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South Derbyshire District Council
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Sent via email to: local.plan@southderbyshire.gov.uk

30th January 2026

Re: South Derbyshire Local Plan Review Part 2 – Issues and Options Consultation

This letter comprises Gladman Developments Ltd (Gladman) written representation in response to South Derbyshire District Council's (the Council) Local Plan Review Part 2 Issues and Options consultation published in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations (as amended).

Gladman is a leading strategic land promoter with considerable experience of the development management and plan-making process. As a company, Gladman has submitted representations on numerous planning documents both at a national and local level. Gladman has also actively participated in multiple Examination in Public hearing sessions on emerging Local Plans.

Gladman have two land interests in South Derbyshire which are being promoted through the emerging Local Plan and are capable of delivering suitable and sustainable residential-led development, these are:

- Land off Etwall Road, Willington (see appendix 1)
- Land off Weston Road, Aston-on-Trent (see appendix 2)

Further details regarding these two sites are provided in site submissions appended at the end of this response.

These representations are made with the intention of assisting the Council in successfully preparing and adopting a sound Local Plan, which positively meets the needs of the district and delivers sustainable development. The comments contained focus on a select number of topics covered within the Issues and Options document and are preceded by a brief overview of the plan-making elements of the National Planning Policy Framework (the Framework) and relevant legal requirements.

South Derbyshire Local Plan Review – Issues and Options Part 2 Review

Background

The South Derbyshire Local Plan was adopted in June 2016. This document sets out the long-term strategic vision, objectives and planning policies to guide development across the borough up to 2028.

The Council has begun work on preparing a new Local Plan and Gladman recognise the Council's ambitious timescales relating to the new Local Plan, as set out in the most recently published Local Development Scheme (LDS) in March 2025.

The Council is currently undertaking an 'Issues and Options' Local Plan Part 2 Review which closes on the 30th of January 2026. The Issues consultation provides an opportunity for residents and stakeholders to comment on what issues the new Local Plan should address and how it can help tackle local priorities. The Council sets out a number of questions in the consultation document that it considers the Local Plan Review should address.

The sections that follow below include specific comments from Gladman on a range of topics and questions that have been posed in the Issues and Options consultation document.

Approach to the Local Plan

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?

It is noted that the Council consulted on the Pre-Submission Local Plan Part 1 Review in Spring 2025, however there have been delays to the plan's submission, and at the time of writing, the Local Plan Part 1 Review had still not yet been submitted to the Secretary of State for examination.

There are still a number of outstanding concerns and objections to the Council's approach in the Local Plan Part 1 Review, which seeks only to allocate two new strategic scale housing sites (STRA1: Infinity



Garden Village and STRA2: Land south of Mickleover). Until the Part 1 Review examination has commenced, uncertainty remains regarding the quantum of development which could be expected to be delivered from these two sites within the plan period to 2041. The Council's expectation that 3,450 dwellings could be delivered from these sites appears overly optimistic.

Any reduction in the expected delivery from either site would have direct implications for the overall housing delivery and impact on the Council's ability to meet their Local Housing Need and proportion of Derby City's Unmet Need.

Progressing the Local Plan Part 1 Review is likely to require significant resource from the Council's officers and the Council would be better concentrating resource on dealing with outstanding matters related to the Part 1 Review and progressing that plan through the examination process to adoption first, before it begins to think about the Part 2 Review. Progressing the Part 2 Review now is premature and risks resulting in abortive work until such time as the number of homes the Part 2 needs to plan for have been quantified.

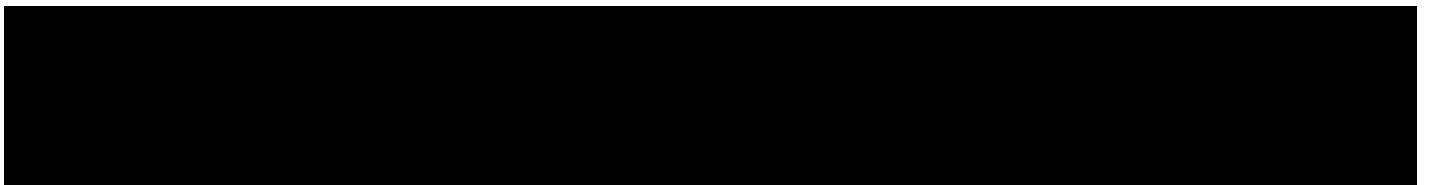
As such, in response to Question 1, the Council should produce a single Full Local Plan under the new system which will be able to deal with strategic matters more effectively. Whilst Gladman are of the view that the Council should not be progressing the Local Plan Part 2 Review at this time, for completeness, we have responded to further questions in the instance that the Council choose not to produce a single Full Local Plan Review.

Housing Allocations

Question 2: Where should the housing needs be met?

It is sensible to continue to be focused in the top-tier settlements identified within the Council's settlement hierarchy, including Swadlincote, Burton-on-Trent, and locations on the edge of Derby City. These areas represent the most sustainable locations for accommodating development due to their access to employment, transport, services, and strategic infrastructure.

Historically, the Derby urban edge has played a central role in meeting South Derbyshire's housing requirement, reflecting its strong functional relationship with the city and its ability to support sustainable patterns of development. However, given the scale of growth already directed to this area, there is a risk of market saturation and delivery constraints if over-reliance continues. A broader and more balanced spatial strategy will therefore be required to maintain delivery rates.



Growth therefore should be directed to key service centres such as Willington and Aston-on-Trent, that are located close to Derby City with good public transport links into the city and have a wide range of services and facilities available. Those within close proximity to Derby will allow for the provision of sustainable infrastructure and will support the vitality of villages.

Directing growth to these locations on small and medium sized sites would assist the Council in ensuring they are able to maintain a five-year housing land supply as it is well documented that smaller sites are able to begin delivering significantly sooner than large-scale strategic allocations. Furthermore, additional growth in the Key Service Centres would help to ensure a wider range of choice in the housing market by allowing more SME housebuilders to enter the market.

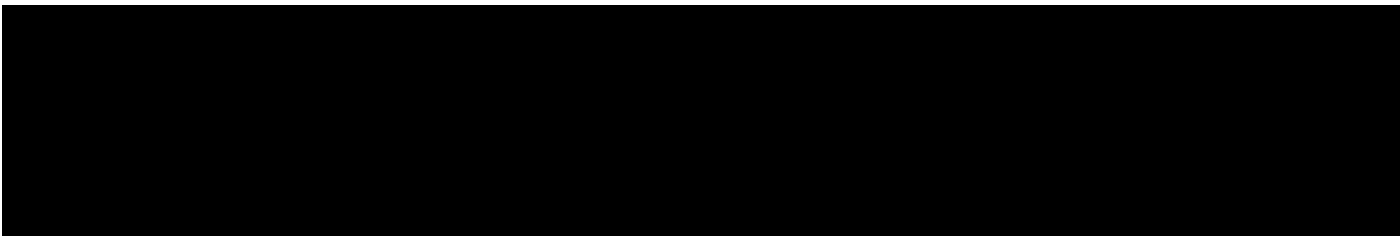
Question 4: Are there any other issues that the Council should consider when ensuring the timely delivery of the right homes in the right places (e.g. policy criteria for looked after children, re-allocating unimplemented employment allocation)?

It is noted that the Council have considered an option of the re-allocation of employment land for residential purposes due to the latest evidence showing that there is a surplus of employment land of nearly 7 hectares. Gladman would caution the Council against this approach for two reasons, firstly, as rightly acknowledged by the Council, there are a number of reasons why having a surplus is beneficial. Secondly, there will be clear reasoning why these sites have previously been identified for employment uses, and it is highly likely that these sites will not necessarily be appropriate for residential development, be that due to location or other constraints, such as flooding. Furthermore, if any of these sites are brownfield, there could be considerable remediation costs associated with making the land suitable for development, which could have an impact on the viability of future schemes.

[Accelerating Housing Delivery](#)

Question 7: Should the Council allocate land South of Mackworth for development within the Plan Period?

Gladman do not support the identification of land South of Mackworth for development post plan period.



There is significant uncertainty regarding the deliverability of this site, most notably because the landowner has confirmed that the site is not available for development, as confirmed during the Amber Valley Borough Council Local Plan Examination. As a result, the site cannot currently be considered developable or deliverable in accordance with national planning policy requirements. A site that is not available is highly unlikely to come forward.

If the Council are minded to identify areas of future potential housing growth they should be identifying sites that are genuinely available, suitable, and achievable, and which can demonstrate a clear prospect of delivering housing. Prioritising such sites will strengthen the overall plan strategy and avoid the risks associated with relying on future growth locations that have fundamental barriers to delivery.

In this context, the Council should give thorough consideration to alternative sites that are in confirmed landowner control and have a much stronger likelihood of progressing to delivery during the plan period.

Settlement Boundaries

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)?

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

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

Gladman would encourage the idea of looking at more flexible policies towards settlement boundaries. This could include looking more favourably at viable sites adjacent to sustainable settlements to come forward outside of defined built-up areas. This would allow the Council to address housing land supply shortfalls without the need to depart from the provisions of the Local Plan. However, the Council would still have the flexibility to refuse a scheme if it was considered to be unsustainable.

Policy HOU5 of the adopted Ashford Local Plan 2030 provides a good example of how this can be implemented in practice. The policy states, *“Proposals for residential development adjoining or close to the existing built-up confines of the following settlements will be acceptable: ... providing that each*

of the following criteria is met". The policy then goes on to list several criteria which must be met, such as the scale of the development being proportionate to the size of the settlement and the site being within safe and easy walking distance of basis day-to-day services.

Overall, the Council would be able to retain more control over development in the district and be less vulnerable to speculative development.

Green Belt

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?

Gladman support the Council in undertaking a Green Belt review with the specific objective of identifying any potential Grey Belt land within the district. The approach to Green Belt within the Local Plan is an important component of the spatial strategy, given the boroughs proportion of constrained land and the need to accommodate growth in sustainable locations.

The introduction of a "Grey Belt" category provides an opportunity to take a more nuanced evidence-led approach to the Green Belt assessment, enabling the Council to distinguish between land performing essential Green Belt functions and areas that offer potential for sustainable development without undermining the wider integrity of the Green Belt.

Infrastructure

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 this is not feasible.

Gladman recognise the importance of ensuring that public open space, SuDS, and other associated infrastructure are subject to appropriate long-term management and maintenance. Effective stewardship of these elements is essential to preserving the quality, lifespan, safety, and overall attractiveness of new development in the long term. Well maintained green infrastructure and drainage systems play a key role in supporting sustainable communities and maintaining the character of a place.

However, the question of whether these responsibilities should be adopted by a public authority is more appropriately directed towards the relevant public bodies themselves. It is crucial that the

Council fully understands the feasibility, resource implications, and long-term financial commitments associated with adopting and maintaining such infrastructure.

In Gladman's experience, the long-term management and maintenance of open space, SuDS and other infrastructure is often outsourced to private management companies, which can provide a practical and effective solution where public adoption is not viable. This approach is widely used across the development industry and can ensure consistency and reliability in maintenance standards.

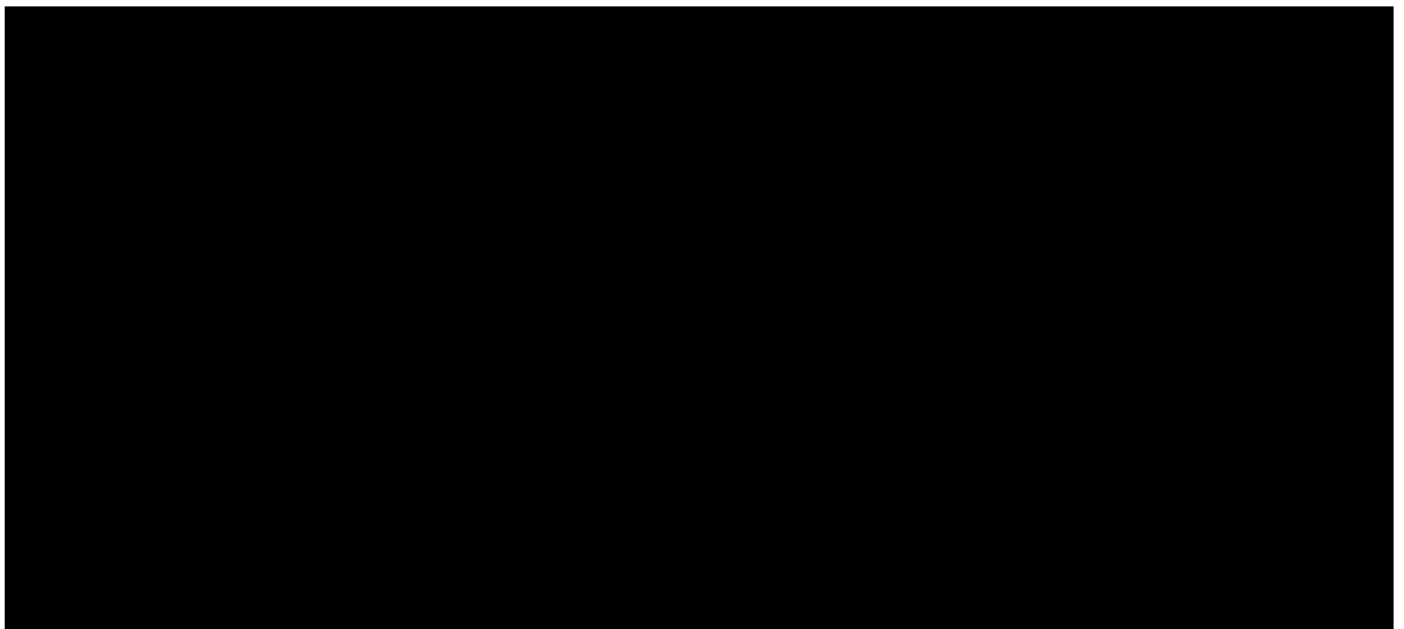
For this reason, Gladman do not support introducing a policy that requires adoption by a public authority as the default position. Any policy should instead retain flexibility to allow for management arrangements that are appropriate to the site, viable, and deliverable, whether through public adoption or via established private management structures.

Summary

Gladman welcomes the opportunity to comment on the South Derbyshire District Council Issues and Options Part 2 consultation document. These representations have been drafted with reference to the revised National Planning Policy Framework (December 2024) and the associated updates that were made to Planning Policy Guidance.

Gladman has provided comments on several of the issues that have been identified in the Council's consultation material and recommends that the matters raised are carefully explored.

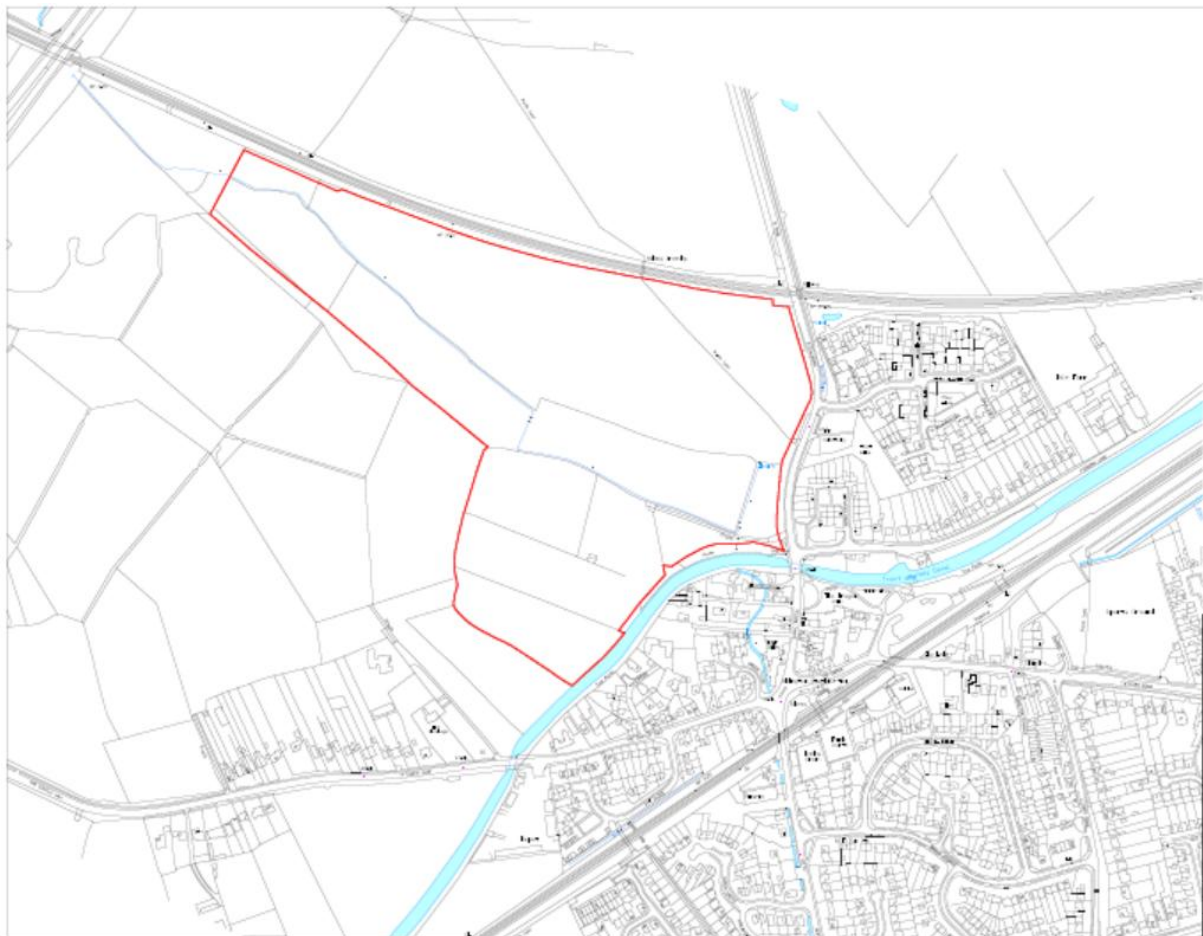
We hope you have found these representations informative and useful. Gladman welcomes any further engagement with the Council. If you would like to discuss this representation or other matters, please contact us at [REDACTED]



Appendix 1

Land off Etwall Road, Willington

Gladman are promoting land off Etwall Road, Willington for a scheme of residential development and associated community infrastructure. The site presents an excellent opportunity to deliver in the range of 200-300 new high-quality market and affordable homes. Depending on the quantum of growth directed towards Willington, the site has the capacity and ability to develop further west and deliver a greater number of new homes, whilst remaining sympathetic towards its surroundings.

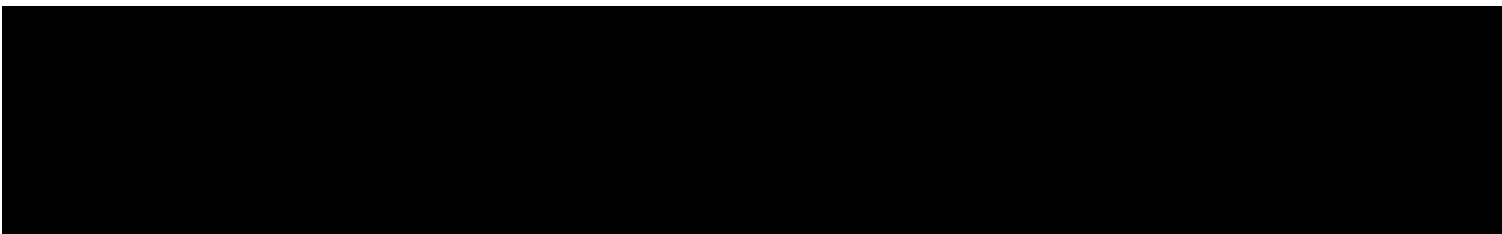


The circa 16 hectares site located off Etwall Road is formed by a number of field parcels which are currently in agricultural use and is bounded by open countryside to the west and south. The Crewe – Derby Railway line forms the northern boundary of the site and Etwall Road the eastern boundary. The site provides an exciting opportunity to deliver a distinctive development of between 200 and 300 market and affordable homes located directly adjacent to the built-up boundary on the north side of Willington and opposite the recent Peveril Homes residential development on the eastern side of Etwall Road.

The village of Willington is located c.9km from the centre of Derby immediately to the south of the A38/A50 junction. Willington is classed as one of ten 'Key Service Centres' and is one of the most sustainable settlements outside of the main urban areas, providing all of the day-to-day services for existing residents including a supermarket, primary school, doctors surgery, pharmacy, railway station, take-aways and pubs. All of the amenities on offer in the village are within safe and easy walking distance of the site. In addition to local amenities, the village is next to one of the largest employers in the region, with Toyota Motor Manufacturing Factory on the village's doorstep.

Willington is the only village out of the ten 'Key Service Centres' to have a railway station. There is a frequent rail service from Willington to Derby and Nottingham with the journey into Derby only taking 8 minutes. There are two services operating in the morning which arrive before 9am, making it possible for commuters to use to reach the centre of Derby.

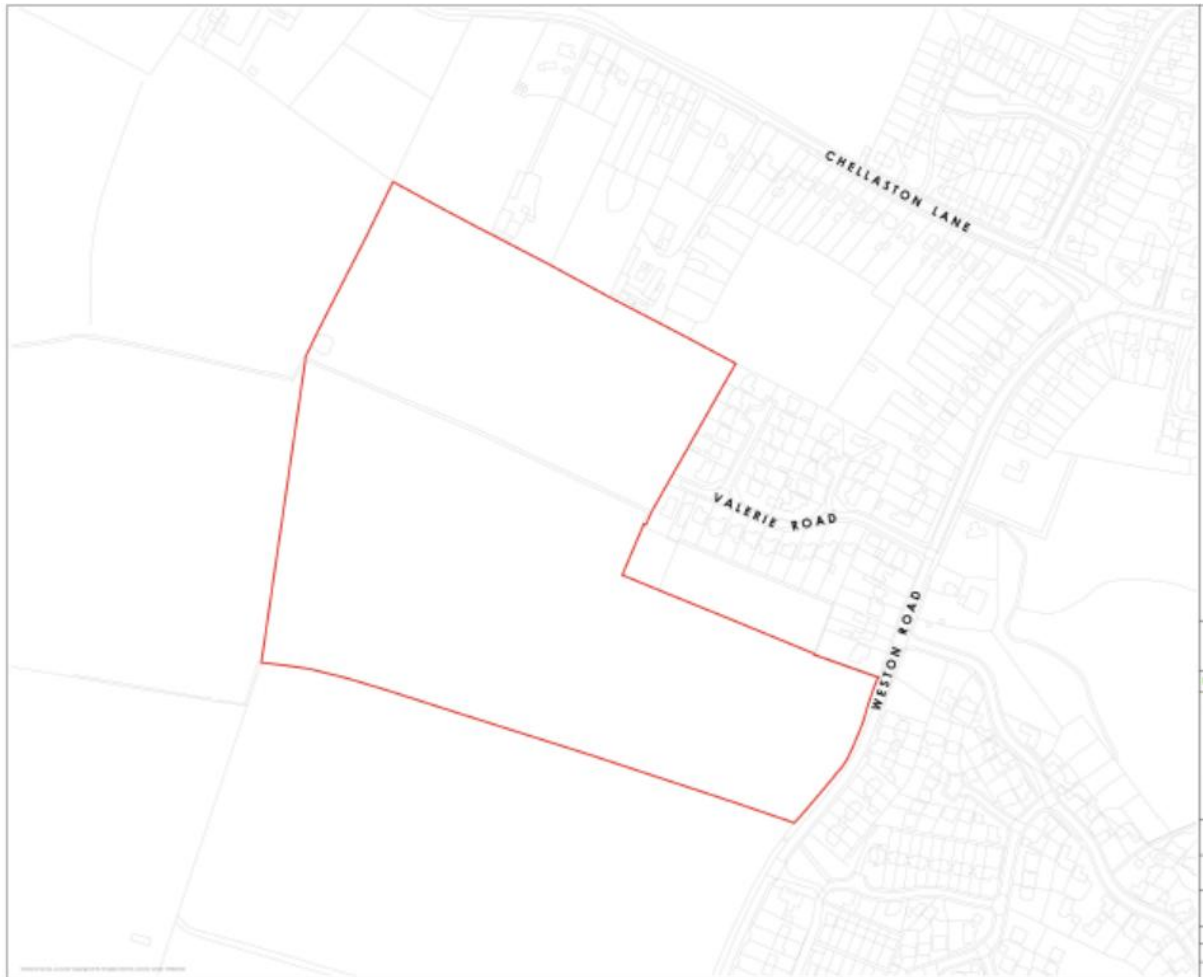
Willington is also served by an hourly bus service, the V3, which takes 30 minutes into Derby and begins at 7.07am and runs through to 11.15pm. The excellent public transport links available from Willington into Derby make it a suitable and sustainable location for delivering a proportion of Derby City's unmet need.



Appendix 2

Land off Weston Road, Aston on Trent

Gladman are promoting land off Weston Road, Aston on Trent for a scheme of residential development and associated community infrastructure. The site offers an exciting opportunity to deliver a distinctive development of between 100 and 200 market and affordable homes located directly adjacent to the built-up boundary to the south of Aston on Trent.



The circa 10.3 hectares site is located off Weston Road and is formed of two fields which are currently in agricultural use. Existing residential development abuts the site on its northern and eastern boundaries. To the south and west of the site is open countryside. The site is not subject to any landscape, wildlife, heritage or ecological designations.

The village of Aston on Trent is located c.10km from the centre of Derby to the south of the A50. Aston is classed as one of ten 'Key Service Centres' and offers a wide range of day-to-day services for existing

residents including a primary school, doctors' surgery, shop, post office, village hall and two public houses. All of the amenities on offer in the village are within safe and easy walking distance of the site.

Aston on Trent is well served by public transport. The number 73 bus, which is operated by Diamond Bus, provides an hourly bus service between Aston and Derby and stops directly outside the site along Weston Road. There are two services which reach Derby before 9am providing a reliable and realistic alternative to the car for commuters into Derby.

Safe and suitable vehicular access can be provided into the site off Weston Road via a priority control junction. The previous outline planning application (9/2019/0646) received no objections from Derbyshire County Council in relation to access or offsite highway safety, therefore demonstrating the site can be safely accessed for all users.

Gladman would welcome the opportunity to discuss the potential of the site further with South Derbyshire and the local community.

