

[REDACTED]

[REDACTED]

[REDACTED]

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Dear Sir/ Madam,

Please find attached a red line and illustrative masterplan which accompanies response #1300590 on behalf of my client.

I'd be grateful if you could confirm receipt.

Kind regards

[REDACTED]

[REDACTED]

South Derbyshire Part 2 Local Plan Review - Issues and Options

Your response has been received.

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Response #1300590

From

[REDACTED]

Date

Started: 22 Dec 2025 12:22. Last modified: 29 Jan 2026 13:43

Status

Complete

Title

[REDACTED]

Job Title

[REDACTED]

Address Line 1

[REDACTED]

Address Line 2

[REDACTED]

Address Town

[REDACTED]

County

[REDACTED]

Address Post Code

[REDACTED]

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

We believe the Council should produce a Local Plan Part 2 Review, given the advanced stage of their Local Plan Part 1 which is expected to be submitted to the Secretary of State circa Spring 2026, for Examination in Public. The Local Plan Part 1 has been based on evidence based housing numbers determined through a collaborative approach with the Housing Market Area councils of Derby City and Amber Valley. The figure of at least 14,500 dwellings to be delivered between the plan period of 2022 to 2041 reflects the needs of both the district and Derby City's unmet need.

Although the Part 1 Plan is being progressed under the Government's transitional arrangements and the December 2023 version of the NPPF, because of this evidenced based approach to its housing requirements, the Part 1 Local Plan actually exceeds the new standard housing method's requirements for 606 homes per annum, by planning for 763 homes per annum.

Therefore the Local Plan Part 2 will be, by extension, reflect this evidenced-based and up-to-date housing need also, despite the plan being progressed under the 2023 NPPF.

Given that Local Government Reform will not be in place and fully operational until 1st April 2028 , and that reorganisation as big as that proposed is inevitably going to subject to delays and challenges, it is imperative that plan making continues under the existing system to ensure South Derbyshire has an adopted and effective Local Plan in place. To provide certainty to the planning industry we urge the Council to continue with its Local Plan Part 2 review.

2.

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

We believe our client's site east of Main Street/ Ticknall Road, which sits at the heart of Hartshorne within South Derbyshire, is a natural and sustainable location to meet the District's remaining housing needs. The Site extends to 12.64 acres of predominately flat arable land and is bound by Ticknall Road and existing residential properties to the west, existing residential properties to the south, woodland and pasture land to the east and woodland to the north. Its location, sandwiched between the western and eastern residential parts of Hartshorne, makes it an ideal infill location for residential development within an existing Local Service Village. The village itself is well serviced with a post office, pubs, primary school and local clubs.

The Site benefits from vehicular access from Ticknall Road which runs along the western boundary of the Site. The Site is within close proximity to the A511 which provides connectivity to Ashby-de-la-Zouch, Burton Upon Trent (including its train station) and Coalville.

The site has capacity for 55 homes based on an illustrative layout informed by technical heritage and landscape advice, respectful of the village's character, historic buildings and landscape setting. This figure almost exactly mirrors the district's remaining shortfall over the plan period (57 homes), so could easily help to meet South Derbyshire's housing needs.

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

Firstly, we commend the Council's pro-active approach to meeting its housing need by considering that additional sites may need to be allocated beyond the minimum requirements, to ensure there is a consistent and certain land supply. This is especially the case given the Council's has recently been unable to demonstrate a five year housing land supply (PINS Ref: APP/F1040/W/25/3368728).

Secondly, we consider that settlement boundaries should be reviewed where they are arbitrary and incongruous. For example, the settlement boundary at Hartshorne does not extend around my client's site despite being largely surrounded by built environment on three of its four sides and opposite the village primary school. Settlement boundaries should reflect the functional nature of a settlement and enable natural development infill opportunities to occur as these often represent the most sustainable locations for residential development, precluding the need for sites in more isolated and dispersed locations.

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 comment

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)

The Local Plan does not necessarily need to allocate specific sites for extra care accommodation for older people or care home provision to allow for the greatest flexibility in terms of delivery across a range of sites. However, the Council should clearly maintain an up to date evidence based list on the supply required for specific accommodation needs, so that individual sites can explore provision accordingly. It is noted that the December 2023 'Derby and South Derbyshire Local Housing Needs Assessment' report indicates that there is a shortfall predicted for specialist housing units with support (2300 units) and care (1700 units), as well as care bed spaces (1400 space), during the plan period. The site at Hartshorne would be open to exploring housing for older persons if a need was demonstrated in the area.

6.

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

No comment

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 comment

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

Allocating sites is the key way to accelerate housing delivery in the District, to provide developers with certainty. The Council could also explore lighter touch PPAs for smaller less complex sites which offer a fast track and dedicated service for planning applications but do not attract the same burdensome costs as strategic scale sites. The drawn out lengthy timescales for obtaining planning permission is the single largest delay to housing delivery at present.

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 comment.

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

We agree with the principles broadly set out but draw attention to the specific principles:

Principle 3: We agree that settlement boundaries should incorporate sites allocated for housing within the Local Plan Part 1 and 2.

Against Principle 4, we do not agree within point (d) "important gaps". Unless there is a protected designation, we feel a pragmatic approach needs to be taken for what would otherwise be obvious locations for infill development, in the context of a housing and sustainability crisis. If housing can be arranged on site to mitigate impact on the settlement character, the whole site should not be automatically overlooked.

11.

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

As aforementioned, the Council should consider where boundaries feel arbitrary or do not extend around the whole settlement, in order to promote

clear opportunities for infill development.

12.

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

☐ Yes

☐ No

Please enter any additional comments

No comment

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 comment

14.

What issues regarding Swadlincote Town Centre redevelopment should

the Council consider? (Please provide details)

No comment

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 comment

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 comment

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 comment

19.

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

No comment

20.

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

No comment

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 comment

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

Policy BNE5 ' Development in Rural Areas' point iv) states that for development is 'considered to be infill that is in keeping with the character of the locality and represents the infilling of a small gap for not normally more than two dwellings, within small groups of housing'. In the context of a housing crisis, we feel that restricting infill to no more than two dwellings is artificially and unduly low, whereas the extent of infill that is appropriate is much more dependent on the site's context and capacity. Technical

assessments should be accepted which explore the appropriate level of infill that is suitable for each individual site, and respectful of each site's particular constraints, and should be considered as part of the assessment of any planning application.

We note the draft NPPF published in December 2025 indicates that a clear distinction will be made between sites inside or outside of settlement boundaries. Under Policy S2, the draft policy intends that spatial strategies should (a) identify settlements and their boundaries, including any allocations that would ultimately form part of the settlement. We therefore encourage that Hartshorne's settlement boundary is reviewed accordingly to enable development to come forward in accordance with expected future national policy. As per draft NPPF policy S4, 'development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects'.

Conversely, policy S5 makes clear that the principle of development outside settlements is much more limited, and therefore it is crucial for the Council to pro-actively allocate Part 2 sites and amend settlement boundaries at this opportune moment in the plan making process.

On a separate note, the current NPPF advises at paragraph 22 that strategic policies should look ahead over a minimum 15 year period from adoption, so there is very likely to be a need for the plan period to be extended beyond 2041, given a realistic adoption date. This would likely increase the housing shortfall further, which would need to be addressed.

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

For smaller sites below 100 homes, we feel s106 agreements represent the most proportionate route to secure the infrastructure required on or off site. We also welcome the Government's intention to prepare standardised templates for s106 agreements which we hope would speed up the process and provide greater financial certainty for smaller scale sites, and urge SDDC to consider utilising this should it be implemented.

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

We do not think a policy is required to express this. If the local authority is willing to adopt open spaces, SUDs and other infrastructure then they should discuss and agree this through the s106 agreement. However, flexibility should be maintained within the planning system, and management companies should remain options for the long-term management of such spaces without a policy restricting this possibility.

25.

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

We would welcome the consideration of our client's site at Hartshorne as a Part 2 allocation site which has the capacity to deliver around 55 homes in a village which benefits from good community infrastructure and access. Its specific location between the eastern and western parts of Hartshorne makes it an ideal and natural infill development that could meet the majority of the Council's housing shortfall. A red line plan and illustrative masterplan will be emailed separately.



Key

Application site boundary

Other land under control of applicant

Existing (retained) trees & hedgerow

Indicative proposed planting (inc. National Forest Planting)

Open space

Indicative wildflower and grassland planting

Indicative surface water attenuation basin

Proposed children's play area

Existing Public Right of Way

Pedestrian/cycle link

Proposed vehicular access

Visual links

Indicative extent of residential area

Listed Buildings in local context

0 10 50 m

nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

Project
Hartshorne

Drawing Title
Illustrative Masterplan

Project Code	Drawing Nr	Rev
n2773	005	-
Date	Drawing Scale	
24.06.2025	1:1,000 @ A2	

