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.

Part A: Your Details

[redacted]
[redacted]
Organisation: Rula Developments Ltd
[redacted]
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[redacted]

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*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)

Question 2: Where should the housing needs be met?

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

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)

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)

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)

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)

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

(Please provide a comment)

Question 12: Do you agree with the retail hierarchy?

☐Yes ☐No

(Please provide a reason for your answer)

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)

Yes. Employment Land Allocation.

Please see **attached.**

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)

Yes. Please see attached.

FREETHS

South Derbyshire District Council

Local Plan Part 2 Review

Issues and Options Consultation

Representations on behalf of Rula Developments Ltd – 30 January 2026

Question 21: Are there any additional policies/other issues that the Local Plan should address? Yes/No Please provide a reason for your answer

Yes. Employment Land Allocation.

We provided representations on the Local Plan Part 1 in respect of our concern that Policy E1 'Strategic Employment Land Allocation' was too reliant on large strategic sites and failed to allocate a range of size of employment sites. We submitted that this would constrain delivery of employment development in the short and medium term. Of the 178-183ha of employment land proposed to meet the District's employment needs, 80% is across three strategic sites:

STRA1 - IGV 70ha;
STRA2 - Land South of Mickleover 5-10ha
STRA 3 – Former Drakelow Power Station up to 68ha.

The IGV employment allocation is part of a significant SUE whereby there is a total of 3,950 dwellings allocated for development across Policy H15 and STRA1. The infrastructure requirements for this development are substantial. There is no clear evidence showing the trajectory of how and when the employment land will be delivered as part of this SUE. In any event it is evident that it is highly unlikely to be within the next 5 years and in all probability will be significantly longer. This is not a solution to boosting employment land delivery in the short or medium term.

In respect of the proposed allocation at Drakelow Power Station, the site is identified in the Employment Land Review (ELR) as being a strategic development serving a larger than local market. The site is owned by E.ON and the ELR notes that "*at the time of writing, it is unclear whether development in the south will focus on energy infrastructure or B2/B8 uses*". We note that there has been a screening opinion submitted for the development of a solar farm on a large part of the proposed allocation site (33ha) (reference DMOT/2024/0152). Whilst an application has not yet been submitted this identifies real concern that the site may not be utilised for employment development.

There are also large infrastructure constraints to the delivery of this site, in terms of connecting the land with the A38, including crossing the River Trent. Land at the top of the site also comprises Drakelow Nature Reserve. Whilst we recognise that this is a brownfield site where development of some form will likely take place, there is significant uncertainty and infrastructure constraints to justify that this will deliver employment land at any speed. There are again real concerns about the deliverability of this site within the forthcoming plan period.

There are significant question marks over the delivery of the above two sites and particularly the speed at which employment land will come forward. These two sites total 138ha.

Similarly, the employment allocation at STRA2, land south of Mickleover, which is more modest at 5-10ha, is part of a large SUE (2,500 dwellings) and is highly unlikely to deliver employment development in the short term. Indeed, it is noted that SDDC accept in their housing trajectory that 850 dwellings of the 2,500 will be beyond the plan period. It is questionable whether the employment

land will be delivered as part of this plan period. Further we note that policy STRA2 states 'employment generating land' rather than a specific requirement for Use Classes E(g); B2 or B8.

In respect to employment delivery as part of the existing Local Plan, up until March 2023, this has been very modest, as set out in our Regulation 18 representations on the Local Plan Part 1. For the 12-year period, 2011-2023, a total of 46.98ha of employment land was delivered. Losses in that period were 24.77ha and so a net delivery of 22.21ha, which over the 12-year period is an average of 1.85ha a year.

Furthermore, of that 46.98ha, 12.91ha was delivered on the Nestle Site in Hatton. This was for the expansion of the existing business and the ELR notes on the Nestle site that "*only occupier ever likely to be Nestle. Future after Nestle likely to be in alternative use"*. If the 12.91ha Nestle expansion is taken out of the figures, then only 34.07ha has been completed since April 2011. With losses of 24.77ha, that leaves a delivery of 9.3ha for the period 2011-2023, which equates to 0.77ha per annum. In addition, the completions table demonstrates that a significant proportion of employment development is from smaller sites (a further 32%).

SDDC latest AMR, for the year 2023-24, identifies net employment delivery to 36.62ha which over a 13-year period, averages 2.81ha. Delivery in 23/24 represents approximately just under 25% of total delivery over the 13-year period. Whilst this has clearly boosted overall delivery, it is indicative of the pattern that can occur with large strategic sites; ie: low delivery over a prolonged period (ie previous 12 years) and then a significant spike.

There is no evidence that the other existing Local Plan allocations are going to deliver, having been carried forward from the previous Local Plan, and as such the new Local Plan should be offering more variety in terms of site size.

The ELR recognises this, stating that *"much of the existing employment land supply, plus the emerging sites [recommend for allocation], comprise a small number of larger strategic options, primarily aimed at a larger than local B2/B8 market. The offer for smaller industrial, warehouse businesses is presently limited. This is against the strong local industrial demand reported in both Derby and South Derbyshire…. with a particular shortage of…500-1,000sq m units in the case of South Derbyshire".*

The ELR also identifies that occupancy rates suggest supply shortages in South Derbyshire. Occupancy rates as of September 2022 for industrial space in South Derbyshire were 96.5%. Occupancy rates of 90-95 percent can be considered a reasonable balance between a vibrant, active market, providing good returns to landlords and providing capacity for churn and growth in the market. A higher occupancy rate is an indicator of a full market with businesses having difficulties in finding adequate premises. The limited delivery and availability of units over recent years reflects restricted supply and allocation of land.

The proposed reliance on large strategic sites will stifle employment land delivery over the next 5-10 years, as these sites will simply not come forward in time. Whilst there may be delivery towards the end of the plan period (albeit there is no clear evidence of this at present), this will cause a vacuum in the short to medium term.

If one or more of the strategic sites either fail to deliver or are significantly delayed, this will have a significant adverse impact on the economic ambitions of the District. The Local Plan requires a greater variety of scale of sites, so that there is flexibility in the event that the strategic sites either fail to come forward or are delayed in delivery.

SDDC should be more ambitious in its approach to realising growth and additional sites of a smaller size should be allocated to provide choice to the market and ensure that sites are available to meet market demand.

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

The Local Plan Part 2 provides an opportunity to overcome our concerns and allocate additional sites for employment use, at a scale to provide flexibility and safeguard against limited delivery in the early years of the Plan period.

The Site being promoted by Rula Developments Limited comprises approximately 6.5ha of grazing land to the north-west of the A516. It is a short distance from the junction with the A50 and to the north of the settlement of Hilton. The site has existing planting along its boundaries, with a small block of woodland to the north and hedging adjoining the A516 to the south-east.

Rula Developments Limited is promoting the site for employment development. At this stage this potentially could be a mix of Use Class E(g) (Office/research & development/ light industry), B2 (general industry) or B8 (storage and distribution). The site represents a logical extension to the successful development at Badger Farm. The Site has been promoted through the SHELAA (site 196) and representations were sent in April 2021 to SDDC. That representation included a site masterplan, a technical highways note, an initial landscape and visual statement and a heritage note. The submission identified that there were no significant constraints to the delivery of the site and that the site provided an opportunity to provide employment development in a strategically appropriate location.

Hilton is the second largest settlement in South Derbyshire with circa 3,300 houses. Significant housing has been delivered here in the past 25 years, but employment opportunities and services and facilities have not been developed at the same pace. The Hilton Neighbourhood plan notes that "*Hilton has a facilities deficit compared with other places in Derbyshire with a similar population. For example, it does not have a café, care home, butchers, bakers, library, swimming pool or petrol station*". It also notes that "*Hilton is a dormitory village with residents commuting to work in a wide range of locations".*

The current Local Plan Part 1 allocates 7ha of land at Hilton Business Park (Policy E1B). To date only 0.27ha of this has been delivered. Proposed Policy E1(e) now identifies only 3ha of land in Hilton for employment development. This reflects the removal of the backland part of the site at Don Amott Leisure Kingdom, which is not available for development by any other party. In respect of the remaining 3ha the ELR notes that "*No identified development plans on the remaining land. It is likely that the developer will seek a majority housing development on the site, given what has been developed to the west*". We note there is also an application for 60 affordable dwellings on part of this site (application reference DMPA/2023/0822), albeit this has been submitted for some time. As such Hilton is a settlement which should be looking to provide additional employment land in order to assist with sustainability and avoid becoming a dormitory village. To date limited employment land has been delivered in this settlement and this site represents a good opportunity to deliver employment development, but without increasing traffic concerns within the village itself.

The Site is well placed geographically both in terms of its proximity to the A50 growth corridor and the settlement of Hilton. In terms of deliverability the Site also provides an opportunity to get units on to the market as quickly as possible within the plan period. Allocating additional land for employment use through the Local Plan Part 1 will assist with delivery as early in the plan period as possible, rather than being reliant on waiting for the new Local Plan review. A key economic asset for South Derbyshire is the A50 which is a strategic corridor connecting to the M1, A38 and M6. The ELR consistently refers to the importance of the A50 growth corridor, and we note that delivery which has taken place in the plan period has been strongest at Dove Valley Business Park, where there is good access to the A50. If this is not accepted, our view is that such allocations must be made in the Part 2 Plan to deliver an overall strategy that provides a range in the scale of employment sites and provides a genuine choice to the market.

We have consistently raised concerns regarding the extent and range of employment allocations within the emerging Local Plan. Part 1 identifies only strategic allocations, and we understood that there would be an opportunity for the Local Plan Part 2 to consider non-strategic sites. This has not happened and exacerbates concerns we raised in the Local Plan Part 1. We will continue to push this issue both at examination of the Local Plan Part 1 and through contribution to the preparation of the Local Plan Part 2.