is agreed that a post office would be an important part of ensuring adequate provision of local facilities for the local population and the Council would endeavour to work with the Royal Mail to make sure post office provision would be retained in the area.

Comments are noted. A conference centre may not be an appropriate use due to the traffic generating potential in a predominantly residential area.

Rep X1.26: The Royal Mail building is already on a built up block and has access from four sides. This would make the ideal site for one of the proposed MSCPs. This would allow the South car park site to be developed in a more comprehensive and harmonious manner. This would allow people to park and then walk along the boulevard straight into the new Westfield development. The frontage onto Midland Road should have retail / office / residential uses to screen the MSCP set behind.

On the face of it, this seems like a reasonable argument. Unfortunately, the provision of the MSCPs, (to allow the rationalisation of the surface level parking), is a key aspect of the overall Plan. It is not guaranteed that the Royal Mail will be relocating from their current premises in the near future. The MSCP therefore needs to be allocated on land where change is more likely in order to aid the deliverability of the overall Plan.

Rep X1.27: The Royal Mail site could be valuable as a conference centre facility given its proximity to the railway station.

Rep X1.28: The current Royal Mail site generates a high level of traffic and has a poor level of design. The site could be alternatively used for retail uses on the first floor with residential properties above.

Rep X1.29: The Royal Mail site should be used for residential and community uses.

All of the above uses might be appropriate for the Royal Mail site. Indeed, the location of this site makes it appropriate for a number of beneficial uses. Owing to its semi-peripheral nature, and considering the operator of the site, it may be a difficult site to justify using compulsory purchase powers to bring it forward. In addition, no overall consensus has been reached as to the most appropriate end-use for this site.

Therefore, the most appropriate way forward may be to allocate the site under a mixed-use policy that allows a range of uses to come forward at the appropriate time.

One proviso that should be part of the policy is the retention of an 'active frontage' on the ground floor. This is to maintain the character of Midland Road.

To ensure the site brings a range of uses forward that can benefit the whole area, it is thought appropriate to split the site into two, with residential or office uses fronting onto Midland Road. On the rear of the site (currently the vehicle depot) it may be more appropriate to permit lower rise workshop or light industrial uses, to the rear of buildings fronting onto London Road. This could act as a location for the relocation of some existing businesses within the area.

Rep X1.30: If a realistic relocation option emerges, a separate development brief should be produced for the Royal Mail site.

The Royal Mail site is one of the largest plots in the whole development area. Therefore it would be inappropriate for the AAP not to set out policies that could control development if the site becomes vacant. It is questionable what further detail a development brief could add considering the contents of the AAP. Also SPD must be supplementary to the main policy document. If the AAP does not set out a policy for the site then the Council cannot produce SPD.

Rep X1.31: The Royal Mail building is out of character with its neighbours. Some more sympathetic to the adjacent conservation area is needed. The Royal Mail facility should be retained within the city, preferably still in proximity to the railway station so that rail links can be utilised by the postal service. If the site is redeveloped a mixed development would be preferred.

It is understood that the Royal Mail train service is no longer in service. Therefore, there is no need to be relocated in the vicinity of the station. If the Royal Mail chooses to relocate, the City Council will make every effort to retain the facility and jobs within the city. Due to the scale of the site a mixed use development would seem appropriate.

The Royal Mail building is clearly out of character with the rest of the Eastern Fringes and in particular inappropriate considering the proximity of the Railway Conservation Area. Considering this, it is necessary for the AAP to propose change. As well as some of the potential policy criteria set out above, the AAP provides an opportunity to stipulate that any replacement building should better respect the adjacent Conservation Area.

Rep X1.32: A developer has noted that the Royal Mail's activity in the Eastern Fringes is desirable. However, if the site did become available a small residential community or small retail development would be best.

The Royal Mail have noted their concerns that their operations may not be appropriate within the proposed residential community. The sorting office operations require a number of vehicular movements 24 hours a day with a number of large articulated lorries regularly visiting the site.

It is questionable as to how the respondent can view such activities as being appropriate in a potential residential area.

South Car Park (Grey Area 'c')

Rep X1.33: The South car park could be used to house the proposed National Rail Centre. It could be connected to the railway and would be better located than on Pride Park.

An application for the National Railway Centre has already been submitted for land on Pride Park.

Rep X1.34: The South car park is appropriate for a number of uses because it is tucked away. The development of a MSCP would free up land for community uses and open space.

Comments are noted. Support for the MSCP is welcomed.

Rep X1.35: The South car park is ideal for locating small industrial units / trade counters. This area could be used to relocate businesses from the Castle Ward area.

Rep X1.36: The South car park should be used as a relocation site for those businesses who will need to be moved from the Castle Ward area. This would keep them in the general vicinity but would be well away from the proposed residential areas.

Rep X1.37: Where are people who live in the area going to work? Some light industry / workshops should be retained in the area to provide a service to the area and maintain some of the character of the area. It would be a shame to lose some of the skilled trades from the area. If businesses do need to relocate they should be retained within the Eastern Fringes. The South car park may be an appropriate site for such activities.

It is unknown exactly how many of the businesses currently located within Castle Ward would want to relocate within the Eastern Fringes.

However, it has become very clear through the consultation that some businesses are unhappy at the prospect of being relocated away from the area, due to existing customer bases and proximity to the city centre. It is essential that B2 and B8 uses are relocated because they are generally not in keeping with a residential neighbourhood. The South car park site could possibly provide a site that could house such business interests. The site may not be appropriate for residential purposes because of the proximity of the railway line and sidings. The South car park could provide accommodation for workshops on the ground floor with possible office accommodation above.

Rep X1.38: South car park should be maintained in its current state.

The AAP hopes to achieve considerable changes within the Eastern Fringes area as a whole. This will be led through the rationalisation of inefficient surface level parking. Surface level parking is unsustainable and makes poor use of a valuable resource in a prime city centre location.

Rep X1.39: The area of the South car park fronting onto London Road should be used for residential uses.

Residential use on the London Road frontage may not be appropriate, particularly if the South Car Park comes forward for industrial uses. The site would be quite isolated from other residential uses on that side of the road, and continuing the 'business' nature of the site will be more appropriate.

Rep X1.40: Any proposals relating to development of the South car park should consider the need to repair / replace the London Road railway bridge. The bridge should be repaired and then utilised for buses, cycles, pedestrians and vehicles with access as part of a wider London Road scheme. Therefore any development of the South car park should attract the minimum number of motorised vehicles possible.

One of the objectives of the AAP is to encourage walking, cycling and public transport use. Any proposal that does not meet the objectives of

the Plan will be identified by the SA and will therefore require further discussion and / or mitigation. It is unlikely the AAP could justify the replacement of the London Road bridge. The Council's Highways Department has not raised any concerns over the capability of this bridge to take the traffic generated by the development.

Rep X1.41: All parking for the railway station should be on Pride Park.

The current option proposes an MSCP on Pride Park to serve the railway station. This utilises all the land on the Pride Park side of the railway that is within the scope of the AAP. In conjunction with the proposed MSCP on the South car park it should reduce the number of vehicles travelling through the heart of Castle Ward and meet the objectives of the Plan.

The Pride Park site is unlikely to be large enough to accommodate all of the Station's parking needs, while still respecting the listed Roundhouse.

Rep 1.42: A developer has suggested that the South car park site would be an excellent location for office accommodation, due to its strategic location in the proximity of the railway station.

Comments are noted. It is agreed that this site would provide a good commercial opportunity, however light industrial uses may also be appropriate at ground floor level.

Gala Bingo (Grey Area'd')

Rep X1.43: The Gala Bingo site should be retained in its current state.

Rep X1.44: Gala Bingo should not remain; it should be replaced by a leisure centre or a new Derby Museum.

Comments are noted.

Rep X1.45: It would seem wasteful to demolish modern buildings so therefore Gala Bingo should be retained.

The fact that the building is 'modern' does not strictly justify its retention. The building is inefficient in its use of space and is questionable whether the architecture will correspond with the scale and style of that being proposed along the boulevard.

Rep X1.46: The Gala Bingo building should be purchased and turned into an 'Eastern Fringes Community Hall'. It is a large building that could accommodate a BMX facility, theatre clubs, arts workshops or whatever is needed by the community.

Rep X1.47: The Gala Bingo building would be better located on Pride Park, or utilised as a community / sports hall. Alternatively it could be a good location for convenience stores.

It is noted that the new population will require leisure and community facilities. However, the scale and nature of such facilities is still an unknown. The building could be allocated for leisure uses so that such facilities could be provided if the building was to become vacant in the future.. It is unlikely to be viable to purchase the site for a community use. A more appropriate vehicle for ensuring community hall provision is to make it a requirement of any developer to contribute to the provision of (or provide) a new community hall. This could be used by existing community groups who may need to be relocated as a result of the AAP or new groups generated by the new community. Notwithstanding this, the boulevard policy will allow community uses should they come forward.

Rep X1.48: The Gala Bingo site should be redeveloped for residential uses.

Rep X1.49: The Gala Bingo site should be landscaped and turned into a park.

Comments are noted. It is questionable whether a park would be appropriate or viable considering the proximity of Bass's Recreation Ground.

Rep X1.50: Derby Cityscape support the appropriateness of leisure and entertainment uses in this area. However, a higher quality development would be welcomed that intensified the mix of uses. The existing surface level parking should also be redeveloped to enhance the townscape.

Opinions on the future of the Gala Bingo have been very mixed. For the purposes of the preferred option, the site will be covered by a mixed-use policy. If the site comes forward for development, a number of uses will be permitted due to the sites optimum location. Permitted uses will include residential, commercial, leisure or community uses. This would encompass all the uses that have been suggested. If the site becomes available for development the Council and its partners will seek to ensure that the building is replaced with a more appropriate form of development.

Rep X1.51: A developer has pointed out that the Eastern Fringes area will require distinctiveness. Gala Bingo should not be looked at in a negative light; instead it should be retained as an attraction and leisure facility for the new community. This could allow Gala to further invest in their leisure offer.

Rep X1.52: Gala Bingo have registered their concerns regarding proposals for the Gala site. They have stated that the facility provides leisure facilities for the whole spectrum of society in a location that accords with Government policy. Gala support the need for regeneration in the area but believe that the modern purpose built unit and facility could provide a cornerstone to the new community. Gala currently employ 98 staff and will soon recruit another 160 at the Riverlights development. They therefore wish to retain the facility in Castle ward

Such a leisure use is highly appropriate in this location, however it is noted that the existing building significantly lacks the quality that the AAP is attempting to instil in the area.

North Car Park (Grey Area 'e')

Rep X1.53: The North and South car parks could become small parks with grass and trees to improve the aesthetics of the area.

Rep X1.54: North car park should be turned into a small park area to compliment the railway terraces opposite and the mature trees. This would create a good impression for visitors entering the city.

The viability of this option must be questioned. Network Rail gain significant income from this car park and would be unlikely to exchange this for a none profit use such as a park. It is likely that this site needs to be used for some form of development in order to facilitate other improvements to the station.

Rep X1.55: North car park could be utilised as a travel interchange.

A study is due to be carried out in the near future to work up designs for the front of the station, encompassing an improved travel interchange area. The results of this will determine whether land in the North car park is needed for the formation of an improved station frontage and transport interchange facility. The Preferred Option report is likely to identify a policy that will allow part of this site to be used as a travel interchange if required.

Rep X1.56: North car park would be a good location for a neighbourhood centre. The shops inside the train station could be relocated and added to.

As already established, the area will require convenience shopping facilities. The scale and location of these facilities is discussed in an accompanying technical paper. However, the North car park is on the

periphery of the main residential area and would not serve the whole community and could undermine the viability of the proposed 'active' boulevard.

Rep X1.57: Light commercial or residential uses on the North car park would create more parking problems. The site would be more appropriately used as part of the new transport interchange area.

Rep X1.58: Short term parking at the railway station is inadequate. Some of North car park should be retained for short term parking. The remainder of the site should be used for a small office development or community use. Residential development would not be appropriate because a satisfactory living environment could not be created due to the proximity of the railway line.

The proposed MSCPs on the South car park and Pride Park would provide short term parking for station users. It is noted that residential development would not be favoured, it may therefore be more appropriate to allocate the land for small scale commercial use that fits in with Conservation Area policies.

It is not accepted that redeveloping this site would cause extra traffic problems. It must be remembered that the site is currently used as a car park. It would be logical to assume that the same level of parking would not be able to be achieved on site. Therefore, it is likely that there would actually be less traffic using the site than there is now.

Rep X1.59: The design of any building on the North car park site should be seriously considered. Mock Victorian buildings would not be appropriate.

Comment is noted and welcomed. The North car park site is adjacent to the railway terraces, within the Conservation Area and abuts Wyvern House. It is therefore a very sensitive site. The Conservation Area Policies will ensure that any development is sensitive to its setting and overall character of the area.

Rep X1.60: If the North car park is developed to the same height, mass and scale as the existing Wyvern House it would have severe detrimental impact upon the setting and character of the adjacent railway cottages.

Any development within the Conservation Area must meet the design policies that will be included in the AAP and also meet the Conservation Area Policies within the City of Derby Local Plan Review. These policies will ensure that development does not detrimentally affect the setting or unique character of the special area or the amenity of existing residents.

Rep X1.61: A developer has noted that the proximity of the railway station may lend itself to commercial activity perhaps more so than the Castle Ward area.

Comments are noted. It is agreed that this site would provide an excellent commercial opportunity.

Siddals Road (Grey Area 'f')

Rep X1.62: The site on Siddals Road should be used for business development.

Rep X1.63: The Siddals Road site should be retained for light industry due to its proximity to Station Approach. The car servicing works are ideally located to serve the new communities that will be living and working in the area in the future.

Rep X1.64: Office development is preferred on the Siddals Road site.

Rep X1.65: Due to air quality and noise issues the Siddals Road site should be used for commercial development or community uses. The link to Bass's Rec should also be incorporated. Residential development is not appropriate.

Rep X1.66: Siddals Road site should be used for a mixture of residential and café uses.

Rep X1.67: If light industrial uses and residential uses are mixed together the negative impacts upon the living environment and business operations must be thoroughly examined.

Rep X1.68: Derby Cityscape support the inclusion of residential or commercial uses in this area provided they offer enhanced natural surveillance over Bass's Rec.

Rep X1.69: Live / work units should be provided to encourage small businesses. Siddals Road may be an appropriate location.

A mixture of comments have been received on this site, with the majority recognising the potential for some form of business development.

It is noted that some businesses may be appropriate to be retained in the area and Siddals Road could be one of the possible sites to allocate for relocation provided that their functioning would not affect the amenity or living environment of surrounding residential properties.

A few comments have suggested a mix of residential and business developments. One issue to consider is that the site is adjacent to the AQMA. However, it is noted that this can be mitigated if residential uses are high enough. As there is no room to set housing back from the AQMA zone, height may be the only way to provide mitigation in this case.

There could possible be potential for vertical separation of uses, with workshops on the ground floor, offices on the first to third floors and residential on the fourth and above, whilst accommodating the Bass's Rec link. This could satisfy all of the respondents and give some element of flexibility. It is not felt that café uses would be suitable in this location. It is not well related to any other area of activity (such as the boulevard, Midland Road or London Road) and thus may be isolated and out of place.

Flexibility is paramount in the Plan so that it is capable of reacting to changes in market conditions over the life of the Plan. The ability to react and be flexible is also a key test of soundness.

Rep X1.70: The Siddals Road site should be developed with a major office complex alongside the one proposed for North Castle Ward. The building should be designed to the highest quality utilising high quality materials, particularly glass. Large atria could be incorporated for pedestrians to walk through, leading to direct access to a footbridge onto Bass's Rec. The attractive public space would help provide access and users for Bass's Rec. The building should be iconic and be a tourist attraction in its own standing. A possible design could be in the shape of an ocean liner. This would continue the transport theme from the railway conservation area.

The AAP cannot get into this level of detail and although the respondent clearly has some set ideas on the form of development, there would be some questions over the viability of a proposal such as the one suggested here. All the plan can do is take on board the principles of what the respondent has said. The need for high quality architecture, pedestrian permeability and high quality public realm are all noted and are supported by the objectives of the Plan.

Rep X1.71: A centre should be provided along Siddals Road that includes many facilities under one roof. These could include an ice rink, shopping centre, night club, theatre, concert hall and bowling alley. This could be built over numerous storeys and designed to the highest standards. This type of development would attract people to Derby and stop the haemorrhaging of wealth to Nottingham.

The viability of such a scheme is questionable, especially considering the development of the new Westfield shopping centre, which will provide a shopping centre and cinema all under one roof. The need for new and improved leisure and entertainment facilities is noted.

Rep X1.72: A developer has suggested that commercial uses would be best on the Siddals Road site.

Siddals Road provides an excellent opportunity for both commercial and residential uses given its proximity to Bass's Rec and the city centre. In order to achieve an optimal blend of uses both residential and commercial uses should be permissible with vertical separation to overcome the air quality issues.

Terrace in Front of the Railway Station (Grey Area 'g')

Rep X1.73: The terrace in front of the station should be retained and refurbished. It provides useful local facilities.

Rep X1.74: The terrace opposite the station should be refurbished but not demolished. It definitely needs improving as it is the first thing seen by visitors to the city.

Rep X1.75: The terrace in front of the station should be retained as a feature distinctive to the city. Identikit cities are not attractive to residents or visitors.

Comments are noted. However, it should be considered that the AAP cannot necessarily control what shops and facilities choose to locate in the terrace.

Rep X1.76: The terrace in front of the station should be refurbished and used for retail purposes and cafes.

Rep X1.77: Retention and refurbishment is the preferred option for this site, in line with conservation policies.

Rep X1.78: Restoration and refurbishment is preferred for the terrace opposite the station. The age and style is in keeping with the conservation area.

Rep X1.79: Any future use of the terrace in front of the station should account for the existing traffic problems that local residents currently encounter.

Rep X1.80: Whatever is located in front of the station must be of the highest quality.

The majority of comments received (though not all) support the idea of retention and refurbishment rather than redevelopment.

Rep X1.81: The terrace opposite the station should be opened up with public open space with seats and trees.

A study is due to be carried out in the near future examining the future configuration of the area in front of the station. There is a possibility that this may include areas of public open space, seating and planting.

Rep X1.82: Derby Cityscape support the redevelopment option, provided that a scheme can be implemented that better enhances the Railway Conservation Area. Any scheme should create a more positive first impression of Derby. In order to create a viable scheme it may be necessary to include other non listed buildings (along Midland Place, inclusive of the Victoria Inn) into the development. This would obviously need to meet the requirements of PPG15 to justify any demolition within a Conservation Area. A better first impression of the City needs to be created.

The Draft Conservation Area Appraisal notes that the Victoria Inn makes a significant contribution to the character of the area and alongside the Waterfall Public House helps to frame Midland Place. Demolition of the Victoria Inn would be contrary to Objective 7 of the AAP.

Bass's Recreation Ground

Rep X1.83: Bass's Rec should include a children's play area, a skate park, a picnic area and football facilities.

Rep X1.84: A children's play area should be provided on Bass's Rec.

Rep X1.85: Allotments should be provided on Bass's Rec. This could be an option for all new residents and would allow for more intense development in the Castle Ward area.

Rep X1.86: In order to encourage wildlife on Bass's Rec, the fewer humans the better.

Rep X1.87: The Council should do more to promote the more intense use of Bass's Rec. More events should be promoted such as the Darley Park concert. There needs to be a mix of quality of life enhancing facilities.

Rep X1.88: Bass's Rec needs seating areas and children's play areas. Play areas should also be dispersed throughout the new development.

Rep X1.89: Bass's Rec could be utilised to provide the necessary outdoor recreational functions associated with any new educational establishments.

RepX1.90: Water could be diverted from Markeaton Brook to form a water feature within Bass's Rec.

Comments are noted. It is widely accepted that Bass's Rec needs improving in terms of access and facilities. The scale and nature of the facilities it should provide are still unknown and need further research.

Rep X1.91: The riverside path in Bass's Rec should be developed as a tourist route from the railway station to Riverlights, the Market Place and the Cathedral area.

RepX1.92: With regard to the use of Bass's Rec, the perceived fear of crime is just as important to combat as the real crime that occurs.

Comments are noted. The need for safe routes is supported by Objective 10. Design policies in the AAP will focus on designing out crime and making the area as safe as possible. These include new buildings and any public realm works. .

Rep X1.93: Derby Cityscape support the retention of Bass's Rec as publicly accessible playing fields, although accessibility must be improved. Consideration should be given to using the area for school playing fields but other options should also be examined. These include the possibility of an ecology park or a mixed scheme including an ecology park and space for recreational playing fields.

Comments are noted.

Rep X1.94: A developer has supported the need to retain Bass's Rec as it will be critical to providing a high quality of life in the Eastern Fringes. However, access and permeability must be improved.

Comments are noted. It is agreed that Bass's Rec will provide a vital function in the new community and must be made more accessible and permeable.

The Boulevard

Rep X1.95: The boulevard should include restaurants and coffee shops.

Comments are noted. Support for such uses is welcomed.

Rep X1.96: There are concerns about the type of uses along the boulevard. It should be ensured that anti social behaviour is designed out and that it doesn't become a 'young person's ghetto'.

Uses on the boulevard should attract people into the City and promote the evening economy. There is no reason why this area should become a 'young persons' ghetto'. Cities such as Manchester, Nottingham and Newcastle have managed to attract a broad spectrum of people back into the city at night. This has been done through the implementation of intelligent design and lighting, high levels of natural surveillance and strict policing. There is no reason why this cannot be done in Derby.

To help restrict the possibility of antisocial behaviour, loitering and littering, it may be appropriate to restrict take away outlets along the boulevard. These uses have potentially the greatest impact on amenity and so may not be appropriate.

Rep X1.97: A tall tower like the CN Tower in Toronto should be located in the area. Derby needs a tourist attraction. It should be located half way along the boulevard. Derby city is currently boring for tourists.

The comment regarding the need for more facilities to attract tourists is noted. This is a citywide issue, rather than one limited to policies in the AAP. However, the viability of locating a tower, on the same scale as the CN Tower, in Castle Ward is questionable in terms of financial viability, whether there would be a market and whether a building such as this would be appropriate in a predominantly residential area.

Rep X1.98: The central boulevard should be designed to be an attractive and safe route for pedestrians and cyclists at all hours. It should be ensured that the boulevard doesn't 'become a dead end in the evening at the northern end. This could happen once the Westfield Centre closes for the day and due to congestion on Traffic Street.

Parts of the Westfield Eagle Centre will still be open in the evening to allow access into the cinema. All routes will aim to attract pedestrians and cyclists in line with Objective Nine. A study is currently being commissioned to design the boulevard. The final design will have to be in line with the Objective Six and therefore must set a new high standard in design.

Rep X1.99: The active frontages designated on the new option are too stretched out. The length of active uses could be unviable. It should be a much shorter intensified stretch.

This may be a fair point and is really a question of viability. This is an issue that will need further investigation and thought. However, the 'preferred option' should still show active frontages along the whole length of the boulevard.

Rep X1.100: It has been suggested that the Traffic Street frontage between the end of the boulevard and London Road should not be allocated for residential purposes. It would be more appropriate to allocate this strip for more commercial uses. This would also be more appropriate considering the air quality issues in the area.

Comments are noted. It is agreed that more commercial uses would be appropriate in the location in question.

North of the River

Rep X1.101: Existing uses in the area such as the print works could mean that the land is contaminated. A site investigation will therefore be required before any development proceeds.

Comments are noted. Existing policies in the CDLPR deal with situations where contamination may be suspected.

Rep X1.102: A developer has supported the development of this area and also supports the need of higher density living on the river frontage.

Comments are noted. The area north of the river will provide a key opportunity to create a high quality, sustainable, city centre residential development of a density in excess of 200 dwellings per hectare.

North Castle Ward

Rep X1.103: A developer has suggested that it would be desirable for a 100 bedroom hotel and convenience retail facilities to be included in the permissible uses for North Castle Ward. It is felt that both elements are essential in attracting a Government departmental relocation. The retail element should include a small food store of approximately 2000sqft, a newsagent, men's and ladies hairdressers, dry cleaners, chemists, a coffee bar and a restaurant.

Comments are noted. The additional uses that the developer mentions are complimentary to the office development being proposed. It is therefore appropriate to permit such uses in such a central and sustainable location, provided that the retail element is limited to negate any impact upon trading in the city centre.

General Land Use Comments

Rep X1.104: A decision should be taken as to whether the overall development should be residential or commercial. It should be one or the other, the two don't mix well.

There are examples of mixed use developments in nearly all major cities in the UK and Europe. Residential and commercial uses can compliment each other provided that the type of commercial activity is restricted to those that do not adversely effect residential amenity. Also, mixed use development can facilitate more sustainable lifestyles.

Rep X1.105: The area will need features that add significant value to the area. These could include waterways, water features, children's play areas, BMX course, skate park, cycle demonstration area or even a velodrome. This would be a regional facility that would attract visitors from across the Midlands and really make a bold statement.

Rep X1.106: More community facilities will be required. A primary and junior school will be needed. These could be potential annexes from other existing schools.

Comments are noted. A primary school will definitely be provided within the Eastern Fringes and it is anticipated that the Nursery could be relocated within this. Secondary school provision across the city as a whole is currently being considered. It is unlikely that the Eastern Fringes will justify a secondary school in its own right. Therefore, the AAP will contain S106 policies that would ensure provision is made for off-site secondary school education. It is also uncertain whether a suitable site consists for a secondary school that would not undermine other parts of the Plan.

Rep X1.107: Land for allotments should be allocated in the area. They would be a useful community facility and could be used by the local school for teaching purposes.

This is an interesting point and is an issue that had not been raised at the first stage of consultation. It must be questioned whether allotments are an appropriate land use for such a sustainable inner city location.

Rep X1.108: Is there a possibility that the Queens Hall Methodist Mission building could be included in the development mix? If a new facility could be secured through a developer obligation it could open up a large site on London Road.

In order for the site in question, or any additional sites for that matter, to be considered for development an official written representation needs to be received. The next opportunity for this to happen is during the 6 week statutory consultation period on the Preferred Option in September/October 2006. Once a preferred developer has been appointed for the Castle Ward area it may be possible for landowners to negotiate directly with the developer. However, any new development in this location would need to respect the unique character of the London Road area and meet the design criteria set out in the AAP.

Rep X1.109: The area needs new pubs to help build social cohesion.

A number of pubs will be retained within the Eastern Fringes, including the Waterfall, the Station Inn and the Brunswick Inn to name just a few. The proposed boulevard could also provide further A3 and A4 uses. However, the AAP cannot necessarily dictate the exact nature of such uses.

Rep X1.110: Why do Cityscape want to put an office complex on the terrace opposite the station when there is already plenty of underused office floorspace in the city, such as Wyvern House?

A serviced office demand study has been commissioned by Derby Cityscape to discover the level of demand for such uses within the city. The results of this will feed into the AAP at a later date. It is recognised that Wyvern House is currently underused and it is hoped that by allocating it as a refurbishment opportunity and through providing secure multi storey parking in the vicinity will increase its attractiveness to potential tenants.

Rep X1.111: Derby Cityscape would support the introduction of a high quality educational academy if there proves to be an identifiable need. This could be a key driver behind the overall regeneration of the area.

A review of secondary educational facilities is underway across the city as a whole. This will look at the capacity of existing schools, future residential developments and the location of existing schools. If the review recommends that a new secondary establishment is built within the city centre, then the Eastern Fringes would have to be looked at as a potential location. All development sites within the city would have to be looked at as part of a sequential approach to site selection. However, the desire for an Academy (private investment) is noted. The residential development within the Eastern Fringes will not provide enough pupils to justify a new secondary establishment outright, therefore any new establishment will be part of the overall review of provision in the City.

Rep X1.112: The area should be developed for residential and retail purposes as proposed. This is supported and it will hopefully develop into a safe, balanced and welcoming community.

Comments are noted and welcomed.

Rep X1.113: A developer has voiced strong support for the residentially led, mixed use development of the overall Castle Ward area. However, stronger reference to family housing needs to be made.

Comments are noted. The Preferred Option Report will make reference to family housing as well as apartments. The AAP aims to achieve a

mix of housing to attract a diverse and varied community. It will also be important to provide a mixed range of housing in order to be flexible in light of changing market conditions.

Rep X1.114: A developer has voiced concerns over the rationale and justification for a 40,000sqm office complex in North Castle Ward. The amount of provision and the location have both been questioned.

The 40,000sqm office complex is being proposed to provide ample accommodation for a governmental departmental relocation. Interest has already been shown by a number of developers. The location of the proposed complex is a landmark site on the perimeter of the ring road, within 5 minutes walking distance of the core of the city centre. This would appear to be an excellent location for such a development.

(2) Traffic, Transportation and Movement

Rep X2.1: The proposition to improve pedestrian movement and the public realm throughout the area is fully supported.

Comments are noted and welcomed.

Rep X2.2: Cycle paths are only used when they are the most direct route between two points, otherwise roads and pavements are used. The boulevard would link the station and the Westfield development but would not allow continued cycle movement across the city. Therefore the cycle route should be along Siddals Road or Bass's Rec to the bus station and beyond. The cycle path must be continuous to be effective.

The AAP is committed to promoting cycling. Members of Derby Cycling Group have, and will continue to be consulted on the emerging proposals. Safeguarding the strategic cycle network will be an important step towards ensuring that the network is fully integrated with the rest of the city.

Rep X2.3: There needs to be a single point that all buses pick up and drop off between the railway and bus stations. Signage will also need to be improved in conjunction with this.

The new Riverlights scheme and integral bus station will provide a new and improved pick up and drop off point for people entering the city via bus from the railway station. Improvements to the frontage of the railway station will also allow for the development of an improved transport interchange. These two developments will provide improved facilities for people travelling between the bus and railway stations.

The AAP will also safeguard a direct link between the stations along Siddals Road.

Rep X2.4: Bus services need to be cheaper, more attractive and integrated with train times in order to get more people to use them.

Unfortunately the cost and timing of bus services is out of the control of the AAP. However, it is hoped that the Plan as a whole will facilitate improved services throughout the area.

Rep X2.5: The distance between the railway station and the bus station is not great. The design of the pedestrian link is very important to promote walking. Pedestrians make for safer and more vibrant cities.

Comments are noted and welcomed.

Rep X2.6: North car park should provide cycle facilities particularly if the Round House becomes part of Derby College.

As part of the proposed reorganisation of the front of the station, parking and public transport facilities will be reviewed. This is likely to involve improving facilities for cyclists.

Rep X2.7: Traffic calming measures should be implemented in front of the station on railway terrace. Traffic numbers should also look to be reduced.

It is an objective of the Plan to improve all aspects of the station frontage. Traffic calming measures may be part of this – indeed it may be an option to close this part of the road altogether. The AAP will facilitate any such proposals that are deemed necessary to fulfil there objectives.

Rep X2.8: Traffic at the station needs to be separated. Buses and cars should use different sides of the station, either the Pride Park side or the Railway Terrace side. Either way the buses should be given a priority route into the city.

The AAP will try to achieve this. The proposed dedicated bus route along Siddals Road and 'bus gate' mechanism at the Cock Pitt roundabout will prioritise buses and allow them to move more easily. Proposals to put a MSCP on Pride Park will also help to separate traffic.

Rep X2.9: Midland Road and London Road should be used as the key route into the city centre from the railway station.

It is not clear whether the respondent was talking about pedestrian or vehicle movements. However, London Road and Midland Road will always be key routes. It is hoped that environmental improvements can be made to Midland Road to reinforce its role.

Rep X2.10: There will be a need to establish cycle links to and from the Round House site once it is developed.

This is true. Unfortunately the Roundhouse is outside of the remit of the AAP but it will be important that the Eastern Fringes provides an extensive cycle network that can link up with the development of the Roundhouse.

Rep X2.11: Active traffic management should be investigated in order to lower vehicle speeds, but create improved movement. It is start / stop driving that creates more air pollution.

Once the Plan proposals have been run through the DATS modelling system there will be an opportunity to apply mitigation measures to the areas of stress. A variety of mitigation measures will be examined including active traffic management.

Rep X2.12: If more innovative forms of transport are investigated for the link between the railway and bus stations, the effect on the conservation area must be seriously considered. A monorail would have serious detrimental effects upon the setting and character of the conservation area.

Whatever innovative forms of transport are implemented in the future, the supporting infrastructure will have to comply with the Conservation Area policies set out in the Plan and other legislation, as with any development in the Conservation Area.

Rep X2.13: There needs to be further analysis of pedestrian and cycle routes to ensure that the best possible connectivity can be achieved.

Comments are noted.

Rep X2.14: Derby Cityscape recommends that the designated bus link between the railway and bus stations is routed along Station Approach rather than Siddals Road. The Siddals Road route would sever the office complex site allocated in North Caste Ward.

The bus link is most appropriate along Siddals Road as it will entirely separate it from traffic on Station Approach. There is no reason why the bus link highway cannot be factored into the design of office development in North Castle Ward.

Rep X2.15: Traffic at the front of the railway station should be restricted to drop-off, short term parking (30 minutes), taxis, buses, cyclists and pedestrians. Other traffic along Midland Road and the conservation area should be restricted to access only.

The Plan aims to restrict traffic movements through the majority of Castle Ward through the implementation of Home Zone type initiatives. Certain routes will therefore have to continue to be utilised in order to allow circulation around the perimeter of the development in castle Ward. Midland Road will be needed for this purpose. Traffic and parking at the front of the station is due to be reorganised as already detailed.

Rep X2.16: It needs to be made clearer which areas will be car free, home zones, pedestrian priority areas and access routes within these.

Comments are noted. The preferred option report should provide a higher level of detail with regard to moving around the area.

Rep X2.17: Gas powered or hybrid vehicles should be used on the shuttle route between the railway and bus station.

Comments are noted and welcomed. The use of alternative and renewable energy is supported by Objective 8 of the Plan. However, the AAP cannot influence the type of vehicles used. This is outside the scope of the Planning system.

Rep X2.18: The Plan should take into account an international perspective. The new Channel Tunnel rail link into St Pancras will mean that Derby is on the main line into Europe so should therefore vastly improve the area around the station to make it more 'tourist friendly'. Low cost airline destinations have become tourist destinations in themselves, the same could occur for cities on the main line cross channel links. This needs to be exploited.

The AAP aims to vastly improve the area between the railway station and the city centre. This will hopefully be one piece in the overall jigsaw that will see the face of Derby change for the better. The planned improvement and regeneration will hopefully attract tourists from within the UK and hopefully even further afield.

Rep X2.19: The footfall of commuters using the station must be exploited.

Commuters will hopefully use the active uses that are accommodated on the boulevard.

(3) Parking

Rep X3.1: No multi storey car parks should be located in the vicinity of the Conservation Area. The most appropriate locations for MSCPs are on Pride Park and South Car Park.

Rep X3.2: Can MSCPs really fit in with the surrounding conservation area?

Rep X3.3: The use of MSCPs should be kept to a minimum. Can they be designed any better than the existing Cock Pitt?

MSCPs can now be designed sympathetically to fit in with the character of their surroundings. Examples can be seen in various locations across the UK. The Masson Mill development, just outside Cromford, is a good example. The site is within a World Heritage Site and yet a sympathetic MSCP has been provided integrated into the mill building. Any buildings within or adjacent to listed buildings or conservation areas will be subject to existing policies designed to protect their setting. In terms of 'need' for MSCPs, the Parking Study published by Atkins has demonstrated a need for additional parking in the area.

Rep X3.4: Parking spaces need to be provided for people with shops on London Road to stop people parking on the pavement.

Rep X3.5: Current parking issues / problems need to be alleviated before adding more residential properties to the area. Illegal / dangerous parking is particularly a problem around the Keble Close area.

Rep X3.6: There needs to be better enforcement of parking restrictions, particularly to stop people parking on cycle paths.

Illegal parking is not a matter that the AAP can deal with. Illegal and dangerous parking is a matter for parking enforcement officers and the police.

Rep X3.7: An MSCP on the South car park would be a good use of space. The South car park site should not be used for residential or office uses due to its proximity to the railway lines.

Comments are noted.

Rep X3.8: Parking provision for local residents is very poor.

Rep X3.9: Consideration must be given to providing parking for residents' visitors and delivery vehicles without adversely affecting the visual appearance.

Comments are noted. It would be hoped that detailed working up of designs for the area can achieve these aims.

Rep X3.10: The number of city centre car parking spaces should be reduced to encourage the use of public transport.

The rationalisation of existing surface parking is unlikely to lead to any net gain in the number of public parking spaces provided whilst the intensity of development will increase significantly. This is possible due to the sustainability of the location. In parallel to parking provision there will improved public transport routes and improved routes for pedestrians and cyclists to make these forms of travel more attractive.

Rep X3.11: To prevent congestion as people search for spaces it should be possible for people to book ahead for a guaranteed space.

This is a good idea but is not within the scope of the AAP. Innovative ideas to combat transportation and parking problems are welcomed, but this is more of a matter for the Local Transport Plan.

Rep X3.12: All housing should be provided with parking either next to the house or undercroft. Alternatively more innovative parking solutions could be considered such as underground parking.

Rep X3.13: Undercroft and underground parking should be seriously investigated as parking solutions for the area.

Comments are noted.

Rep X3.14: Every new house should be provided with two parking spaces. This would not be excessive, just realistic.

Existing parking standards are an average of 1.5 spaces per dwelling. The Eastern Fringes area, particularly Castle Ward is a highly sustainable area. It is adjacent to the city centre and will have high quality public transport, cycling and pedestrian routes. By providing every dwelling with 2 parking spaces it will significantly reduce the intensity of development thus requiring more dwellings to be built on the edge of the city within green areas. The AAP provides a major opportunity to build an exemplar environmentally sustainable community. In order to achieve this, there is certainly no justification for increasing standards.

Rep X3.15: Current parking provision for the pubs and restaurants in the area is inadequate. More short stay spaces must be provided if more cafes and restaurants are to be developed.

The key asset of the Eastern Fringes area is its strategic location, on the edge of the city centre adjacent to the new Westfield development. Improvements to public transport and pedestrian routes will allow more people to use the area without actually bringing their car into the area. Obviously some short stay parking will be provided but it is hoped that people will choose the more sustainable modes of transport. The proposed MSCP serving the office complex in North Castle Ward could possibly be utilised at weekends and evenings as short stay parking.

Rep X3.16: Car sharing and car clubs should be looked at as alternative solutions to parking problems in the area.

Developers will need to consider new and innovative solutions to reducing car use because of the strict parking policies that will be included in the AAP. This may include the use of car clubs. Such schemes have been implemented at specific residential schemes in places such as London. City wide projects have also been attempted in Leeds. The aim of a car club is to provide a car when you want one,

theoretically cutting car ownership and reducing the number of small trips carried out by car. The requirement for developers / operators of major developments to provide Travel Plans is already in the CDLP Review and this practice will continue in the AAP. This may lead to innovative schemes such as this to happen

Rep X3.17: A MSCP on the North car park site would be highly inappropriate in the conservation area.

MSCPs can be designed to compliment even the most sensitive of surroundings. However, it is agreed an MSCP on the North car park site would be inappropriate due to the small and limited footprint of the site.

Rep X3.18: MSCPs should be built near to Traffic Street to keep traffic movements within the Eastern Fringes to a minimum.

MSCPs will be proposed to serve the railway station and the proposed new office scheme in North Castle Ward. The remaining MSCP should be located alongside the proposed supermarket on the boulevard to serve a dual use as a short stay car park for people visiting the area and also to serve the supermarket. Locating the MSCP on the Bemrose and Sovereign sites will enable access from London Road, therefore negating the need for traffic movements through the residential area.

Rep X3.19: The MSCP on Pride Park is supported. This should allow car travel to be kept to a bare minimum on the opposite side of the tracks.

Comment is welcomed.

Rep X3.20: The new development could create up to 6000 extra cars in the area; what will be done to cater for these?

The proposals within the Plan will be tested through the DATS model. Any potential problems will be highlighted by the system and therefore mitigation methods can be developed before the Plan is implemented.

The figure of 6000 cars hasn't been substantiated or evidenced as far as can be told. Obviously the development will create some car traffic but issues such as the relocation of the DRI will take a major traffic generator out of the area.

Rep X3.21: The location of the MSCPs will be very important. The majority of traffic should be kept to Pride Park and away from the pedestrian priority routes along London Road and Midland Road.

Comment is noted.

Rep X3.22: Derby Cityscape fully support the rationalisation of surface level car parking in the Eastern Fringes area.

Comment is welcomed.

Rep X3.23: Who will be the main users of the MSCP allocated on the corner of Wellington Street and Carrington Street? Existing car parks currently serve the DRI and local businesses which will not exist once the Plan is implemented. Parking will be needed but it should be restricted to permit use for local residents, visitors and local businesses.

The MSCP allocated on the corner of Wellington Street and Carrington Street will serve the users of the facilities on the boulevard, users of the City Centre some users of the railway station and act as extra parking for visitors to the area. There may be scope for permit parking within the MSCP for local businesses, but this will eventually be a management issue that is outside the scope of the AAP.

Rep X3.24: There needs to some form of justification of the proposed MSCPs. Who is going to be using which car parks?

A City Centre car parking study has been commissioned and it is evidence from this which has demonstrated a need for parking in the area. It must be remembered that the MSCP that was shown on Bemrose and Sovereign car parks (Wellington Street) will be replacing existing surface car parking in the area.

Rep X3.25: Developers should be made to contribute towards parking enforcement.

Parking enforcement is not a matter for the AAP. A number of new parking enforcement officers have recently been recruited. Developer contributions should therefore not be needed towards this service (nor may they be justified under planning law).

(4) Conservation and Environment

Built Environment

Rep X4.1: The towers at the front of the DRI should be retained and the trees in front of them should be cleared.

Rep X4.2: The statues of Queen Victoria and Florence Nightingale should be retained.

Rep X4.3: The wall and railings in front of the DRI should be retained and the properties opposite should be encouraged to re-instate their railings.

Comments are noted. A design policy for the London Road area will ensure that any development maintains, and in places enhances the best elements of the London Road area, including the features mentioned (many of which are listed). It would not be appropriate to clear the trees if these are deemed important to the character of the area.

Rep X4.4: Views in and out of the conservation area are important, especially the small streetscape views which may be ruined by tall buildings.

Rep X4.5: Particular strategic views should be identified. Particularly views of the cathedral from Station Approach should not be obscured.

The Draft Conservation Area Appraisal sets out a number of important vistas from the Conservation Area. Implementation of the AAP will lead to a step change in the scale of development in the Eastern Fringes area. This may lead to the loss of some strategic views. However, the new development has the potential to create more important vistas and enhance some of the existing ones.

Rep X4.6: There are concerns over the idea to plant trees along Midland Road. Who will maintain them, and will they inhibit natural surveillance?

Tree planting along Midland Road has been recommended through the Draft Conservation Area Appraisal. It is hoped that this would help to enhance the existing streetscape. It would be part of the City Council's remit to maintain the new trees and ensure that they do not significantly obscure natural surveillance or CCTV. The specie of tree used would not be a matter for the AAP.

Rep X4.7: Support is given to the retention of the trees and railings along Railway Terrace in front of the North car park site.

Comments are noted and welcomed. This will form part of the policy for this site.

Rep X4.8: The cottages behind the Nightingale Macmillan unit need substantial refurbishment. They should definitely be retained and would make good quality family housing.

Unfortunately the Trinity Street buildings are not listed (statutory or locally) and do not fall within the Conservation Area. The NHS applied for a demolition order in June 2006 which was subsequently granted. Unfortunately the AAP has no power to stop such demolition until it reaches a more advanced stage. The AAP must reach at least the Preferred Option stage before development proposals could realistically be refused on the grounds of prematurity (meaning the development would prejudice an emerging Plan).

Rep X4.9: All new homes should meet the highest level of eco home standards. Micro generation solutions are becoming more viable in terms of the period of pay back due to the rising oil prices.

Comment is noted and welcomed. There will be a Policy in the AAP dealing with the environmental sustainability of new homes.

Rep X4.10: An AQMA buffer zone will be needed to protect residential properties from the traffic fumes on Traffic Street. To mitigate air borne pollution, trees should be planted along Traffic Street and new technologies should be investigated such as self cleaning paving slabs.

An Air Quality Management Area exists along Traffic Street and up to the Cock Pitt junction. All new development will be expected to comply with the restrictions of the AQMA. Planting and landscaping will be used to help soften the urban landscape and mitigate noise and pollution. Innovative new technologies will also be welcomed in any new schemes.

Rep X4.11: Derby Cityscape support the redevelopment of the redundant cottages on the corner of Nelson Street and Carrington Street. The proposed scheme is considered to enhance the appearance of the Railway Conservation Area and improve the setting of the Grade II listed Midland Hotel. Subsequently Derby Cityscape recommends that the buildings in question are not specified for retention.

A redevelopment scheme was granted for this area in Spring 2006. The scheme involves the demolition of the redundant cottages and former public house on Nelson Street and the conversion of Churnet House in conjunction with new development to provide 53 apartments. Unfortunately the AAP is not sufficiently progressed to have been a material consideration in this application. However, the scheme does fit in with the overall residentially led vision for the area as a whole and can be considered acceptable in terms of design and conservation area policy.

Rep X4.12: Derby Cityscape have stated that the London Road Policy area does not appear to justify any special designation compared with other arterial roads into the city.

The London Road streetscape is one of the key assets of the Eastern Fringes area. In order to maintain its inherent quality the AAP will include a specific design policy for the London Road character area, to

ensure that its best aspects are retained. There will not be a 'London Road Policy Area' designation but the design policy for the area will aim to protect the same features.

Other arterial roads are not designated in the same way as there are no other Area Action Plans in the City that have the ability to go to the same level of detail.

Rep X4.13: The Conservation Area should be enlarged. It must be ensured that the fringes of the conservation area are treated sympathetically so that there is not an abrupt transition to newly built modern architecture.

The Draft Conservation Area Appraisal sets out areas to be included in the possible expansion of the Conservation Area. The AAP is not the vehicle to pursue these expansions but they should be considered. All development surrounding and adjoining the Conservation Area will be sensitive in design to ensure that the character and setting of the area is not detrimentally affected.

Rep X4.14: English Heritage have also mentioned that the AAP process is an opportunity to review the conservation area boundaries and prepare Conservation Area Statements / Management Plans in order to achieve sensitivity in urban design.

This is already being done through the Conservation Area Appraisal that is being produced alongside the AAP process will review the boundaries of the Conservation Area and set out a Management Plan for the whole area. This should meet the requirements of the respondent. Where appropriate the AAP will take on board the Management Plan

Natural Environment

Rep X4.15: There is a great deal of wildlife that needs protecting in the Bass's Rec area. A habitat creation scheme should be implemented in the area.

The AAP Preferred Option will recommend the retention and improvement of Bass's Rec. A habitat creation scheme could form part of the improvements. However, the AAP will not stipulate the exact detail of the improvements. This level of detail needs to be determined once a local population begins to form. The designated Wildlife Corridor and Site of Importance for Nature Conservation (SINC) will be maintained in the AAP.

Rep X4.16: Flood risk issues may limit the scope of development on the area north of the river. This area will also be constrained by the potential for contaminated land. Remediation works would be needed to safeguard against pollution entering the river.

Land north of the river is appropriate for development provided that flood mitigation measures are implemented. Before any development occurs site surveys will be carried out and appropriate remediation works progressed. This is standard development practice.

Rep X4.17: The construction of footbridges across the River Derwent will require the consent of the Environment Agency under the provisions of the Water Resources Act 1991.

Comments are noted and welcomed. The footbridges are only proposals at present. The Environment Agency will, of course be key consultants in any designs that come forward.

Rep X4.18: No more major open spaces will be required in the development area as Bass's Rec is so close by and is sufficient.

Rep X4.19: A range of different types of green spaces should be provided, from balconies to major open space. The idea of pocket parks should be considered and the linkages between them, forming

'beads on a string' or in the form of formal squares as seen in London or Edinburgh.

Rep X4.20: Areas should not be dominated by large areas of parkland, instead open space should be provided in 'pocket parks'.

Comments are noted. The extent to which major open space is needed is debateable. An improved Bass's Rec should serve the residents' need for major open space. Smaller areas of open space should be provided within the development.

The amount, layout and type of open space will be controlled by policy, though it is unlikely that a large new park would be appropriate as it would undermine other policies and objectives. The idea of 'pocket parks' or smaller areas of open space may be an appropriate solution.

Rep X4.21: The River alongside Bass's Rec is in a terrible state and needs serious improvement before any development could occur north of the river.

Improvements to the River Derwent could become part and parcel of the improvements to Bass's Rec and development of north of the river. However, maintenance of the River banks (e.g. litter picking) is not something the AAP can necessarily influence.

(5) Delivery and Implementation

Rep X5.1: Mechanisms for monitoring and implementing the plan need to continue to be discussed in order for the Plan to meet the tests of soundness.

A monitoring framework will be established alongside the implementation strategy that is currently being developed in partnership with Derby Cityscape. This will be included in the Preferred Option for discussion.

Rep X5.2: There is a concern whether it will be commercially viable to purchase land for housing which has a profitable commercial business operating on it, given its present land value and the cost of relocation. Due to the high land values it is questionable whether a desirable and sustainable neighbourhood could be created whilst meeting the housing numbers. Higher density housing may be needed and mixed tenures may not be possible.

Rep X5.3: There is uncertainty over the delivery of the Plan. Questions need to be asked such as, are there people who want to build in the area and is there a market for so many inner city properties?

A number of national land developers have already shown interest in the aspirations being set out for the AAP. Any parts of the AAP that are not commercially viable should be indicated by developers in their submissions on the Preferred Option document. The Plan will have in built flexibility to allow it to react to changes in the market. It could therefore permit more family housing if the market for apartments slows down or vice versa. This flexibility is one of the tests of soundness that the Plan will need to satisfy.

Rep X5.4: It is thought that there are inflated aspirations over how many housing numbers are achievable. Regional plan figures should be looked at and a justification of the provisional figures for the Eastern Fringes should be given.

High quality, high density development is achievable, as demonstrated by a number of housing projects highlighted by CABE. The provisional housing figures will be published at the Preferred Option stage. The Eastern Fringes will play an important part of meeting the regional targets set out in the RSS. The draft RSS will be published in Sept 2006.

Rep X5.5: There is confusion over Cityscape's and DCC's role with regard to business relocation. This needs to be made clearer as relocation will be a key catalyst to change.

The implementation and relocation strategies, currently being developed in partnership with Derby Cityscape, will set out the roles of the different partners and organisations involved in the land acquisition process. Drafts of these will be put in the Preferred Option document for discussion.

Rep X5.6: The provisional office floorspace figures and housing numbers should be reviewed as part of the AMR.

The AMR will monitor housing numbers and will also monitor employment land supply (B1, B2 and B8). Offices fall under use class B1. The AMR cannot review the outputs expected from the AAP, but it will be able to tell us whether the policies are working. This could inform whether a review of policies is needed.

Rep X5.7: So many things are up in the air; people need to know once and for all; when will things finally start to happen?

Rep X5.8: It is extremely important that detailed timescales for development are set out in the preferred option stage. Businesses need to know timescales in order to plan ahead.

The implementation and relocation strategy being developed will set out a basic phasing timescale so that businesses know when there land is likely to be needed for development purposes.

Rep X5.9: A project manager(s) will be employed by Cityscape to set out the way forward in terms of implementing the Plan

Comment is noted and welcomed.

Rep X5.10: Will CPO compensation recover the costs of new investments?

Rep X5.11: There needs to be more information available explaining what compensation any leaseholders may receive. A further seminar would be helpful with input from businesses that have already been through the CPO process.

A further workshop / exhibition, aimed at local businesses is a possibility for the Preferred Option consultation period. By this time there should be more information available regarding any possible CPO.

Rep X5.12: It is paramount that Council Officers and members of the Derby Cityscape team begin to talk to individual businesses on a one-to-one basis. Businesses should be spoken to at the earliest possible opportunity. Business owners need to know that if they move the detrimental effects will be mitigated / compensated against and what the possible relocation options will be. What sites are suitable and available at this moment in time and which sites are expected to be available in the future?

Derby City Council and Derby Cityscape have been speaking to a number of businesses on a one to one basis for some time and we are happy to continue with this. As part of the relocation strategy sites will be examined to find appropriate sites for affected businesses.

Rep X5.13: It will be extremely difficult to relocate many businesses and be able to give them exactly the same trading conditions. Some businesses thrive on the close proximity of the city centre. Accessibility to relocation sites will be a key issue.

Rep X5.14: Businesses are worried that they will not find alternative sites that meet all their requirements. It needs to be understood that some businesses need to trade from the Eastern Fringes area and are long established.

Rep X5.15: Businesses will be taken out of their comfort zone. It must be ensured that customer loyalty is maintained during relocation.

It is accepted that the exact trading conditions may not be achieved for everyone. Derby City Council and Derby Cityscape will do their utmost to minimise the number of businesses who may be detrimentally affected by relocation. Indeed, it would be hoped that some businesses may improve their situation. There may possibly be some scope for some 'residentially friendly' businesses to be retained within the Castle Ward area.

Rep X5.16: Some sort of forum needs to be set up for businesses. This could represent their needs and help with advice.

This is the role of the Derbyshire Chamber and Business Link. They are invited to the regular Project Advisory Group meetings to help oversee the development of the Plan. The Council would welcome any group or forum set up by the businesses and tenants.

Rep X5.17: The Council need to be clearer about whether any small scale industry will be retained in the Castle Ward area.

If any light industry is retained only a very small number of businesses would be permitted and they would have to be 'residentially friendly' (minimal impacts upon residential amenity; visual, noise, vibrations, smell, air pollution etc).

Rep X5.18: Many of the businesses in the area are clean businesses, why should these businesses have to relocate? These businesses should be incorporated into the wider Plan for the area. More consideration must be given to the effects upon light industry in the area; they are part of the infrastructure of the area.

Rep X5.19: Businesses who are long established, have a customer base and a reputation that they wish to retain. Therefore a number of businesses do not wish to relocate.

Rep X5.20: Why are thriving businesses being asked to relocate?

Retaining a very small number of clean light industrial uses within the Castle Ward area may be viable. The number of businesses who wish to stay in the area and the nature of each the industries is currently being investigated. Retaining any more than a small number of businesses has the potential to undermine the vision and the overall viability of the Plan as a whole. However, there may be scope for some land to be allocated for such uses and appropriate sites may be Siddals Road (ground floor); South car park of the railway station or part of the Royal Mail building – should it come forward for development.

Rep X5.21: What are the implications, in terms of compensation, of land being allocated for residential uses rather than light industrial?

Compensation will only be awarded if the land is acquired through a CPO. The effects of the CPO on the value of a property are ignored when assessing compensation. Therefore it is necessary to value the land on the basis of its open market value without any increase or decrease attributable to the scheme of development which underlies the CPO. No decision has been made on a CPO. It would be a last resort that would only be considered where negotiation has not worked. CPO is not something the Council would take lightly.

Rep X5.22: Castle Ward is a very advantageous location for many existing businesses. Therefore, any compensation must take this into account.

Castle Ward would also be a very advantageous and sustainable location for a residential community. Many of the businesses currently located in Castle Ward could move to other sites without their business being detrimentally affected. If the CPO route is undertaken then any compensation will be based on the principle of equivalence. This

means that land owners should be no worse off in financial terms after the acquisitions than they were before. Likewise they should be no better off. However, see earlier comments on whether CPO will be needed.

Rep X5.23: More information is needed as to how the relocations will work. This needs to be written out in a strategy or schedule.

Information regarding the relocations will be included in the relocation strategy due to be published alongside the Preferred Options report.

Rep X5.24: It has been stated that relocations could lead to redundancies.

It is the aspiration of Derby City Council and Derby Cityscape that there will be no loss of jobs due to the implementation of the AAP. Every effort will be made to retain each and every job within the City.

Rep X5.25: Could the former QDF site be used to relocate affected businesses in Castle Ward?

All appropriate sites are being investigated within the City as a whole as part of the development of the relocation strategy.

Rep X5.26: Derby Cityscape have recommended that it would be inappropriate to designate light industrial uses within the city centre, as they may be bad neighbours and draw heavy industrial traffic into the area. Such uses are more appropriate in other areas of the city, closer to their customer base. However, car repairers could be allowed in the city centre and could be accommodated within blocks in the Masterplan as retail, where they would be subject to normal development control considerations.

The Masterplan allocates the following areas for retail development, the Westfield Eagle Centre (currently under construction), St Peter's Street, East Street, Sadler Gate, Iron Gate and the St George's area (Sadler Gate). None of these areas are considered to be appropriate for light industrial uses such as car repairers because these areas form

the retail core of the City (A1 uses). It would be more appropriate and more sustainable for such uses to be located near to their existing and potential customer base. A limited number of sites within the Eastern Fringes would therefore be more appropriate.

(6) Design Principles

Rep X6.1: Low rise flats should be located near to the city centre with family housing located further out.

The respondent has not made clear how they define 'low rise'. Apartments of between 3-5 storeys may appropriately be located along the boulevard at the interface with Traffic Street and overlooking Bass's Rec. Lower rise townhouses will be in other areas located away from the primary routes.

Rep X6.2: All new buildings should have solar panels and mini wind turbines. Communal micro renewable energy generation could be invested in by local residents in return for reduced bills. However, retrofitting older buildings, within the Conservation Area, should be avoided.

Rep X6.3: The basic design and siting of buildings should take into account passive solar gain and natural drying areas to avoid excessive use of central heating and tumble dryers.

Policies within the AAP will ensure that all new buildings are built to a highly sustainable standard. The possibility of including a 10% renewable energy standard for the new developments is currently being investigated. Other 'softer' solutions will also be sought.

Rep X6.4: Housing densities should be varied to encourage a social mix and a wide range of households. Not all households will need a car. Some of the housing should include an agreement so that occupiers get free bicycles and storage facilities in return for agreeing not to own a car.

Objective 4 of the AAP seeks the provision of a residential development of a mix of size, types and tenure. Between 20 and 30 percent of the housing will be allocated for 'affordable housing'. Strict parking standards will ensure that car ownership is minimised.

Rep X6.5: The inclusion of objectives that seek the highest standards of design, energy efficiency and minimised environmental impact give the overall scheme the potential to become a major regional flagship for sustainable development.

Comments are noted and welcomed. This is a principle we hope to carry through.

Rep X6.6: Any large BMX / skateboard facility will attract large crowds, leading to excess noise and possible anti social behaviour. In order to combat this, a number of 'one trick stops' should be dispersed through the area. The single piece of 'furniture' will allow users to carry out one or two skills and then move on to another piece. This would keep people moving and therefore aid natural surveillance.

Comments are noted and welcomed. The design, format and exact location of street furniture or open space is beyond the remit of the AAP. The AAP can include design principles but not such detail as the design and format of street furniture. The principle of providing leisure facilities for younger people is noted. It is also agreed that the design of the built environment should facilitate natural surveillance wherever possible.

Rep X6.7: The iconic public art should be a full size aeroplane on a plinth. As well as being a piece of art it could also be used as a restaurant, as proposed for Pride Park in the past.

As already stated, the AAP can only set out the design policies. The design of any public art must fit in with these policies but public art is a subjective topic and should not be subject to prescriptive standards set out in the planning document.

Rep X6.8: Development on the DRI site should be low rise as it already sits higher than the level of London Road.

What is meant by 'low rise' is unknown. It is suggested that development on the DRI site should be between 3 and 5 storeys taking into account the topography of the site.

Rep X6.9: Given the proximity of Bass's Rec to Siddals Road, any potential development should include a site line through the building to get a glimpse of the park.

Comment is noted and welcomed. This could form a development principle for this allocation.

Rep X6.10: The design of footbridges should include areas of decking / seating for people to sit on, as seen on the Millennium Bridge in Newcastle.

Rep X6.11: The bridge leading to Bass's Rec must be covered.

The AAP can only set out design principles. The detailed design of footbridges is outside of the remit of the AAP, but the comments are noted.

Rep X6.12: Rubbish storage collection needs to be considered. Bins and boxes can detract from the streetscape. Imaginative solutions should be investigated.

Rep X6.13: It is paramount that recycling facilities are factored into the design of the area. Split waste bins should be used to pre-sort rubbish.

It is noted that recycling bins and boxes can seriously detract from the urban landscape. Developers will be asked to consider imaginative solutions to this issue. However, the provision of these facilities should be an important part of the Plan to aid with sustainability objectives.

Rep X6.14: The design of MSCPs should be incorporated into the overall design scheme so that different approaches are taken in different areas to provide variety.

The whole of the Eastern Fringes will be divided into a number of character areas with their own specific design policies. This will allow variety and diversity in design but the overall aim should be to create a cohesive urban form.

Rep X6.15: The design of the green spaces behind the railway cottages are of particular interest and should be replicated in new developments.

Comment is noted. Communal gardens or open space may be one of many appropriate design solutions. The AAP's design policies must not be so prescriptive that they stifle innovation or flexibility. What is important is that key objectives and principles are achieved.

Rep X6.16: The design of the bridge over station Approach should be of the highest quality and be a work of art.

Comment is noted. The Council and its partners will seek the highest design quality throughout the whole of the development.

Rep X6.17: Development heights should be graded. The highest development should face onto Traffic Street gradually tapering down towards the railway station and the conservation area.

It is suggested that development will tend to higher (4-5 storeys) around the primary routes in order to define public spaces. These areas will include sites overlooking Traffic Street, the boulevard and Station Approach. Towards the Conservation Area heights will be more domestic to respect the character and setting of the Conservation Area.

Rep X6.18: A specific 'Derby style' needs to be identified for the Eastern Fringes. Curved corners, ironwork, copper and cupolas should all be looked at for inspiration. Sadler Gate and the Cathedral should also inspire future designs.

Rep X6.19: Some form of design forum / day / panel needs to be set up to discuss design issues and develop basic design principles.

Comments are noted and welcomed. There may be a specific 'design event' during the consultation on the Preferred Option to help determine a true 'Derby style' drawing on expertise from various agencies.

Rep X6.20: Sustainability should be the key driver behind design and Cityscape should be the design champions.

Comment is noted and welcomed. It is of utmost importance that the AAP champions high quality design and Derby Cityscape should help drive this forward. Policies will exist to ensure this.

Rep X6.21: The design of buildings in North Castle Ward should mitigate rather than be influenced by the existing Cock Pitt car park.

There will be a specific design Policy for the development of Castle Ward. It will seek high quality architecture and public realm. The development should be an individual landmark in the city centre, setting new high standards of design.

Rep X6.22: It may be better to use modern / contemporary design to contrast with existing architecture rather than to create a pastiche or compromise development.

In areas around the Railway Conservation Area, policies will ensure that development is sympathetic to the character and setting of the protected area. This does not mean pastiche. In areas further away there will be opportunities to demonstrate the best in modern and contemporary design.

Rep X6.23: The design of the new housing on Calvert Street is very poor. This was designed to fit in with the Conservation Area. New residential properties must be designed to a much higher standard than these properties.

This is justification for writing the AAP for the Eastern Fringes. The AAP allows more detailed design policies than what are currently included in the City of Derby Local Plan Review. The AAP will allow the Council and its partners to have more say in what happens in the Eastern Fringes area and allows greater control on development. Quality of design is often subjective. Some people may feel that these houses on Calvert Street are of a reasonable quality.

Rep X6.24: High density housing will not create a good social mix. It will create social problems and deprivation. High density housing always creates ghettos and social problems.

This is not true in every case. Successful high density housing has been built in inner city areas of many major cities in the UK and Europe. Examples can be seen in Manchester, Newcastle and Leeds to name just a few. There is no reason why development in Derby cannot be just as successful. By providing high density housing in sustainable inner city locations it reduces the number of less sustainable greenfield developments that need to be built. There is a delicate balance to be struck. New housing will be needed over the next 20 years so it is preferential to initially consider previously developed land in order to maintain greenfield sites.

Rep X6.25: The AAP should try and incorporate water into the proposals. This could either be in the form of public art pieces or through the opening up of the former canal. This would immeasurably improve the area and add to the vibrancy. Examples of similar developments can be seen in places such as Brindley Place in Birmingham.

Comments are noted. The AAP will stipulate that a major piece of iconic art is located in the main civic area of the boulevard. This could potentially be a water based feature. It is unlikely that the canal could be reinstated here. The CDLP Review already contains proposals to restore the Derby and Sandiacre canal on a different route.

Rep X6.26: Derby Cityscape support the need for MSCPs to be of an 'excellent' design standard.

Comment is welcomed.

Rep X6.27: If the Plan intends to attract families to live in the area then gardens must be provided. The design and urban format of the railway terraces could be replicated. A 2-3 metre frontage would give residents more ownership and would provide extra private space. This would also accommodate wheelie bins and recycling facilities.

It is accepted that green open space needs to be provided for families. This will be provided in various formats including children's play areas, pocket parks and private green spaces or gardens in courtyards and communal areas.

Rep X6.28: There should be some form of buffer / acoustic wall along Traffic Street to protect the residential properties proposed for Castle Ward.

Rep X6.29: Planting and landscaping will be needed to soften the area and help mitigate noise problems.

Comments are noted. Appropriate planting and landscaping will be used to contribute to the mitigation of loud noises and to help soften the urban landscape. Trees will be planted along the boulevard and Midland Road to help achieve this. .

Rep X6.30: A developer has stated that a benchmark needs to be set in terms of the design aspirations of the Plan. An appropriate aspiration could be for the area to reach Conservation Area status in the future.

In terms of design quality, the policies within the Plan should ensure that development is of the highest design quality, however in terms of benchmarks, all development will be expected to attain a minimum BREEAM / Eco Home standard of 'very good'.

Rep X6.31: A developer has suggested that the urban form of the railway area should be the main influence on Castle Ward.

The areas of Castle Ward surrounding the Railway Conservation Area will be expected to be developed with respect to the character and nature of the Conservation Area. However, in areas of Castle Ward further removed from the Conservation Area there will be opportunities to demonstrate the best of modern and contemporary design and architecture.

Rep X6.32: Derby Cityscape have suggested that more detailed information is needed in relation to the layout and format of new

development. This will be necessary to ensure that the emerging option responds to the SA objectives set out by White Young Green.

The role of the AAP at this stage is to determine the most appropriate land uses for the area. Detailed layouts will be able to be developed once the land uses are solidified and once a preferred developer has been chosen. The AAP must not be too prescriptive otherwise it has the potential to stifle the creativity of designers and architects.

(7) Consultation

Rep X7.1: Land owners must be kept up to date with information. Lack of information will lead to delays in the land assembly process.

Derby City Council and Derby Cityscape will continue to make every effort in order to keep affected people informed on the progress of the Plan. Since the work on the Plan began in 2005, there have been 5 workshop events and 2 leaflet drops. Council Officers and members of the Derby Cityscape team are always willing to meet face to face with any residents, landowners or leaseholders that may be affected by the proposals and have so on a number of occasions.

Rep X7.2: The colours used on the consultation leaflet are too similar, particularly the oranges and the reds.

This is accepted. Apologies to anyone who had problems understanding the leaflet. Every effort will be made to ensure that the preferred options consultation material is as clear and precise as possible.

Rep X7.3: It needs to be made clearer about the different roles that DCC and Derby Cityscape will be fulfilling in the AAP process.

A clearer explanation of the different roles will be given in the preferred option document and supporting implementation strategy.

Rep X7.4: Clearer information needs to be given regarding the likelihood of a CPO.

A CPO is last resort mechanism. All other routes will be exhausted before the Council or its partners choose to execute a CPO. More research and information collecting needs to be done before the Council can state how likely a CPO will be.

Rep X7.5: There should be a clearer explanation of the difference between 'residential development' and 'residentially led development'. Explanations should say that residential development will be a mix of sizes, types and tenures including 30% affordable housing to meet identified housing need.

A Policy for the provision of affordable housing will be included in the Preferred Option. In the first instance it is likely that the Preferred Option document will suggest a 30% threshold for allocated sites. Any housing that comes forward on unallocated sites will be subject to the CDLP Review's policy on Affordable Housing.

'Residential development' refers to areas that are proposed for only dwellings. 'Residentially led development' refers to more central areas of the Castle Ward area, such as along the boulevard, where residential dwellings will be vertically separated with active (A1, A2, A3 A4 uses) on the ground floor.

Rep X7.6: A developer has suggested that the Castle Ward area should begin to be branded through community participation and engagement. A unique identity needs to be established, building on the features of the adjacent Conservation Area. The names, 'Railway Quarter' and 'Castle Ward Urban Village' have been suggested.

(8) General Points

Rep X8.1: The area currently has a shabby appearance as it is an industrial park. This needs improving.

Rep X8.2: The Eastern Fringes has a number of positive points that should be optimised; these include the character of the buildings, proximity to local amenities and the accessibility to the town centre.

The comments are noted.

Rep X8.3: The proposed school should be used as a community centre outside of school hours. The school should be provided 'up front' by the Council in order to attract residents to the area. Developers could then pay back the costs over time, once residents have been attracted to the new properties. Currently families tend to move away once children reach school age.

Any developers will have to sign Section 106 agreements before development can proceed. This will provide up front contributions towards education, highways, open space, public art etc. This should hopefully allow the primary school to be in place before residents begin to move to the area. In terms of using the facility as a community centre 'out of hours' is essentially a management matter, but there is no reason why, from a planning perspective, this should not be permitted.

Rep X8.4: It is felt that the name, 'City Centre Eastern Fringes Area Action Plan' (CCEFAAP) is far too long and that the word 'Fringes' has negative connotations such as being insignificant. It was suggested that the 'Castlefields Area Action Plan' (CAAP) may be a more appropriate title that people can identify with.

It is accepted that CCEFAAP is a long title. It is felt that by changing the name at this late stage has to potential to confuse some people. There is already confusion between the AAP and the Masterplan and therefore changing the name of the AAP could just add to this.

Rep X8.5: People want to live sustainable lives. There needs to be active encouragement, face to face contact to try to promote and persuade people to start living in this way. They need to be shown how small things can make a big difference.

There will be active encouragement to ensure that people make an effort to live as sustainably as possible. Recycling will be encouraged; driving dissuaded and renewable energy solutions will be promoted. However, 'sustainable living' is a city wide (and nation wide) issue that needs to be dealt with not just through the policies of the AAP.

Rep X8.6: New residents should be given 'Home Starter Packs'. These should include free bus passes, public transport timetables and information about the area. This will enable people to make informed choices about the way they live and travel.

Home starter packs are now compulsory for all new homes. Developers will be persuaded to provide as much information as possible in the packs. However, the AAP cannot contain a policy dictating that this is done.

Rep X8.7: More advice is needed from the PCT regarding the provision of doctors and dentists in the area.

Comment noted, but this isn't an issue the AAP can influence.

Rep X8.8: Due to the proximity of the railway station the needs of commuters should be factored into the Plan. This could involve the provision of grocery pick up points at the station. Commuters could order food online and then pick it up at the station on their way home. This would reduce the need for individual house deliveries and reduce travel distances. A commuter library service could also be provided.

These are excellent sustainable ideas. Unfortunately the AAP cannot dictate what facilities are provided at the railway station. These ideas will be passed onto Network Rail.

Rep X8.9: Why is a café culture trying to be created when it doesn't exist in this country?

This point is open to debate. Many city centres in the UK have seen a cultural revolution over the past 12 years. The extent to which café culture now exists in these places is down to personal opinion.

Rep X8.10: There are concerns that substantial amounts of 'affordable housing' will lead to social problems and anti social behaviour. Crime may become more of an issue.

Provision of affordable housing does not necessarily have a direct correlation to social problems and anti social behaviour. There are many examples of successful high density housing schemes with elements of affordable housing. Affordable units should be 'pepper potted' throughout the scheme to generate a true mix. Notwithstanding this, the CDLP Review contains policies on affordable housing that the AAP must support.

Rep X8.11: Young people are not mentioned in the consultation leaflet. They need areas to meet and also facilities to keep them entertained in order to reduce anti-social behaviour.

More detail on the proposals will be provided in the preferred option report. Children's play areas will be provided and also facilities for young people. The exact nature of these facilities is still yet to be decided and may be a matter for a dedicated planning application.

Rep X8.12: Specific reference should be made to the level of affordable housing that will look to be secured in the Eastern Fringes area.

See earlier comment.

Rep X8.13: Castle Nursery school should be retained in the area and may need to be extended to cater for the new residential population.

Comment is noted and welcomed. Nursery facilities will be needed and the development provides an excellent opportunity to secure a brand new facility for the existing Castle Nursery. There may be an opportunity to combine the nursery with the new primary school that is being proposed.

Rep X8.14: Mobility housing should be provided in the area and there is also potential for the creation of a 'retirement village'.

The City of Derby Local Plan seeks to ensure that 'mobility housing' or 'lifetime homes' are provided on developments of over 40 dwellings. Lifetime homes are adaptable to meeting people's changing needs throughout their lives. The design of dwellings therefore needs in built flexibility. This is a feature that should be sought from all the new dwellings in the Eastern Fringes.

The objectives of the AAP seek a mixed population in the inherently sustainable location of the Eastern Fringes. The proximity to the city centre, provision of local services, enhanced public transport link and flexible housing design should all contribute to attracting older people to the area. These facets should be enough of an attraction without designating the area a 'retirement village'.

Rep X8.15: If the boulevard is to include bars and cafes it must be considered that the area is predominantly residential so therefore there needs to be strict licensing.

Comment is noted, but licensing is not a planning matter.

Rep X8.16: Electronic maps should be provided at the railway station.

The AAP cannot dictate what facilities are provided at the railway station, however the comment will be passed onto Network Rail.

RepX8.17: The key to the success of the Plan will be civic pride. It must be generated in order for the area to work as a sustainable, mixed use community. The area needs to look 'lived in' and not become a 'dormitory estate'.

This is an important point. For the overall Plan to be successful civic pride has to be generated so that a community atmosphere can be produced. Sterility needs to be avoided. This will be done through a mix of uses including active uses along the boulevard.

RepX8.18: There should be policies in the Plan that ensure that the area is actively managed and maintained to a high standard.

Comments are noted. The Plan will include a section on monitoring that will set out how the progress of the developments will be recorded. However, the Plan cannot set out policies that ensure that individual residents keep their properties maintained to a high standard. This is outside of the scope of the AAP. Public areas will be maintained by the City Council as with any public areas in the City.

Rep X8.19: A developer has recommended that the vision should be made broader to read as follows;

'To establish a framework for the creation of an inclusive and sustainable neighbourhood, where people of all ages and backgrounds can enjoy a high quality of life within an integrated and vibrant and attractive, high quality, urban environment'.

It was stated that this would better communicate the true aspirations of the Plan.

The term 'sustainable neighbourhood' (as mentioned in the 'vision') already embodies all the elements of sustainable development. It is widely recognised that sustainable development should be inclusive and cater for diverse needs. It is felt that the suggested amendments are adequately covered by the term 'sustainable neighbourhood'. A vision should be a short statement, the suggested amendments would make the vision too cumbersome and include unnecessary detail.

Rep X8.20: Within Objective 4 references should be made to the provision of family housing. This will help to deliver a mixed community and stop the community becoming transient. Truly mixed sustainable

communities are rare and therefore the provision of family housing could make the area unique.

Objective 4 already makes reference to residential development of a 'mix of sizes, types and tenures'. This adequately portrays the required aim. It is unnecessary to get into more detail. If family housing was referenced then all other types should be as well. It is assumed that people will understand that family housing will be included in the 'mix' of housing solutions.

Rep X8.21: A developer has noted that Objective 5 should be reconsidered to ensure that the deliverability of the Plan is not affected. Complimentary employment and commercial uses would add to the sustainability of the area but it needs to be ensured that uses that would affect residential amenity are avoided.

All residential developments will be expected to provide a satisfactory living environment and satisfy Saved Policy ST12 of the CDLP Review, regarding amenity. On areas such as Siddals Road a satisfactory mix will be required between employment/commercial uses and residential uses. This has been achieved in developments in many other cities and there is no reason why it cannot be achieved in Derby.

(9) Conclusions

Following the two stages of informal consultation, the initial options have been distilled down into a set of policies and a proposals map that form the Preferred Option. This is the draft plan and there will be a statutory period of 6 weeks for people to comment on the policies and proposals. The Preferred Option will be published in September 2006. The Policies and proposals have been shaped and in places directly influenced by the comments that were received during the front loading process detailed in this document.

Having taken on board and considered all the comments that have been made up to this point, it is possible to summarise the alterations that will be made to the 'third option' in order for it to become the Preferred Option / Draft Plan.

Derbyshire Royal Infirmary – Grey Area 'a' will be allocated for residential uses whilst the London Road Policy Area will become a purely design based Policy. The green network, Conservation Area boundary and important buildings designation will all be retained.

Bemrose and Sovereign Car Parks – Land will be allocated for a combined 1500 sqm supermarket and MSCP. Land surplus to the development of these uses would be appropriate for residential uses.

Royal Mail – Grey Area 'b' will be allocated for mixed use development subject to the satisfactory relocation of Royal Mail operations within the City.

South Car Park – Subject to the release by Network Rail, South car park will be used for a MSCP. Land surplus to this (Grey Area 'c') will be utilised for business and industrial uses.

Gala Bingo (Grey Area 'd') - The Council would welcome the redevelopment of this site to include a new bingo hall / leisure /

community use with either residential or offices above in order to improve the quality of the built environment.

North Car Park (Grey Area 'e') – Land surplus to the needs of Network Rail will be allocated for small scale office use.

Siddals Road – An innovative mix of residential and business uses will be sought on this site (Grey Area 'f'). Land will be secured for the creation of a new access point off Station Approach.

Traffic Street – Land fronting Traffic Street between North Castle Ward and the entrance of the boulevard will be allocated for uses that will compliment nearby activities in Castle Ward and the City Centre. Permissible uses will include hotels, offices, health uses and residential uses.

Terrace in front of the Station - The terrace will be included as part of an overall improvement Policy for the Conservation Area. The Council will support and, where appropriate, implement proposals to improve parts of the Conservation Area including the terrace. Any proposals must satisfy the criteria in Saved Policy E18 of the CDLP Review and Suggested Policy xx: Railway Conservation Area Design Guidance.

North Castle Ward – An office complex of 25,000 sqm will be sought with appropriate levels of parking facilities. Ancillary uses will be permitted such as small scale retail and cafes and also complementary uses such as hotels and conference facilities will be permissible.

The Boulevard – The section behind Wellington Crescent will be rerouted to avoid the unnecessary demolition of existing properties and the length of ground floor active uses will be reduced.

Transport and Movement – The need for a vehicular crossing point over the boulevard has been recognised. Canal Street would seem the most appropriate place to implement this.

The Preferred Option Report, Draft Conservation Area Appraisal and Sustainability Appraisal will all be published in late September and will be available on the Council's website www.derby.gov.uk. Copies will also be available from the Plans and Policies section on 01332 256008.

