

South Derbyshire

Issues and Options Part 2 Local Plan Review

Paper Response Form

Your reviews are being sought on the South Derbyshire Issues and Options Part 2 Local Plan Review and the Local Plan Part 2 Review Scoping Report.

The consultation documents can be viewed at
www.southderbyshire.gov.uk/issuesandoptionsPart2Review

This form can be used as an alternative to the online questionnaire. Responses should be submitted to the Planning Policy Team by email at local.plan@southderbyshire.gov.uk or via post to Planning Policy, Planning Services, South Derbyshire District Council, Civic Offices, Civic Way, Swadlincote, Derbyshire, DE11 0AH

Comments must be received by 5pm on 30th January 2026, late comments will not be accepted.

[Redacted]

[Redacted]

Name*: Peveril Homes Limited

[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

Privacy Notice - How is your information used?

Representations 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?

South Derbyshire District Council Planning Services. Personal information is not shared with any other department or agency, will not be sold and will not be used for any other purpose.

For further information, please visit our Privacy section of our website at

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

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

- ☒ Produce a Local Plan Part 2 Review under the existing system
☐ Produce a single Full Local Plan under the new system
☐ Other

(Please provide a reason for your answer)

Please see Covering Letter

Question 2: Where should the housing needs be met?

(Please provide site details including projected delivery timescales and the specific need being met).

Please see Covering Letter

Question 3: Are there other mechanisms that the plan should consider to securing housing delivery in addition to allocating specific sites (e.g. identifying indicative broad locations/areas for future growth adjacent to existing settlements, extending settlement boundaries, supporting certain Changes of Use)?

- ☒ Yes ☐ No

(Please provide a reason for your answer)

Please see Covering Letter

Question 4: Are there any other issues that the Council should consider when ensuring the timely delivery of the right homes in the right places (e.g. policy criteria for looked after children, re-allocating unimplemented employment allocations)?

- ☐ Yes ☐ No

(Please provide a reason for your answer)

Question 5: What specific accommodation needs should the Local Plan address through allocations (e.g. extra care accommodation for older people, care home provision for looked after children etc.)?

(Please provide details)

Question 6: What could the Council do to speed up delivery on strategic allocations?
(Please provide details)

Please see Covering Letter

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

☐ Yes

☐ No

(Please provide a reason for your answer)

Question 8: Are there other steps that the Council could take to accelerate housing delivery on other sites?

☐ Yes

☐ No

(Please provide a reason for your answer)

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

☒ Yes

☐ No

(Please provide a reason for your answer)

Please see Covering Letter

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

☒ Yes

☐ No

(Please provide a reason for your answer)

Please see Covering Letter

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

(Please provide a comment)

Please see Covering Letter

Question 12: Do you agree with the retail hierarchy?

☐ Yes

☒ No

(Please provide a reason for your answer)

Please see Covering Letter

Question 13: Should the Council redefine the retail centre in Swadlincote as a commercial centre which would allow for a wider range of uses?

☐ Yes

☐ No

(Please provide a reason for your answer)

Question 14: What issues regarding Swadlincote Town Centre redevelopment should the Council consider?

(Please provide details)

Question 15: Should the Council define the boundaries of all of the retail areas within the District?

☒ Yes

☐ No

(Please provide a reason for your answer)

Question 16: Should the Council include a locally specific Green Belt policy (beyond the NPPF policy) that defines what appropriate development is within the context of 'disproportionate' and 'limited infilling'?

☐ Yes

☐ No

(Please provide a reason for your answer)

Question 17: If you answered yes to question 16, what should the policy consider?

Question 18: Should the Council undertake a Green Belt review with a specific objective of identifying what, if any, Grey Belt exists within the district?

☐ Yes

☐ No

(Please provide a reason for your answer)

Question 19: What other sites and/or options should the Council consider for providing Gypsy and Traveller accommodation?

(Please provide details)

Question 20: Are there any other issues that the Council should consider when meeting the needs of Gypsies and Travellers?

(Please provide details)

Question 21: Are there any additional policies/other issues that the Local Plan should address?

☒ Yes

☐ No

(Please provide a reason for your answer)

Question 22: Are there any amendments required to the existing policies to reflect implemented changes to national planning policy, policy guidance or Regulations?

☒ Yes

☐ No

(Please provide a reason for your answer)

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

☐ Yes

☐ No

(Please provide a reason for your answer)

Question 24: Where there is the potential need for long-term management / maintenance of open space, SUDS or other infrastructure, should the Council introduce a policy requiring these to be adopted by a public authority unless there is clear evidence that this is not feasible.

☐ Yes

☐ No

(Please provide a reason for your answer)

Question 25: Do you have any further/additional comments?

(Please provide details)



29 January 2026

South Derbyshire District Council
Civic Offices, Civic Way
Swadlincote
Derbyshire
DE11 0AH

Sent via email only to local.plan@southderbyshire.gov.uk

Dear Sir/Madam,

**SOUTH DERBYSHIRE LOCAL PLAN PART 2 REVIEW (REGULATION 18) ISSUES AND OPTIONS CONSULTATION
RESPONSE ON BEHALF OF PEVERIL HOMES LIMITED**

Introduction

CarneySweeney have been instructed by Peveril Homes Limited (referred to as 'our client' hereafter) to submit a response to the current consultation on the South Derbyshire Local Plan Part 2 Review (Regulation 18) Issues and Options Consultation. Our client has an interest in part of the land subject to proposed allocation Policy STRA2: Land South of Mickleover in the Part 1 Local Plan Review Publication Version. Our client also has interest in land adjacent to the STRA2 allocation, comprising part of SHELAA Site Reference 158 and SHELAA Site Reference 155 (see plan in Appendix A). These two parcels of land were promoted through the Part 1 Local Plan consultation process as part of the wider strategic site but have not been included within the proposed STRA2 allocation. The response is submitted in this context of our client's land interests both within and without of the STRA2 allocation.

It is noted that the Issues and Options consultation document has 25 consultation questions. Our responses are issued to those questions we consider to be relevant in the context of our client's land interest. For those questions we have not responded to, we reserve our position to make comments or representations on these matters during later stages of the emerging Local Plan but at this Issues and Options stage, do not wish to make any specific comments.

Response to Issues and Options Consultation Questions

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

We consider that the Council should continue to proceed with a two-part Local Plan under the existing planning system. This will allow for plan-led development during the period of uncertainty and delay resulting from the forthcoming Local Government Reorganisation.

It is noted that this will require the Council to follow an ambitious timeline and that it does not deliver the efficiency benefits to be derived from a single plan. However, it is considered that these elements are outweighed by the benefit outlined above.

Question 2: Where should the housing needs be met?

Housing should be delivered in sustainable locations in accordance with the aims and objectives of the Local Plan Part 1. The full potential of strategic allocations and the sustainability benefits derived from creation of new settlements should be realised.

The allocation boundary for STRA2: Land South of Mickleover, shown on Page 60 of the Local Plan Part 1 Review document (Publication Version, March 2025) includes land forming part of SHELAA Site Reference 158 which has been promoted on behalf of our client. Whilst this is welcomed, it is noted that not all the land forming part of SHELAA Site Reference 158 has been included, with some parcels continuing to be excluded from the proposed allocation boundary. In addition, it is further noted that SHELAA Site Reference 155, which has also been promoted on behalf of our client does not form part of strategic allocation STRA2.

The omitted land parcels have formed part of the SHELAA, which have assessed the full extent of Site References 155 and 158 as being 'suitable', 'available' and 'achievable' and coming forward between years 6-10 of the plan period. It is therefore unclear as to why the full extent of Site Reference 158, and Site Reference 155, have not been included within the extent of the allocation boundary in the Part 1 Local Plan (Publication Version March 2025). Assuming that these parcels are not added to the STRA2 allocation during the examination process and prior to adoption, we recommend that the Council gives these remaining parcels further consideration for inclusion as 'Areas for Future Growth' in the Part 2 Local Plan to assist in securing housing delivery in addition to allocated sites.

To aid the Council's consideration, please find enclosed at Appendix B of this response a concept masterplan showing how these additional land parcels could be accommodated in relation to the proposed strategic allocation STRA2. The concept masterplan builds on the approach included at Page 61 of the Local Plan Part 1 Review (Publication Version March 2025).

The concept masterplan at Appendix B demonstrates that the additional land parcels will not conflict with the overall vision for this proposed strategic allocation, providing an opportunity to further enhance the areas of landscaping and provide scope to allow the built form to be designed in a more considered format. These additional parcels will also continue to support the creation of a strategic development on a non-Green Belt site situated on the edge of Derby City. As such, the inclusion of these additional land parcels as 'Areas for Future Growth' would not undermine the policy aspirations for strategic allocation STRA2. These additional parcels of land could increase the capacity of the allocation to plug the shortfall of 57 dwellings identified in the Part 2 Local Plan Issues and Options Consultation document (Page 8).

For completeness, Appendix A of these representations includes a map showing the areas of land within our client's control and promoted to the Council for inclusion as part of the boundary for strategic allocation STRA2, and for identification as 'Areas for Future Growth' in the Part 2 Local Plan.

Question 3: Are there other mechanisms that the plan should consider to securing housing delivery in addition to allocating specific sites (e.g. identifying indicative broad locations/areas for future growth adjacent to existing settlements, extending settlement boundaries, supporting certain Changes of Use)?

See response to Question 2; we consider that 'Areas for Future Growth' should be identified adjacent to draft allocation STRA2.

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

Appendix 5 of the Part 1 Local Plan (Publication Version March 2025) includes a projected trajectory, which for strategic allocation STRA2 indicates delivery of 150 dwellings per annum from 2030/2031 to the end of the plan period, providing 1,650 dwellings in the plan period, with 850 dwellings provided beyond. The projected trajectory for STRA2 is considered reasonable in the context of the strategic scale of development proposed (notwithstanding the potential additional dwellings that could be delivered through expansion of the allocation with 'Areas for Future Growth' as set out in our response to Question 2 above).



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

We support the identification of settlement boundaries around the new Strategic Allocations. This will ensure that the Local Plan is effective in securing the delivery of necessary housing to meet the requirement, as well as providing suitable protection to the countryside from encroachment from inappropriate development.

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

We support Principle 3(a) of the Settlement Boundary Assessment Principles set out in Appendix 1 of the Part 1 Local Plan Issues and Options Consultation document and specifically the inclusion of Local Plan Part 1 and Part 2 Housing Allocations within settlement boundaries.

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

The protection of important gaps and green infrastructure is noted to be included in the Settlement Boundary Assessment Principles (Principles 4(d) and 4(f)) set out in Appendix 1 of the Local Plan Part 2 Issues and Options Consultation document). Whilst the importance of this is recognised it should be noted that in the specific case of strategic allocations, land identified in the indicative masterplans included within the Local Plan Part 1 for housing verses green infrastructure will be subject to detailed masterplanning and consideration of all technical aspects and may be subject to change. Therefore, at this stage, the full extent of the allocations should be included within the settlement boundary. The settlement boundaries can then be subject to review once development is built out and gaps and areas of green space are confirmed.

Question 12: Do you agree with the retail hierarchy?

We note that Table 2 does not include any reference to the 'local retail centres' to be created with the proposed Strategic Allocations from the Part 1 Local Plan. We consider that, whilst it may not be possible to define a boundary of a centre at this stage, the retail hierarchy should address the centres to be created in the strategic allocations, with the boundaries to be defined at a later stage. The position of the strategic allocation centres within the hierarchy should be subject to the same analysis as existing centres, albeit on a theoretical basis, based on the policy requirements set out in the draft Strategic Policies in the Part 1 Local Plan.

Question 15: Should the Council define the boundaries of all of the retail areas within the District?

See response to Question 12.

Question 21: Are there any additional policies/other issues that the Local Plan should address?

Question 22: Are there any amendments required to the existing policies to reflect implemented changes to national planning policy, policy guidance or Regulations?

Critical to these questions is the emerging National Planning Policy Framework, the Consultation Draft of which was published in December 2025 ('the emerging Framework'). The full impact of the emerging Framework will depend on the approach selected by the Council for the review (see Question 1) (i.e. whether the Local Plan is to be submitted and examined under the December 2024 version of the Framework or under the emerging Framework).

However, regardless of the approach to be taken (i.e. which version of the Framework the Local Plan will be examined against), the emerging Framework states that, in decision-making, 'very limited weight' should be afforded to policies in development plans that conflict with the national decision-making policies (unless the development plan was examined and adopted against the emerging Framework) (Page 98, Annex 1, Paragraph 2). The effect of this is that the national decision-making policies override the Development Plan in this regard.

Further, the Consultation Draft of the Framework states, at PM6, that Local Plans should "c. not duplicate, substantively restate or modify the content of national decision-making policies unless directed by other policies in this Framework". In parts a and b, PM6 is clear that Local Plans should only include policies which are necessary and relevant to the plan and where policies which extend beyond site or location-specific requirements should only be included where necessary and there is a clear and justified reason for inclusion.

Given the ambitious timetable required to deliver the two-part local plan (see Question 1), the Council could consider where reliance could be placed on the national decision-making policies set out in the emerging

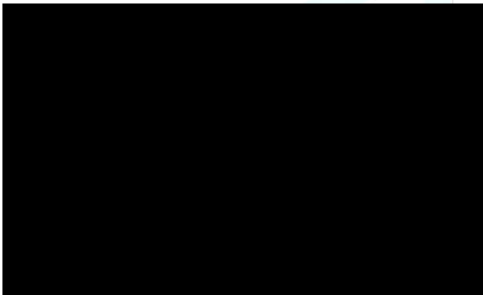
Framework. A review of the national decision-making policies should include a consistency check to ensure that any policies in the emerging development plan do not conflict with the emerging Framework and in doing so render them subject to 'very limited weight' in decision-making.

In terms of the Part 2 Local Plan, we would note the following points for further consideration as part of this review:

- Part 2 Policies SDT1 Settlement Boundaries and Development and BNE5 Development in Rural Areas
 - o Policies S4 and S5 of the emerging Framework separate of the presumption in favour of sustainable development into considerations for development on land inside and outside of settlement boundaries.
- Part 2 Policy BNE10 Heritage
 - o Section 20 of the emerging Framework includes a change in approach to heritage assessment, including the removal of the 'less than substantial harm' expression.
- Part 2 Policy RTL1 Retail Hierarchy
 - o It is understood that the Government are considering potential changes in the approach to retail planning and the sequential test (see Question 91 of the 'Questions on Proposed reforms to the National Planning Policy Framework and other changes to the planning system' accompanying the emerging Framework).

We trust that our comments will be taken into account as part of the ongoing preparation of an emerging Local Plan and would be happy to discuss if this would be helpful.

Yours faithfully



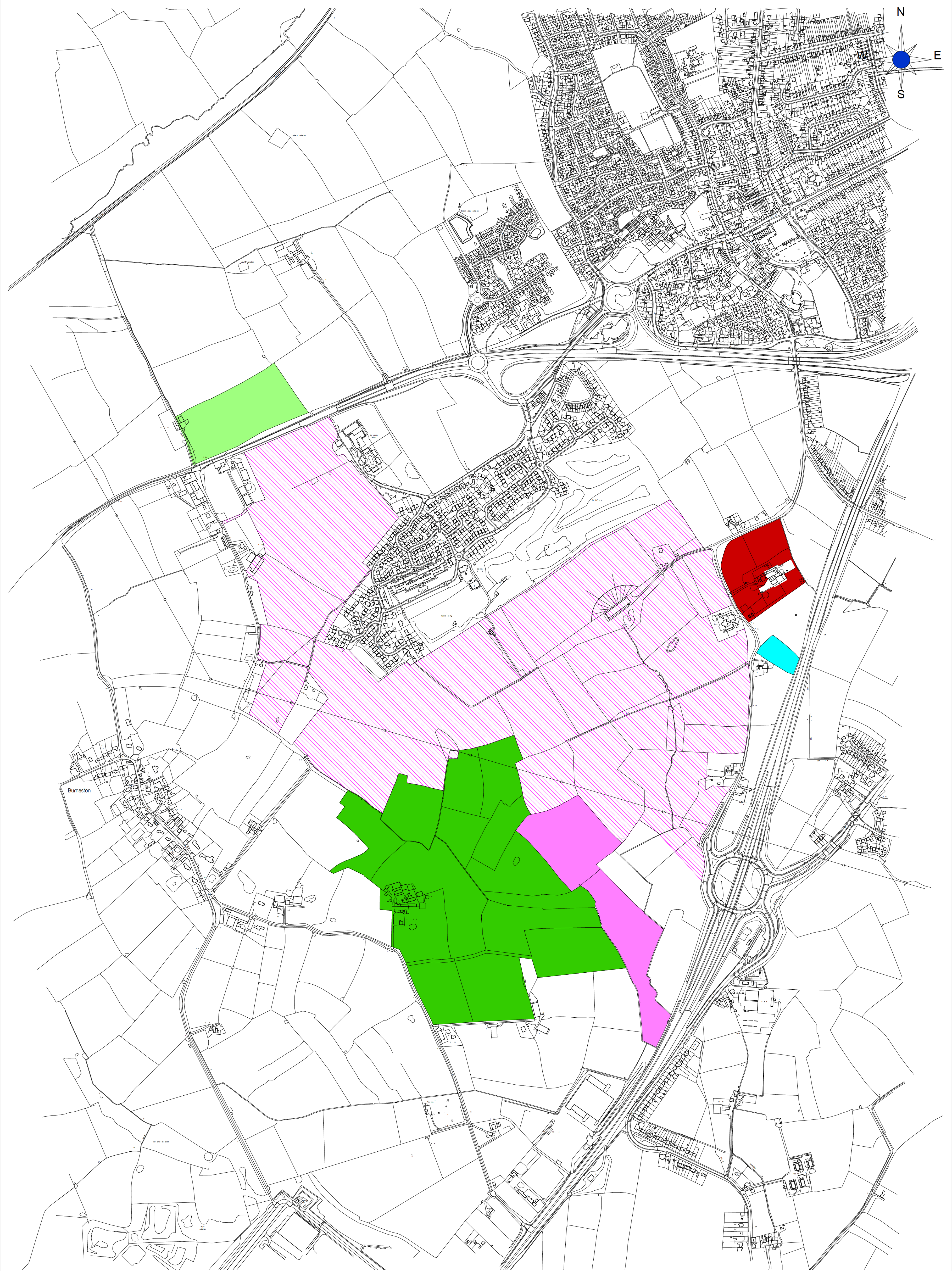
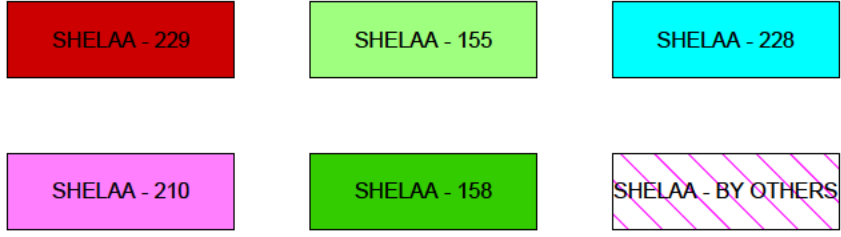
Appendices

Appendix A – Promoted Land Parcels

Appendix B – Concept Masterplan

Appendix A





nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

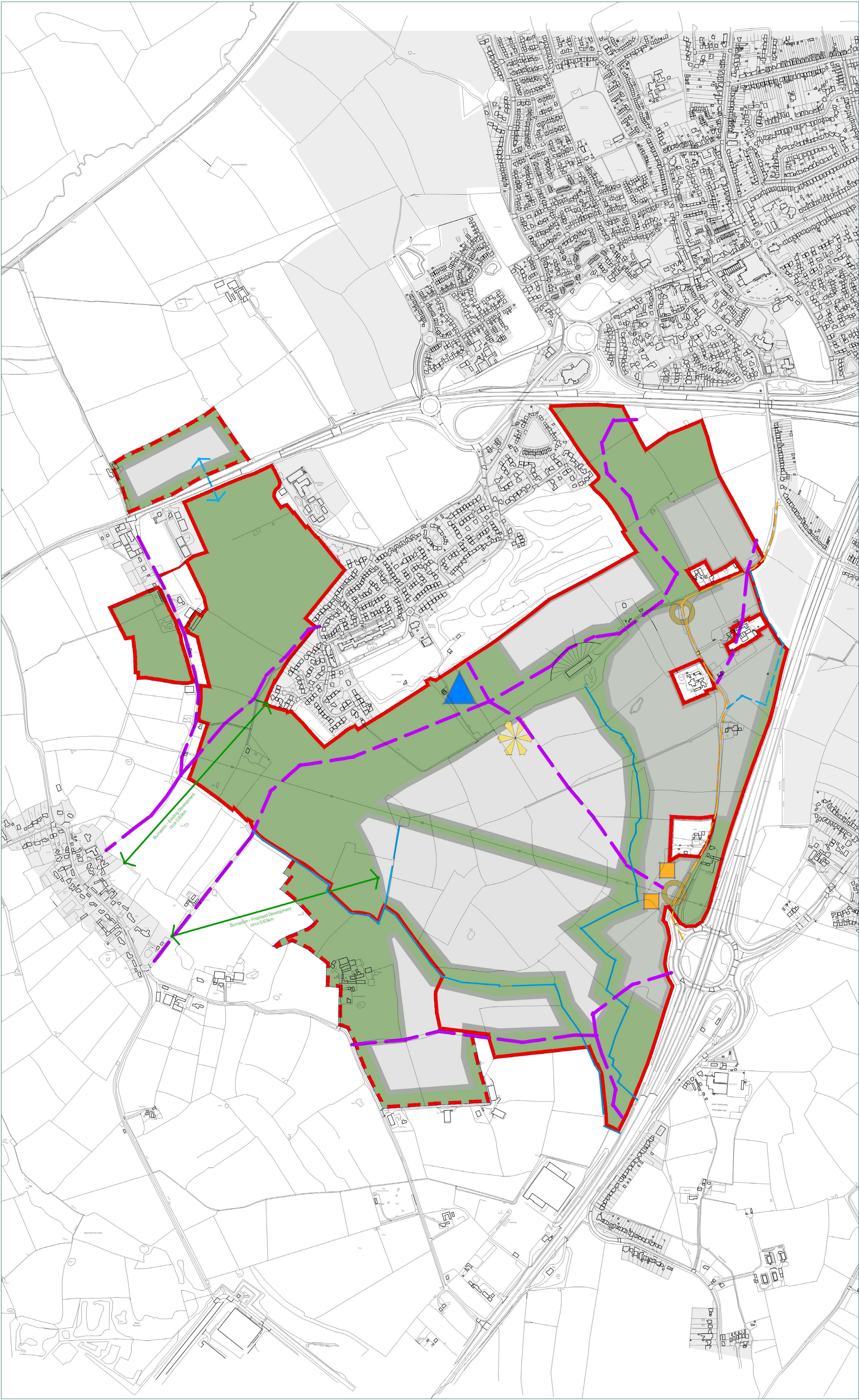
Project:
South West Derby
Drawing:
Promoted SHELAA Sites

PEVERIL
HOMES TO BUILD A LIFE IN

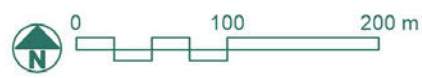
Drawing No. SWD-LP-06
Revision: B
Scale: 1:5,000 @ A1
Date: 14.02.2025
Drawn: n47

Appendix B





- Key
- Draft Allocation Boundary
 - Proposed Extension of Allocation
 - Country Park/Green Infrastructure
 - Pedestrian/cycle Connections
 - Staker Lane
 - Vehicular Access Points
 - Proposed Development
 - Proposed Local Centre
 - Proposed Education Facilities
 - Proposed Education Facilities



nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

Project
South-west Derby

Drawing Title
Masterplan

Project Code	Drawing Nr	Rev
n2477	005	D
Date	Drawing Scale	
07.04.2025	1:5,000 @ A1	

Report