

South Derbyshire Local Plan

Local Plan Part 1 Review

Submission Topic Paper

Employment

August 2026



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Introduction

- 1 This paper identifies relevant national policy and guidance; sub regional and local economic strategies; and the Local Plan evidence base. This paper also explains how these are reflected in the Local Plan employment strategy, allocations and policies.
 - a) Employment land for these purposes comprises:
 - offices (use class E(g)(i))
 - research & development (E(g)(ii))
 - light industrial (E(g)(iii))
 - industrial (B2)
 - warehouse and distribution (B8).

Executive Summary

- 2 South Derbyshire benefits from a strong strategic location at the heart of the Midlands, making it an attractive destination for business investment. The A50 corridor is a recognised logistics hotspot providing Strategic Road Network links between the M1 and M6 Motorways, which attracts interest from third-party logistics development. The area's attractiveness is furthered by the proposed East Midlands Intermodal Park in South Derbyshire which is part of the wider East Midlands Freeport and its proximity to existing large manufacturers such as Toyota, Rolls Royce and JCB, supporting continued demand for employment land and premises. Manufacturing is South Derbyshire's most important sector, providing 21% of jobs - three times higher than the national average for the sector.
- 3 South Derbyshire District Council (SDDC) has fully cooperated with neighbouring authorities, particularly in meeting cross boundary employment need.
- 4 SDDC has a strong history of delivery of employment land and with the additional allocations proposed in the LPP1 there is a surplus over the plan period.
- 5 The Employment Land Review (ELR), as conducted by BE Group in October 2023, recommends that there is not a quantifiable need for additional employment allocations. Notwithstanding this the Local Plan follows the recommendations to allocate additional land for employment at STRA1 Infinity Garden Village 70ha, STRA3 Drakelow 68ha, and the Freeport site 173ha under Policy INF3. In addition, Midlands Connect have done additional work

on the A50 corridor highlighting congestion issues and promoting it as a manufacturing location

<https://www.midlandsconnect.uk/media/wmfd0ufx/driving-economic-growth-on-the-a50-a500-corridor-business-perceptions-report.pdf>

<https://fifty500.com/corridor/>

6. In line with this evidence, Infinity Garden Village (IGV) (STRA1), the Freeport site (INF3) and the extension to Dove Valley Park will contain sizeable proportions of logistics development and IGV is subject to a masterplan process to achieve this. Therefore, given the extensive provision above the quantifiable need for new employment development and the positive approach the plan takes to addressing growth opportunities significantly above SDDC need, sufficient evidence is in place from the Employment Needs Study to inform the policies in the Local Plan. Notwithstanding this, there will be smaller allocations in the Local Plan Part 2 Review (LPP2) for housing led schemes, and whilst the Council is not anticipating additional employment allocations, there remains the opportunity for smaller scale allocations in LPP2 if required.
- 6 All recommendations from the ELR, have been addressed in the LLP1, except where they relate to future actions which the policies and allocations in the plan will positively facilitate.
- 7 Proposed employment sites have been tested against reasonable alternatives, and the allocated sites are found to comprise Sustainable Development. The strategy follows the evidence produced through various Sustainability Appraisals and the Employment Land Review. Whilst criticism has been received regarding a focus on quantity rather than quality of sites, allocated strategic sites are adjacent to or within close proximity to existing employment opportunities, sustainable and active travel links to which will form a key part of the Strategic Masterplan requirement set out in part F of the respective STRA1 and STRA2 LPP1 policies.

National Policy

- 8 The [National Planning Policy Framework \(2023\)](#) (NPPF) (paragraph 85) states that planning policies “*should help create conditions within which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future*”.

- 9 Paragraph 86 of the NPPF says that planning policies should:
- a) *set out a clear economic vision and strategy which positively and proactively encourage sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
 - b) *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
 - c) *seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
 - d) *be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.*
- 10 *Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations (NPPF Paragraph 87).*
- 11 In regard to rural areas, the NPPF (paragraph 88) says that *planning policies and decisions should enable:*
- a) *the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;*
 - b) *the development and diversification of agricultural and other land-based rural businesses;*
 - c) *sustainable rural tourism and leisure developments which respect the character of the countryside; and*
 - d) *the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*
- 12 *Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist (NPPF Paragraph 89).*

Planning Practice Guidance (PPG)

- 13 [Planning Practice Guidance](#) (PPG) refers to the need for an economic land availability assessment to be used in identifying a future supply of land which is suitable, available and achievable for economic development uses over the plan period.
- 14 The PPG refers to an evidence base for identifying employment land needs. These include the identification of the Functional Market Area; the existing stock of land for employment uses; the recent pattern of employment land supply and loss; evidence of market demand; wider market signals and any evidence of market failure. Particular attention is given to the needs of the logistics sector and those of specialist or new sectors.

The UK's Modern Industrial Strategy

- 15 The [UK's Modern Industrial Strategy](#) published in 2025, seeks to make it easier and simpler for companies to do business, giving them the stability to make long term investments. It identifies priority sectors for growth and support as advanced manufacturing, creative industries, life sciences, clean energy, defence, digital and technologies, professional and business services, financial services and foundational industries.

Local Policy

The East Midlands Growth Plan

- 16 The [East Midlands Growth Plan](#), published by the East Midlands Combined County Authority, seeks to deliver inclusive economic growth across the region. It identifies five sectors that offer the greatest potential to achieve this. Four of these align directly with the government's Industrial Strategy: clean energy, MedTech and life sciences, advanced manufacturing, and digital, creative and cultural Industries. The fifth is the visitor economy.
- 17 The Plan identifies a set of Strategic Growth Areas, among which is the Trent Arc, which includes much of the northern part of South Derbyshire, Derby and Nottingham city centres, the East Midlands Freeport, Infinity Park Investment Zone and the former coal-fired power stations at Ratcliffe-on-Soar and Willington. Home to global brands in aerospace and marine propulsion, nuclear Small Modular Reactors (SMRs), rail, and automotive, the area is also renowned for engineering and life sciences. It has the potential to deliver a £2.4bn uplift in Gross Value Added (GVA), 30,000 new homes, and 40,000 new high-quality jobs. The north western part of South Derbyshire lies within the Peaks and Dales growth area where visitor economy opportunities are identified.

Midlands Connect have done additional work on the A50 corridor highlighting congestion issues and promoting it as a manufacturing location

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<https://fifty500.com/corridor/>

South Derbyshire Economic Development and Growth Strategy 2023-27

- 18 The [South Derbyshire Economic Development and Growth Strategy 2023-27](#) sets an economic vision for the District “*To promote greater sustainable economic development and growth in South Derbyshire, in order that it becomes a more prosperous place to live with better jobs and prospects for its residents and businesses*” (page 4).
- 19 This will be achieved through the pursuit of the following key themes, expressed as “ambitions” (page 48):
 - Business Support and Productivity;
 - Low Carbon / Clean Growth and
 - Connectivity and Inclusion.
- 20 Among the “Connectivity and Inclusion” ambitions is the need to ensure the supply of employment land, together with associated access and utility provision, whilst encouraging the regeneration of brownfield sites.
- 21 The Strategy identifies, as a strength, the availability of employment land and redevelopment sites, but notes a shortage of start-up and grow-on business accommodation, including managed accommodation on flexible terms, as a weakness. It also identifies high levels of out-commuting from the District as a weakness, especially to higher level skilled occupations. Opportunities include the East Midlands Intermodal Park Freeport proposal at Egginton Common and the presence of large brownfield sites with potential for new business development, including the former power station sites at Drakelow and Willington.

Strategic Housing and Economic Land Availability Assessment (SHELAA)

- 22 The Council has undertaken a combined Strategic Housing and Economic Land Availability Assessment from 2019 onwards by issuing a call for sites which were then assessed for their development potential, suitability, availability and achievability. Over 200 sites were initially submitted for assessment, of which 39 were proposed either partially or wholly for

employment uses. No end date for the exercise was identified and subsequent to those initially received a further seven potential employment sites have been submitted for assessment.

Derby and South Derbyshire Employment Land Review

- 23 This independent [Employment Land Review \(ELR\)](#), published in October 2023, was jointly commissioned by Derby City Council and South Derbyshire District Council. It forecasts local employment land needs for the period 2022-2041, assesses the suitability of the current stock of employment land and premises and considers options for how any shortfall in provision, in both quantitative and qualitative terms, can be met.
- 24 Quantitative need forecasts are calculated using three different methodologies:
- Model 1: Historic land take up: a forward projection of historic land take up trends. This showed that, taking account of land already available there was a surplus of 6.97ha of employment land in South Derbyshire to 2041.
 - Model 2A: Labour demand: this looks at job growth, as identified in Oxford Economics, Cambridge Econometrics and Experian and translates this into employment floorspace and land needs. These showed employment land surpluses of 65.29 ha, 35.69 ha and 26.29 ha respectively.
 - Model 2B: This looks at the baseline employment forecasts produced by Model 2A and factors in the East Midlands Freeport site at Egginton Common (Local Plan Part 1 Review Allocation INF3). In the case of the Oxford Economics forecast this shows a surplus of 1.79ha, whilst for Cambridge Econometrics and Experian it shows deficits (i.e. further needs) of 34.81 ha and 41.97 ha respectively.
 - Resident Workforce Forecast: As part of the Local Plan development process, the Councils have identified two preferred scenarios for projecting population and jobs growth in Derby and South Derbyshire. These can be converted into a forecast of land needs, using a methodology comparable to that for Model 2. This shows a land need of 29.6 ha for South Derbyshire, although it is important to note that this represents the employment land requirement specifically from these population/jobs growth scenarios and is not a forecast of objectively assessed need for the whole Derby and South Derbyshire economy.
- 25 The Study recommends the use of Model 1 as the basis for identifying the employment land need to be met through Local Plan policy. On this basis it can be concluded that South Derbyshire already has a sufficient quantity of land to meet its own needs.

- 26 However, the Study identifies that the development of additional land may potentially still be justified for the following reasons:
- to enhance the sustainability of housing-led mixed-use developments by providing for an element of employment development on site;
 - to enable the expansion of premises occupied by established businesses, allowing them to continue to grow and prosper within the District;
 - to provide for particular types of business accommodation for which there is an identified unmet demand within the District, such as small and grow-on units;
 - to allow for employment development beyond settlement boundaries to help diversify the rural economy;
 - to meet the locational requirements of particular economic sectors;
 - to provide for regional and sub-regional business accommodation needs;
 - to allow flexibility in responding to currently unanticipated needs;
 - to balance any loss of established employment sites.
- 27 The Study considers regional and sub regional demand for strategic distribution facilities. Whilst it acknowledges that this demand exists and that the A50 corridor represents an attractive location for such development, the absence of a sub-regional scale study means that the extent of any unmet need has not been quantified. However, the proposed East Midlands Freeport Strategic Rail Freight Interchange site (SHELAA site 130, LPP1 allocation INF3) presents a substantial opportunity to accommodate such development at scale with 173 ha of developable land available. The ELR states that: *“Model one does not specifically allow for growth at Egginton Common, in South Derbyshire which should be considered a strategic development site, meeting larger than local needs, and distinct from the local needs identified in Model 1”* (para 10.75).
- 28 The Study also assessed 39 South Derbyshire sites (Table 1) identified as having employment potential as part of the SHELAA for their suitability against market and deliverability criteria and graded A-E. Those graded A+ - B-, of which there were 14, were identified as realistic options for employment land supply.

Table 1: Assessment of SHELAA sites identified as having employment potential

Site Reference	Grade
DER/0289: Land South of Chequers Road/Land to the rear of the Cattle Market, Chequers Road	D

DER/279: Former Ram Arena, Raynesway	D (increasing to C if constraints can be addressed)
DER/318: Infinity Park Extension, Land to south of Sinfin Moor Lane	E
Land at Breadsall Hilltop (Area B)	D
002: Land at John Street, Church Gresley	C
007: West of Main Street, Egginton	C
020: Old Shardlow Nurseries, London Road, Shardlow	C
024/067/198: Land south of Uttoxeter Road, Foston	B-
026: High Cross, Linton Heath	D
051: Land adjoining Gorsey Lane, Netherseal	D
055: East of Swarkestone Road, Chellaston	D
057: Land north west of Swarkestone Road, Chellaston	B-
061: Land to the East side of Swarkestone Road, Spring Farm, Chellaston	A-
090 (Including 137): Infinity Garden Village, Land between Sinfin and Chellaston (Including Land East of Deep Dale Lane, Derby)	A-
096: Access 50 (Previously Axis 50), Willington	A+
117: Land at Mercia Marina, Findern Lane, Willington	B-
120: Land south west of Micklemeadow B	C
130: Land south of the A50 (Strategic Rail Freight Interchange)	A-
136: Land south of Mickleover	C
138: Willington Power Station	D
150: Talbot Farm, 75 Derby Road, Hilton	B+
152: Bonehill Farm, Etwall Lane, Burnaston	B-
154: Liberty Farm, Burnaston	D
155: Land at Bannell's Lane and Etwall Road, Mickleover	B-
156: Land lying on the north east side of Bannell's Lane, Mickleover	B-
158: Land to the north of New Buildings Farm, Burnaston	C
159: New Range Farm, Burnaston	C
161: Land to the east of the A38 and south of Doles Lane, Findern	C
162: Land north east of the A38 A50 Toyota junction, Findern	A-
164: Land at the former Hilton Depot (east), south of The Mease, Hilton	C
167: Kings Newton Lane Part 1, Kings Newton	D
168: Kings Newton Lane Part 2, Kings Newton	D

169: Trent Lane, Kings Newton	E
172: Derby Airfield (SE), Egginton	D
173: Derby Airfield (SW), Egginton	D
185: Land at Colliery Lane, Linton	D
190: Land adjacent to Fourways, Little Derby Hill, Burnaston	D
192: Land North West of A516, north of Hilton	B-
195: Land at Cadley Lane, Castle Gresley	C
199: Land at Aston Lane, Shardlow	C
200: Cowlshaw, Shardlow	D
211: Former Drakelow Power Station	B- (potentially increasing to A- with transport investment)
214: Hay Lane, Foston	C

- 29 The study sets out a series of recommendations, among which is that consideration be given to the identification of a new strategic scale site at Egginton Common (the Freeport site). The recommendations of the study are identified and considered under the ‘Conclusions and Recommendations’ section of this Topic Paper.
- 30 The study also assessed the suitability of undeveloped employment land allocations identified in the adopted South Derbyshire Local Plan Part 1 and recommended that all but one of these (Policy E1B – a 3.71ha site at Hilton) be rolled forward for inclusion in the Local Plan Part 1 review. Whilst Hilton Business Park remains an active employment location, future employment is expected to come through small-scale employment developments, expansion of existing business, rural diversification, and protection to existing employment. Therefore, this site is no longer identified as a strategic employment allocation.

Sustainability Appraisal of Potential Employment Sites

- 31 The Council commissioned consultants SLR to undertake a Sustainability Appraisal which included a study of the employment sites identified in the ELR as realistic options for employment land supply.
- 32 The SA assessed 14 potential employment site options across South Derbyshire. Most sites performed positively overall against economy (SO6, and employment (SO7) objectives. Therefore, reflecting their potential to support business growth, inward investment and job creation.
- 33 Significant positive effects were associated in the SA with the strategic employment locations of Infinity Garden Village, Land South of the A50

(Freeport/SFRI) and the Former Drakelow Power Station. This aligns with SDDC's wider economic growth strategy, and the preferred employment allocations therefore remain.

- 34 A further site, S234, was submitted after the ELR assessment had been completed, but was added to the Sustainability Appraisal as a natural extension to adjoining site S192.

Local Plan Part 1 Review:

11a. Local Plan Part 1 Review consultation responses

- 35 In response to the Issues and Options consultation of October 2022, there was general support for employment development within the District to support the local economy, informed by the emerging Employment Land Study. The proposed Freeport was identified as a key consideration. The majority of respondents considered that South Derbyshire's employment needs should be met in full within the District. It was considered that poor past delivery and lack of employment land potential in Derby City should influence the quantum and location of future development within the District. It was also considered that the likelihood of global pressures on resources (e.g. food and energy) and the development of new technology meant that flexibility, in the type and quantum of employment land allocations and in terms of policies, would be key to ensure a strong and resilient economy. Policy should aim to retain existing employers and support the expansion of existing sites.
- 36 Generally, landowners and developers suggested that the LP should build on the strengths of the District's central geographic location with access to the strategic road network (i.e. the A50 corridor) being key for determining locations for growth. Proximity to a skilled workforce and coexistence with existing urban areas and allocations (e.g. Infinity Garden Village) were also considered to be key influences for the location of future growth. Other respondents suggested that the character of the area should influence where employment is located, and that new employment development should deliver a high-quality environment both in terms of biodiversity and amenity for users.

11b. Local Plan Part 1 Review: Vision and Objectives

- 37 The Vision states that: *"By 2042, the economy will have grown with more jobs in a more diverse business environment supported by a more skilled, diverse workforce."*
- 38 *"Major urban renewal will also have taken place in the wider Swadlincote urban area with the reclamation and re-development of underused and derelict brownfield land south of Woodville. This will create new employment*

land and housing, significantly enhancing the environment and job opportunities in the area.;

39 *Agricultural employment and diversification will continue to play a significant role throughout the rural areas of the District, with the high level of productivity and associated business that this brings with it. Employment growth will also continue with the development of the East Midlands Intermodal Park Strategic Rail Freight Interchange/East Midlands Freeport within the District."*

40 Among the Local Plan Strategic Objectives are the following:

"3. To enable, support and promote a robust and diverse economy, resistant to downturns and providing a strong base for sustainable growth which respects environmental limits and safeguards natural resources."

"10. To make the most of the economic, social and environmental opportunities presented by the District's central location within the National Forest and promote the continued growth of local tourism and leisure offer across the whole of the District."

11c. Sustainable Growth Strategy (Policy S1) and Employment Land Strategy (Policy S5)

41 These policies seek to retain, promote and regenerate employment development (Use Classes E(g), B2 and B8) to meet SDDC's needs through the provision of sites measuring 178-183ha, comprising sites in urban areas, on the edge of the Derby urban area, brownfield sites at Drakelow, Dove Valley and Hilton and sites within the Swadlincote urban area. In addition, a site comprising 173ha to help meet national and regional needs is allocated at Egginton Common for an East Midlands Intermodal Park Strategic Rail Freight Interchange/ East Midlands Freeport.

11d. Employment Policies E1, E2, E3, E6 and E7

42 Policy E1: Strategic Employment Land Allocations provides more detail on site allocations and in Part B requires that provision be made as part of a number of these for the development of small and grow-on business accommodation. It also seeks to protect new office, light industrial and research and development uses by conditioning planning permissions to restrict changes of use.

43 Policy E2 allows for employment development on land outside allocated sites within settlement boundaries; where it is for the redevelopment of existing employment land and premises or for the expansion of an existing business.

44 Policy E3 allows for changes of use of existing employment land and premises only where the existing use is harmful to the amenity of neighbouring uses or

where marketing demonstrates that there is no demand for use of the site for these purposes.

- 45 Policy E6 protects land in Woodville for employment-led redevelopment to enable social, economic and environmental regeneration.
- 46 Policy E7 allows for rural employment development to support the social and economic needs of rural communities.

11e. Policy INF3: East Midlands Intermodal Park Strategic Rail Freight Interchange/ East Midlands Freeport

- 47 The East Midlands Freeport has been approved by the UK Government and has been operational since 2023. It aims to deliver a low carbon advanced manufacturing and logistics hub, with connectivity by rail, road and air. It will deliver through three major development sites: East Midlands Airport and Gateway Industrial Cluster (EMAGIC), Ratcliffe-on-Soar Power Station and East Midlands Intermodal Park.
- 48 The LPP1, para 1.25, states that the proposed Egginton Common Strategic Rail Freight Interchange (SRFI) would represent a Nationally Significant Infrastructure Project (NSIP). NSIPs are projects which are considered by the Government to be of such national importance that permission to build them needs to be given at national level. NSIPs are therefore not determined by the local planning authority, but rather are given planning permission via a Development Consent Order (DCO). This is an application for approval to construct a NSIP and is dealt with by the Planning Inspectorate, which recommends the application to the Secretary of State, whom in turn has the authority to decide upon whether development should go ahead. The role of the local planning authority (in this case the District Council) is that of a statutory consultee.
- 49 In response to the Regulation 19 Consultation and the Regulation 19 Addendum Consultation the Council received strong support for East Midlands Intermodal Park (EMIP) under policy INF3 to attract inward investment and deliver economic benefits at local, regional and national scales. The East Midlands Freeport describes EMIP as a next-generation rail-connected employment park which supports manufacturing and logistics sectors, benefits from proximity to Toyota and the wider automotive sector, and has potential for a modal shift from road to rail freight. However, EMF raise concerns that the policy is too prescriptive regarding NSIP status and rail connectivity requirements.
- 50 It is understood from the Regulation 19 Addendum consultation that landowners of Access 50 are working with East Midlands Freeport on developing potential access options for the East Midlands Intermodal Park (EMIP), including

potential new connections across the A38 and/or the A50. The site is immediately adjacent to this major infrastructure project and may support early delivery with enhanced early access options to the Freeport.

Current Employment Land Supply

- 51 Using the historic employment land take up model (Model 1) the ELR identified a need for 39.12ha of employment land to 2041. Extrapolating this figure to cover the period to 2042 gives a need of 40.75 ha. Employment land supply at the LPP1 review base date of 1 April 2022, measured 46.09ha. Therefore, in quantitative terms, there was an oversupply of 5.34ha. However, a planning permission which formed part of the available land supply at 1 April 2022, measuring 1 ha, has since lapsed (DMPA/2020/0939) bringing the total supply surplus to 4.34ha.
- 52 Since 1 April 2022 there have been further employment land gains and losses as set out in Table 2. The gains recorded comprise land that was not included in the ELR as forming part of available land supply as at 1 April 2022 and therefore represents additional new land. It can be seen that the total supply of new land identified since 1 April 2022 is 45.39ha. Adding to this the employment land surplus identified at 1 April 2022 gives a gross total of 49.73ha. From this figure must be deducted losses of established employment sites since 1 April 2022, measuring 4.52ha in total. Deducting this figure from the gross total gives a net total of **45.21ha**.

Table 2: Employment land supply change 1 April 2022 – 31 March 2026

A. New sites Completed since 2022	Area (ha.)
Dove Valley Park, Foston	16.67
ATL Unit DC2, Woodyard Lane, Foston	2.32
Small sites (less than 1ha)	4.58
Total	23.58
B. New sites Under Construction	
ATL Foston	3.9
Land East of Dove Valley Park, Foston	14.62
Total	19.18
C. New sites with Planning Permission	
Land North of Derby Road, Hilton	1.4
Small sites combined (all less than 1ha.)	1.23
Total	2.63

D. Total new sites (A+B+C)	45.39
E. Employment land need forecast 2022-2042	40.75
F. Employment land provision as at April 2022 (46.09ha minus 1ha representing lapsed planning permission)	45.09
G. Employment Land Surplus at 1 April, 2022 (E-F)	4.34
H. Total land supply (D+E)	49.73
G. Loss of Employment Land since 2022	
Walton Road, Drakelow	4
Small sites (less than 1ha)	0.52
Total	4.52
H. Net employment land surplus (E-F)	45.21

Conclusions and Recommendations

53 The policy background and evidence discussed in this paper and how these have informed emerging Local Plan policy are considered in the context of the recommendations of the ELR, as set out below.

Recommendation 1 – Defining and Protecting the Current Realistic Land Supply

54 The ELR identifies and assesses the sites comprising the employment land supply, which, as at 1 April 2022, measured 46.09ha in South Derbyshire. It concludes that, with the exception of sites considered to be of insufficient quality, these sites should be protected from loss to alternative uses. The emerging LPP1 therefore seeks to protect employment land from loss to other uses by:

- retaining undeveloped land allocated for employment development in the adopted LPP1 (Policy E1), except for a 3.71ha parcel at Egginton Road, Hilton; and
- protecting land with an established employment use against loss to other uses, except where the existing use represents a ‘bad neighbour’ activity or where marketing has demonstrated that continued use of the site for employment purposes is no longer viable (Policy E3).

Recommendation 2 – Defining the Objectively Assessed Need

55 The ELR recommends that the Council’s should adopt the Model 1 land take-up scenario. This identifies a need for 39.12ha for South Derbyshire for the period 2022-2041. Extrapolating the need to cover the period 2022-2042 results

in a figure of 40.75ha. In quantitative terms this need was already met by sites comprising the existing employment land supply at the Local Plan base date, 1 April 2022. The extent of the surplus supply has been further extended by subsequent planning permissions on unallocated sites (see Table 2).

Recommendation 3 – Potential New Strategic Allocations

- 56 The ELR recommends that to allow strategic growth, reflect national policy and allow the re-use of major infrastructure sites, the Council should consider allocating the following SHELAA sites to meet larger than local needs:
- Site 090 (including 137): Infinity Garden Village, Land between Sinfin and Chellaston (Including Land East of Deep Dale Lane, Derby) (the part of this location identified as an employment land allocation as part of the LPP1 measures 70ha).
 - Site 130: Land south of the A50 (Strategic Rail Freight Interchange) (255 ha of which 173 ha is employment development)
 - Site 211: Former Drakelow Power Station (68 ha)
- 57 **Site 090 (including 137) is identified as part of allocation STRA1**, as part of the wider mixed use Infinity Garden Village development and will represent the southward expansion of the Infinity Park business location within Derby City, parts of which have already been completed or are under construction. Access to the trunk road network will be provided via a new A50 junction and the planned South Derby Integrated Transport Link, with attractive active travel connections to nearby residential areas, services and facilities. The site will address both the local and sub-regional business markets, with development comprising large scale units and small to medium scale accommodation.
- 58 **Site 130 (Strategic Rail Freight Interchange), is identified as allocation INF3** to accommodate a rail connected facility representing part of the East Midlands Freeport initiative. As it would represent a Nationally Significant Infrastructure Project (NSIP) development consent would need to be given at national level, rather than by the local planning authority. Whilst the site as a whole measures 255ha, only the area to the north of the Derby-Crewe railway line (measuring 173ha) is to be used to accommodate built development, the area to the south being reserved for associated blue and green infrastructure and open recreational uses.
- 59 As recommended by the ELR, para.10.88, it has been determined that the circa 170ha of developable land at Site 130 (Land south of the A50 (Strategic Rail Freight Interchange) as part of the national Freeport programme would be of strategic scope, meeting the property requirements of national and international businesses, so its development would not contribute to the local need identified in the Model 1 forecast.

- 60 **Site 211, Former Drakelow Power Station, is identified as allocation STRA3.** The allocation of the site was made through adopted policy in the Part 2 Local Plan (BNE12), and LPP1 Policy STRA3 sets out detailed policy requirements. The site comprises previously developed land, supporting sustainable employment growth in the south of the District. The soon to be completed Walton on-Trent Bypass highway link will provide convenient access to the A38. The site will provide land suitable for business accommodation of a range of sizes including small and grow-on units. Business growth in this location will help to balance the large-scale housing development taking place as part of the adjacent Drakelow Park mixed use scheme. New active travel links and improved public transport services will be needed to ensure sustainable accessibility.
- 61 In addition to these a further site, measuring 5-10ha, representing part of SHELAA **Site 136, has been identified as part of the STRA2 multi-use allocation.** This represents part of SHELAA site S136.
- 62 Added to the current employment provision identified in Table 2, the new LPP1 allocations (excluding site INF3) give total provision for the District of 188.21 – 193.21ha over and above the forecast local need for the plan period identified in the ELR using Model 1, as shown in Table 3, below.

Table 3: Total Employment Land Provision (excluding the Freeport)

Allocations	Area (ha)
STRA1 Infinity Garden Village	70
STRA2 Land South of Mickleover	5-10
STRA3 Land at the Former Drakelow Power Station	68
Net employment land surplus at 1 April 2026	45.21
Total	188.21-193.21

- 63 This level of provision does not represent an employment land development target and it should be noted that national planning policy and practice guidance do not require Local Plans to set such targets. Rather is intended to provide choice and flexibility for business investors in terms of development location and scale.
- 64 Forecasting the quantum of employment land need is far from an exact science, particularly over a period of fifteen years, during which time there is enormous scope for unforeseeable change in the economic context. The Council's approach is therefore intended to provide the capacity to respond to unexpected circumstances.
- 65 To help support the economy of the whole of SDDC the strategic allocations are distributed between the north and south of the District. Close proximity to strategic housing development is a prime consideration in order to enable sustainable access to jobs.

- 66 The new strategic allocations are intended to provide for the accommodation needs of a wide range of different types and sizes of business from start-up and growing enterprises to medium and large scale units. LPP1 Policy E1B requires that development on sites allocated at E1A, E1B, E1C, E1D, E1E, STRA1, STRA2 and STRA3 shall include provision to meet the needs of small and “grow on” businesses with respective floor areas of 100-200sqm and 200-1000sqm. Policy E1C allocates land to the north of Dove Valley Business Park for the development of large scale industrial and business units only, as defined by Use Classes B2 and B8. The minimum gross internal floor area per unit will be 15,000 sqm.
- 67 This provision is supplemented by existing planning permissions on unallocated sites of various sizes across the District, including on land to the east of Dove Valley Business Park, measuring 14.62ha to accommodate two units measuring 37,386 sqm and 13,025sqm respectively (planning application DMPA/2025/1570).

Recommendation 4 – Meeting Business Needs: Land Recycling, Small Site and Infill Developments

- 68 The ELR recommendations reflect the evidence that there is no identified quantitative need for significant new employment land, but there does remain an ongoing requirement for smaller premises serving local businesses to help meet employment needs while making efficient use of previously developed land and existing employment locations.
- 69 LPP1 Policy E2 supports industrial and business development where it is within a settlement boundary, or it is for the redevelopment of established industrial or business land or premises or is for the expansion of an existing business. The policy takes a positive approach to extensions or expansion of existing businesses, as this can help to ensure the retention and growth of local employers.

Recommendation 5 – Office Development in Derby City Centre

- 70 Recommendation 5 of the ELR relates to the support for office development within Derby City Centre. This is not something that can be directly addressed through the SDDC LPP1. However, indirectly it is partially addressed with the positive approach to growth particularly in relation to exceeding SDDC housing need by over 5,000 homes to provide high quality homes that are well connected to Derby for the potential pool of workers which will add to the attraction of office developers investing in Derby City Centre.

Recommendation 6 – Office Development in South Derbyshire

- 71 ELR recommendation 6 supports a flexible and market-responsive approach to office development within South Derbyshire; recognising the demand for

smaller premises and high value employment sectors. Evidence demonstrates that South Derbyshire has a consistent demand for office space, with projected increases of between 1,137 and 4,058 office jobs by 2041 and further growth in ICT-related employment.

- 72 LPP1 Policy E1 sets out that use class E(g), which includes offices, is permitted at a number of allocations, is carried forwards from the adopted Local Plan and the new strategic housing-led allocations at STRA1 and STRA2. This policy also includes a requirement that new E(g) use class provision will be restricted through planning conditions from changing use outside that Use Class to protect future accommodation needs.
- 73 In addition, the Local Plan Part 2 will cover the retail and town centre policies to which this recommendation mostly relates, though the emerging LPP1 policies do not rule out small scale office development in other locations, such as part of rural employment development within policy E7.

Recommendation 7 – Business Expansion Under Policy E2

- 74 The ELR suggests that, subject to other planning considerations, SDDC policy continues to flexibly allow business growth and expansion on sites identified for their needs.
- 75 LPP1 Policy E2 supports industrial and business development where it is for the expansion of an existing business. The policy takes a positive approach to extensions or expansion of existing businesses, as this can help to ensure the retention and growth of local employers.

Recommendation 8 – Encouraging Rural Economic Diversification

- 76 The ELR recommends that a rural diversification policy is adopted in South Derbyshire which indicates support for E(g)/B2/B8 developments which are appropriate to their location.
- 77 LPP1 Policy E7 provides support for industrial and business development outside settlement boundaries, including the re-use, conversion or replacement of existing buildings, or the development of new buildings where no alternative suitable accommodation is available.

Recommendation 9 – Retention of Existing Employment Areas

- 78 This ELR recommendation supports the protection of existing employment areas that continue to accommodate businesses and provide jobs across the District.
- 79 LPP1 Policy E3 aims to protect existing employment areas unless it can be demonstrated that the existing use is significantly harmful to the amenity of neighbouring land uses that cannot be overcome or where there has been no demand for the use of the site within a 12-month period.

Recommendation 10 – Support for Skills Development

- 80 Recommendation 10 of the ELR supports improvements in sub-regional skills provision, particularly in engineering and technical sectors. This is addressed through LPP1 Policy INF1(D) which requires developer contributions toward recruitment, skills and training programmes to ensure that the benefits of development are maximised for local communities.

Recommendation 11 – Monitoring

- 81 ELR recommendation 11 supports the monitoring of losses of office premises, to other uses, as a priority. This activity is already undertaken by the Council and is published annually in the Authority Monitoring Report (AMR).

Recommendation 12 – Future Reviews

- 82 Recommendation 12 of the ELR suggests the review and monitoring of the employment land and premises position and the re-assessment of the study again in about five years. The monitoring of employment land and premises is already undertaken by the Council and is published annually in the Authority Monitoring Report (AMR). SDDC will review the evidence base to support a new style Local Plan which will commence within 5 years of the adoption of the existing Local Plan.

Recommendation 13 – Cross Boundary Matters and External Influences

- 83 Recommendation 13 supports continued cross-boundary collaboration with neighbouring authorities to address shared economic and employment issues. SDDC has a long history of effective cross-boundary collaboration with its neighbouring authorities, particularly within the Housing Market Area and this will continue.

Conclusion

- 84 The Council has taken a proactive approach to employment needs with policies and allocations that go significantly further than the quantified need for such development. There is evidence in place from the Council's Employment Land Review and from Midlands connect that the A50 corridor is an attractive location for further manufacturing and logistics development and the plan has allocations and policies to support this including the Freeport, and employment opportunities at STRA1 in particular. There is a need for smaller units in sustainable locations elsewhere in the District and this is being taken forward in policies in the Local Plan Part 2.
- 85 Regarding business parks there are policies in this Local Plan which assist in seeing that such developments will include the necessary infrastructure including consideration of utility provision sufficient for manufacturing activities

(power, water/wastewater, broadband, etc), plus public/active travel provision, and capable of accommodation energy generation (e.g. solar panels).

86. Whilst delivery at the Freeport may take longer to develop, this does not deny adequate opportunities to continue the high levels of employment growth and the housing to support it that this Local Plan provides.