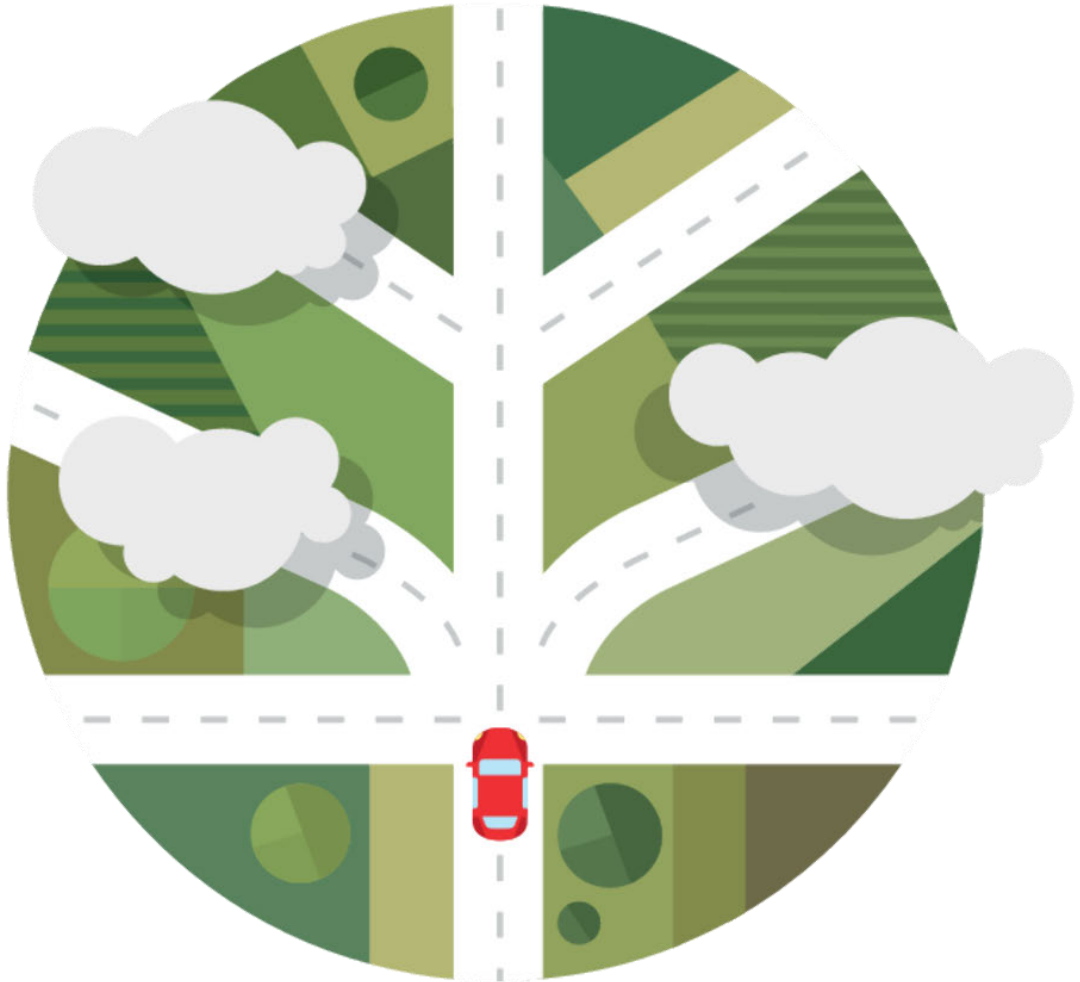




Church Commissioners for England
South Derbyshire – Local Plan Part 2
Issues and Options Consultation

January 2026

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1. Introduction

- 1.1.1. Deloitte LLP is instructed by the Church Commissioners for England (“the Commissioners”) to submit representation to the South Derbyshire Local Plan Part 2 – Issues and Options Consultation (“the Consultation”), which is the subject of public consultation until 30th January 2026.
- 1.1.2. The Consultation provides background information on a range of planning issues and sets out a series of questions concerning the strategic policies of the South Derbyshire Local Plan Part 2 (“the emerging Local Plan”).

1.2. The Church Commissioners

- 1.2.1. The Commissioners are one of the Church of England’s three National Investing Bodies, with a long-term responsibility to manage their property portfolio in a way that balances financial stewardship, social value, and environmental sustainability. They are a responsible and experienced land promoter, with a proven record of bringing forward high-quality, sustainable development sites across England through the Local Plan process.
- 1.2.2. The Commissioners’ involvement in plan-making is underpinned by their statutory duty to manage their assets for the long-term benefit of the Church and its mission, while contributing positively to sustainable community growth and the delivery of housing and infrastructure needs in line with the National Planning Policy Framework (“NPPF”).

1.3. Background and Context of Representation

- 1.3.1. This representation has been prepared having regard for the Commissioners’ land at Milton (“the Site”). The Site, approximately 1.25ha, lies immediately adjacent to the existing settlement of Milton, in South Derbyshire.
- 1.3.2. The current consultation represents a crucial stage in the South Derbyshire Local Plan Part 2 Review process. This review sets out non-strategic policies and allocations against which future planning applications will be determined. This consultation provides an important opportunity to present the suitability of the Site as a sustainable and deliverable development location, consistent with the objectives and spatial strategy now emerging for South Derbyshire.

1.4. Supporting Evidence

- 1.4.1. This representation is accompanied by supporting material to demonstrate the Site’s suitability and deliverability. This includes a Technical Note, prepared by TPS Transport Consultants Ltd (Appendix A) and a Red Line Boundary Plan (Appendix B). This evidence confirms that the Site can be safely and appropriately accessed via Main Street, with the Commissioners having retained access for this purpose, and that the land is developable with no insurmountable flood risk or ecology constraints.

1.5. Structure of Representation

- 1.5.1. This document replicates and provides a response to the following questions within the Council’s online Consultation Questionnaire:
- 1.5.2. Concluding comments are provided at the end of the document.

2. 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?

- 2.1.1. The Commissioners contend that a robust and up-to-date Local Plan is required for providing certainty and guiding sustainable development. Given the current stage of the Consultation and the need for timely delivery of housing, proceeding with a Local Plan Part 2 Review under the existing system appears to be the most pragmatic approach to ensure a continuous planning framework. This approach would allow for the timely allocation of deliverable sites, such as the Site, which can contribute to meeting immediate housing needs.
- 2.1.2. The NPPF, at its core, promotes a plan-led system that facilitates the timely delivery of sustainable development, particularly housing. As highlighted in the Council's own Issues and Options document (page 6), proceeding with a Local Plan Part 2 Review under the existing system offers the benefit of providing "full Local Plan coverage prior to Council reorganisation" and helping to "secure robust long term housing supply". Conversely, the document acknowledges that undertaking a single full Local Plan Review under the new system would "likely lead to delays in production and leave the District more vulnerable to unplanned speculative development."
- 2.1.3. The NPPF, at its core, promotes a plan-led system that facilitates the timely delivery of sustainable development, particularly housing. As highlighted in the Council's own Issues and Options document (page 6), proceeding with a Local Plan Part 2 Review under the existing system offers the benefit of providing "*full Local Plan coverage prior to Council reorganisation*" and helping to "*secure robust long term housing supply*". Conversely, the document acknowledges that undertaking a single full Local Plan Review under the new system would "*likely lead to delays in production and leave the District more vulnerable to unplanned speculative development.*"
- 2.1.4. Such delays would run contrary to the NPPF's imperative to significantly boost the supply of homes (NPPF paragraph 60). The government's ongoing planning reforms, including the MHCLG's December 2025 consultation on a draft NPPF, consistently underscore an explicit focus on delivery, viability, and the efficient use of land. While these reforms signal a desire to accelerate housing delivery and rationalise planning obligations, the immediate priority must be to maintain a continuous and effective planning framework.
- 2.1.5. Allocating deliverable sites, such as the Commissioners' land in Milton, within a timely Local Plan Part 2 Review under the existing system would directly contribute to the Council's housing supply without unnecessary delay. This approach would allow the Council to proactively bring forward sites that are immediately available and developable, thereby strengthening the five-year housing land supply and reducing the risk of speculative development, which NPPF paragraph 79(c) seeks to avoid where a five-year supply is not demonstrated.
- 2.1.6. Therefore, to provide certainty, avoid delays, and ensure the continuous delivery of housing in line with national policy objectives, the Commissioners strongly support the production of a Local Plan Part 2 Review under the existing planning system.

3. Question 2

Where should the housing needs be met?

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

- 3.1.1. The Commissioners assert that housing needs in South Derbyshire should be met through a diversified portfolio of sites, including the proactive allocation of well-located, deliverable smaller sites within sustainable villages such as Milton. This approach aligns directly with the NPPF, by ensuring South Derbyshire can maintain a resilient housing supply.
- 3.1.2. The Site is strategically positioned to provide a logical and sustainable extension to the village represents a prime example of a deliverable site that can make a timely and significant contribution. Development access has been secured through properties on Main Street in the Commissioner's ownership, confirming its immediate deliverability. The Commissioners have previously demonstrated that the Site is available and capable of delivering homes within 0–5 years of allocation, a crucial factor in bolstering the Council's five-year housing land supply.
- 3.1.3. The Site's allocation would directly address several critical housing needs. It would contribute to the overall housing supply, which is required to meet both local demand and a share of Derby's unmet need. Furthermore, the site is capable of delivering on-site affordable housing at the required rate, aligning with the Council's affordable housing policy and directly addressing NPPF paragraph 61, which mandates that: *"The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, for example, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people wishing to build their own homes, and people wishing to rent their homes)."*
- 3.1.4. The allocation of the Milton site directly supports several key NPPF objectives for meeting housing needs. The NPPF explicitly states in paragraph 83: *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."* An allocation at the Milton site would directly support the vitality of Milton's community by bringing much-needed investment, homes, and increased demand for local services, aligning precisely with this requirement.
- 3.1.5. Moreover, the NPPF places significant emphasis on the role of smaller sites in meeting housing requirements. Paragraph 73 advises: *"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a range of sites, local planning authorities should... include land for at least 10% of their housing requirement on sites of 1 hectare or less."*
- 3.1.6. The Site's scale and immediate deliverability mean it would function as an ideal addition to meet the Council's 10% small-site target, contributing to a "good mix of sites" as encouraged by national policy. The Site's greenfield nature, while noted, is mitigated by its contiguous relationship to the existing village, presenting a logical infill/extension that would not compromise the countryside beyond Milton's established envelope, thereby making efficient use of land as advocated by NPPF paragraph 129.
- 3.1.7. Beyond the Site, the Commissioners further contend that other strategically located sites within sustainable Key Service Villages, such as Repton, are equally suitable for development and can significantly contribute to meeting South Derbyshire's housing requirements. Repton, recognised for its established services and community infrastructure, offers a sustainable context for new homes. Allocations in such villages would provide timely and deliverable housing, including

affordable options, thereby enhancing the resilience of the Council's housing supply and supporting the continued vitality of rural communities, in full accordance with the principles of the NPPF.

- 3.1.8. In conclusion, the Milton site represents a sustainable, deliverable opportunity to meet diverse housing needs, including affordable housing, within the plan period. Its allocation is fully consistent with the objectives and principles of the NPPF and would provide a vital contribution to the District's housing strategy, while also supporting the vitality of a rural community.

4. 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)?

- 4.1.1. The Commissioners strongly advocate that the Local Plan must consider additional mechanisms for securing housing delivery beyond solely allocating specific sites. A flexible and nuanced approach is essential to ensure a resilient housing supply, particularly in rural areas, and to align with the NPPF and the pressing housing needs identified in the Derby and South Derbyshire Local Housing Needs Assessment (LHNA) (December 2023).
- 4.1.2. The Standard Method (adopted Dec '24) housing requirement for South Derbyshire is 581 dwellings per annum, a figure that has seen fluctuations, including an increase from the pre-December 2024 Standard Method of 507 dwellings per annum. Crucially, these figures do not fully account for South Derbyshire's commitment to help meet neighbouring authority, Derby's, unmet housing need. This additional responsibility, coupled with the upward adjustment in the Standard Method requirement, underscores the ongoing necessity for further, well-located allocations to ensure a robust and truly sufficient housing supply that addresses the full extent of the District's housing challenges. Relying exclusively on fixed site allocations can be overly restrictive and may hinder the organic, sustainable growth of villages that possess the capacity and infrastructure to accommodate it. The current classification of Milton as a "Rural Village" within the Council's settlement hierarchy, and the associated restrictions on development, exemplify a rigidity that is counterproductive to meeting these identified needs. Such an approach risks stifling the very vitality that the NPPF seeks to promote in rural communities. NPPF paragraph 83 states: "*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*"
- 4.1.3. Furthermore, NPPF paragraph 89 outlines that: "*Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.*" A plan that relies exclusively on fixed site allocations may fail to capture emerging opportunities for such growth, thereby undermining the Council's ability to meet its housing targets.
- 4.1.4. Therefore, mechanisms such as extending settlement boundaries should be actively considered. For settlements like Milton, a more flexible approach to boundaries is warranted. This would allow for logical, proportionate, and well-designed extensions that respect local character, rather than confining growth solely to small rural exception sites or preventing it altogether due to an overly rigid interpretation of the settlement hierarchy. The CCE's land in Milton, contiguous to the existing village, represents a prime example of where a carefully considered extension of the settlement boundary would facilitate sustainable development, making efficient use of land as advocated by NPPF paragraph 129. This would enable the delivery of homes, including much-needed affordable housing, in locations that are demonstrably sustainable and contribute to the vitality of rural communities.
- 4.1.5. Additionally, the identification of indicative broad locations/areas for future growth adjacent to existing settlements would provide the necessary flexibility for the plan to adapt to unforeseen needs and opportunities over its lifetime. This proactive approach, while not committing to specific sites, signals areas where growth could be accommodated sustainably, providing greater certainty

for landowners and developers. Finally, supporting certain Changes of Use can also contribute to housing delivery by making efficient use of existing buildings and land within settlements, reducing pressure on greenfield sites and promoting regeneration, consistent with NPPF paragraph 128.

- 4.1.6. In conclusion, a multi-faceted approach that incorporates mechanisms such as extending settlement boundaries, identifying broad locations for growth, and supporting appropriate changes of use, is essential for a resilient and responsive housing supply. This will enable the Council to effectively manage growth, meet its housing requirements, and ensure that genuinely sustainable development opportunities, including those in well-connected rural areas like Milton, can come forward, thereby contributing to the "*significant boost to the supply of homes*" mandated by NPPF paragraph 60 and addressing the specific housing and affordability challenges highlighted in the LHNA.

5. 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)?

- 5.1.1. The Commissioners contend that the Council should consider several other critical issues to ensure the timely delivery of the right homes in the right places. While South Derbyshire demonstrates a strong HLS, these figures do not account for Derby's unmet need and the need for a nuanced approach to ensure the right homes are delivered in the right places, addressing specific needs and optimising land use in line with the NPPF.
- 5.1.2. Furthermore, the Council must critically examine its settlement hierarchy and its impact on delivering the right homes in the right places. The current classification of Milton as a "Rural Village" in the draft Local Plan Part 1, which places restrictions on development, may inadvertently prevent the delivery of homes in otherwise sustainable and desirable locations. The "right places" should not be solely dictated by an outdated or overly rigid hierarchy but by a comprehensive assessment of a settlement's capacity for sustainable growth, its relationship to services, and its ability to contribute to the overall housing mix. The Site, for example, is deliverable and in a sustainable rural location that could provide much-needed homes, including affordable housing, and contribute to the vitality of the community, as encouraged by NPPF paragraph 83. An inflexible hierarchy risks misdirecting development away from such sustainable locations, thereby hindering the timely delivery of homes where they are genuinely needed and desired.
- 5.1.3. Finally, timely housing delivery is intrinsically linked to the proactive provision of necessary infrastructure and ensuring viability. The Council should consider how planning obligations, such as Community Infrastructure Levy (CIL) and Section 106 agreements, are applied to ensure they do not unduly impact the viability of schemes, particularly smaller sites. NPPF paragraph 57 advises that "Where up-to-date policies have set out the contributions expected from development, it is important that these are not sought over and above those set out in the plan." Proactive engagement with developers to understand and address viability challenges will unlock sites that can come forward quickly and ensuring a continuous supply of homes.
- 5.1.4. By addressing these issues, the Council can create a more responsive and effective planning environment that facilitates the timely delivery of the right homes in the right places across the District, ensuring its planning policies are robust, flexible, and fully compliant with the NPPF.

6. 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.)?

- 6.1.1. The Commissioners emphasise that the Local Plan must address a diverse range of specific accommodation needs through its allocations, reflecting the changing demographics and social requirements of South Derbyshire. This approach is fundamental to creating inclusive and sustainable communities, as mandated by the NPPF.
- 6.1.2. NPPF paragraph 61 explicitly states: "*The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, for example, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people wishing to build their own homes, and people wishing to rent their homes).*" Furthermore, paragraph 62 encourages planning policies to "*set out a housing mix for the whole plan area, and for different parts of the area, reflecting the identified needs.*" The Derby and South Derbyshire LHNA provides crucial evidence for these specific needs.
- 6.1.3. Based on these principles and the detailed evidence from the LHNA, the Local Plan must address a number of specific accommodation needs. Firstly, the LHNA highlights a significant and growing need for accommodation for older people. Projections for the 2022-39 period indicate a 41% increase in the population aged 65+ and a 51% increase in the number of people aged 65+ with dementia and a 47% increase in those aged 65+ with mobility problems. This translates to a need for up to 2,300 housing units with support (sheltered/retirement housing) and around 1,700 additional housing units with care (e.g. extra-care). Therefore, the Local Plan must actively allocate sites for, and include policies supporting, the provision of extra care accommodation, care home provision, and smaller, accessible homes and bungalows to facilitate downsizing and provide suitable accommodation for those with reduced mobility.
- 6.1.4. A persistent need exists for affordable housing across all tenures, despite the overall housing delivery. The LHNA identified a local housing need figure of 522 dwellings per annum, prior to the new standard method brought in by the 2024 NPPF, for South Derbyshire, with a substantial 20% affordability uplift. This underscores the critical importance of ensuring a balanced mix of housing tenures, including social rented, affordable rented, and intermediate housing. The Site, for instance, is capable of delivering on-site affordable housing at the required rate, aligning with the Council's affordable housing policy and contributing to this critical need within a rural settlement. The current restrictive classification of Milton as a "Rural Village" risks hindering the delivery of such diverse housing types in sustainable locations.
- 6.1.5. In line with national policy and the welfare of vulnerable young people, the Local Plan should include specific policies or criteria for the provision of small-scale, high-quality care homes for looked after children. This ensures that these children can be accommodated within appropriate, supportive environments close to their communities, directly addressing a specific group's housing needs as outlined in NPPF paragraph 61.
- 6.1.6. Furthermore, the LHNA identifies a need for "up to 2,800 dwellings to be for wheelchair users (meeting technical standard M4(3))". The Local Plan should therefore address the need for accessible and adaptable dwellings, potentially by requiring all dwellings to meet M4(2) standards and a proportion to meet M4(3) (wheelchair user dwellings), while allowing for flexibility based on viability or site-specific circumstances. Finally, the NPPF encourages local authorities to promote

opportunities for self-build and custom build housing, and the Local Plan should identify suitable sites and establish policies that support the delivery of these homes, offering greater choice and meeting specific individual needs.

- 6.1.7. By proactively addressing these diverse accommodation needs through its allocations and policies, and by adopting a flexible approach to settlement boundaries that allows sustainable rural communities like Milton to contribute, the Local Plan can ensure it delivers the right homes for all segments of the community, fostering inclusive and sustainable growth across South Derbyshire, in full compliance with the NPPF and the evidence presented in the LHNA.

7. Question 8

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

- 7.1.1. The Commissioners contend that the Council should take additional steps to accelerate housing delivery on other sites, particularly smaller, non-strategic sites. The acceleration of housing delivery is particularly pertinent given South Derbyshire's increased housing targets brought by the new standard method and that the requirement to meet Derby's unmet need. Derby City Council currently has a 2.73 housing land supply. As such, accelerating delivery on a diverse range of sites, including smaller ones, is crucial for ensuring the right types of homes are delivered in the right places and for maintaining a resilient supply that can consistently meet the Standard Method housing requirement of 581 dwellings per annum as well as assist in meeting Derby's unmet need, fully aligning with the NPPF. Given that the draft South Derbyshire Local Plan Part 1 currently seeks to deliver 522 homes per year, the Local Plan Part 2 will be required to allocate additional sites to fully address the Standard Method requirement of 581 dwellings per annum.
- 7.1.2. The NPPF explicitly recognises the vital role of smaller sites in meeting housing requirements. NPPF paragraph 73 advises: *"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a range of sites, local planning authorities should... include land for at least 10% of their housing requirement on sites of 1 hectare or less."* The Council should therefore implement a proactive identification and allocation strategy for smaller sites, particularly those that are well-located within or adjacent to existing settlements. The Site, for example, is a deliverable smaller site in a sustainable rural location that, despite its current restrictive "Rural Village" classification, could significantly contribute to this 10% target and diversify the housing offer. An inflexible settlement hierarchy risks overlooking such opportunities, thereby hindering the timely delivery of homes in places where they are genuinely needed and desired.
- 7.1.3. To further accelerate delivery, the Council must implement streamlined and efficient planning application processes specifically tailored for smaller, less complex sites. For these developments, the planning application process can often be disproportionately lengthy. The Council should consider a fast-track application process for smaller, policy-compliant sites that meet clear sustainability criteria, providing clear, upfront guidance and pre-application advice to reduce uncertainty and speed up decision-making. Ensuring timely determination of planning applications for these sites is paramount, as delays can significantly impact viability and delivery timelines. This aligns with NPPF paragraph 158, which encourages local planning authorities to *"work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area."*
- 7.1.4. Furthermore, dedicated support for local and SME builders is essential. Smaller sites are often developed by local and small-to-medium enterprise ("SME") builders, who are crucial for fostering competition and innovation in the housing market. The Council should actively engage with local builders to understand their specific challenges and needs and consider policies that encourage a diverse range of developers, including SMEs, to participate in delivering housing. This will help to ensure that the housing market is not overly reliant on a few large developers and can respond more flexibly to local demand.
- 7.1.5. Finally, the Council must proactively address infrastructure and viability barriers specific to smaller sites. While smaller sites may have fewer infrastructure demands than strategic allocations, they can still face specific challenges. The Council should ensure that planning obligations, such as CIL and Section 106 agreements, are proportionate and do not render smaller schemes unviable. Proactively identifying and addressing minor infrastructure constraints, such as utility connections

or local highway improvements, that could hinder the delivery of multiple smaller sites, will be critical. The Site, benefiting from secured access and deliverability, demonstrates how such sites can come forward quickly if supported by appropriate policy and a responsive planning system.

- 7.1.6. By implementing these steps, the Council can unlock the significant potential of other sites to contribute to housing delivery, ensuring a more resilient, diverse, and timely supply of homes across South Derbyshire.

8. Question 10

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

- 8.1.1. The Commissioners generally agree with the principles for assessing settlement boundaries as set out in Appendix 1 of the Issues and Options document. These principles provide a clear and structured framework for defining the limits of settlements, which is essential for managing growth and protecting the character of the countryside. The NPPF places significant emphasis on making effective use of land and promoting sustainable development, with NPPF paragraph 119 encouraging local planning authorities to "*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.*" Well-defined settlement boundaries are a key tool in achieving this balance, and the principles outlined in Appendix 1 offer a sound basis for this.
- 8.1.2. The Commissioners particularly supports Principle 1, which advocates for drawing boundaries tightly following defined physical features, as this provides clarity and certainty, helping to avoid arbitrary lines. Furthermore, Principle 3(a), stating that "*Housing allocations: Sites which are allocated for housing within the Local Plan Part 1 and 2 will be included within settlement boundaries,*" is crucial. This provides a clear mechanism for integrating new development into the defined settlement pattern. The Commissioners advocate for the allocation of the Site, which would then logically be included within the revised settlement boundary, reflecting its role in meeting housing needs. The inclusion of existing commitments (Principle 3(b)) and land closely related to the built form (Principle 3(c)) also contributes to a realistic and defensible boundary.
- 8.1.3. However, while broadly supportive, the Commissioners contend that the application of these principles, particularly in the context of sustainable rural villages, requires a crucial degree of flexibility and careful interpretation to ensure they do not unduly constrain appropriate development. An overly rigid application of boundary principles that could hinder the delivery of the right types of homes in the right places, especially in sustainable rural communities. The current classification of Milton as a "Rural Village" in the draft Local Plan Part 1, with its associated restrictions, exemplifies how an inflexible hierarchy can inadvertently prevent proportionate and sustainable growth.
- 8.1.4. The Council must be particularly cautious in applying the exclusion principles, such as Principle 4, to ensure they do not inadvertently stifle sustainable growth in rural villages. For instance, Principle 4(a) and 4(b), which exclude large gardens or areas that could "*detrimentally impact upon the form and character of a settlement*" or "*relate more to the open countryside,*" must be assessed on a nuanced, case-by-case basis. A blanket exclusion, or an overly strict interpretation, could prevent logical and proportionate extensions to villages, even where such development would be well-designed and contribute positively to the community's vitality, as encouraged by NPPF paragraph 83: "*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*" The Commissioner's Milton site, being contiguous to the village and representing a logical infill/extension, is an example of how a flexible application of these principles would benefit the District by providing much-needed housing, including affordable homes, without compromising the countryside beyond Milton's established envelope.
- 8.1.5. In summary, while the principles in Appendix 1 provide a sound basis for assessing settlement boundaries, their application must be flexible enough to accommodate sustainable and deliverable development opportunities, particularly in rural areas, in line with the overarching aims of the NPPF and the need to maintain a diverse and responsive housing supply.

9. Question 11

What issues regarding the settlement boundaries should the Council consider?

- 9.1.1. The Commissioners argue that, while the principles for assessing settlement boundaries (Appendix 1) provide a useful starting point, the Council must consider several critical issues to ensure these boundaries effectively support sustainable development and meet housing needs, particularly in rural areas, in line with the NPPF. An overly rigid or uncritical application of these principles risks undermining the District's ability to deliver the right types of homes in the right places.
- 9.1.2. Firstly, the Council must critically re-evaluate the rigidity of settlement boundaries versus the imperative for sustainable rural growth. The current classification of Milton as a "Rural Village" in the draft Local Plan Part 1, and the associated restrictions on development, exemplify how an inflexible hierarchy can hinder proportionate and sustainable growth. NPPF paragraph 83 clearly states: *"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."* Furthermore, NPPF paragraph 89 outlines that: *"Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services."* Settlement boundaries should therefore be dynamic tools that allow for well-designed, contiguous extensions to villages that possess the capacity for sustainable growth and can contribute to local vitality, rather than acting as static barriers that prevent such development. The Site, being a logical extension to the existing village, demonstrates how a flexible approach to boundaries can facilitate the delivery of much-needed homes, including affordable housing, in a sustainable rural location.
- 9.1.3. Secondly, the Council should consider the consistency of settlement boundaries with overall housing delivery objectives and the need for a diverse supply. The NPPF, in paragraph 73, emphasises the importance of "Small and medium sized sites" in contributing to housing supply. If settlement boundaries are drawn too tightly, they can exclude such sites, particularly those on the edge of existing settlements, thereby limiting the diversity of the housing offer and potentially increasing reliance on larger, strategic sites. Larger, strategic allocations often present inherent complexities, including significant infrastructure dependencies and longer lead-in times, which can introduce considerable risks to their deliverability and viability, potentially hindering the timely contribution to the overall housing supply. The Council should ensure that boundaries are drawn to facilitate, rather than impede, the delivery of a broad range of sites that contribute to the overall housing mix and meet identified needs.
- 9.1.4. Thirdly, the "right places" for development should not be solely dictated by potentially outdated or overly rigid classifications. Instead, settlement boundaries should reflect a nuanced assessment of a settlement's current sustainability credentials, its functional relationship with nearby services (e.g., Milton's proximity to Repton, a Key Service Village, as supported by NPPF paragraph 69), and its genuine capacity to accommodate proportionate growth. An inflexible hierarchy risks misdirecting development away from sustainable rural locations that could otherwise contribute positively to the District's housing goals.
- 9.1.5. Finally, the Council must exercise extreme care in applying exclusion principles (e.g., Appendix 1, Principle 4) to avoid arbitrary prevention of sustainable development. While protecting the countryside is vital, a blanket exclusion of all greenfield land adjacent to settlements can be counterproductive, especially when such land represents a logical and sustainable extension. NPPF paragraph 119 promotes the *"effective use of land,"* and paragraph 129 encourages *"efficient use of land."* The Site, though greenfield, is contiguous to the village and represents a logical infill/extension. Its exclusion based on an overly strict interpretation of *"open countryside"* would

be an inefficient use of a deliverable site that can contribute to the District's housing needs without compromising the countryside beyond Milton's established envelope.

- 9.1.6. By carefully considering these issues, the Council can ensure that its settlement boundaries are not just static lines on a map, but dynamic tools that facilitate sustainable development, meet housing needs, and protect the character of South Derbyshire's communities and countryside in a balanced and NPPF-compliant manner.

10. 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’?

- 10.1.1. The Church Commissioners advocate that the Council should include a locally specific Green Belt policy that provides key principles to guide the interpretation of ‘disproportionate’ and ‘limited infilling’. While the NPPF provides the overarching framework for Green Belt policy, the application of these terms requires local nuance. Establishing clear principles, rather than rigid definitions, is crucial for effective and consistent decision-making, which in turn supports the overall efficiency of the planning system and housing delivery. NPPF paragraph 154 clearly states that "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt." However, it then lists exceptions, including "limited infilling in villages" and "limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development." The terms 'disproportionate' and 'limited infilling' are inherently open to interpretation, leading to potential inconsistencies in planning decisions and uncertainty for landowners and developers. articulated through guiding principles, would provide much-needed clarity without imposing impractical, rigid metrics.
- 10.1.2. Such a policy would provide clarity and certainty, reducing ambiguity and streamlining the planning application process for proposals within or adjacent to the Green Belt. This aligns with NPPF paragraph 16(b), which states that plans should "be prepared positively, in a way that is aspirational but deliverable." Clear guiding principles contribute directly to deliverability by reducing the scope for subjective interpretation and protracted negotiations. Furthermore, a locally specific policy can reflect local character, taking into account the specific nuances of Green Belt villages or previously developed land within the District, ensuring that any permitted development is genuinely appropriate and respects local distinctiveness. This would ultimately support sustainable development by ensuring that appropriate development, which does not harm Green Belt openness, can come forward without undue delay, contributing to housing supply and local vitality where consistent with Green Belt purposes.

11. Question 17

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

- 11.1.1. If the Council includes a locally specific Green Belt policy, it should consider providing guiding principles that enable a consistent yet flexible assessment of proposals, acknowledging that every site and proposal is unique, and a high level of prescriptive detail is impractical within policy.
- 11.1.2. Firstly, the policy should establish principles for assessing 'limited infilling' in villages. These principles should focus on the character and context of the proposed development, guiding decision-makers to evaluate its visual and spatial impact on Green Belt openness. Rather than setting arbitrary size limits, the principles should encourage an assessment of whether the infilling maintains the essential characteristics of the Green Belt and respects the prevailing scale, density, and form of the village. This would involve considering how the development relates to the existing built form, ensuring it avoids ribbon development and does not inappropriately extend beyond the established village envelope, thereby integrating harmoniously with the local context.
- 11.1.3. Secondly, the policy must provide principles for determining what constitutes a 'disproportionate' addition to an existing building. These principles should guide the assessment of the impact on the original building's character and the Green Belt's openness. The focus should be on whether an extension, by its scale, design, or cumulative effect, fundamentally alters the original building's appearance or significantly encroaches upon the Green Belt, rather than prescribing specific percentage increases. For previously developed land in the Green Belt, the policy should establish principles for assessing the 'greater impact on openness' when redeveloping such sites, as per NPPF paragraph 154(g). This would involve guiding the comparison between the proposed development and the existing development's footprint, height, and massing, with a view to ensuring that redevelopment does not result in a more harmful impact on Green Belt openness. The principles should also encourage opportunities for environmental improvements or enhancements to openness that could be achieved through the redevelopment of certain previously developed sites.
- 11.1.4. Finally, the policy should include overarching principles that acknowledge the site-specific nature of proposals within the Green Belt. It should recognise that the interpretation of 'limited infilling' and 'disproportionate' additions will always require professional judgement based on the unique circumstances of each site. The principles should also guide the consideration of the cumulative impact of multiple developments within a specific area of the Green Belt, ensuring that individual appropriate developments do not collectively undermine Green Belt purposes. These principles would provide a robust framework for consistent and defensible decision-making, allowing for necessary flexibility while upholding the fundamental protections of the Green Belt.

12. 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?

- 12.1.1. The Council should undertake a Green Belt review with a specific objective of identifying what, if any, 'Grey Belt' exists within the district. This is a forward-thinking approach that aligns with the evolving understanding of Green Belt land and the imperative to make efficient use of land, particularly given the ongoing need for housing, and meeting Derby's unmet need. Identifying 'Grey Belt' areas can contribute to a diverse and resilient housing supply without compromising the fundamental purposes of the Green Belt.
- 12.1.2. The term 'Grey Belt' typically refers to previously developed land within the Green Belt that may have limited contribution to Green Belt purposes due to its existing developed nature. While the NPPF already allows for the redevelopment of previously developed land in the Green Belt under certain conditions, NPPF paragraph 154(g) states that "*the partial or complete redevelopment of previously developed land whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development*" is not inappropriate development. A specific review to identify 'Grey Belt' areas would build upon this existing flexibility and provide a more strategic approach.
- 12.1.3. Such a review would promote efficient land use by enabling the Council to make more informed decisions about the potential for sustainable redevelopment of these sites. This aligns directly with NPPF paragraph 119, which encourages local planning authorities to "*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.*" By identifying and potentially prioritising 'Grey Belt' sites for appropriate redevelopment, the Council could reduce pressure on more open and undeveloped parts of the Green Belt, thereby strengthening its overall protection and ensuring that the Green Belt genuinely serves its purposes.
- 12.1.4. Furthermore, the redevelopment of 'Grey Belt' sites can offer significant opportunities for regeneration and environmental improvement. These sites, often characterised by existing development or dereliction, can be transformed to provide new homes, enhance local amenities, and even improve the openness of the Green Belt compared to existing dilapidated structures. This proactive approach would demonstrate a nuanced and sophisticated understanding of Green Belt management, acknowledging that not all land within the Green Belt contributes equally to its purposes. It would also align with the government's broader agenda for making the best use of land and supporting sustainable development.
- 12.1.5. A Green Belt review with this specific objective should be undertaken carefully, with a clear and robust methodology for identifying 'Grey Belt' land based on factors such as its current use, level of previous development, and contribution to Green Belt purposes. This would provide a strong evidence base for future policy decisions regarding these areas, ensuring that any changes are justified and contribute positively to both housing delivery and Green Belt protection.



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[REDACTED]

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[Report](#)

[REDACTED]

Apologies, it looks as though we forgot to attach the appendix. For clarity the site is SHELAA 223.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

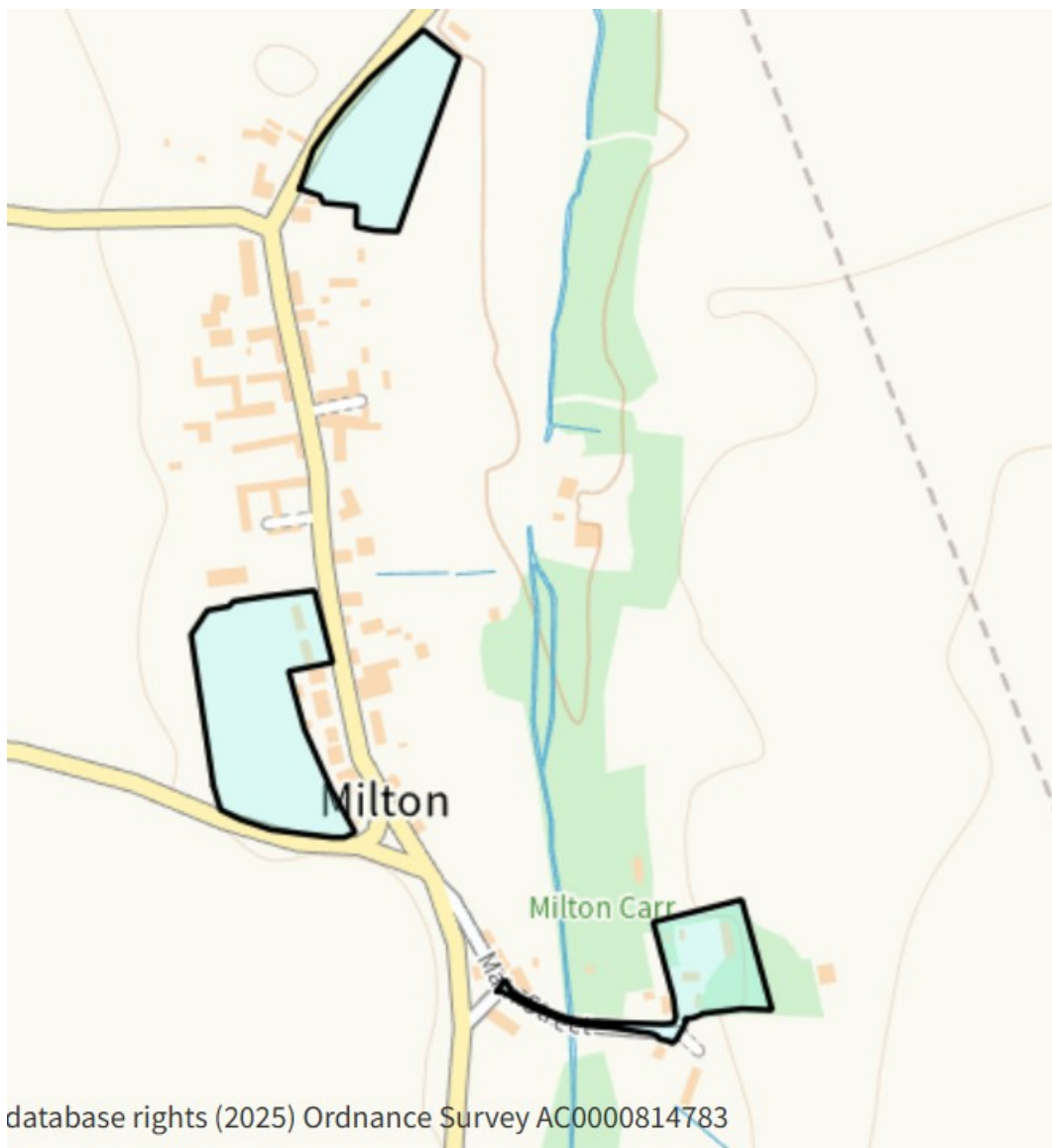
[REDACTED]

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[REDACTED]

Within your consultation response to the Local Plan Part 2 Issues and Options consultation you promote Land at Milton. Can you please confirm which site you are promoting, as there is no SHELAA reference number or map provided?

Please a screenshot of the SHELAA sites within Milton. SHELAA site 222 is at the top of the village, site 223 is to the west of Main Street and site 41 can be found at the very bottom of the village. The SHELAA sites can be found on the following webpage: [Strategic Housing and Economic Land Availability Assessment | South Derbyshire District Council](#)



If the site in question is not one of the above SHELAA sites, can you please complete the attached call for sites form and provided a map showing the boundary of the site.

Looking forward to your response.

[Redacted]

[Redacted]

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