

# View Response

Response #1307251

**From** [East Staffordshire Borough Council](#)

**Date** Started: 30 Jan 2026 15:21. Last modified: 30 Jan 2026 15:22

**Status** Complete

**Title**

**First Name**

**Last Name**

**Organisation** East Staffordshire Borough Council

**Job Title**

**Address Line 1**

**Address Line 2**

**Address Town**

**County**

**Visibility** Unknown.

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 option and provide a reason for your answer)

☐ Produce a Local Plan Part 2 Review under the existing system

- ☐ Produce a single Full Local Plan under the new system
- ☐ Other

Please enter any additional comments

«No response»

2.

**Where should the housing needs be met?** (Please provide site details including projected delivery timescales and the specific need being met).

«No response»

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)?** (Please provide a reason for your answer)

- ☐ Yes
- ☐ No

Please enter any additional comments

«No response»

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)?** (Please provide an answer to your question)

☐ Yes

☐ No

Please enter any additional comments

«No response»

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)

«No response»

6.

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

«No response»

7.

**Should the Council allocate land South of Mackworth for development within the plan period?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

8.

**Are there other steps that the Council could take to accelerate housing delivery on other sites?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

9.

**Do you agree that settlement boundaries should be drawn around the urban edge of Derby, Drakelow and Stanton and any new allocations?** (Please provide a reason for your answer)

☒ Yes

☐ No

Please enter any additional comments

Settlement boundaries define the built limits of a settlement and distinguish between the main built form of a settlement and the countryside.

The draft NPPF (December 2025) emphasises the importance of identifying settlement boundaries to support the Government's proposed approach to decision-making on development within and outside settlements (policies S4 and S5 in the latest draft NPPF).

It is considered that Drakelow meets the definition of a settlement, as set out in Annex B (Glossary) of the latest draft NPPF.

In light of the above, East Staffordshire consider that it would be appropriate to define a settlement boundary around Drakelow because in-principle it would align with emerging national planning policy, and would also provide greater clarity about where particular types of development would (or would not) be appropriate.

10.

**Do you agree with the principles for assessing the settlement boundaries, as set out in Appendix 1?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

11.

**What issues regarding the settlement boundaries should the Council consider?** (Please provide a comment)

«No response»

12.

**Do you agree with the retail hierarchy?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

13.

**Should the Council redefine the retail centre in Swadlincote as a commercial centre which would allow for a wider range of uses?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

14.

**What issues regarding Swadlincote Town Centre redevelopment should the Council consider?** (Please provide details)

«No response»

15.

**Should the Council define the boundaries of all of the retail areas within the District?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

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'?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

17.

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

«No response»

18.

**Should the Council undertake a Green Belt review with a specific objective of identifying what, if any, Grey Belt exists within the district?** (Please provide a reason for your answer)

☒ Yes

☐ No

Please enter any additional comments

The Burton upon Trent and Swadlincote Green Belt was designated in 1983 to cover the open countryside between Swadlincote and Burton-upon-Trent. The purpose of the Green Belt is to prevent the coalescence of the two settlements and assist with the regeneration of Swadlincote. The Burton upon Trent and Swadlincote Green Belt covers an area of 720 hectares, the majority of which lies within South Derbyshire, but with 39 hectares (5.4%) within East Staffordshire.

The Government attaches great importance to Green Belts and national planning policy states that Green Belt boundaries should only be altered where “exceptional circumstances” are fully evidenced and justified through the preparation or updating of plans. Currently, there is no clear evidence to indicate that there are exceptional circumstances which would justify either Council seeking to change the boundaries of the Burton upon Trent / Swadlincote Green Belt.

However, Policy GB2(3) (Assessing existing Green Belt land) in the latest draft of the NPPF (December 2025) says “the preparation of local plans should be informed by an assessment, conducted in accordance with the process at

Annex E, which identifies grey belt and informs any Green Belt boundary alterations which accord with policy GB3.”

If the South Derbyshire Local Plan Part 2 Review is to be produced in accordance with the latest draft version of the NPPF then it is considered that an assessment of the Green Belt (and identification of grey belt) would be necessary. It is considered that any review of the East Staffordshire Local Plan would need to be in accordance with the updated NPPF and would need to assess the Green Belt.

In light of the above, if South Derbyshire District Council conclude that an assessment of the Burton upon Trent and Swadlincote Green Belt would be appropriate, then East Staffordshire (which accommodates 5.4% of the Green Belt) would support the decision and be prepared to actively engage in the assessment.

19.

**What other sites and/or options should the Council consider for providing Gypsy and Traveller accommodation?** (Please provide details)

«No response»

20.

**Are there any other issues that the Council should consider when meeting the needs of Gypsies and Travellers?** (Please provide details)

«No response»

21.

**Are there any additional policies/other issues that the Local Plan should address?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

22.

**Are there any amendments required to the existing policies to reflect implemented changes to national planning policy, policy guidance or Regulations?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

23.

**Are there better/alternative mechanisms that the Council should use to secure the required infrastructure?** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

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.** (Please provide a reason for your answer)

☐ Yes

☐ No

Please enter any additional comments

«No response»

25.

**Do you have any further/additional comments?** (Please provide details)

Other Issues – Employment Land

In preparation for a review of the East Staffordshire Local Plan, the Borough Council has been reviewing its evidence in relation to employment land provision.

It was noted that the South Derbyshire Local Plan Part 1 Review proposed to allocate 178 - 186 hectares of employment land in South Derbyshire, including up to 68 hectares at the former Drakelow power station. Given the strong functional economic links between South Derbyshire and East

Staffordshire (and between Swadlincote and Burton upon Trent in particular) and the close proximity of Drakelow to Burton, we would like to explore whether there are any implications or opportunities arising from South Derbyshire's proposed employment land at a future duty to cooperate meeting.

30<sup>th</sup> January 2026

Planning Policy  
South Derbyshire District Council  
Civic Offices  
Civic Way  
Swadlincote  
DE11 0AH

Dear Sir / Madam,

**South Derbyshire Local Plan Part 2 Review: Issues and Options (November 2025)**

Thank you for the opportunity to comment on the South Derbyshire Local Plan Part 2 Review document. This is an officer response on behalf of East Staffordshire Borough Council.

As background, the East Staffordshire Local Plan was adopted in October 2015. East Staffordshire Borough Council assesses the Plan each year in the light of recent appeal decisions, the latest version of the NPPF, national guidance, and other factors. The most recent review took place in October 2025 where the Council agreed that the Plan remained up to date. Therefore, the adopted Local Plan remains in use, and forms part of the Development Plan for East Staffordshire.

We recognise that that the planning system is in a state of flux due to the Government's proposed local government reorganisation, proposed new process for plan-making and proposed new National Planning Policy Framework (including new National Development Decision-Making Policies).

In relation to local government reorganisation, East Staffordshire Borough Council, together with Cannock Chase, Lichfield, South Staffordshire, Stafford and Tamworth submitted a proposal to Government in November 2025 proposing the creation of a Southern and mid-Staffordshire Unitary Authority.

Whilst most of the issues raised in the Issues and Options consultation are primarily for local consideration, we recognise that there are close strategic interdependencies between Drakelow and Burton, and that a joint approach on the Burton – Swadlincote Green Belt would be helpful. Our comments are therefore confined to Questions 9 (Settlement Boundaries) and 18 (Green Belt Review) on your Response Form.



**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.

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**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.

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### **Other Issues – Employment Land**

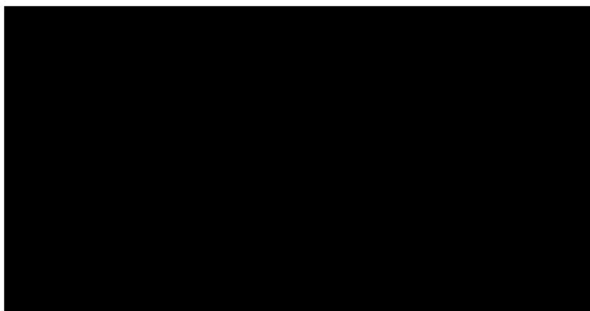
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East Staffordshire Borough Council is committed to further discussions as both the South Derbyshire Local Plan Review and our own Local Plan review progress to comply with on-going requirements associated with the Duty to Co-operate.

Yours faithfully,





**Thomas Deery BA (Hons), MSc  
Head of Regeneration**

30<sup>th</sup> January 2026

**Direct Line:** (01283) 508238

**Reply to: Naomi Perry**

**Our Ref:**

*(please quote this reference on all correspondence with us)*

Planning Policy  
South Derbyshire District Council  
Civic Offices  
Civic Way  
Swadlincote  
DE11 0AH

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Yours faithfully,

*Naomi Perry*

Naomi Perry  
Planning Manager  
[naomi.perry@eaststaffsbc.gov.uk](mailto:naomi.perry@eaststaffsbc.gov.uk)

[REDACTED]

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[REDACTED]

[REDACTED]

CAUTION! This Email was sent from outside SDDC. Only open links and attachments you're expecting.

[Report](#)

Dear Sir / Madam,

Thank you for the opportunity to comment on the South Derbyshire Local Plan Part 2 Review document.

Please find attached an officer response on behalf of East Staffordshire Borough Council.

Our response focuses on Questions 9 (settlement boundaries) and 18 (Green Belt Review) on your Response Form. Our response also suggests that it would be useful to consider employment land at a future duty to cooperate meeting.

If you would like further information or clarification on any issues raised in our response please do not hesitate to let me know.

Yours sincerely,

[REDACTED]