

# TWENTY5

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Representations in response to  
South Derbyshire District Council  
Local Plan Part 1 Review Regulation 19  
Addendum Consultation  
Land south of Mickleover

June 2026



Representations to the  
South Derbyshire District Council  
Local Plan Part 1 Review  
Addendum  
Regulation 19 Consultation

Land South of Mickleover, South Derbyshire

June 2026

Prepared for: Parker Strategic Land

## Mickleover – South Derbyshire District Council Local Plan Part 1 Addendum Regulation 19

Revision	Description	Author	Date	Independent Review	Date
01	Draft	LV	12/06/2026	GW	15/06/2026

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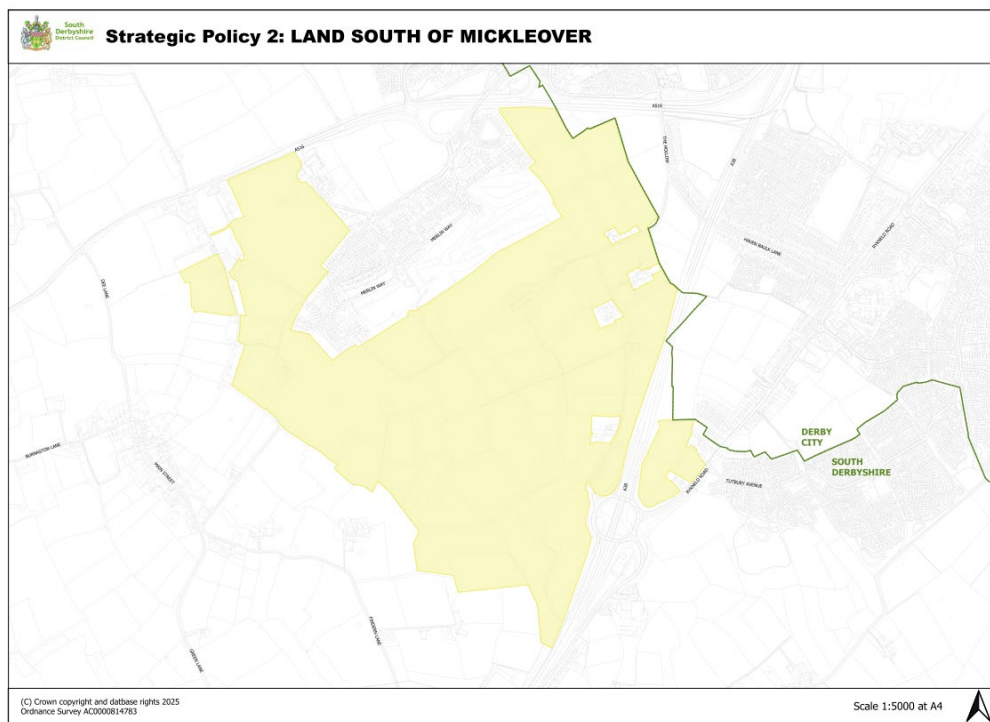
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# 1 Introduction

- 1.1.1 This Representation has been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Parker Strategic Land (the 'Principal Promoter'), in response to the South Derbyshire District Council (SDDC) Local Plan Part 1 Addendum Regulation 19 Consultation that is open until 16<sup>th</sup> June 2026.
- 1.1.2 PSL is a family-owned company that promotes, manages and develops new places to live, work and play around the country. PSL controls all of the land that is the subject of this representation, which encompasses 58% of the 195 hectares of land proposed to be allocated under the reference Policy STRA2: Land South of Mickleover as part of the emerging Local Plan Part 1. It relates to the land known as 'Mickleover South', shown at **Appendix 1** (the 'Site').
- 1.1.3 This Representation responds to the Proposed Modifications to the South Derbyshire Local Plan Part 1 Review 2022 – 2041 (Publication Version March 2025) (Main Modifications Document – May 2026) and the available updates to the South Derbyshire District Council evidence base. In doing so cross reference is made to representations submitted in response to the following consultations (comments made within these previous representations remain applicable):
- South Derbyshire Local Plan Part 1 Review 2022 – 2041 (Publication Version March 2025) (Regulation 19)
  - South Derbyshire Local Plan Part 2 Review Issues and Options (Regulation 18)
- 1.1.4 It is recognised that SDDC published its original Regulation 19 Local Plan for consultation prior to the 12<sup>th</sup> March 2025 trigger stated at paragraph 234 of National Planning Policy Framework (NPPF) dated December 2024. As such it is anticipated that the emerging SDDC Local Plan Part 1 Review will be Examined under the requirements of the NPPF dated December 2023.
- 1.1.5 These representations are structured as follows:
- **Section 2** – Site Description and Context
  - **Section 3** – Response to Main Modifications
  - **Section 4** – Summary

## 2 Site Description and Context

- 2.1.1 The Site is located entirely within South Derbyshire District and comprises undeveloped agricultural land located to the south of Mickleover. The Site Location is enclosed at **Appendix 1**.
- 2.1.2 The Site abuts an area of development that sits north of the proposals, comprising mainly post-war development around the former Pastures Hospital, now Duesbury Court and the Pastures Golf Club. Duesbury Court was a Victorian hospital and is now converted to residential development. The conurbation of residential development extends from Hospital Lane connecting to the A516 close to the administrative boundary of Derby City. The Site sits in a location which SDDC, as part of Local Government Reform, has proposed for the extension of the urban boundary of the City to assist in meeting the needs of both Derby City and South Derbyshire, where existing and planned infrastructure can support growth.
- 2.1.1 The Site has been identified as part of the wider allocation at Policy STRA2: Land South of Mickleover of the emerging Local Plan Part 1.



*Extract of Site Allocation Policy STRA2 from SDDC Local Plan Part 1 Review*

- 2.1.2 The Site represents a key contribution to SDDC's Local Plan strategy for delivering community, housing, and infrastructure needs of the local and wider area. PSL estimates that up to 2,100 new homes, key connectivity corridors, a Neighbourhood Centre, community, education and recreational facilities can be provided on land within its control as part of a wider c.3,300 homes that the allocation could accommodate.
- 2.1.3 The Site continues to be a suitable, available, achievable and deliverable for a new neighbourhood that is seamlessly connected to the wider Derby conurbation but is also as self-sustaining as possible to the benefit of both new and existing communities.
- 2.1.4 As the Principal Promoter, PSL will continue to work closely with SDDC and seek to work with the wider STRA2 land promoters with the aim of a cohesive and coordinated vision for a new neighbourhood underpinned by healthy living principles.

### 3 Response to Main Modifications

3.1.1 The following table and explanatory text set out the response to the proposed main modifications provided in the Local Plan Addendum Regulation 19 Consultation with reference to the Council’s evidence base and the requirements for plan making contained within NPPF 2023.

	<b>SDDC Proposed Modification</b>	<b>PSL Comment</b>
PM2	Policy S1: Sustainable Growth Strategy - South Derbyshire will promote sustainable growth to meet its objectively assessed housing and commercial needs in the plan period 2022- <del>2041</del> <b>2042</b> .	Support is given to the Council’s proposed extension of the plan period, so that it spans 15 years from the point of adoption as required by the NPPF 2023 (para 22).
PM3	Policy S1: Sustainable Growth Strategy Over the plan period (2022 – <del>2041</del> <b>2042</b> ) at least <del>14,500</del> <b>15,263</b> dwellings will be built within South Derbyshire. This comprises <del>9,633</del> <b>10,140</b> homes to meet South Derbyshire’s own needs and the remainder to help meet Derby City’s unmet need to reflect the high level of housing delivery experienced in South Derbyshire in recent years; to provide flexibility in regard to site delivery and to help match affordable housing need with delivery as closely as possible.	Support is given to the Council’s proposed uplift to the housing requirement to reflect the proposed extension of the plan period at Proposed Modification PM2, this ensures that the plan is positively prepared and the plan period reflects the requirements of the NPPF.
PM5	Policy S7: Retail The urban extensions to Derby City ( <b>STRA1 and STRA2</b> ) will be expected to include <del>some</del> retail provision on site <del>including</del> within local centres that <del>is</del> <b>are</b> appropriate to the size of the development and will not be detrimental to existing retail provision. <u><b>These should each include an anchor store of approximately 1,000 square metres.</b></u>	PSL supports in principle the inclusion of retail provision as part of the allocation at STRA 2, to be delivered within the local centre.  It is noted however that reference is made to an ‘anchor store’ of approximately 1,000sqm. It is requested that wording be amended to:  <i>“retail provision should be made within the local centre, with floorspace of up to 1,000 sqm”.</i>  The amended text is more accurate and would enable more flexibility to respond to market demand from

Mickleover– South Derbyshire District Council Local Plan Addendum Regulation 19 Consultation

		retail operators making the policy more effective (NPPF 2023, paragraph 35).
PM15	Policy STRA2 <del>Explore t</del> The provision of a retirement village <b>or specialist housing for older people</b> within the scheme;	Support is given to PM15 and the clarity provided by the proposed wording amendment to Policy STRA 2 therefore making the policy more effective (NPPF 2023, paragraph 35).
PM16	Policy STRA2 <b><u>c) north of the site – access to be off the A516.</u></b>	<p>Strong support is given to PM16 because this amendment is robustly justified.</p> <p>The SDDC Transport Modelling (January 2026) evidence has identified the positive benefits arising from the A516 connection. It is stated that:</p> <p><i>“6.6.4 In Mickleover, the link between the A516 and A38 improves the accessibility of the site to the wider network providing the opportunity for development traffic to avoid the Findern roundabout. The road is primarily used as a development access road and helps mitigate the impact of the proposed strategic development on land to the South of Mickleover. Development traffic uses a combination of the A516 and A38 to access the wider highway network, which causes reductions in flow on local roads through Mickleover including the Hollow, Staker Lane, Haven Bulk Lane, Brierfield Way and Etwall Road.”</i></p> <p>The connection to the A516 will also facilitate access into the site for bus services and wider active travel connectivity.</p>

<p>PM17</p>	<p>Policy STRA2</p> <p>Provision of a local retail centre <u>(with an anchor store of approximately 1,000 square metres)</u> commensurate with the size of the development to provide for the day to day needs of the development and surrounding area;</p>	<p>Support is given to the incorporation of retail provision within the local centre at STRA2.</p> <p>It is noted that reference is made to an ‘anchor store’ of approximately 1,000sqm. It is requested that the wording be changed to:</p> <p><i>“retail provision should be made within the local centre, with floorspace of up to 1,000 sqm”.</i></p> <p>The amended text is more accurate and would enable more flexibility to respond to market demand from retail operators and increasing the potential for delivery, therefore making the policy more effective (NPPF 2023, paragraph 35).</p>
<p>PM18</p>	<p>Policy STRA2</p> <p><u>vi) A layout and form of development that reduces any impact on the existing overhead electricity lines;</u></p>	<p>Support is given to the addition of the new criterion proposed at PM18 to acknowledge the existing utility infrastructure.</p> <p>The Promoter has carefully considered the location of the overhead electricity lines to ensure all requisite offsets can be maintained, with most development under control of PSL focused to the north of the overhead lines.</p>
<p>PM21</p>	<p>Policy STRA2</p> <p><del>viii) ix)</del> In the event of the transport modelling or other evidence showing the necessity of a <b>A</b> vehicular road between the A516 and A38, <del>this</del> shall be provided as part of a comprehensive development of the site and forming part of the South Derby Integrated Transport Link.</p>	<p>It is noted that reference to the ‘South Derby Integrated Transport Link’ remains unchanged. Whilst it is not the focus of this consultation, the continued reference to ‘South Derby Integrated Transport Link’ is inconsistent with the evidence base. In particular, we note the findings of the ‘Shaping Streets Design Review’</p>

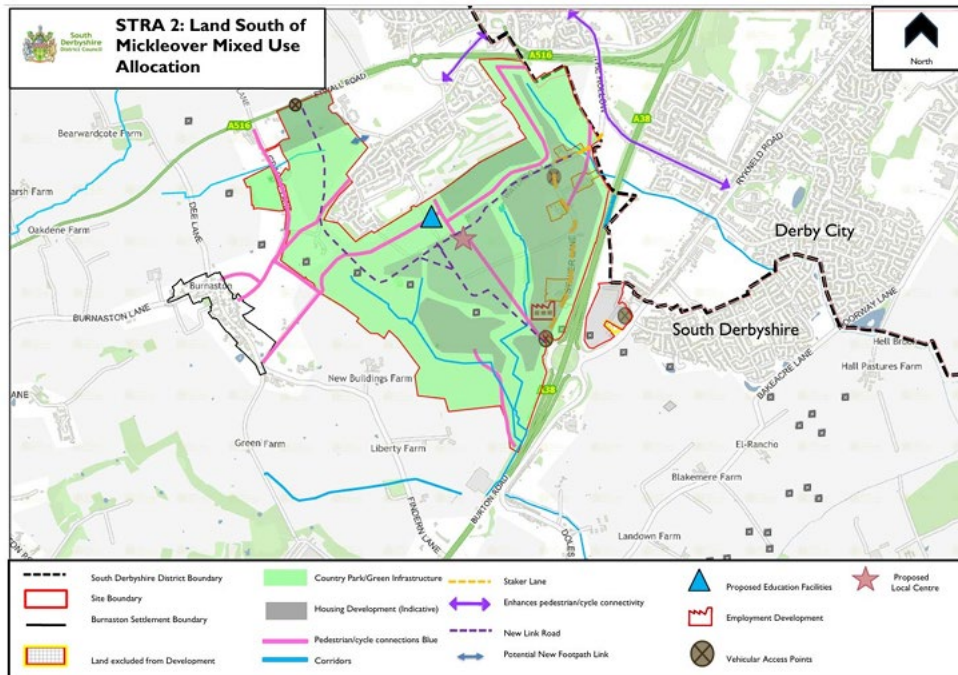
		<p>which recommends the use of 'Main Street' as the appropriate terminology and states at paragraph 2.2. that this "...needs to be consistently referenced across policy and masterplan documents".</p> <p>It is noted that this policy criteria should be read in conjunction with the proposed additional supporting text at AM73 which identifies the expectation for the 'Main Street' connection through the STRA 2 Site allocation, between A516 and A38.</p> <p>In communication with PSL Transport Consultant PJA, Systra has confirmed that the transport modelling has tested the scenario of the main street being "a road of slow speeds".</p> <p>It is important that both the policy criterion and the supporting text reflect the supporting evidence base both from a highways technical perspective but also in respect of establishing a vision for the development, optimising design and place making for the new neighbourhood.</p>
<p>PM22</p>	<p>Policy STRA2</p> <p><b><u>New indicative layout</u></b> (as shown on the following page)</p>	<p>Please refer to response set out at paragraphs 3.1.2 onwards below and appended Appendix 2 Placemaking Response.</p>
<p>PM28</p>	<p>Policy H21</p> <p>The Council will seek to secure up to <del>40</del><b>30</b>% of new housing development as affordable housing as defined in the NPPF on sites of <del>over</del> 10 <b>or more</b> dwellings.</p>	<p>Whilst the proposed reduction in the affordable housing requirement from 40% is welcomed, the policy requirement should be kept under review in accordance with any updates to the Local Plan evidence base to ensure that it remains appropriately justified. This is particularly pertinent given that site viability</p>

		<p>assessments are currently being undertaken by the Promoter, the findings of which may have further implications for the level of affordable housing that can be viably delivered on site.</p> <p>The Interim Viability Statement April 2026 identifies that it is a “<i>high-level review of available evidence and should be treated as indicative. The appropriate level of affordable housing provision will be tested and refined through the forthcoming full Local Plan Viability Assessment, which will consider a wider range of development scenarios, site typologies and sensitivity testing in detail</i>”.</p>
<p>PM29</p>	<p><b>Policy H22</b> Strategic sites which are defined as housing or mixed-use sites of over 1000 dwellings will be required to: i) provide 5 serviced Gypsy and Traveller pitches per 1000 dwellings, <u>or part thereof</u>, up to a maximum of 15 pitches, to deliver 5 pitches per each 1000 homes with all required pitches to be provided concurrently or prior to the residential completion of the site; or (if it can be demonstrated that the pitches cannot be viably delivered on site)</p>	<p>Object. Representations have previously been submitted in response to both the Local Plan Part 1 Regulation 19 Consultation and the Local Plan Part 2 Regulation 18 Consultation, questioning the justification for Gypsy and Traveller provision at the STRA2 – Land South of Mickleover allocation. These comments remain valid.</p> <p>It is considered that SDDC should have regard to the guidance prepared by the National Policy Advisory Panel on Gypsy and Traveller Housing, 'Places We're Proud Of', which sets out a range of approaches to meeting identified needs. In relation to strategic sites, reference is made to the Mid Devon Local Plan, which establishes that pitches should be provided on-site within urban extensions unless it can be demonstrated that off-site provision would achieve an acceptable outcome for</p>

		<p>Gypsies and Travellers in terms of pitch numbers, site facilities and accessibility to services.</p> <p>Following further discussion with SDDC, it is understood that an off-site solution would be supported in lieu of on-site provision, with a financial contribution used by the Council to acquire land and deliver pitches.</p> <p>It is noted that the Social and Affordable Homes Programme (SAHP) 2026–2036, which primarily funds the supply of new-build affordable housing, also supports the delivery of Traveller pitches. The Programme guidance includes a case study demonstrating how a previous iteration of this funding was used to deliver a scheme of 13 pitches in Norwich. It is therefore considered that SDDC should explore the feasibility of a similar bespoke project where a locational need can be justified.</p>
PM42	Housing Trajectory	<p>Object. The Council's Housing Trajectory assumes a maximum delivery rate of 150 dwellings per annum at Land South of Mickleover. However, it is considered that a site of this scale could sustain annual delivery rates of 200 to 240 dwellings per year from multiple outlets across the site.</p> <p>Please also refer to representations submitted in response to the Local Plan Part 1 Regulation 19 Consultation and the Local Plan Part 2 Regulation 18 Consultation, and to the response to proposed modification AM53 below.</p>

AM53	<p>Explanation</p> <table border="1" data-bbox="435 224 821 459"> <thead> <tr> <th data-bbox="435 224 630 280">Strategic Site allocations</th> <th data-bbox="630 224 821 280">No of dwelling</th> </tr> </thead> <tbody> <tr> <td data-bbox="435 280 630 369">STRA 1: Infinity Garden Village</td> <td data-bbox="630 280 821 369">2000 (<del>1800</del> <b>1665</b> within plan period)</td> </tr> <tr> <td data-bbox="435 369 630 459">STRA 2: Land South of Mickleover</td> <td data-bbox="630 369 821 459">2500 (<del>1650</del> <b>1838</b> within plan period)</td> </tr> </tbody> </table>	Strategic Site allocations	No of dwelling	STRA 1: Infinity Garden Village	2000 ( <del>1800</del> <b>1665</b> within plan period)	STRA 2: Land South of Mickleover	2500 ( <del>1650</del> <b>1838</b> within plan period)	<p>Whilst the increase in anticipated dwellings at STRA2 over the plan period is welcomed, the figure is still considered to underestimate delivery potential. It is anticipated that the site can deliver at a faster rate than the conservative approach taken by SDDC.</p> <p>Representations submitted in response to both the Local Plan Part 1 Regulation 19 Consultation and the Local Plan Part 2 Regulation 18 Consultation highlighted that the site is capable of delivering an average of 50 to 60 dwellings per year per outlet, which at peak delivery could result in approximately 200 to 240 dwellings per annum from multiple outlets across the site.</p> <p>On this basis, it is anticipated that 2,100 dwellings could be delivered in total across the plan period from the PSL site, with further delivery possible from other outlets on land controlled by the wider allocation land promoters. It is therefore considered necessary to amend AM53 to update the housing requirement as follows:</p> <p>'STRA2: Land South of Mickleover – A minimum of 2,100 dwellings within the plan period.'</p>
Strategic Site allocations	No of dwelling							
STRA 1: Infinity Garden Village	2000 ( <del>1800</del> <b>1665</b> within plan period)							
STRA 2: Land South of Mickleover	2500 ( <del>1650</del> <b>1838</b> within plan period)							

PM22 – STRA2 – Indicative Layout



3.1.2 Proposed amendment PM22 is described as a “new indicative layout” for the strategic allocation at STRA2 Land South of Mickleover.

3.1.3 Whilst some improvements are noted compared to the indicative layout prepared by SDDC and contained within the original Regulation 19 Local Plan (March 2025), objection is raised to certain detailed elements of the indicative layout proposed at PM22 which are not sufficiently justified.

3.1.4 Paragraph 5.17 of the Regulation 19 Local Plan states “An indicative layout map is included to guide the development of the strategic allocation and identify the general proposed location of key features”. However, the Regulation 19 Local Plan, Draft Policy STRA 2, proposed criterion F requires the following:

*“A Development Framework Document comprising a Strategic Masterplan, must be prepared for development expected to be delivered at Land South of Mickleover and approved by South Derbyshire District Council as the Local Planning Authority, prior to approval of the first planning application on the site. The Strategic Masterplan should incorporate and demonstrate how the requirements set out in this policy have been complied with. **The development shall be provided in broad conformity with the plan below, which has been informed by a Design Review process.**” (bold added for emphasis).*

3.1.5 Whilst reference to 'broad conformity' is welcomed, it is considered that the indicative layout as proposed is not sufficiently justified. Furthermore, given that Draft Policy STRA2 already contains a requirement for a Masterplan to be prepared separately to the Local Plan, it is neither necessary nor effective to include such a prescriptive layout within the Local Plan itself.

3.1.6 It should be noted that the current indicative layout (PM22) has not been subject to a Design Review process. As set out in the accompanying Placemaking Response appended hereto, serious concerns are raised regarding SDDC's indicative layout in its current form. The Placemaking Response highlights best practice for placemaking, particularly in the context of new neighbourhoods, in response to PSL's Vision for the site, which is centred upon healthy living principles and informed by technical site assessment.

3.1.7 The NPPF (2023) advises, in respect to making efficient use of land, that:

*“123. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions...”*

*“128. Planning policies and decisions should support development that makes efficient use of land, taking into account:*

*a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*b) local market conditions and viability;*

*c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

*d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*

*e) the importance of securing well-designed and beautiful, attractive and healthy places.”*

3.1.8 A key concern is that the indicative masterplan proposed by SDDC is not justified in its prescriptive approach to green infrastructure provision, which appears to be far more than the policy requirements commensurate with the quantum of housing proposed for allocation. This raises concern regarding both the ability to achieve a high quality design and the viable delivery of the scheme as a whole.

3.1.9 It is considered that the spatial arrangement of built development and the amount and location of green infrastructure must be informed by robust spatial analysis and open space evidence, to be established through the masterplan process already provided for within proposed Policy STRA2.

3.1.10 It is considered that SDDC must give due consideration to both the physical and financial scale of infrastructure requirements including the green infrastructure provision expected for the site, so as not to overly restrict the site’s capacity and to ensure the viable delivery of the scheme as a whole.

3.1.11 To remedy concerns, it is recommended that the Council should further amend the indicative masterplan to focus on the key aspects of:

- Primary points of access
- Key movement corridors including ‘Main Street’
- Location for local centre
- Location for primary school.

3.1.12 Detail regarding the spatial arrangement of the built development, the amount and location of green infrastructure, must be informed by robust spatial analysis and open space needs evidence.

**Placemaking Response – Mickleover South (June 2026)**

- 3.1.13 Stantec has prepared a Placemaking Response (Appendix 2) to the Addendum Local Plan Part 1 Review consultation. Whilst the proposed modifications to Policy STRA2 are broadly welcomed as a positive step forward in strengthening the policy framework, a number of elements remain overly prescriptive and insufficiently evidenced, particularly the indicative layout (PM22) and the supporting text (AM73).
- 3.1.14 PSL's response advocates for a flexible, design-led approach to masterplanning, structured around four key themes. First, in respect of quantum and spatial distribution, a more compact and integrated form of development is promoted, focused on a well-connected Main Street and local centre to optimise land use and support sustainable travel.
- 3.1.15 Regarding green and blue infrastructure, the requirement for a continuous 'horseshoe' green infrastructure corridor is considered unjustified and risks creating fragmented, poorly overlooked spaces. In particular, PSL fundamentally disagrees with the quantum of green space identified between the A516 and the Pastures Hospital Estate, which is considered overly prescriptive, insufficiently evidenced and disproportionate to the level of housing proposed for allocation. A more cohesive hierarchy of green spaces anchored by a compact Country Park is proposed instead.
- 3.1.16 On movement, PSL supports the proposed link road in principle but considers it should be reframed as a 'Main Street', forming the place-based backbone of the new community, with active frontages, integrated active travel provision and strong public transport connectivity.
- 3.1.17 In relation to social infrastructure, the co-location of the local centre, retail, education and community uses along the Main Street is supported, ensuring accessibility for both new and existing communities.
- 3.1.18 In conclusion, it is recommended that the indicative masterplan be revised to focus on access points, the local centre location and the primary school, with detailed spatial arrangements to be determined through the masterplan process already provided for within Policy STRA2.

**Response to Proposed Modification AM73 'Explanation of Policy STRA2'**

- 3.1.19 Suggested alternative wording is proposed to the Council's proposed modification AM73 as set out in the table. This includes justification for the proposed changes.

	Explanation of Policy STRA2	Proposed Alternative Wording	Explanation for Proposed Alternative Wording
AM73	<p>Approximately 2,500 new homes should be delivered of a tenure and mix to accordance with Policy H20.</p> <p>It is expected that the bulk of the development will be to the south of the site with some more limited development fronting onto the A516.</p> <p>Densities should take account of the landform and use adjacent to them, with higher densities around the more urban character local centre and areas adjacent to the main urban parts of the link road, and lower densities (including bungalows) adjacent to the rural character green spaces and active travel routes.</p>	<p><del>Approximately</del> <b>A minimum of</b> 2,500 new homes should be delivered of a tenure and mix to accordance with Policy H20.</p> <p>It is expected that <b>development would make efficient use of the land available, incorporating the delivery of 'main street' connecting to A516 in north and the A38 in east.</b> <del>bulk of the development will be to the south of the site with some more limited development fronting onto the A516.</del></p> <p>Densities should take account of the landform and use adjacent to them, with higher densities around the more urban character local centre and areas adjacent to the main urban parts of <b>the site.</b> <del>the link road, and</del> <b>Lower densities, (including opportunities for bungalows), are expected to positively respond to landscape considerations, and adjacent to</b></p>	<p>PSL consider the capacity of land within their control as 2,100 dwellings. PSL consider that all 2,100 dwellings can be delivered within the adjusted plan period.</p> <p>For the reasons highlighted within these representations, good placemaking is centred upon making efficient use of land, PSL consider that this is essential to the deliverability of the proposed allocation. The suggested wording better reflect the requirements of paragraph 128 of the NPPF (2023).</p> <p>The revised text reflects the sentiments of paragraph 129 of the NPPF (2023).</p>

	<p>The population of the district is aging and demand for retirement provision will increase over the lifetime of the development. Sufficient numbers of new homes to meet the identified needs of people with disabilities, including housing with support, housing with care and residential care bed spaces should be provided in accordance with policy H20.</p> <p>Strategic Allocations are required to provide 5 Gypsy and Traveller pitches per 1000 dwellings. If it can be demonstrated that the pitches cannot be viably delivered on site, alternative land which meets the criteria of Part C of Policy H22 to accommodate the required</p>	<p><del>the rural</del> provide a transition to the rural edge of the development, towards Burnaston in the west.</p> <p><del>character green spaces and active travel routes.</del></p> <p>The population of the district is aging and demand for retirement provision will increase over the lifetime of the development. Sufficient numbers of new homes to meet the identified needs of people with disabilities, including housing with support, housing with care and residential care bed spaces should be provided in accordance with <b>relevant Local Plan policies.</b> <del>H20.</del></p> <p><del>Strategic Allocations are required to provide 5 Gypsy and Traveller pitches per 1000 dwellings. If it can be demonstrated that the pitches cannot be viably delivered on site, alternative land which meets the criteria of Part C of Policy H22 to accommodate the</del></p>	<p>The various policies of the Local Plan will be considered as required. It is not necessary to duplicate requirements within supporting text.</p> <p>For the reasons set out within previously made and elsewhere within these representations the justification for onsite Gypsy and Traveller provision at STRA2 has not been demonstrated.</p> <p>In addition, the various policies of the Local Plan will be considered as required. It is not</p>
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	<p>numbers of pitches will be required.</p> <p>The link road between the A516 and the A38 is expected to be designed to achieve slow vehicle speeds and be urban in character in areas of built development, but rural in character where it dissects the Country Park.</p> <p>It is expected that the road will be tree lined, with limited (if any) lighting for the rural character area, and include safe crossing points and, where feasible, segregated cycling routes. The road should be designed in such a way that pedestrians and active travel take precedence and should be of sufficient width to accommodate a bus route and associated infrastructure.</p>	<p><del>required numbers of pitches will be required.</del></p> <p>The link road between the A516 and the A38 is expected to be designed <b>with 'a main street' character with residential development fronting onto it.</b> <del>To</del> <b>It would</b> achieve slow vehicle speeds. <del>and be urban in character in areas rural in character where it dissects the Country Park.</del></p> <p>It is expected that the <b>main street</b> <del>road</del> will be tree lined, with limited (if any) lighting for the rural character area, and include safe crossing points and, where feasible, segregated cycling routes. The road should be designed in such a way that pedestrians and active travel take precedence and should be of sufficient width to accommodate a bus route and associated infrastructure.</p>	<p>necessary to duplicate requirements within supporting text.</p> <p>Paragraph 135 of the NPPF (2023) states that:  <i>"Planning policies and decisions should ensure that developments:...d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit..."</i></p> <p>The proposed alternative wording better reflects the SDDC Local Plan evidence base.</p> <p>Minor typo and consistency wording changes are suggested.</p>
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	<p>Community Facilities should be provided in accordance with the Councils Built Facilities Strategy. The provision of community facilities should consider need arising from the proposed development and any benefit that could be derived from existing residents.</p> <p>Education should be delivered in consultation with Derbyshire County Council who are the education authority. This includes the provision of a 3 form entry primary school plus nursery which should be delivered as per the Department for education guidance on school size, Building Bulletin 103. It is expected that this will be provided in close proximity to the retail centre to create a multifunctional / multipurpose centre for the new development.</p> <p>It is expected that retail facilities will include an anchor store of 1000sqm to provide for local convenience/food to support the</p>	<p>Community Facilities should be provided in accordance with the Councils Built Facilities Strategy. The provision of community facilities should consider need arising from the proposed development and any benefit that could be derived <del>from</del> <b>for</b> existing residents.</p> <p>Education should be delivered in consultation with Derbyshire County Council who are the <b>E</b>ducation <b>A</b>uthority. This includes the provision of a 3 form entry primary school plus nursery which should be delivered as per the Department for education guidance on school size, Building Bulletin 103. It is expected that this will be provided in close proximity to the <b>local</b> <del>retail</del> centre to create a multifunctional / multipurpose centre for the new development.</p> <p>It is expected that retail facilities will include an anchor store of <b>up to</b> 1,000sqm to provide for local convenience/food to support the</p>	<p>This change would enable more flexibility to respond to market demand from retail operators and increasing the potential for delivery, therefore making the policy more effective (NPPF 2023, paragraph 35).</p>
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	<p>new and existing residents and reduce the need for travel elsewhere.</p> <p>As set out in the Council's Active Wellbeing Strategy and Green Spaces Strategy there are clear links between health inequalities and deprivation. Well-designed places have a key role in creating opportunities and encouraging healthier choices not just through formal activity like organised sports but through the informal activity such as walking and cycling and reducing the dependence on vehicular travel.</p> <p>New Green Infrastructure provision should support the objectives of the Council's Active Wellbeing strategy and Green Spaces Strategy.</p> <p>All new and existing residents should have good access to high quality multifunctional open space which fits with both the heritage objective of preserving the setting of the Pastures Hospital in its</p>	<p>new and existing residents and reduce the need for travel elsewhere.</p> <p>As set out in the Council's Active Wellbeing Strategy and Green Spaces Strategy, there are clear links between health inequalities and deprivation. Well-designed places have a key role in creating opportunities and encouraging healthier choices not just through formal activity like organised sports but through the informal activity such as walking and cycling and reducing the dependence on vehicular travel.</p> <p>New Green Infrastructure provision should support the objectives of the Council's Active Wellbeing strategy and Green Spaces Strategy.</p> <p>All new and existing residents should have good access to high quality multifunctional open space which fits with both the heritage objective of preserving the setting of the Pastures Hospital in its</p>	<p>In the approach to design of the proposal, high quality multifunctional open space has been incorporated into the proposal which responds to the heritage objectives of preserving the setting of the Pastures Hospital, particularly in views south east as</p>
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	<p>hilltop location, and the health objective/ vision for the whole site as set out in the Heritage Impact Assessment.</p>	<p>hilltop location, and delivering the health objective/ vision for the whole site. <del>as set out in the Heritage Impact Assessment.</del></p>	<p>informed by the PSL Heritage Impact Assessment.</p> <p>It is not considered that the SDDC Heritage Impact Assessment (HIA) acts as robust justification for the extent of off-set / green infrastructure shown in the indicative masterplan (PM22) around Pastures Hospital. The HIA itself states at page 34:</p> <p><i>“Based on the analysis of the impact to the setting of the heritage assets, it is concluded that development adjacent to the heritage assets would result <b>in less the substantial harm</b> medium to high. Therefore, the areas shaded yellow (important open sites) on the plan below should be kept free from development to protect the setting of the existing site.</i></p> <p><i>This includes leaving the area to the front of the main hospital site clear of built form, plus the edge of the former site, as detailed above, at the Burnaston side of the site, to enable the interpretation of a separate area, as per the previous redevelopment of the hospital site.</i></p> <p><b>Please note that this is a very basic layer added to an existing map, and by no means is a measured assessment; but rather a suggestion of context areas to</b></p>
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	<p>Green Infrastructure should be interconnected, publicly accessible, safe and attractive formal and informal open space. This should include areas of planted landscaping (including woodland), pedestrian and cycle routes, children’s play areas, village greens and a Country Park.</p> <p>It is expected that BNG requirements are met on site and that existing hedges and trees are retained where possible.</p> <p>It is expected that Green Infrastructure will, as a minimum, form a continuous ‘horseshoe’ shape around the existing residential properties of the Pastures Estate.</p>	<p>Green Infrastructure should be interconnected, publicly accessible, safe and attractive formal and informal open space. This should include areas of planted landscaping (including woodland), pedestrian and cycle routes, children’s play areas, village greens and a Country Park.</p> <p>It is expected that <b>Biodiversity Net Gain is achieved, through requirements are met on site delivery, and supplemented by off site provision where necessary noting the high baseline of the site.</b> <del>and that</del> Existing hedges and trees are retained where possible.</p> <p><del>It is expected that Green Infrastructure will, as a minimum, form a continuous ‘horseshoe’ shape around the existing residential properties of the Pastures Estate.</del></p>	<p><b>remain undeveloped.”</b> (bold added for emphasis)</p> <p>Notwithstanding the aspiration to achieve on site biodiversity net gain, site assessment has identified that there is a high baseline.</p> <p>This requirement is not robustly justified within the Council’s evidence base.</p>
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	<p>New Green Infrastructure should link into key routes to Derby, Mickleover and Burnaston Village, this should include a route over the A516 near the Derby Mickleover Hotel.</p> <p>A new pedestrian / cycle route and access point which extends the existing public footpath at the north of the site linking to Hospital Lane at the existing school site entrance should be provided.</p> <p>New built development should front on to open space to provide passive surveillance.</p> <p>It is expected that Green Infrastructure is provided early in the site construction process to ensure that sufficient safe open space is available for walking, cycling and playing for new and existing residents during the construction works.</p>	<p>New Green Infrastructure should link into key routes to Derby, Mickleover and Burnaston Village, this should include a route over the A516 near the Derby Mickleover Hotel.</p> <p>A new pedestrian / cycle route and access point which extends the existing public footpath at the north of the site linking to Hospital Lane at the existing school site entrance should be provided.</p> <p>New built development should front on to open space to provide passive surveillance.</p> <p>It is expected that Green Infrastructure is provided early in the site construction process, <b>commensurate to the delivery of residential dwellings/ employment floorspace, and timings for necessary infrastructure</b>, to ensure that sufficient safe open space is available for walking, cycling and playing for new and</p>	<p>It is necessary to ensure that the development can be delivered viably, as such it is necessary to ensure that triggers for green infrastructure, and other infrastructure, are commensurate to the delivery of residential dwellings/ employment floorspace.</p>
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	<p>The site is traversed by a 132kV overhead electricity line which runs roughly east to west through the southern element of the allocation. This essential infrastructure needs to be safeguarded, and the masterplan should identify the presence of the lines and require their retention.</p> <p>The site is a cross-boundary site between Derby City Council and South Derbyshire District Council. Derby City Council currently has a Green Wedge policy and whilst this designation is outside the South Derbyshire administrative area and therefore does not apply within South Derbyshire, the principles of extending the green wedges concept with green infrastructure beyond the administrative boundary of Derby City is supported.</p>	<p>existing residents during the construction works.</p> <p>The site is traversed by a 132kV overhead electricity line which runs roughly east to west through the southern element of the allocation. This essential infrastructure needs to be safeguarded, and the masterplan should identify the presence of the lines and require their retention.</p> <p><del>The site is a cross-boundary site between Derby City Council and South Derbyshire District Council. Derby City Council currently has a Green Wedge policy and whilst this designation is outside the South Derbyshire administrative area and therefore does not apply within South Derbyshire, the principles of extending the green wedges concept with</del> providing green infrastructure <del>beyond the</del> development,</p>	<p>The Development Plan should reflect the requirements for the administrative area. It is questioned what the justification is to include specific reference to Green Wedge policy which does not relate to South Derbyshire District.</p>
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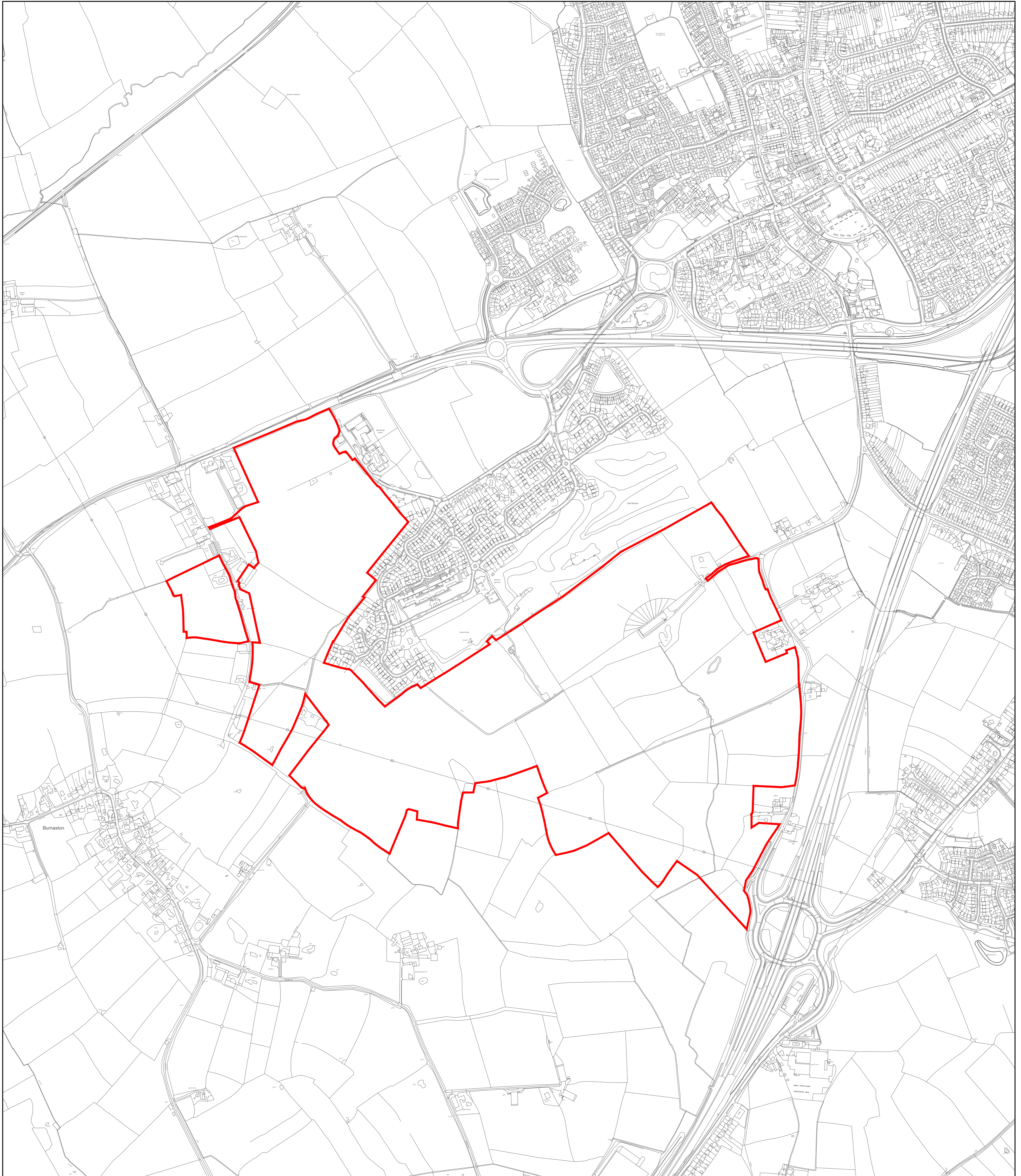
	<p>This will ensure that the Green Wedges within Derby are not obstructed by development in South Derbyshire. This is to provide opportunities for Derby City residents to access the countryside beyond the city boundary but also to allow residents of the new allocations the opportunity to access the city via attractive green routes.</p> <p>The site was previously used for sports pitches by Derby Grammer School prior to the construction of their new facilities at Rykneld Sports Centre. As a result of the replacement facility the sports provision reverted back to agricultural use.</p> <p>The site is directly adjacent to the Pastures Golf Club, and the master planning should consider the mitigation of the potential impacts from such a neighbour use (such</p>	<p><del>administrative boundary of Derby City is supported.</del></p> <p><del>This will ensure that the Green Wedges within Derby are not obstructed by development in South Derbyshire.</del> This is to provide opportunities for <b>both Derby City and South Derbyshire</b> residents to access the countryside <del>beyond the city boundary</del> but also to allow residents of the new allocations the opportunity to access the city via attractive green routes.</p> <p>The site was previously used for sports pitches by Derby Grammer School prior to the construction of their new facilities at Rykneld Sports Centre. As a result of the replacement facility the sports provision reverted back to agricultural use.</p> <p>The site is directly adjacent to the Pastures Golf Club, and the master planning should consider the mitigation of the potential impacts from such a neighbour</p>	
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	<p>as noise, overshooting, ball strike, lighting etc.).</p> <p>The provision of new sports and recreation facilities should be in accordance with the Councils Playing Pitch Strategy and Built Facilities Strategy.</p> <p>It is expected that new formal sports provision should be focused adjacent to the exiting Mickleover FC playing pitch/ Golf course on the southern side of the Pastures Estate to create a 'sports hub' in a single location.</p> <p>The use of a Community Use Agreement should be explored with the Education Authority to secure well-managed and safe community use of sports facilities.</p>	<p>use (such as noise, overshooting, ball strike, lighting etc.).</p> <p>The provision of new sports and recreation facilities should be in accordance with the Councils Playing Pitch Strategy and Built Facilities Strategy.</p> <p>It is expected that new formal sports provision should be focused adjacent to the exiting Mickleover FC playing pitch/ Golf course on the southern side of the Pastures Estate to create a 'sports hub' in a single location.</p> <p>The use of a Community Use Agreement should be explored with the Education Authority to secure well-managed and safe community use of sports facilities.</p>	
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## 4 Summary

- 4.1.1 This representation, prepared by Twenty5 Planning Ltd on behalf of Parker Strategic Land, responds to South Derbyshire District Council's Local Plan Part 1 Regulation 19 Local Plan Addendum Consultation.
- 4.1.2 It focuses on Land South of Mickleover, which forms a substantial part of the proposed strategic allocation STRA2 in the emerging Local Plan Part 1 Review, with reference to the supporting evidence base documents.
- 4.1.3 These representations respond to the suggested alternative wording to the proposed Main Modifications and set out the robust planning justification for the Promoter's approach to the design of the strategic urban extension.
- 4.1.4 It is reiterated that the Mickleover South site is suitable, available and deliverable, provided that the emerging indicative masterplan and associated policy requirements are not overly restrictive. In this regard, a fundamental concern is raised regarding the quantum of green space identified between the A516 and the Pastures Hospital Estate, which is considered overly prescriptive, insufficiently evidenced and disproportionate to the level of housing proposed for allocation, with consequent implications for the viable delivery of the scheme.
- 4.1.5 The Promoter's proposed approach to the site demonstrates efficient use of the allocated land and good design. Whilst significant public open space is proposed, delivered through a landscape-led approach incorporating healthy living principles, it is essential that green infrastructure requirements are proportionate, deliverable and informed by robust evidence through the masterplan process.

## Appendix 1 – Site Location Plan



Site Boundary - Parkers of Leicester - 113.62Ha / 280.76Ac

Project  
**MICKLEOVER,  
SOUTH DERBYSHIRE**

Drawing Title  
**PARKERS OF LEICESTER  
SITE BOUNDARY PLAN**

Date  
06.12.24

Scale  
1:5000 @A1  
1:10,000 @A3

Project No  
333101169

Drawn by  
M.D.

Check by  
D.S.

Revision

STN-GEN-SW-DR-MP-01-1



Stantec UK Limited  
The Blade  
Abbey Square  
Reading  
RG1 3BE  
T: 0118 9430 000



stantec.com/uk

## Appendix 2 – Stantec - Placemaking Response

# MICKLEOVER SOUTH

## Addendum Local Plan Part 1 Review PLACEMAKING RESPONSE

Green & Blue  
Infrastructure



Social &  
Economic



Connectivity  
& Movement



Towards Zero  
Carbon



  
**PARKER**  
STRATEGIC LAND

JUNE 2026

# SDDC DRAFT ALLOCATION

## SDDC Policy STRA2: Land South of Mickleover Modifications

The South Derbyshire Local Plan Part 1 Review 2022-2041 was published for consultation under Regulation 19 between the 10th March and 25th April 2025. The original Regulation 19 Local Plan identified Land South of Mickleover as a strategic allocation site. Comments were made on behalf of PSL in response to the Reg 19 Local Plan which still remain.

As a result of representations made during this consultation and further evidence, the Council wishes to make some modifications to the Publication Version of the Local Plan. The Council have prepared an addendum consultation to allow stakeholders to comment on the modifications, including the changes below.

### Proposed Modifications - May 2026. These quoted changes relate to proposed modification AM73 'Explanation of Policy STRA2'.

Approximately 2500 new homes should be delivered of a tenure and mix to accordance with Policy H20. It is expected that the bulk of the development will be to the south of the site with some more limited development fronting onto the A516. Densities should take account of the landform and use adjacent to them, with higher densities around the more urban character local centre and areas adjacent to the main urban parts of the link road, and lower densities (including bungalows) adjacent to the rural character green spaces and active travel routes.

The population of the district is aging and demand for retirement provision will increase over the lifetime of the development. Sufficient numbers of new homes to meet the identified needs of people with disabilities, including housing with support, housing with care and residential care bed spaces should be provided in accordance with policy H20.

Strategic Allocations are required to provide 5 Gypsy and Traveller pitches per 1000 dwellings. If it can be demonstrated that the pitches cannot be viably delivered on site, alternative land which meets the criteria of Part C of Policy H22 to accommodate the required numbers of pitches will be required.

The link road between the A516 and the A38 is expected to be designed to achieve slow vehicle speeds and be urban in character in areas of built development, but rural in character where it dissects the Country Park. It is expected that the road will be tree lined, with limited (if any) lighting for the rural character area, and include safe crossing points and, where feasible, segregated cycling routes. The road should be designed in such a way that pedestrians and active travel take precedence and should be of sufficient width to accommodate a bus route and associated infrastructure.

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Education should be delivered in consultation with Derbyshire County Council who are the education authority. This includes the provision of a 3 form entry primary school plus nursery which should be delivered as per the Department for education guidance on school size, Building Bulletin 103. It is expected that this will

be provided in close proximity to the retail centre to create a multifunctional / multipurpose centre for the new development.

It is expected that retail facilities will include an anchor store of 1000sqm to provide for local convenience/food to support the new and existing residents and reduce the need for travel elsewhere.

As set out in the Council's Active Wellbeing Strategy and Green Spaces Strategy there are clear links between health inequalities and deprivation. Well-designed places have a key role in creating opportunities and encouraging healthier choices not just through formal activity like organised sports but through the informal activity such as walking and cycling and reducing the dependence on vehicular travel. New Green Infrastructure provision should support the objectives of the Council's Active Wellbeing strategy and Green Spaces Strategy.

All new and existing residents should have good access to high quality multifunctional open space which fits with both the heritage objective of preserving the setting of the Pastures Hospital in its hilltop location, and the health objective/ vision for the whole site as set out in the Heritage Impact Assessment.

Green Infrastructure should be interconnected, publicly accessible, safe and attractive formal and informal open space. This should include areas of planted landscaping (including woodland), pedestrian and cycle routes, children's play areas, village greens and a Country Park. It

is expected that BNG requirements are met on site and that existing hedges and trees are retained where possible.

It is expected that Green Infrastructure will, as a minimum, form a continuous 'horseshoe' shape around the existing residential properties of the Pastures Estate. New Green Infrastructure should link into key routes to Derby, Mickleover and Burnaston Village, this should include a route over the A516 near the Derby Mickleover Hotel.

A new pedestrian / cycle route and access point which extends the existing public footpath at the north of the site linking to Hospital Lane at the existing school site entrance should be provided. New built development should front on to open space to provide passive surveillance.

It is expected that Green Infrastructure is provided early in the site construction process to ensure that sufficient safe open space is available for walking, cycling and playing for new and existing residents during the construction works.

The site is traversed by a 132kV overhead electricity line which runs roughly east to west through the southern element of the allocation. This essential infrastructure needs to be safeguarded, and the masterplan should identify the presence of the lines and require their retention.

The site is a cross-boundary site between Derby City Council and South Derbyshire District Council. Derby City Council currently has a Green Wedge policy and whilst this designation is outside the South Derbyshire administrative area and therefore does not apply within South Derbyshire, the principles of extending the green wedges concept with green infrastructure beyond the administrative boundary of Derby City is supported. This will ensure that the Green Wedges within Derby are not obstructed by development in South Derbyshire. This is to provide opportunities for Derby City residents to access the countryside beyond the city boundary but also to allow residents of the new allocations the opportunity to access the city via attractive green routes.

The site was previously used for sports pitches by Derby Grammar School prior to the construction of their new facilities at Rykneld Sports Centre. As a result of the replacement facility the sports provision reverted back to agricultural use. The site is directly adjacent to the Pastures Golf Club, and the master planning should consider the mitigation of the potential impacts from such a neighbour use (such as noise, overshooting, ball strike, lighting etc.). The provision of new sports and recreation facilities should be in accordance with the Councils Playing Pitch Strategy and Built Facilities Strategy. It is expected that new formal sports provision should be focused adjacent to the exiting Mickleover FC playing pitch/ Golf course on the southern side of the Pastures Estate to create a 'sports hub' in a single location.

The use of a Community Use Agreement should be explored with the Education Authority to secure well-managed and safe community use of sports facilities.

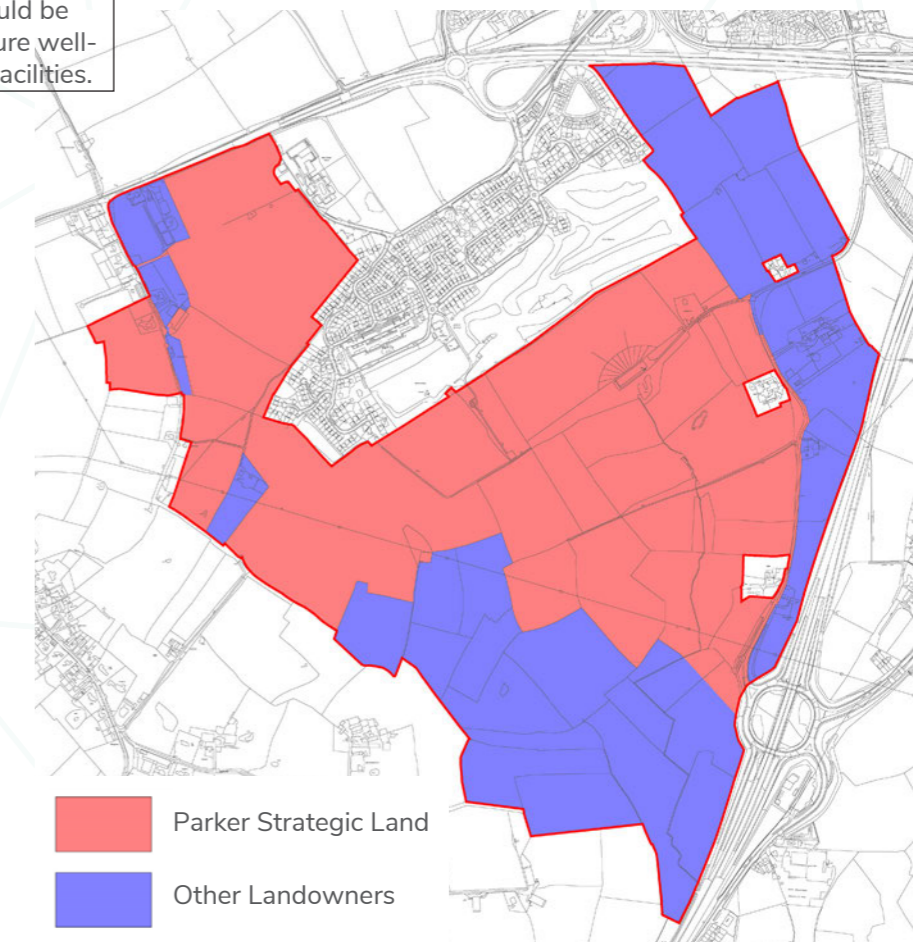
## Parker Strategic Land (PSL) response

Parker Strategic Land (PSL) (the Principal Promoter) of land south of Mickleover, supports South Derbyshire District Council's (SDDC) intention to allocate growth at Mickleover South. PSL controls the majority of the land that makes up the draft allocation, that would deliver the critical infrastructure required and most homes.

The PSL Regulation 19 Addendum Placemaking Response and accompanying written representations collectively consider the opportunity for the allocation to benefit from a vision established in key placemaking principles which respond to the wider aspirations to deliver a new sustainable neighbourhood at the edge of Derby.

PSL considers that the opportunity for Mickleover is achieved through a fully integrated and connected extension to Derby – one that does not isolate or segregate existing communities (e.g. the Pastures Hospital Estate community) but seeks to share the many benefits of new social and green infrastructure, and the vitality new homes and amenities will bring to the area. We also believe there is an opportunity to create an improved and more defensible green separation between the expanded urban area of Derby and the village of Burnaston.

This Document has been prepared to explain our response to South Derbyshire's proposed changes, taking into account their preferred outcomes set out in draft policy STRA2. It is structured under a short sequence of design layers to illustrate the opportunities presented by the PSL vision, taking a landscape-led, place-shaping approach to create the highest quality environment, and fully accessible social infrastructure whilst making effective use of the land to maximise housing capacity.



# Parker Strategic Land Vision

Land to the South of Mickleover provides the opportunity to create an exemplary new neighbourhood built on a shared vision for healthy living, based on the founding principles of the nearby former Pastures Hospital.

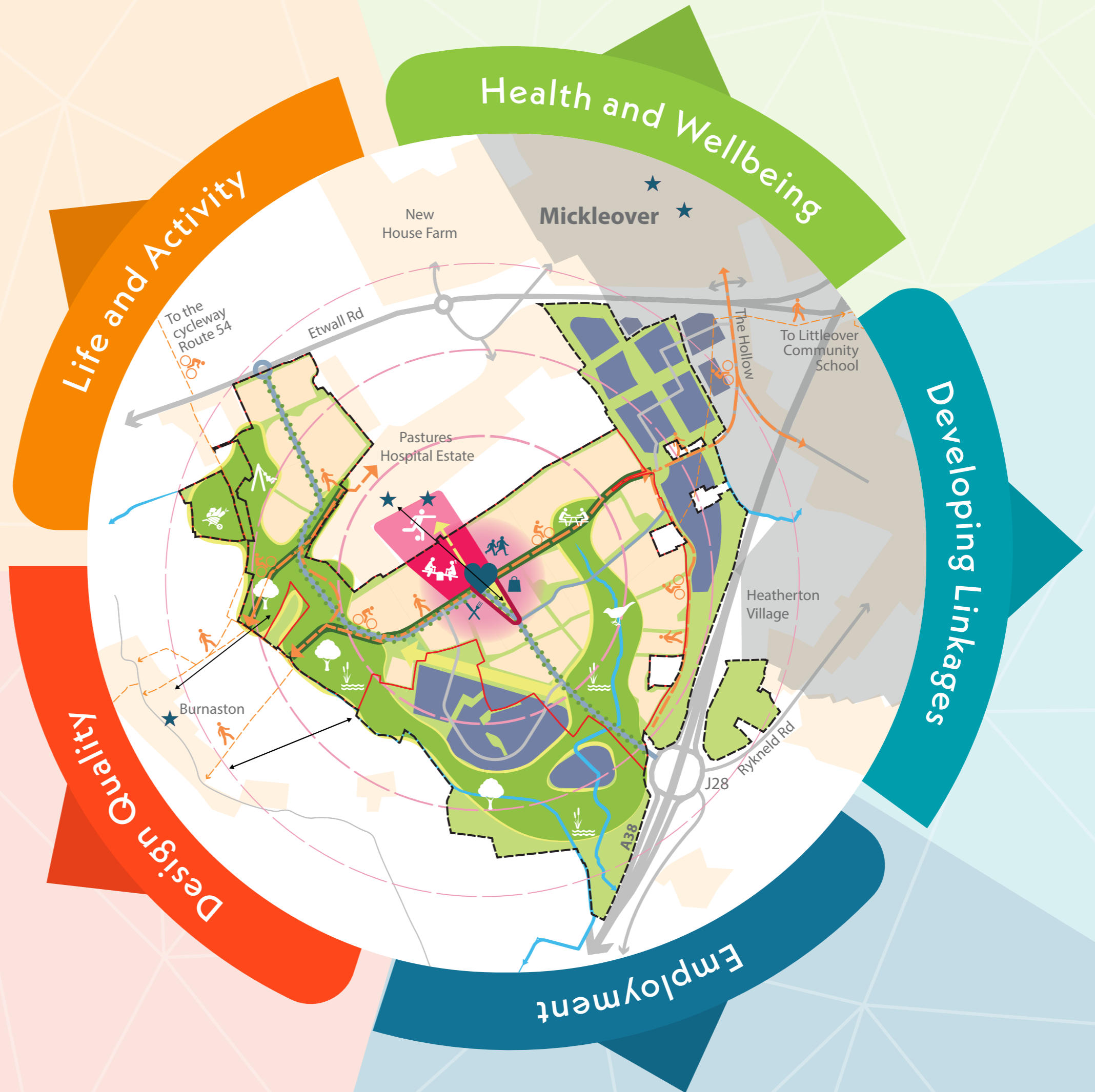
This sustainable and attractive new community will be **integrated to the local area, protecting the environment and providing affordable homes** for existing and future residents.

A **connected, resilient and biodiverse green infrastructure framework** will bring character to the new neighbourhood, celebrate the legacy of the historic hospital grounds, and strengthens the green edge between Mickleover and Burnaston.

This **new compact, mixed use neighbourhood** will be connected to the wider Derby conurbation but also as self-sustaining as possible. It will define an attractive and sensitive new edge to the urban area with generous **parkland, naturalistic landscapes and new publicly accessible foot and cycle paths**.

The proposed neighbourhood will also provide a greater level of connectivity between the existing residents of the Pastures Hospital Estate neighbourhood and the future development proposals creating an **inclusive community**.

The development's vision, design rationale and the principles underpinning the proposals have informed this placemaking response to the addendum consultation.



# INTRODUCTION

The proposed modifications provide helpful clarification to Policy STRA2. However, a more flexible, design-led approach is required to ensure the allocation is deliverable, integrated and capable of creating a high-quality, sustainable new community responding to the identified needs of Derby City and South Derbyshire.

The Regulation 19 consultation introduces a number of modifications to Policy STRA2: Land South of Mickleover. These changes provide greater clarity in relation to development quantum, infrastructure requirements and placemaking expectations.

The comparative analysis in these pages highlights the evolution of the policy between the March 2025 draft allocation and the May 2026 proposed modifications, and identifies the key implications for the delivery of a coherent, high-quality and sustainable new community.

## WHAT HAS CHANGED

The proposed modifications seek to introduce clarification about infrastructure, green infrastructure and community provision, strengthening the overall policy framework.

Key changes include:

- Greater clarity on development quantum and housing mix, including provision for specialist and older persons housing;
- Introduction of the A516 access and a more defined movement framework, including the link road or 'main street' between the A516 and A38 which will improve permeability and sustainable movement in the local area;
- Enhanced requirements for green infrastructure, health and wellbeing, including references to the Council's Active Wellbeing and Green Space strategies;
- Clearer expectations regarding community infrastructure, including a primary school, local centre and sports provision;
- Additional recognition of site constraints, including utilities infrastructure and cross-boundary relationships.

## WHAT IT MEANS

While the modifications strengthen the policy framework, a more flexible, design-led approach is required that is informed by robust site assessment, to ensure delivery of the new neighbourhood as envisioned.

The modifications represent a positive step forward; however, a number of requirements remain overly prescriptive or insufficiently evidenced, and therefore not adequately justified, which may constrain the ability to deliver an effective and cohesive Strategic Masterplan as required by STRA2 policy criterion F.

In particular:

- The requirement for a continuous 'horseshoe' green infrastructure corridor lacks, clear, robust justification and risks creating fragmented and poorly integrated spaces;
- The concentration of uses, including sports provision, into single locations may reduce accessibility;

- The link road, while supported, requires a stronger emphasis on its role as a place-based main street, rather than a 'link road' movement only corridor. This placemaking approach would also reflect the advice received from the Design Review Panel that highlighted "the importance of the Spine Road to the overall scheme and the need for this to be a character defining feature of the development."

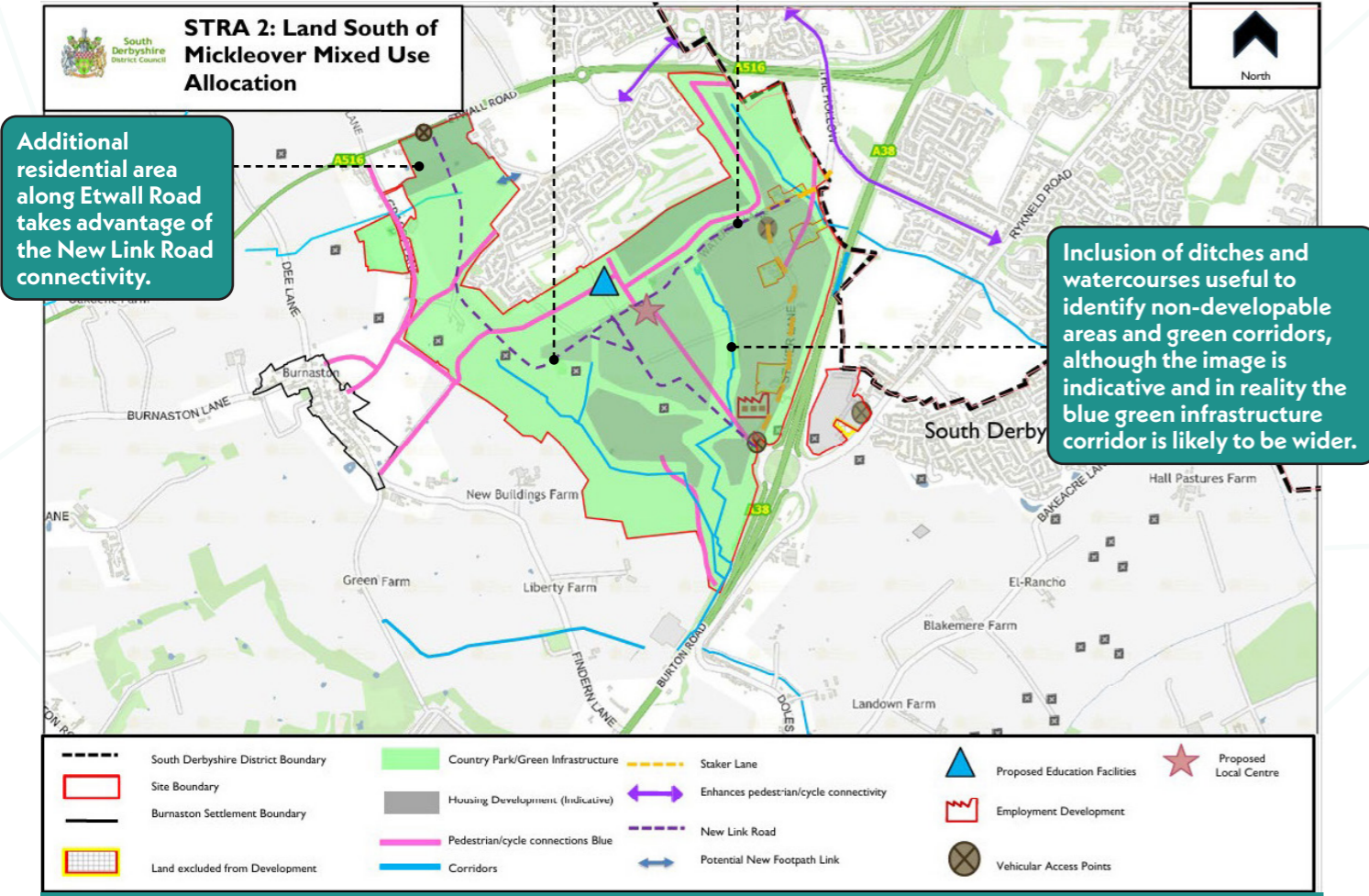
These considerations highlight the need for a design-led, flexible masterplanning approach, capable of responding to robust assessment of the site and its context, the delivery of the development and its supporting infrastructure, and long-term stewardship requirements.

New Link Road beneficial to serve the scheme and promote sustainable travel patterns.

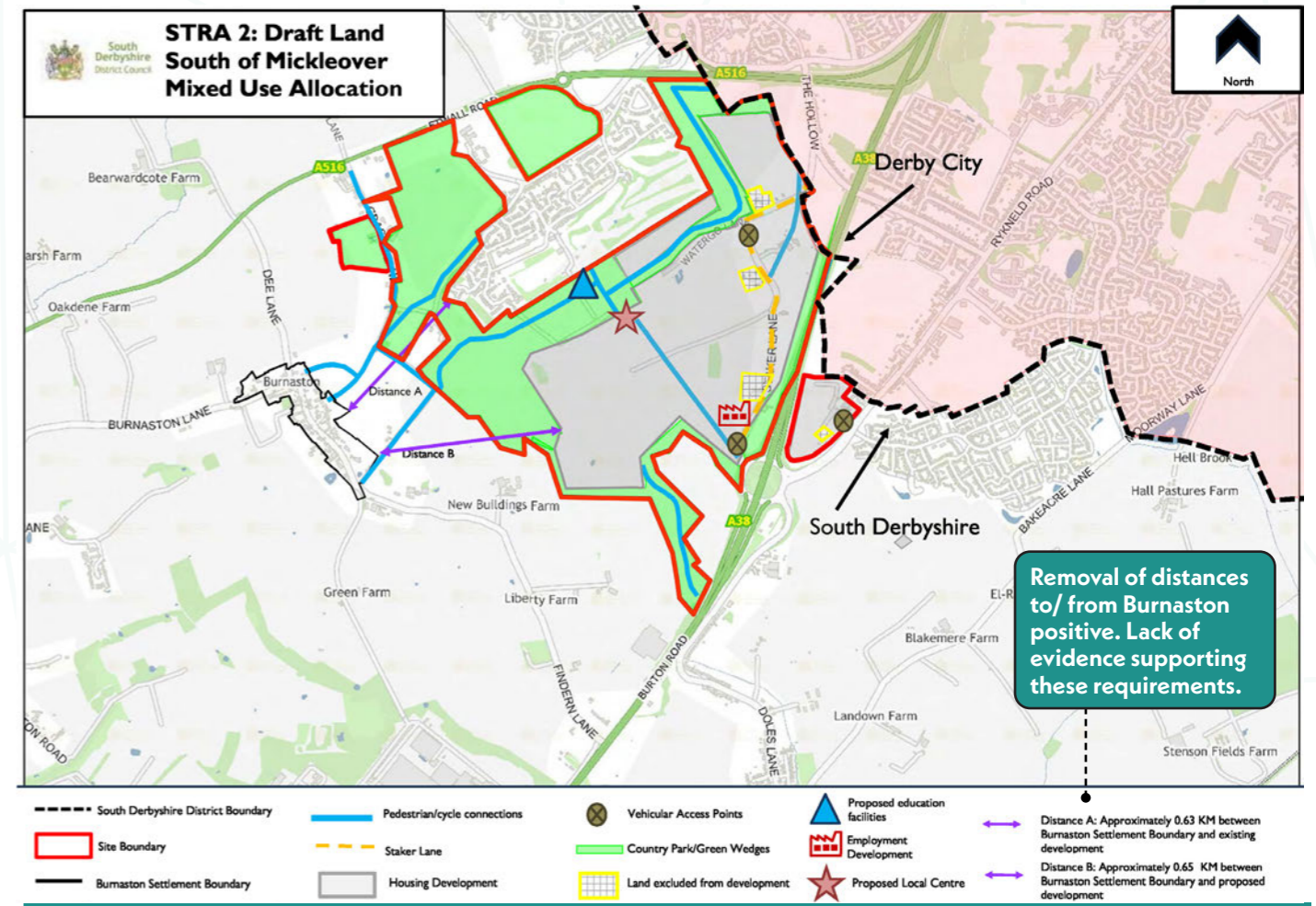
However, referring to the New Link Road as "Main Street" is a more place-based approach to this strategic connection.

New Link Road connecting with Staker Lane may result in vehicular congestion on Staker Lane.

However, a secondary less direct connection would provide a balance between permeability and encouraging active travel.



May 2026 Policy STRA2: Draft Land South of Mickleover - Mixed Use Allocation



March 2025 Policy STRA2: Draft Land South of Mickleover - Mixed Use Allocation

# QUANTUM OF DEVELOPMENT

## Delivering a well-integrated neighbourhood of appropriate density, maximising accessibility to Mickleover and supporting viable infrastructure delivery.

A design-led approach ensures development is focused around a well connected main street, local centre and walkable neighbourhoods, optimising land use while reinforcing place identity and social integration.

The proposed modifications introduce greater clarity on development quantum, distribution and housing mix, which is welcomed. In particular, the emphasis on responding to landform, urban structure and housing needs provides a stronger framework for placemaking.

However, the current spatial distribution risks inefficient use of land in highly accessible locations, particularly within walking distance of the proposed local centre, Main Street and Mickleover Village Centre. A more compact, integrated form of development would better support sustainable travel patterns and delivery of optimal public transport connectivity.

Placemaking best practice suggests the allocation should prioritise:

- Higher density development focused on the main sustainable movement corridor (New Link Road/ Main Street);
- Consistent overlooking and active frontages to reinforce safety and identity of this key strategic route;
- Integration of existing and proposed communities, avoiding spatial or social segregation.

The Council's approach to spatial separation of the Pastures Estate is not supported by robust evidence and conflicts with the historic ethos of integration associated with the hospital site.

A more integrated neighbourhood structure would:

- Promote inclusivity and social cohesion,
- Integrate residential development with social and community infrastructure and services,

- Deliver a more legible and accessible urban form.

## Social Infrastructure + Local Centre

A well-located, multifunctional local centre integrating education, retail and community uses will form the heart of a walkable neighbourhood.

The proposed modifications significantly strengthen requirements for community infrastructure, including the 3FE primary school and nursery, local retail provision and anchor store, and community and sports facilities.

This is supported, particularly the emphasis on co-location of uses to create a multifunctional centre.

However, this should be explicitly embedded within the masterplan by:

- Locating retail and community uses to be served by the Main Street (with the school co-located nearby);
- Designing the local centre as a walkable hub accessible to both new and existing communities;
- Ensuring strong integration with public transport routes.

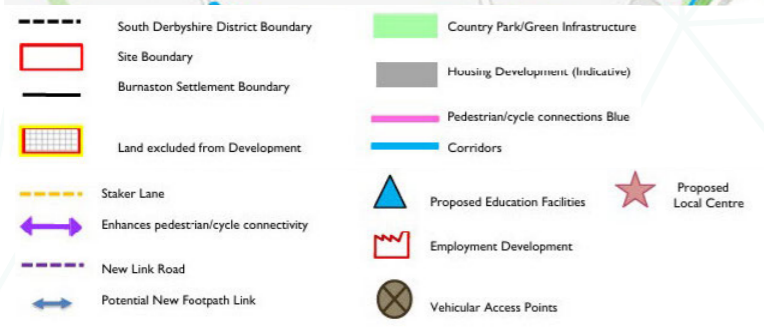
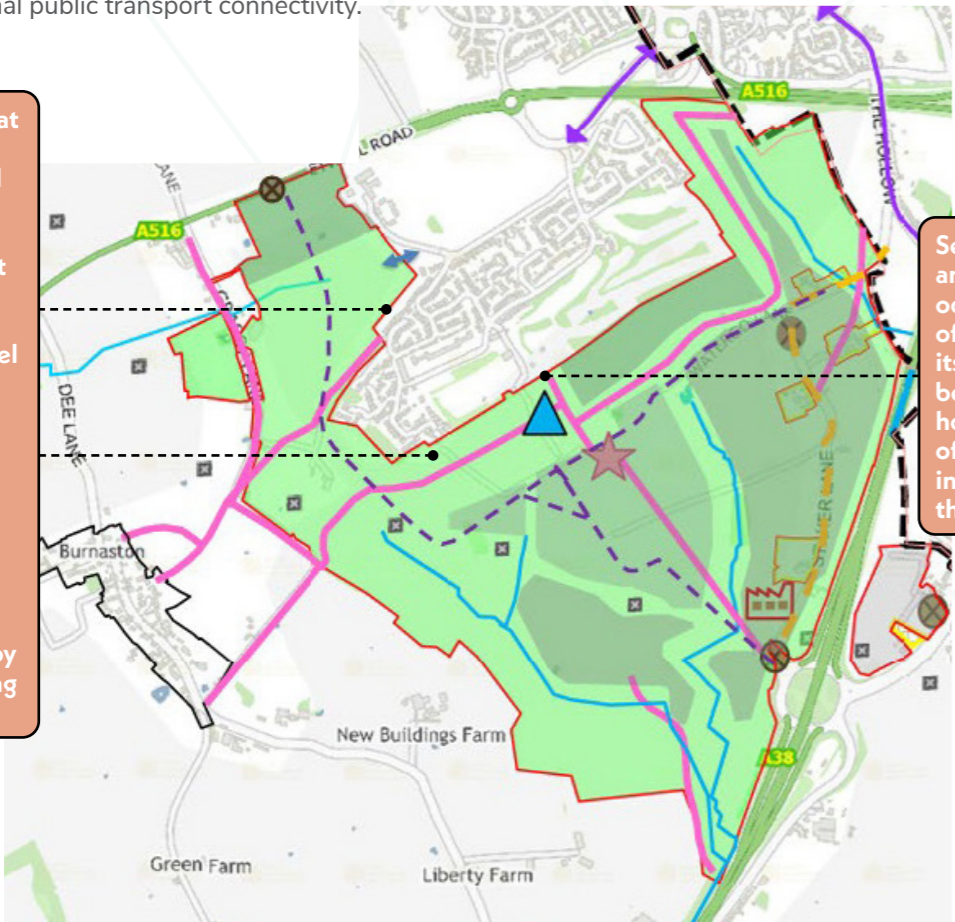
This approach will:

- Maximise accessibility and viability,
- Encourage social interaction,
- Reduce the need to travel.

The scheme should clearly demonstrate how these requirements are integrated into the spatial framework, rather than treated as standalone components.

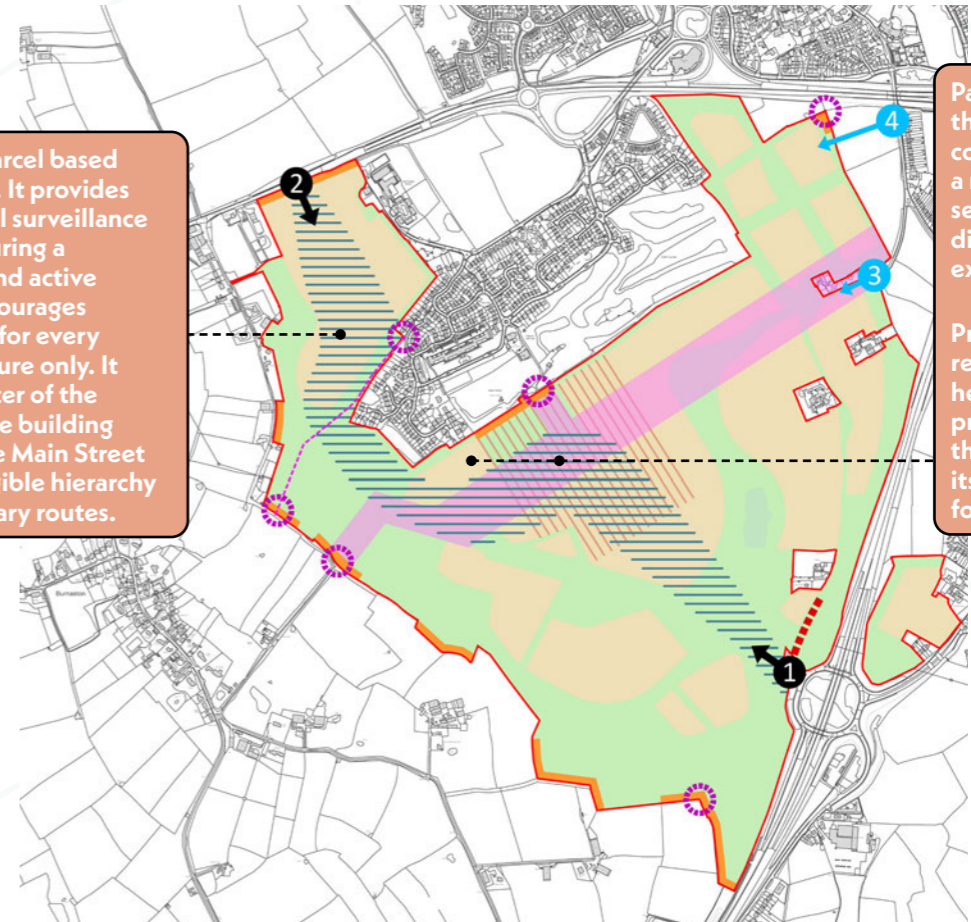
Inefficient use of land that does not optimise the opportunities associated with the delivery of the New Link Road/ Main Street and the significant accessibility provided by its associated public transport and active travel infrastructure.

Existing residential back fences define the proposed open space failing to provide a positive edge for Derby and resulting in poor placemaking. This would be further exacerbated by the Main Street dissecting the Country Park.



Segregation of existing and new community at odds with the heritage of Pastures Hospital and its vision of the health benefits of inclusivity. The hospital site was ahead of its time in terms of integrating patients into the wider community.

Northern residential parcel based on efficient use of land. It provides overlooking and natural surveillance to the Main Street ensuring a safe, attractive street and active travel corridor, and encourages sustainable movement for every day use rather than leisure only. It also reflects the character of the local area with attractive building frontages activating the Main Street complemented by a legible hierarchy of secondary and tertiary routes.



Pastures Park integrates the existing and proposed communities and delivers a range of proposed services within walkable distance that complement existing destinations.

Proposed approach responds to both the heritage objective of preserving the setting of the Pastures Hospital, and its health objective/ vision for the neighbourhood.

# GREEN & BLUE INFRASTRUCTURE

## A cohesive and deliverable green infrastructure network prioritising quality, connectivity and usability over arbitrary spatial requirements.

The strengthened emphasis on green infrastructure, health and wellbeing is strongly supported.

However, the requirement for a continuous 'horseshoe' green infrastructure corridor is not supported by robust evidence, introduces significant placemaking concerns and is not reflective of the reality of the site's constraints. The Design Review Panel aspiration to "ensure that the green infrastructure is well considered, interlinked and serves a purpose beyond acting as a buffer to development" is not realised by creating excessive open space with limited use and purpose.

Key limitations of the Council's approach include:

- Lack of clear design rationale;
- Creation of poorly overlooked and disconnected spaces;
- Fragmentation of the proposed Country Park by infrastructure;
- Focusing primarily on buffering Pasture's Estate to the detriment of good place-making and community integration in the long term;
- Lack of focus on the site's most ecologically valuable areas.

An alternative approach is proposed:

- A more compact, cohesive Country Park forming a clear destination;
- A hierarchy of spaces, including a Country Park, strategic landscape corridors, neighbourhood greens local play spaces;

- Integration with movement corridors and development edges.

This approach would:

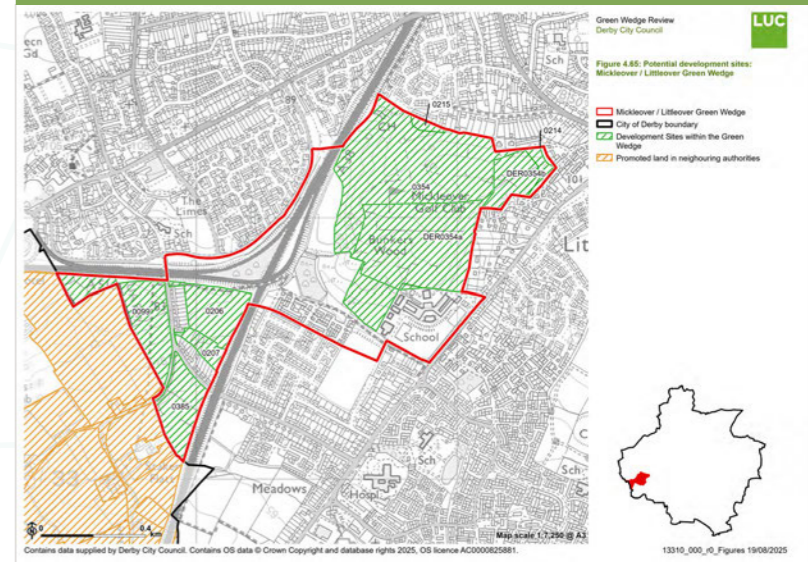
- Improve usability, safety and maintenance;
- Better align with landscape, ecology and drainage requirements.

The focus on health, wellbeing and sports provision is welcomed, particularly in light of links between health inequalities and access to activity.

However, the requirement for a single 'sports hub' may be overly prescriptive and may not represent the most effective or inclusive solution.

A more flexible approach is recommended where formal sports provision still responds to existing assets (Mickleover FC), but is not constrained to a single location where this undermines accessibility or placemaking.

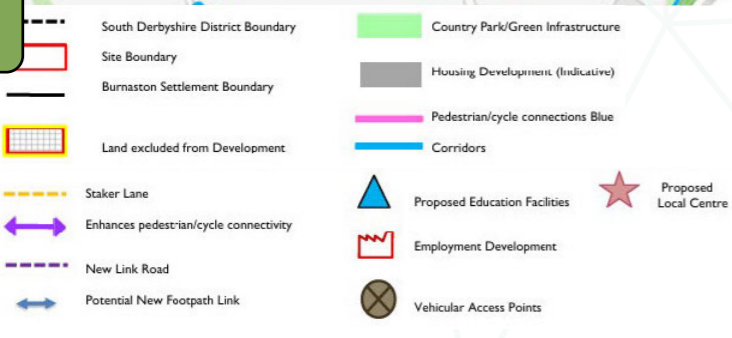
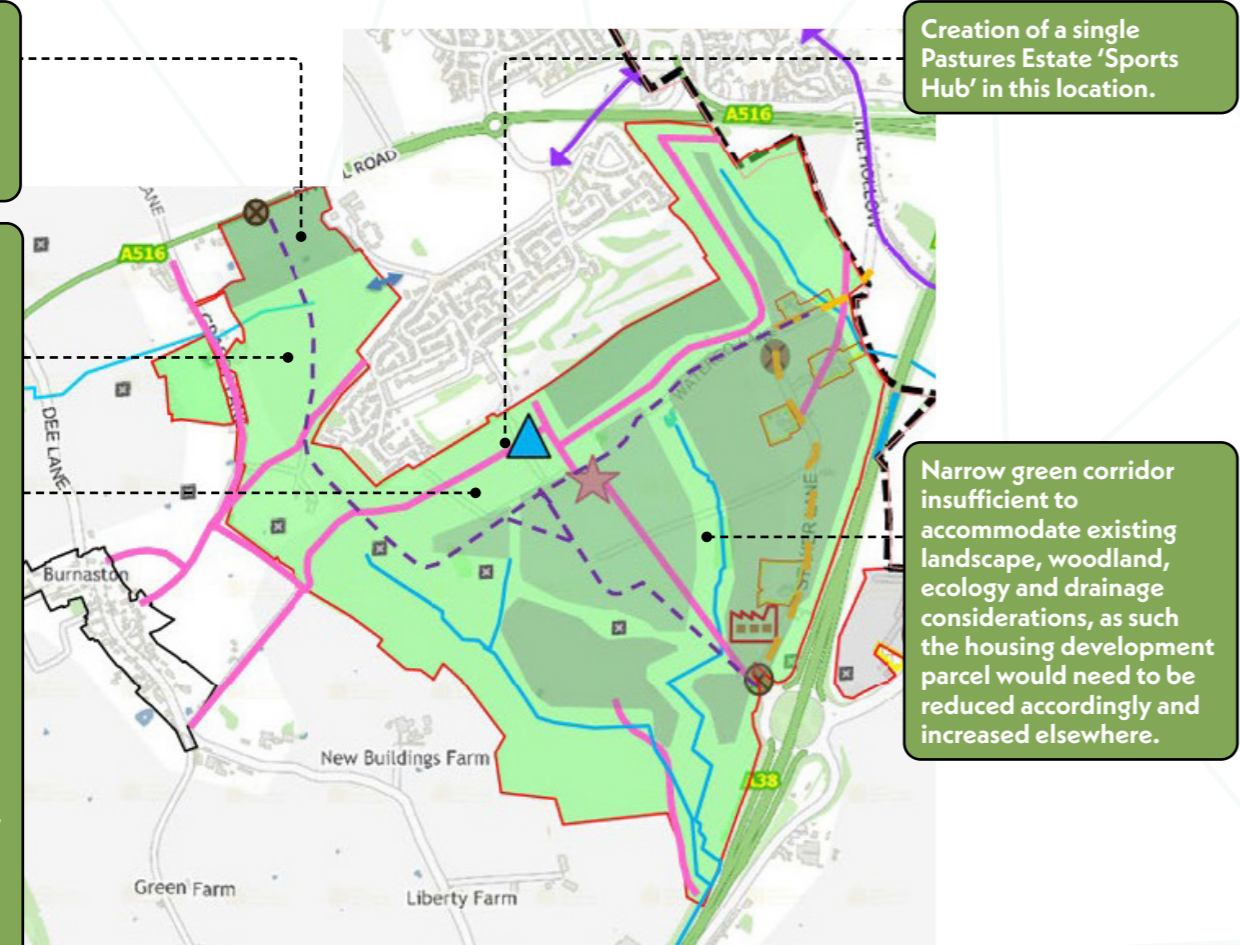
Littleover/ Mickleover Green Wedge - Potential Development Sites extract from Derby Green Wedge Review, Sep 2025



Lack of justification for the extent of the housing development adjacent to the A516 being limited as shown with an abrupt edge.

Lack of evidence underpinning the expectation that Green Infrastructure will, as a minimum, form a continuous 'horseshoe' shape around the existing residential properties of the Pastures Estate, and lack of justification for such a significant area of open space.

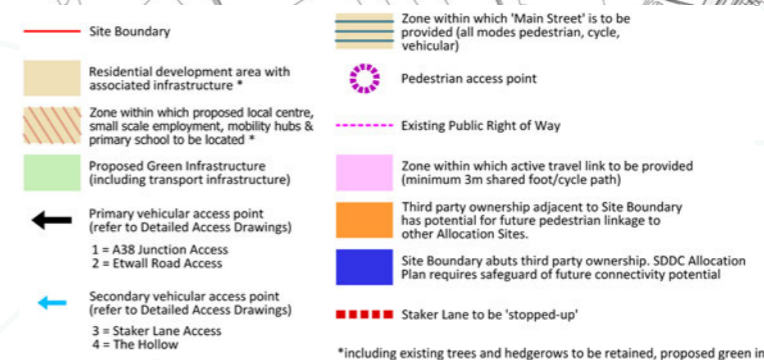
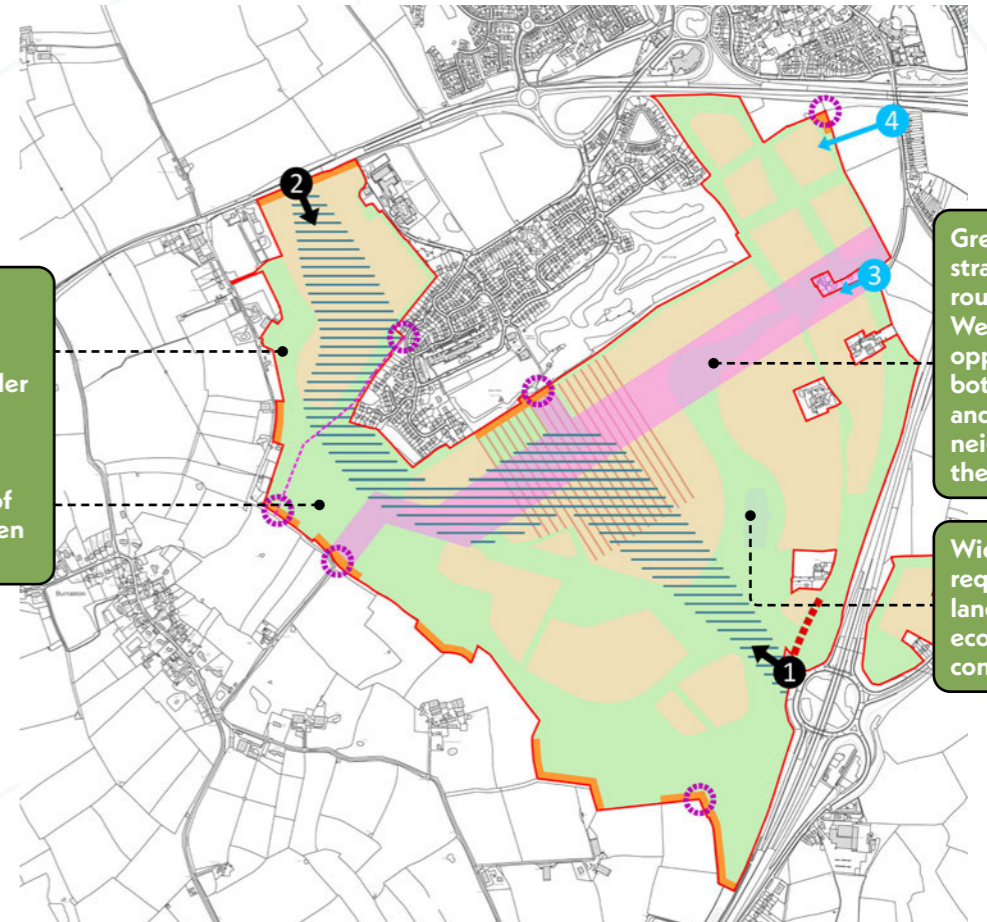
No clear design rationale underpinning the large scale Country Park, which is split into two large areas by the Main Street, does not reflect the most ecologically valuable area, and would be defined by existing property back fences, thus failing to provide a positive edge for Derby and resulting in poor placemaking.



Smaller more compact Country Park would create a more cohesive destination with a smaller horseshoe hilltop park to the east of the Main Street creating a more appropriate hierarchy of formal and informal open spaces.

Green corridor and strategic active travel route support the Green Wedge objective to create opportunities for for both Derby City residents and residents of the new neighbourhood to access the countryside.

Wider green corridor required due to existing landscape, woodland, ecology and drainage considerations.



# MOVEMENT

**Reframing the Link Road as a 'Main Street' creates a people-first movement corridor, and helps to establish the character of the new neighbourhood. The Main Street would support active travel, public transport and connect to a vibrant local centre.**

The proposed link road between the A516 and A38 is a critical piece of infrastructure and is supported in principle.

However, it should not function as a conventional highway corridor. Instead, it must be designed as a place-based 'Main Street', forming the backbone of the new community. This approach better aligns with the Council's Active Wellbeing and Green Spaces Strategies and with the advice received as part of the Design Review and its aspiration to "undertake a design approach which focuses on the place and movement function of the Main Street including a design which reinforces character areas and spaces."

Best practice design principles include:

- Integration of vehicular, bus and active travel routes;
- Overlooking by attractive building frontages along most of its length to create a sense of safety and maximise its useability;
- Direct relationship with the local centre and community uses.

The current SDDC indicative masterplan risks:

- Long stretches without active frontage;
- Reduced natural surveillance and perceived safety;
- Missed opportunity to maximise active travel and public transport uptake.

In addition to this, a less direct vehicular connection to Staker Lane would be more effective in encouraging the use of the active travel connection to this key route.

The Local Centre strategy should seek a location where facilities are "accessible to as many people as possible from within and outside the red line" as advocated in the recently published Delivering Quality: Local Centres. Peverell Avenue in Poundbury, Dorset and Baldock High Street in Hertfordshire are precedents of local centres suggested by the Design Review Panel served by primary routes with integrated movement provision. Segregation of the Main Street and active travel route would result in limited footfall to Local Centre shops and a street hierarchy that is less legible and more difficult to navigate.

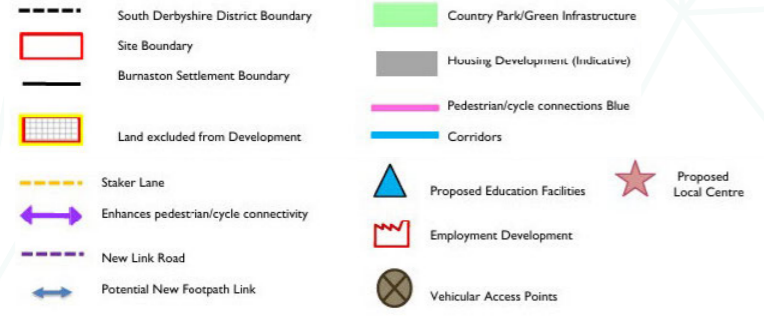
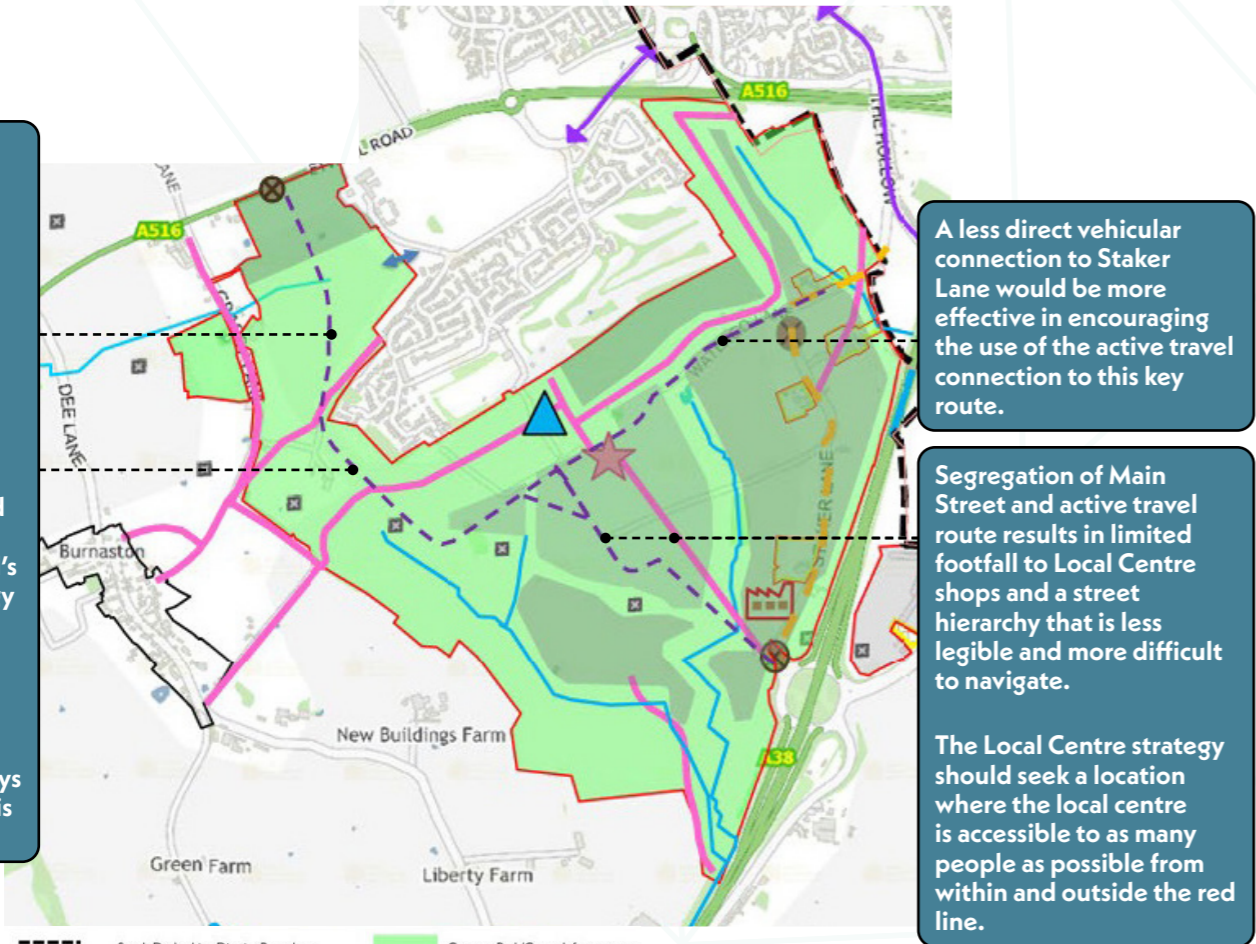
A legible hierarchical movement strategy is recommended, where:

- Primary routes (the new Main Street) support movement and placemaking;
- Secondary routes provide permeability without encouraging rat-running;
- Active travel routes remain direct, legible and prioritised, including routes segregated from vehicular movement.

Long section of the Main Street not fronted by development does not provide overlooking to the route and does not reflect Secure by Design principles.

The potential for the link road to encourage active travel and public transport patronage is not optimised and would not fully support the objectives of the Council's Active Wellbeing strategy and Green Spaces Strategy.

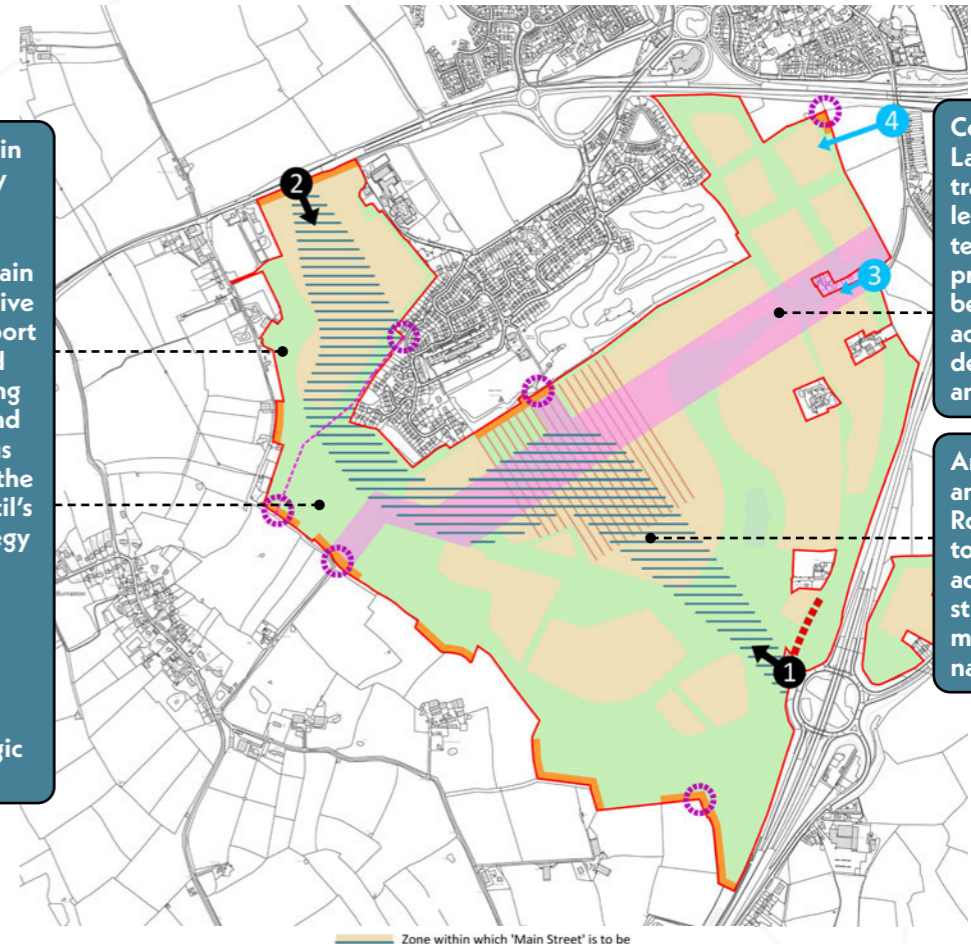
Calling this strategic connection "New Link Road" suggests a highways dominated design for this route.



Short section of the Main Street severing Country Park.

The potential for the Main Street to encourage active travel and public transport patronage is maximised by development fronting onto the Main Street and in close proximity to bus stops, thus supporting the objectives of the Council's Active Wellbeing strategy and Green Spaces Strategy.

Calling the New Link Road "Main Street" is a more placemaking-led approach to this strategic connection.



\*Including existing trees and hedgerows to be retained, proposed green infrastructure and proposed transport infrastructure - refer to Landscape Framework Plan

## SOCIAL INFRASTRUCTURE + LOCAL CENTRE

**A well-located, multifunctional local centre integrating education, retail and community uses will form the heart of a walkable neighbourhood.**

The proposed modifications significantly strengthen requirements for community infrastructure, including:

- 3FE primary school and nursery;
- Local retail provision including anchor store;
- Community and sports facilities.

This is supported, particularly the emphasis on co-location of uses to create a multifunctional centre.

However, this should be explicitly embedded within the masterplan by:

- Locating retail and community uses to be served by the Main Street and strategic active travel routes (with the school co-located nearby) where facilities are "accessible to as many people as possible from within and outside the red line";
- Designing the local centre as a walkable hub accessible to both new and existing communities;
- Ensuring strong integration with the public transport services along the Main Street.

This approach will:

- Maximise accessibility and optimise the opportunity for local centre operators to deliver a successful and vibrant community hub;
- Encourage social interaction;
- Reduce the need to travel, particularly by private vehicle.

The proposed scheme should clearly demonstrate how these requirements are integrated into the spatial framework, rather than treated as standalone components.

## CONCLUSION

Draft Policy STRA 2 already has a requirement for a Masterplan to be prepared separately to the Local Plan. The 'indicative masterplan' as proposed by SDDC is not justified in its prescriptive approach to the expansive identification of green infrastructure provision, which:

- appears to be far in excess of the proposed green infrastructure policy requirements commensurate to the amount of housing proposed for allocation by SDDC,
- does not reflect the evidence related the site's constraints, and
- is a cause for concern in regard of the viability and deliverability of the scheme.

In order to remedy the position, it is recommended that the Council should amend the indicative masterplan to focus on the key aspects of:

- points of access
- location for local centre
- location for primary school.

Detail regarding the spatial arrangement of the built development, the amount and location of green infrastructure, must be informed by robust spatial analysis and open space evidence. Therefore, the policy masterplan should be much more flexible to ensure constraints are leveraged to create distinctive placemaking.

Furthermore, SDDC must ensure due consideration is given to the scale of infrastructure requirements, including the required green infrastructure provision, to not overly restrict the capacity of the site, therefore ensuring the viable delivery of the scheme as a whole.

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Document Status	DRAFT
Revision	C
Author	Various
Checked by	NT
Authorised by	DS
Issue Date	June 2026

## Appendix 3 – Completed Consultation Representation Form

**Regulation 19 Addendum: Proposed Modifications to the South Derbyshire  
Local Plan Part 1 Review 2022-2041**

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)

(ENGLAND) REGULATIONS 2012

Regulation 19 Addendum

**REPRESENTATION FORM**

The easiest way to **submit your comments is online** at <https://bit.ly/Part-1-Local-Plan-Review> or by scanning the QR code. We would encourage you to use the online form wherever possible. Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



**Submission form**

**This form has two parts**

**Part A** – Personal Details: need only to be completed once.

**We will not be able to accept responses where personal details are not provided.**

**Part B** – Your representation(s): **Please fill in a separate sheet for each representation you wish to make relating to each individual policy.**

You will be asked to give details on whether you think the plan is legally compliant and why you consider the proposed modifications to the policies of the Local Plan to be sound or unsound, please be as precise as possible.

You will also be asked to set out the modification(s) you consider necessary to make the Local Plan legally compliant and the policies sound in respect of any matters you have identified. You will need to say why each modification will make the Local Plan legally compliant or policy sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Privacy Notice**

**Representations (including your name) will be made publicly available following the close of the consultation however personal details (personal address, signature and contact details) will NOT be made publicly available but will be kept in a secure database and used to notify you of the Plan's progress.**

**Who has access to your information?**

Personal details will be protected although it may be necessary to disclose these to a Planning Inspector appointed by the Secretary of State at a later date. For further information, please visit our Privacy section of our website at [www.southderbyshire.gov.uk/privacy](http://www.southderbyshire.gov.uk/privacy) where you can see a full copy of our privacy notice.

For further information, please visit our Privacy section of our website at [www.southderbyshire.gov.uk/privacy](http://www.southderbyshire.gov.uk/privacy) where you can see a full copy of our privacy notice. Alternatively, you can request a hard copy by emailing [local.plan@southderbyshire.gov.uk](mailto:local.plan@southderbyshire.gov.uk)

### Part A: Personal Details\*

**We will not be able to accept responses where personal details are not provided.**

#### 1. Please provide your contact details.

Respondent details	Agent details (where applicable)
Name*: Parker Strategic Land	Name*: Gareth Wilson
Organisation:	Organisation: Twenty5 Planning Ltd
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

\*indicates required field

#### Future notification

The District Council will retain your contact details to inform you of future consultations on the Local Plan. If you do not wish for your contact details to be added to the consultation database, please email [local.plan@southderbyshire.gov.uk](mailto:local.plan@southderbyshire.gov.uk)

**Part B: Please use a separate sheet for each representation you wish to make**

**3. To which part of the Local Plan does this representation relate?**

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each Proposed Modification that you wish to comment on.

Comment being made against:	Please tick only one		
PM1		PM23	
PM2	✓	PM24	
PM3		PM25	
PM4		PM26	
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PM14		PM36	
PM15		PM37	
PM16		PM38	
PM17		PM39	
PM18		PM40	
PM19		PM41	
PM20		PM42	
PM21		Other (Please specify)	
PM22			

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		
2) Sound		
(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		
a) Positively prepared		
b) Justified		
c) Effective		

d) Consistent with national policy	✓	
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**5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.**

Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Local Plan does not comply with). If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Please refer to submitted representations made on behalf of PSL in full.**

Support is given to the Council's proposed extension of the plan period, so that it spans 15 years from the point of adoption as required by the NPPF 2023 (para 22).

(Continue on a separate sheet /expand box if necessary)

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Please check the relevant box

No, I do not wish to participate in hearing sessions

Yes, I wish to participate in hearing sessions	✓

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

The emerging Local Plan Part 1 Review proposes two Strategic Allocations. Parker Strategic Land controls 58% of the 195 hectares of land proposed to be allocated at 'Land South of Mickleover' (Policy STRA2).

As a key stakeholder it is important that the opportunity for oral evidence is provided to further expand on points made throughout the representation submissions.

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**Please refer to submitted representations made on behalf of PSL in full.**

Support is given to the Council's proposed uplift to the housing requirement to reflect the proposed extension of the plan period at Proposed Modification PM2, this ensures that the plan is positively prepared and the plan period reflects the requirements of the NPPF.

(Continue on a separate sheet /expand box if necessary)

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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c) Effective		✓

d) Consistent with national policy		
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**Please refer to submitted representations made on behalf of PSL in full.**

PSL supports in principle the inclusion of retail provision as part of the allocation at STRA 2, to be delivered within the local centre.

It is noted however that reference is made to an ‘anchor store’ of approximately 1,000sqm. It is requested that wording be amended to:

*“retail provision should be made within the local centre, with floorspace of up to 1,000 sqm”.*

The amended text is more accurate and would enable more flexibility to respond to market demand from retail operators making the policy more effective (NPPF 2023, paragraph 35).

(Continue on a separate sheet /expand box if necessary)

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**Please refer to submitted representations made on behalf of PSL in full.**

Support is given to PM15 and the clarity provided by the proposed wording amendment to Policy STRA 2 therefore making the policy more effective (NPPF 2023, paragraph 35).

(Continue on a separate sheet /expand box if necessary)

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N/A

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Please check the relevant box

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Yes, I wish to participate in hearing sessions	✓

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PM10		PM32	
PM11		PM33	
PM12		PM34	
PM13		PM35	
PM14		PM36	
PM15		PM37	
PM16	✓	PM38	
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PM20		PM42	
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PM22			

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	Please tick the relevant box	
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(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		
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b) Justified	✓	
c) Effective		

d) Consistent with national policy		
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**Please refer to submitted representations made on behalf of PSL in full.**

Strong support is given to PM16 because this amendment is robustly justified. The SDDC Transport Modelling (January 2026) evidence has identified the positive benefits arising from the A516 connection. It is stated that:

*“6.6.4 In Mickleover, the link between the A516 and A38 improves the accessibility of the site to the wider network providing the opportunity for development traffic to avoid the Findern roundabout. The road is primarily used as a development access road and helps mitigate the impact of the proposed strategic development on land to the South of Mickleover. Development traffic uses a combination of the A516 and A38 to access the wider highway network, which causes reductions in flow on local roads through Mickleover including the Hollow, Staker Lane, Haven Bulk Lane, Brierfield Way and Etwall Road.”*

The connection to the A516 will also facilitate access into the site for bus services and wider active travel connectivity.

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

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Please check the relevant box

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Support is given to the incorporation of retail provision within the local centre at STRA2.

It is noted that reference is made to an ‘anchor store’ of approximately 1,000sqm. It is requested that the wording be changed to:

*“retail provision should be made within the local centre, with floorspace of up to 1,000 sqm”.*

The amended text is more accurate and would enable more flexibility to respond to market demand from retail operators and increasing the potential for delivery, therefore making the policy more effective (NPPF 2023, paragraph 35).

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Support is given to the addition of the new criterion proposed at PM18 to acknowledge the existing utility infrastructure.

The Promoter has carefully considered the location of the overhead electricity lines to ensure all requisite offsets can be maintained, with most development under control of PSL focused to the north of the overhead lines.

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Yes, I wish to participate in hearing sessions	✓
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It is noted that reference to the ‘South Derby Integrated Transport Link’ remains unchanged. Whilst it is not the focus of this consultation, the continued reference to ‘South Derby Integrated Transport Link’ is inconsistent with the evidence base.

In particular, we note the findings of the ‘Shaping Streets Design Review’ which recommends the use of ‘Main Street’ as the appropriate terminology and states at paragraph 2.2. that this “...needs to be consistently referenced across policy and masterplan documents”.

It is noted that this policy criteria should be read in conjunction with the proposed additional supporting text at AM73 which identifies the expectation for the ‘Main Street’ connection through the STRA 2 Site allocation, between A516 and A38. In communication with PSL Transport Consultant PJA, Systra has confirmed that the transport modelling has tested the scenario of the main street being “a road of slow speeds”.

It is important that both the policy criterion and the supporting text reflect the supporting evidence base both from a highways technical perspective but also in respect of establishing a vision for the development, optimising design and place making for the new neighbourhood, to support its delivery as intended.

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Policy STRA 2 proposed criterion ix) should refer to a ‘Main Street’ through the site to more clearly reflect the evidence base a both from a highways technical

perspective but also in respect of establishing a vision for the development, optimising design and place making for the new neighbourhood, to support its delivery as intended.

(Continue on a separate sheet /expand box if necessary)

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**Please refer to submitted representations made on behalf of PSL in full.**

3.1.2 Proposed amendment PM22 is described as a “new indicative layout” for the strategic allocation at STRA2 Land South of Mickleover.

3.1.3 Whilst some improvements are noted compared to the indicative layout prepared by SDDC and contained within the original Regulation 19 Local Plan (March 2025), objection is raised to certain detailed elements of the indicative layout proposed at PM22 which are not sufficiently justified.

3.1.4 Paragraph 5.17 of the Regulation 19 Local Plan states “*An indicative layout map is included to guide the development of the strategic allocation and identify the general proposed location of key features*”. However, the Regulation 19 Local Plan, Draft Policy STRA 2, proposed criterion F requires the following:

*“A Development Framework Document comprising a Strategic Masterplan, must be prepared for development expected to be delivered at Land South of Mickleover and approved by South Derbyshire District Council as the Local Planning Authority, prior to approval of the first planning application on the site. The Strategic Masterplan should incorporate and demonstrate how the requirements set out in this policy have been complied with. **The development shall be provided in broad conformity with the plan below, which has been informed by a Design Review process.**” (bold added for emphasis).*

3.1.5 Whilst reference to 'broad conformity' is welcomed, it is considered that the indicative layout as proposed is not sufficiently justified. Furthermore, given that Draft Policy STRA2 already contains a requirement for a Masterplan to be prepared separately to the Local Plan, it is neither necessary nor effective to include such a prescriptive layout within the Local Plan itself.

3.1.6 It should be noted that the current indicative layout (PM22) has not been subject to a Design Review process. As set out in the accompanying Placemaking Response appended hereto, serious concerns are raised regarding SDDC's indicative layout in its current form. The Placemaking

Response highlights best practice for placemaking, particularly in the context of new neighbourhoods, in response to PSL's Vision for the site, which is centred upon healthy living principles and informed by technical site assessment.

3.1.7 The NPPF (2023) advises, in respect to making efficient use of land, that:  
*“123. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions...”*

*“128. Planning policies and decisions should support development that makes efficient use of land, taking into account:*

*a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

*b) local market conditions and viability;*

*c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*

*d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*

*e) the importance of securing well-designed and beautiful, attractive and healthy places.”*

3.1.8 A key concern is that the indicative masterplan proposed by SDDC is not justified in its prescriptive approach to green infrastructure provision, which appears to be far more than the policy requirements commensurate with the quantum of housing proposed for allocation. This raises concern regarding both the ability to achieve a high quality design and the viable delivery of the scheme as a whole.

3.1.9 It is considered that the spatial arrangement of built development and the amount and location of green infrastructure must be informed by robust spatial analysis and open space evidence, to be established through the masterplan process already provided for within proposed Policy STRA2.

3.1.10 It is considered that SDDC must give due consideration to both the physical and financial scale of infrastructure requirements including the green infrastructure provision expected for the site, so as not to overly restrict the site's capacity and to ensure the viable delivery of the scheme as a whole.

3.1.11 To remedy concerns, it is recommended that the Council should further amend the indicative masterplan to focus on the key aspects of:

- Primary points of access

- Key movement corridors including 'Main Street'
- Location for local centre
- Location for primary school.

3.1.12 Detail regarding the spatial arrangement of the built development, the amount and location of green infrastructure, must be informed by robust spatial analysis and open space needs evidence.

### **Placemaking Response – Mickleover South (June 2026)**

3.1.13 Stantec has prepared a Placemaking Response (Appendix 2) to the Addendum Local Plan Part 1 Review consultation. Whilst the proposed modifications to Policy STRA2 are broadly welcomed as a positive step forward in strengthening the policy framework, a number of elements remain overly prescriptive and insufficiently evidenced, particularly the indicative layout (PM22) and the supporting text (AM73).

3.1.14 PSL's response advocates for a flexible, design-led approach to masterplanning, structured around four key themes. First, in respect of quantum and spatial distribution, a more compact and integrated form of development is promoted, focused on a well-connected Main Street and local centre to optimise land use and support sustainable travel.

3.1.15 Regarding green and blue infrastructure, the requirement for a continuous 'horseshoe' green infrastructure corridor is considered unjustified and risks creating fragmented, poorly overlooked spaces. In particular, PSL fundamentally disagrees with the quantum of green space identified between the A516 and the Pastures Hospital Estate, which is considered overly prescriptive, insufficiently evidenced and disproportionate to the level of housing proposed for allocation. A more cohesive hierarchy of green spaces anchored by a compact Country Park is proposed instead.

3.1.16 On movement, PSL supports the proposed link road in principle but considers it should be reframed as a 'Main Street', forming the place-based backbone of the new community, with active frontages, integrated active travel provision and strong public transport connectivity.

3.1.17 In relation to social infrastructure, the co-location of the local centre, retail, education and community uses along the Main Street is supported, ensuring accessibility for both new and existing communities.

3.1.18 In conclusion, it is recommended that the indicative masterplan be revised to focus on access points, the local centre location and the primary school, with detailed spatial arrangements to be determined through the masterplan process already provided for within Policy

STRA2.

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To remedy concerns, it is recommended that the Council should further amend the indicative masterplan to focus on the key aspects of:

- Primary points of access
- Key movement corridors including 'Main Street'
- Location for local centre
- Location for primary school.

Detail regarding the spatial arrangement of the built development, the amount and location of green infrastructure, must be informed by robust spatial analysis and open space needs evidence. This can be determined through the masterplan process already provided for within Policy STRA2.

(Continue on a separate sheet /expand box if necessary)

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PM21	Other (Please specify)		
PM22			

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**Please refer to submitted representations made on behalf of PSL in full.**

Whilst the proposed reduction in the affordable housing requirement from 40% is welcomed, the policy requirement should be kept under review in accordance with any updates to the Local Plan evidence base to ensure that it remains appropriately justified.

This is particularly pertinent given that site viability assessments are currently being undertaken by the Promoter, the findings of which may have further implications for the level of affordable housing that can be viably delivered on site.

The Interim Viability Statement April 2026 identifies that it is a “*high-level review of available evidence and should be treated as indicative. The appropriate level of affordable housing provision will be tested and refined through the forthcoming full Local Plan Viability Assessment, which will consider a wider range of development scenarios, site typologies and sensitivity testing in detail*”.

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Please refer to submitted representations made on behalf of PSL in full.**

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(Continue on a separate sheet /expand box if necessary)

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**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Please check the relevant box

No, I do not wish to participate in hearing sessions

Yes, I wish to participate in hearing sessions

✓

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

The emerging Local Plan Part 1 Review proposes two Strategic Allocations. Parker Strategic Land controls 58% of the 195 hectares of land proposed to be allocated at 'Land South of Mickleover' (Policy STRA2).

As a key stakeholder it is important that the opportunity for oral evidence is provided to further expand on points made throughout the representation submissions.

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**Part B: Please use a separate sheet for each representation you wish to make**

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PM6		PM28	
PM7		PM29	✓
PM8		PM30	
PM9		PM31	
PM10		PM32	
PM11		PM33	
PM12		PM34	
PM13		PM35	
PM14		PM36	
PM15		PM37	
PM16		PM38	
PM17		PM39	
PM18		PM40	
PM19		PM41	
PM20		PM42	
PM21		Other (Please specify)	
PM22			

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant		
2) Sound		
(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		
a) Positively prepared		
b) Justified		
c) Effective		✓

d) Consistent with national policy		
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**5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.**

Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Local Plan does not comply with). If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Please refer to submitted representations made on behalf of PSL in full.**

Object. Representations have previously been submitted in response to both the Local Plan Part 1 Regulation 19 Consultation and the Local Plan Part 2 Regulation 18 Consultation, questioning the justification for Gypsy and Traveller provision at the STRA2 – Land South of Mickleover allocation. These comments remain valid.

It is considered that SDDC should have regard to the guidance prepared by the National Policy Advisory Panel on Gypsy and Traveller Housing, 'Places We're Proud Of', which sets out a range of approaches to meeting identified needs. In relation to strategic sites, reference is made to the Mid Devon Local Plan, which establishes that pitches should be provided on-site within urban extensions unless it can be demonstrated that off-site provision would achieve an acceptable outcome for Gypsies and Travellers in terms of pitch numbers, site facilities and accessibility to services.

Following further discussion with SDDC, it is understood that an off-site solution would be supported in lieu of on-site provision, with a financial contribution used by the Council to acquire land and deliver pitches.

It is noted that the Social and Affordable Homes Programme (SAHP) 2026–2036, which primarily funds the supply of new-build affordable housing, also supports the delivery of Traveller pitches. The Programme guidance includes a case study demonstrating how a previous iteration of this funding was used to deliver a scheme of 13 pitches in Norwich. It is therefore considered that SDDC should explore the feasibility of a similar bespoke project where a locational need can be justified.

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward**

your suggested revised wording of any policy or text. Please be as precise as possible.

**Please refer to submitted representations made on behalf of PSL in full.**

The need for pitch provision and quantum as part of the allocation site (STRA2) needs to be clearly justified.

Further it is understood that an off-site solution would be supported in lieu of on-site provision, with a financial contribution used by the Council to acquire land and deliver pitches, such an approach needs to be clearly reflected in the policy requirements to enable effective delivery.

*(Continue on a separate sheet /expand box if necessary)*

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**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Please check the relevant box

No, I do not wish to participate in hearing sessions	
Yes, I wish to participate in hearing sessions	✓

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

The emerging Local Plan Part 1 Review proposes two Strategic Allocations. Parker Strategic Land controls 58% of the 195 hectares of land proposed to be allocated at 'Land South of Mickleover' (Policy STRA2).

As a key stakeholder it is important that the opportunity for oral evidence is provided to further expand on points made throughout the representation submissions.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the

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PM15		PM37	
PM16		PM38	
PM17		PM39	
PM18		PM40	
PM19		PM41	
PM20		PM42	✓
PM21	Other (Please specify)		
PM22			

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
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2) Sound		
(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		
a) Positively prepared		
b) Justified		✓
c) Effective		

d) Consistent with national policy		
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Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Local Plan does not comply with). If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Please refer to submitted representations made on behalf of PSL in full.**

Object. The Council's Housing Trajectory assumes a maximum delivery rate of 150 dwellings per annum at Land South of Mickleover. However, it is considered that a site of this scale could sustain annual delivery rates of 200 to 240 dwellings per year from multiple outlets across the site.

Please also refer to representations submitted in response to the Local Plan Part 1 Regulation 19 Consultation and the Local Plan Part 2 Regulation 18 Consultation, and to the response to proposed modification AM53 below.

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Please refer to submitted representations made on behalf of PSL in full.**

Representations submitted in response to both the Local Plan Part 1 Regulation 19 Consultation and the Local Plan Part 2 Regulation 18 Consultation highlighted that the site is capable of delivering an average of 50 to 60 dwellings per year per outlet, which at peak delivery could result in approximately 200 to 240 dwellings per annum from multiple outlets across the site.

On this basis, it is anticipated that 2,100 dwellings could be delivered in total across the plan period from the PSL site, with further delivery possible from other outlets on land controlled by the wider allocation land promoters.

(Continue on a separate sheet /expand box if necessary)

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PM15		PM37	
PM16		PM38	
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PM18		PM40	
PM19		PM41	
PM20		PM42	
PM21		Other (Please specify) ✓ AM53	
PM22			

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Whilst the increase in anticipated dwellings at STRA2 over the plan period is welcomed, the figure is still considered to underestimate delivery potential. It is anticipated that the site can deliver at a faster rate than the conservative approach taken by SDDC.

Representations submitted in response to both the Local Plan Part 1 Regulation 19 Consultation and the Local Plan Part 2 Regulation 18 Consultation highlighted that the site is capable of delivering an average of 50 to 60 dwellings per year per outlet, which at peak delivery could result in approximately 200 to 240 dwellings per annum from multiple outlets across the site.

On this basis, it is anticipated that 2,100 dwellings could be delivered in total across the plan period from the PSL site, with further delivery possible from other outlets on land controlled by the wider allocation land promoters.

It is therefore considered necessary to amend AM53 to update the housing requirement as follows:

'STRA2: Land South of Mickleover – A minimum of 2,100 dwellings within the plan period.'

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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It is therefore considered necessary to amend AM53 to update the housing requirement as follows:

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(Continue on a separate sheet /expand box if necessary)

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Please check the relevant box

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PM15		PM37	
PM16		PM38	
PM17		PM39	
PM18		PM40	
PM19		PM41	
PM20		PM42	
PM21		Other (Please specify) ✓ AM73	
PM22			

<b>4. Do you consider the Local Plan is:</b>		
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	Yes	No
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(If you check 'No', please also confirm below which of the 'tests' it fails to meet)		
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Suggested alternative wording is proposed to the Council's proposed modification AM73 as set out in the table within the full representations submitted. This includes justification for the proposed changes.

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**Please refer to submitted representations made on behalf of PSL in full.**

Please refer to submitted representations made on behalf of PSL for full proposed wording changes and the reasoning for these suggestions.

(Continue on a separate sheet /expand box if necessary)

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Please check the relevant box

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Please return your completed representation form(s) by post to: Planning Policy Team, Council Offices, Civic Way, Swadlincote, DE11 0AH

Forms must be received by **5pm on Tuesday 16<sup>th</sup> June 2026**.