

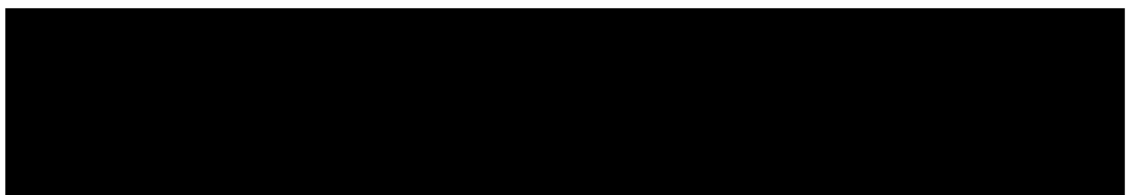
Representations

South Derbyshire Local Plan Part 2 Review

Issues and Options

Rainier Developments Limited

January 2026





1. The following representations are made in response to the South Derbyshire Local Plan Part 2 Review Issues and Options on behalf of Rainier Developments Limited (Rainier) in respect of their land interests at land at Elm Tree Farm, Hilton (SHLAA Site 187). A response has been made only to the questions relevant to Rainier's land interests.

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. Rainier do not have a preference on which option is pursued by the Council. However, whichever option it chooses, the Council will need to ensure that its Plan can meet the tests of soundness as set out in the Framework. In particular, that it has identified sufficient sites to demonstrate it can fully meet its housing requirement for a period of at least 15 years from adoption of the Plan. This will be for a Plan period that extends beyond 2041 as currently proposed within the Part 1 Review, and that is informed by the latest evidence of housing need and any unmet needs arising from Derby.

Question 2: Where should the housing needs be met? Please provide site details including projected delivery timescales and the specific need being met.

3. The Council need to ensure it has identified sufficient deliverable sites for five years following the intended date of adoption, and developable sites for subsequent years 6-10, and where possible 11-15 to fully meet its housing requirement. This includes identifying sites to provide flexibility to ensure the requirement is fully met, and a mix of suitable sites. Further, the Plan needs to set out the anticipated rate of delivery on specific sites that it intends to rely upon to meet its housing requirement.
4. Rainier do not consider the Council have demonstrated this within its proposed Part 1 Review, and that relying on the sites and assumptions in the Part 1 Review to meet its housing requirement would not be a sound Strategy for the Plan going forward. Rainier's representations to the Regulation 19 consultation explain the reasons why the Council need to identify additional land (appended to this submission). Rainier consider the shortfall is therefore far greater than 57 homes as suggested on page 8



of the consultation document, and this needs to be reviewed prior to either Plan progressing.

5. Housing needs should be met in locations near to where the need arises, in locations which limit the need to travel and that offer a genuine choice of modes of travel as set out in the Framework, and in locations where available, achievable and suitable sites exist.
6. Hilton with a population of over 8,000 will generate housing needs during the Plan period which should be met within and around the village as far as possible. Further, as a Key Service Village, it is a location which has a broad range of services and facilities, and frequent bus services connecting with Derby. It is inherently a sustainable location for housing to meet housing needs arising from both Hilton and the wider District, and Derby.
7. Moreover, there is land available to the east of Hilton which is not constrained by any environmental designations or susceptible to flooding. Land east of Lucas Lane is not constrained by any such designations, is of limited landscape value, and is within walking distance of most of the village's services and facilities. Development east of Lucas Lane already exists and therefore it is not a strong edge to the village.
8. Land at Elm Tree Farm (SHLAA Site 187) is available, achievable and suitable as set out in the Council's SHLAA. The site could deliver up to 50 homes within the first five years of the Plan period, and we would anticipate the site would deliver homes within 2 to 3 years of securing outline planning permission. This is an important factor given the Council are currently unable to demonstrate a five year supply of deliverable housing sites. The homes would also contribute towards meeting the specific housing needs of Hilton, both market and affordable.
9. An illustrative masterplan is provided overleaf which shows how development could be accommodated and retain existing vegetation. Rainier would be willing to work with the Council and other stakeholders to bring this site forward in accordance with the Plan, and would be happy to meet to discuss this further.





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?

10. As it takes the Plan forward, the Council will need to be mindful of the NPPF reforms and the Government's focus on supporting small and medium housebuilders. In that respect, the Council should consider allocating small/medium size housing sites that can deliver up to 50 dwellings and help to support that part of the housebuilding economy. Such sites can of course be delivered quicker and address short term housing supply issues.

Question 10: Do you agree with the principles for assessing the settlement boundaries, as set out in Appendix 1? Yes/No

11. Yes, but it will be important for the Council to carefully assess whether built development and its curtilage closely relates to the character of the built form (Principle 3 (c)), or the built development and its curtilage relates more to the open countryside (Principle 4 (b)). In particular, the existing built development on land east of Lucas Lane at Hilton is far more than an isolated dwelling in the countryside and of an extent which should properly be considered as part of the existing settlement.

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

12. The Council will need to review its approach to Development Management Policies once the new Framework has been published later this year.

**Marrons
January 2026**

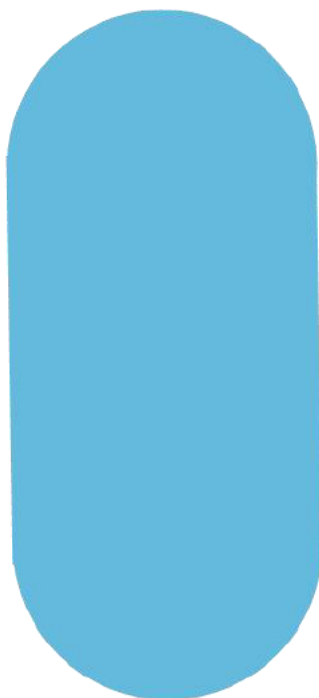
Appendix 1: Regulation 19 Representations

Representations

South Derbyshire Local Plan Part 1 Review 2022-2041
Publication Version March 2025

Rainier Developments Limited

April 2025





1. The following representations are made in response to the South Derbyshire Local Plan Part 1 Review 2022-2041 Publication Version (March 2025) on behalf of Rainier Developments Limited in respect of their land interests at land at Elm Tree Farm, Hilton (SHLAA Site 187).

Policy REV1: Review of the Local Development Plan

2. Policy REV1 C is not consistent with national planning policy and therefore not sound.
3. The requirement of REV1 C to only submit for Examination within 5 years of adoption is not consistent with Paragraph 33 of the NPPF 2023, which states that ‘relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.’
4. The Local Housing Need figure has changed significantly already, rising from 507 dwellings per annum (dpa) used in this Draft Local Plan to 581 dpa based on the latest Standard Method. Over a 15-year Plan period that equates to 1,110 dwellings.
5. On this basis, submitting the Plan for Examination within 5 years will not lead to the relevant strategic policies being updated in line with the NPPF. The Plan needs to be adopted within 5 years, and therefore Rev1 C needs to set a much stricter deadline for submission than currently drafted.
6. The Local Development Scheme 2025-2028 (LDS) sets out a timetable for the Full Review of the Plan, although confusingly it also refers to this as a Part 2 Plan covering non-strategic policies. It is therefore not a Full Review, although at Issues and Options Stage it states it will include a Full Review of the Policies in the Part 1 Plan to be submitted to PINS at a similar time. A Plan should be considered sound at the point of submission, and so the Council should review its Part 1 policies anyway at this stage of the process. If it concludes they are not sound, then they should not submit the Plan for Examination but instead amend the Part 1 Plan and re-consult. To submit for Examination, and in parallel undertake a Full Review of the Draft Plan may undermine



the Plan-making process and cause confusion for participants. It is unclear therefore from the LDS when a Full Review of the Part 1 Plan will commence.

Proposed Change

7. Policy REV1 C needs to be re-written to provide a timetable for the review of the Plan that leads to adoption within 5 years in accordance with the NPPF.



Policy S1: Sustainable Growth Strategy

8. Policy S1 i) is not positively prepared, justified, or consistent with national planning policy and therefore not sound.

Plan Period

9. The Local Plan proposes a Plan period of 2022-2041. The Framework requires Strategic Policies to look ahead over a minimum 15-year period from adoption. The Local Development Scheme 2025-2028 published in March 2025 states the Local Plan is not anticipated to reach Regulation 22 until Autumn 2025 and will be adopted by Spring 2026. However, given the average length of time it takes an Examination to take place and the likely need for proposed modifications, the Plan is more likely to be adopted in 2027. On this basis, the Plan period should be extended to at least 2042 to ensure certainty that the minimum 15-year period will be met.
10. Furthermore, whether the Plan is adopted in 2026 or 2027, there is no justification for a Plan period that starts 4 or 5 years before the Plan is adopted, and there is no support for adopting such an approach in the NPPF or NPPG.
11. NPPF2023 paragraph 22 requires strategic policies to look ahead over a minimum 15-year period. There is no requirement for strategic policies to also look backwards 5 years.
12. The consequences of having strategic policies that look backwards is that in this case it undermines the ability of the Plan to make sufficient provision to meet the housing requirement.
13. Policy S1 i) proposes a housing requirement of 763 dwellings per annum (dpa). In the period between 2022-2024, there were 2,181 completions¹. Therefore, there were 655 completions in excess of the proposed Local Plan requirement (2,181 - 763 x 2). The inclusion of supply between 2022-2024 means that the housing requirement for

¹ Appendix 5 of the Draft Plan

the 17 years ahead from 2024-2041 will not be met. This is irrespective of whether the identified sites and unidentified sites deliver as expected.

14. The December 2023 NPPF paragraph 60 clearly states the Government's objective is to significantly boost the supply of homes. That has not changed with the change in Government. By adopting a Plan period that looks back 4 or 5 years, the Council is manipulating the figures to avoid meeting the housing needs of the District.

Housing Requirement

Local Housing Need

15. The housing requirement is 14,500 dwellings, made up of 9,633 dwellings towards local housing need and 4,867 dwellings towards Derby's unmet needs. The local housing need uses a standard method figure of 507 dwellings per annum (dpa) which is out of date. The current local housing need figure is 581 dpa which gives a requirement of 11,039 dwellings. Paragraph 4.34 of the Plan advises there are no exceptional circumstances to deviate from the standard method of calculating housing needs. On this basis, the Plan should express the local housing need figure as 11,039 dwellings.
16. Whilst paragraph 234 a. of the NPPF 2024 dictates that the policies of the NPPF 2024 do not apply, it does not say that the new Standard Method does not apply. The Council could have chosen to amend its local housing need figure prior to this Regulation 19 and introduce new allocations (as it has already done anyway). Paragraph: 008 Reference ID: 2a-008-20241212 of the NPPG is clear that strategic policy-making authorities should take into consideration changes to housing need figure prior to submission.

Unmet Need

17. The contribution of 4,867 dwellings to help meet Derby City's unmet need across the Plan period has been informed by the Statement of Common Ground (SoCG) for the Derby Housing Market Area (HMA). The SoCG is based on an out-of-date standard method and should be updated. It also refers to Derby City having a supply of 12,500

dwelling for the period 2022-2039 but this figure has not been justified, evidenced, or tested, and an updated SHLAA is awaited from the City Council.

18. In the absence of any evidence to support Derby's housing land supply and therefore the extent of its unmet needs, it is not possible to conclude the contribution proposed by this Local Plan is sufficient to meet unmet needs.

Other Factors

19. The housing requirement should be increased to take account of affordability within the District, consistent with Paragraph 2a-024-20190220 of the NPPG. The Derby and South Derbyshire Local Housing Need Assessment identifies a need for 214 affordable homes per annum. Although the Assessment suggests this is not a reason to increase the housing requirement, the need as identified represents over 40% of the total local housing need per annum. Given the Council only seek to secure 40% of new housing as affordable on sites of over 10 dwellings, and that the 40% figure is a target that still needs to be tested as to its effects on viability, the housing requirement should be increased to take account of the need for affordable housing.
20. In addition, rates of past delivery have averaged over 1,000 dwellings per annum, notably higher than the proposed housing requirement figure of 763 dwellings per annum. This is evidence of market demand and further reason for a higher housing requirement.

Proposed Change

21. Policy S1 i) needs to be amended to reflect a Plan period of 2024 to 2042, and set a housing requirement that reflects the current standard method, an evidenced contribution towards unmet needs arising from Derby City, levels of affordability, and the evidence as to past rates of delivery.

Policy S4: Housing Strategy

22. Policy S4 is not justified, effective, or consistent with national planning policy and therefore not sound.

Flexibility and Contingency

23. The policy only makes provision to meet the housing requirement and does not provide any flexibility or contingency should any of the sites not come forward as planned. Typically, you would expect a Plan to make an over provision of some 10-20% to allow for circumstances where a site(s) is delayed or does not come forward at the rate envisaged. This is important where reliance is placed on a small number of large sites to meet the requirement as in this case. Any failure in delivery on the strategic allocations, even 1 year, would mean the housing requirement is not met. Plans should be positively prepared in a way that is aspirational but deliverable (paragraph 16 b) of the NPPF), and the Plan should make an over-provision of at least 10% to ensure delivery.

Reliance on Previous Allocations

24. Paragraph 69 of the December 2023 Framework requires policies to identify a supply of specific, deliverable sites for five years following adoption, and specific developable sites for subsequent years 6 onwards. Appendix 5 of the Plan shows that it is heavily reliant on sites allocated in the 2016 and 2017 Plans adopted over 8 years ago, with over 60% of the housing requirement (9,242) to be met on this component of supply. Whilst a number of these sites are under construction, some of the sites have yet to start and the Plan fails to provide clear up to date evidence as to how these sites meet the definitions within the Framework for deliverable and developable. The failure of these sites to deliver any homes since being allocated eight years ago is not an indicator that the sites should be relied upon going forward.

Proposed Allocations

25. Further, in relation to the balance of the supply, Appendix 5 also sets out the trajectory illustrating the expected rate of housing delivery over the Plan period of the two new allocations. There is a heavy reliance on these two new allocations (STRA1 and STRA2) amounting to 3,450 homes over the Plan period (24% of the total housing

requirement). No evidence is provided to demonstrate this level of delivery is effective and consistent with the requirements of paragraph 74 d) of the NPPF2023. These representations are elaborated upon in relation to the site-specific policies.

Windfalls

26. The estimated level of windfalls at 1,515 dwellings is not justified. Firstly, the trajectory at Appendix 5 includes windfalls in the first 5 years of the Plan period (2024-2029). These should not be included to ensure double counting with extant planning permissions is avoided. Further, relying solely upon past trend averages is not sufficient for a forward projection to be made. As the NPPF2023 states at paragraph 72, where an allowance has been made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. No evidence has been provided to demonstrate that there is sufficient capacity within the District to deliver windfalls of 1,515 homes to 2041.

Five Year Supply on Adoption

27. There needs to be clear evidence that there are deliverable sites for five years following the intended date of adoption in 2026 (paragraph 69 a) of the NPPF2023). The trajectory at Appendix 5 demonstrates the Plan is heavily reliant on the sites allocated in the 2016 Plan, as well as the two new strategic sites which are expected to contribute 450 homes by 2031.
28. Whilst some of the 2016 Plan allocations are under construction, a number of the larger sites relied upon are not. Further, there is no clear up to date evidence as to how these sites meet the definitions within the NPPF2023 for deliverable. The Plan is therefore not consistent with the NPPF2023 in failing to identify and justify a supply of sites for five years from the date of adoption.
29. The last sentence in Policy S4 states that a five-year rolling land supply will be maintained but does not advise as to how the Council will do that.

Proposed Change

30. Policy S4 needs to be amended to increase provision for additional dwellings to provide contingency in the event the two strategic allocations and other historic allocations do not deliver as estimated by the Council. Further, evidence is required
-



to substantiate the claimed trajectories of the existing and proposed allocations within Appendix 5 both within the plan period and the first five years post adoption, and to substantiate the windfall allowance. Notwithstanding the above, the housing requirement will not be met, and the Council should identify additional specific deliverable sites such as land at Elm Tree Farm, Hilton (SHLAA Site 187) to bolster supply.

Policy STRA1: Infinity Garden Village Mixed-Use Allocation

31. Policy STRA1 and the allocation of the Infinity Garden Village Mixed-Use Allocation is not effective and deliverable over the Plan period, and is not sound.
32. The trajectory at Appendix 5 of the Plan states the Infinity Garden Village Mixed-Use Allocation will deliver 150 dpa from 2029/30 through to the end of the Plan period. It is wholly unrealistic to expect an allocation of this size to start delivering homes within 3 years of the Plan's adoption, and completions at this delivery rate will not be achieved in the timeframe the Plan has anticipated.
33. Lichfield's 'Start to Finish' Third Edition published in March 2024, demonstrates that large-scale housing sites delivering between 1500-2000+ dwellings, have a median average timeframe of 6-7 years from the validation of the first application to completion of the first dwelling. Further, it is noted that Policy STRA1 E does not allow any occupations prior to necessary infrastructure being provided to serve that dwelling/phase. In addition, Policy STRA1 F requires an updated Development Framework Document to be prepared and approved prior to approval of the first planning application, and that document must demonstrate how this policy has been complied with. There are therefore a number of aspects of the policy that will impact on the delivery of dwellings, and the rate of delivery.
34. Further, as identified within the Infrastructure Delivery Plan, the site is reliant on public funding to secure its primary access from the A50 and this will increase the risk of delay even after permission has been granted.
35. In the absence of a timetable to first completions that is justified and evidence as to the expected completion rate, it is unrealistic to assume delivery of 150dpa within 3 years of adoption of the Plan from 29/30.
36. There is also no evidence to demonstrate the quantum of development proposed to be allocated can be accommodated within the allocation.



Proposed Changes

37. Policy STRA1 should include a realistic trajectory for the number of homes that can be delivered within the plan period and on the site as a whole which is evidenced and effective in terms of being capable of being delivered within the plan period.

Policy STRA2: Land South of Mickleover

38. Policy STRA2 and the allocation of Land south of Mickleover is not effective and deliverable over the Plan period, and is not sound.
39. The trajectory at Appendix 5 of the Plan states the Allocation will deliver 150 dpa from 2030/31 through to the end of the Plan period. It is wholly unrealistic to expect an allocation of this size to start delivering homes within 4 years of the Plan's adoption, and completions at this delivery rate will not be achieved in the timeframe the Plan has anticipated.
40. Lichfield's 'Start to Finish' Third Edition published in March 2024, demonstrates that large-scale housing sites delivering between 1500-2000+ dwellings, have a median average timeframe of 6-7 years from the validation of the first application to completion of the first dwelling. Further, it is noted that Policy STRA2 E does not allow any occupations prior to necessary infrastructure being provided to serve that dwelling/phase. In addition, Policy STRA2 F requires an updated Development Framework Document to be prepared and approved prior to approval of the first planning application, and that document must demonstrate how this policy has been complied with. There are therefore a number of aspects of the policy that will impact on the delivery of dwellings, and the rate of delivery.
41. Further, as identified within the Infrastructure Delivery Plan, the site is reliant on public funding to secure its primary access from the A38 and this will increase the risk of delay even after permission has been granted. Further, it is not yet known whether there is a need for a strategic route between the A516 and A38 to facilitate delivery of this allocation with the potential for further delay.
42. In the absence of a timetable to first completions that is justified and evidence as to the expected completion rate, it is unrealistic to assume delivery of 150dpa within 4 years of adoption of the Plan from 30/31.
43. There is also no evidence to demonstrate the quantum of development proposed to be allocated can be accommodated within the allocation.



Proposed Changes

44. Policy STRA2 should include a realistic trajectory for the number of homes that can be delivered within the plan period and on the site as a whole which is evidenced and effective in terms of being capable of being delivered within the plan period.



Policy H20: Housing Balance & Custom/Self-Build

45. Policy H20E ii) is not consistent with national planning policy and therefore not sound.
46. The requirement for 10% of all dwellings to be self and custom housebuilding (criteria E ii)) remains excessive on small sites over 30 homes. Small sites are essential for SME housebuilders but the inclusion of this policy will make delivery more challenging in relation to day-to-day site management and operation of small sites, and potential health and safety issues with multiple builders on site. This is separate from any impacts on viability covered by the policy. The threshold should be increased to remove burdening SME housebuilders.

Proposed Changes

47. Policy H20 E ii) should be amended to increase the threshold to 100 dwellings.

View Response

Response #1307064

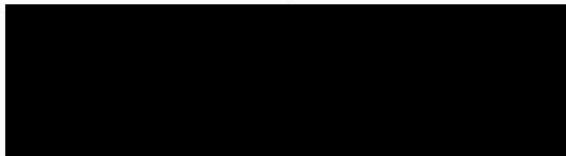
From Marrons on behalf of Rainier D...

Agent Marrons on behalf of Rainier D...

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Status Complete

Title



Organisation Rainier Developments

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

Rainier do not have a preference on which option is pursued by the Council. However, whichever option it chooses, the Council will need to ensure that its

Plan can meet the tests of soundness as set out in the Framework. In particular, that it has identified sufficient sites to demonstrate it can fully meet its housing requirement for a period of at least 15 years from adoption of the Plan. This will be for a Plan period that extends beyond 2041 as currently proposed within the Part 1 Review, and that is informed by the latest evidence of housing need and any unmet needs arising from Derby.

2.

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

The Council need to ensure it has identified sufficient deliverable sites for five years following the intended date of adoption, and developable sites for subsequent years 6-10, and where possible 11-15 to fully meet its housing requirement. This includes identifying sites to provide flexibility to ensure the requirement is fully met, and a mix of suitable sites. Further, the Plan needs to set out the anticipated rate of delivery on specific sites that it intends to rely upon to meet its housing requirement.

Rainier do not consider the Council have demonstrated this within its proposed Part 1 Review, and that relying on the sites and assumptions in the Part 1 Review to meet its housing requirement would not be a sound Strategy for the Plan going forward. Rainier's representations to the Regulation 19 consultation explain the reasons why the Council need to identify additional land (appended to this submission). Rainier consider the shortfall is therefore far greater than 57 homes as suggested on page 8 of the consultation document, and this needs to be reviewed prior to either Plan progressing.

Housing needs should be met in locations near to where the need arises, in locations which limit the need to travel and that offer a genuine choice of modes of travel as set out in the Framework, and in locations where available, achievable and suitable sites exist.

Hilton with a population of over 8,000 will generate housing needs during the Plan period which should be met within and around the village as far as

possible. Further, as a Key Service Village, it is a location which has a broad range of services and facilities, and frequent bus services connecting with Derby. It is inherently a sustainable location for housing to meet housing needs arising from both Hilton and the wider District, and Derby.

Moreover, there is land available to the east of Hilton which is not constrained by any environmental designations or susceptible to flooding. Land east of Lucas Lane is not constrained by any such designations, is of limited landscape value, and is within walking distance of most of the village's services and facilities. Development east of Lucas Lane already exists and therefore it is not a strong edge to the village.

Land at Elm Tree Farm (SHLAA Site 187) is available, achievable and suitable as set out in the Council's SHLAA. The site could deliver up to 50 homes within the first five years of the Plan period, and we would anticipate the site would deliver homes within 2 to 3 years of securing outline planning permission. This is an important factor given the Council are currently unable to demonstrate a five year supply of deliverable housing sites. The homes would also contribute towards meeting the specific housing needs of Hilton, both market and affordable.

An illustrative masterplan is provided overleaf which shows how development could be accommodated and retain existing vegetation. Rainier would be willing to work with the Council and other stakeholders to bring this site forward in accordance with the Plan, and would be happy to meet to discuss this further.

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

As it takes the Plan forward, the Council will need to be mindful of the NPPF reforms and the Government's focus on supporting small and medium housebuilders. In that respect, the Council should consider allocating small/ medium size housing sites that can deliver up to 50 dwellings and help to support that part of the housebuilding economy. Such sites can of course be delivered quicker and address short term housing supply issues.

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

«No response»

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

Yes, but it will be important for the Council to carefully assess whether built development and its curtilage closely relates to the character of the built form (Principle 3 (c)), or the built development and its curtilage relates more to the open countryside (Principle 4 (b)). In particular, the existing built development on land east of Lucas Lane at Hilton is far more than an isolated dwelling in the countryside and of an extent which should properly be considered as part of the existing settlement.

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

«No response»

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

The Council will need to review its approach to Development Management Policies once the new Framework has been published later this year.

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)

«No response»