

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.

[Redacted]

[Redacted]

[Redacted]

Organisation: Midlands Land Portfolio Limited

Address*:

Email:

[Redacted]

*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

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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?

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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)

The December 2024 NPPF (as carried forward from the December 2023 NPPF) states that the planning system should be genuinely plan-led, involving succinct and up-to-date plans. Therefore the Council should continue with the production of a Local Plan Part 2 in order to ensure that the Council has an up-to-date Local Plan in place a timely fashion, including the necessary site allocations and development management policies, to enable planning application decisions to be made in accordance with the Development Plan.

Question 2: Where should the housing needs be met?

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

MLPL recognises that the Council has proposed a strategy which seeks to meet its own housing need as well as contributing to meeting the unmet cross-boundary housing need for Derby City. This strategy involves proposing strategic allocations on the edge of Derby, as well as continuing to allocate sites on the edge of the existing South Derbyshire settlements. MLPL endorses the principle of this approach, but considers that the Local Plan Part 2 needs to allocate more housing sites adjacent to the existing South Derbyshire settlements in line with the settlement hierarchy for the reasons explained below.

Consideration of the Proposed Cross-Boundary Strategic Allocations

MLPL is not proposing to comment on the site-specific rationale for the draft strategic allocations identified in the emerging Local Plan Part 1 on the edge of Derby City at Infinity Garden Village (proposed Policy STRA1) and Land south of Mickleover (proposed Policy STRA2) for meeting the Derby City cross-boundary housing need. However MLPL considers that the Council needs to be realistic in its consideration of the timescales for the development of these 2no. strategic sites. There is currently an expectation, as set out in Appendix 5 of the Draft Part 1 Plan, that these 2no. strategic sites can collectively deliver approx. 3,450 new homes within a Local Plan period from 2022 to 2041.

The current Development Plan already includes some large allocations adjacent to Derby City, notably allocations: H13 (Boulton Moor) for 1,950 dwellings; H15 (Wragley Way) for 1,950 dwellings; and H19 (West of Mickleover) for 1,650 dwellings. It should be noted that 13 years into the current Local Plan period these sites collectively still needed to deliver 4,095 dwellings out of a total allocated capacity of 5,500 dwellings (i.e. 74% capacity remaining).

This demonstrates the reality that large strategic sites can take a long time to start delivering development and achieve peak annual delivery. A delivery delay of just 1-2 years from emerging draft Local Plan Part 1 proposed allocations STRA1 and STRA2 would provide a projected shortfall of 150-450 dwellings for the Plan period from these 2no sites alone (based on the draft Local Plan Part 1 Appendix 5 trajectory). This should be borne in mind through the preparation of the Local Plan Part 2 and mitigated through the allocation of additional smaller sites.

Wider Consideration of the Proposed Housing Allocations

In addition to adopted Local Plan allocations H13, H15 and H19 mentioned above, MLPL notes that the Council is also proposing to carry forward a significant number of the other existing adopted Part 1 and Part 2 Local Plan allocations into the emerging Part 1 Local Plan. In fact the analysis submitted by MLPL to the Regulation 19 Draft Local Plan Part 1 consultation showed that 34% of the capacity for the 2011-2028 period from these other existing allocations was yet to be delivered and is being rolled forward into the next Plan period.

From an overall strategy it is clear that the majority of the housing delivery which the Council is reliant upon is made up from adopted Local Plan allocations. Many of these sites have been granted planning permission and are being delivered. However some of these sites have still not been granted planning permission and if planning permission is granted for these sites following the adoption of the Local Plan Part 1 Review then regard will need to be given to the impact of the additional housing standards and affordable housing requirements set within the Local Plan Part 1 Review, as well as the current mandatory BNG requirements, on the potential housing capacity of these sites and the viability and deliverability of developing these sites. These additional policy requirements, notably in respect to BNG, were not factored into the appraisal process which informed the allocation in the current adopted Local Plan.

It should also be noted from emerging Local Plan Part 1 Appendix 5 that 14 years into the current Local Plan period, existing adopted Local Plan allocations H13, H15, H16, H19, E6, H23G, H23J, H23L and H23N (or phases thereof) are still yet to deliver any development / occupations. This highlights that there can be a significant delay in delivering some allocations. Furthermore just a 10% reduction in the capacity of these sites to account for the impact of new policy and legislative requirements would result in a decrease in capacity of c.440 dwellings. There is also still no certainty that all of these allocations will be completed during the next Local Plan period.

Paragraph 35 of the December 2024 NPPF (taken forward from paragraph 34 of the December 2023 NPPF) states that a Local Plan should set out the contributions expected from development and highlights that such policies should not undermine the deliverability of the Local Plan. Of fundamental concern is the fact that the viability testing for the proposed new strategic allocations has still not yet been published. On this basis there is still a significant degree of uncertainty over whether the remaining existing allocations and proposed new allocations will all be viable, deliverable and able to achieve the stated capacities during the emerging Local Plan period.

Approach to Allocating new Sites Through the Local Plan Part 2

The Local Plan Part 2 Issues and Options consultation document (page 8) identifies that there is considered to be a shortfall of 57 dwellings against the minimum Standard Method requirement for the Local Plan period, which should be addressed through the new Local Plan Part 2.

However MLPL welcomes the specific recognition given within the Local Plan Part 2 Issues and Options consultation document (pages 8-9) that *“the Local Plan should allocate enough sites to ensure flexibility in the supply so that if some sites don’t deliver at the time expected or there are unforeseen reasons why a site cannot be delivered as expected the overall requirement will still be met”*. MLPL considers that this approach would be consistent with the December 2024 NPPF paragraph 61 requirement to significantly boost the supply of homes and for a sufficient variety and amount of land to come forward where it is needed (as carried forward from paragraph 60 of the December 2023 NPPF).

With the above in mind there is considered to be a need for the Council to progress a robust strategy through the Local Plan Part 2 which plans for the delivery of additional smaller non-strategic allocations (in the 90+ dwelling range).

The allocation of additional smaller (90+ dwelling) sites will ensure that there is sufficient flexibility in the supply of housing land, which will overcome potential delays in delivery or reduced capacities from identified sites, and thereby enable the housing need for South Derbyshire to be met in sustainable locations adjacent to existing South Derbyshire settlements during the new Local Plan period, whilst ensuring the ongoing achievement of a five-year housing land supply.

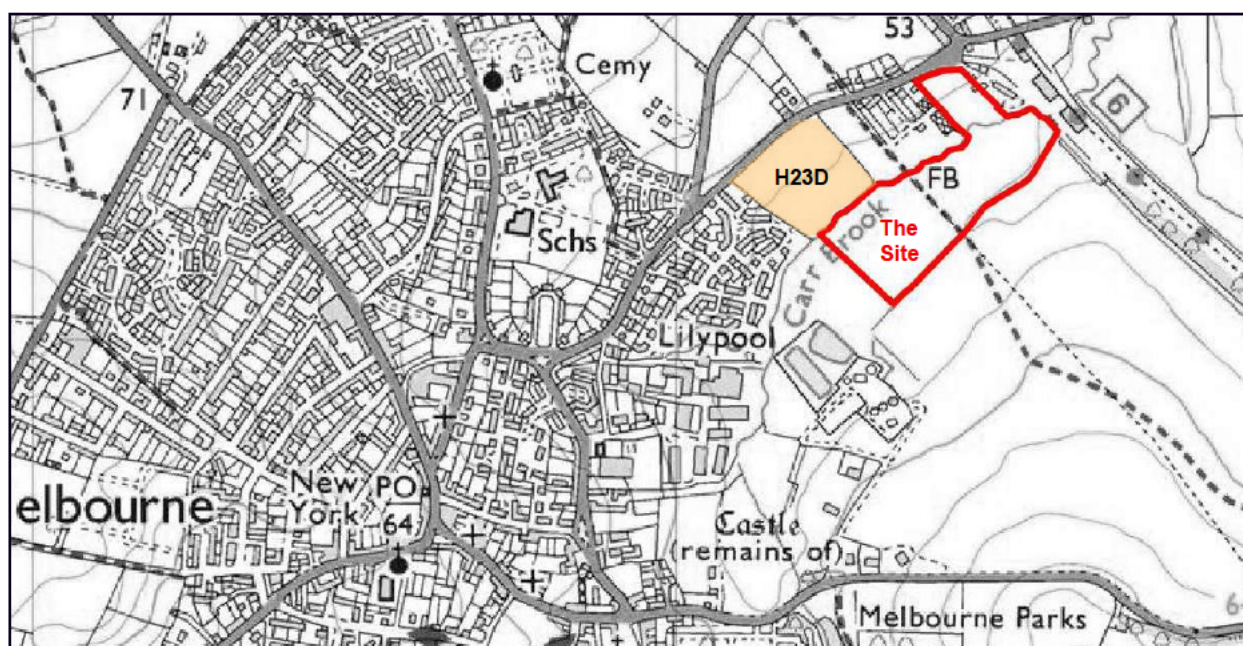
To inform this approach MLPL proposes that a review of reasonable alternative options to meet the needs of SDDC should take place, informed by the review of the deliverability of the existing allocations, which also takes into account the outcome of viability appraisal work, once this has been produced. This review should result in the allocation within the Local Plan Part 2 of additional sites at the Key Service Villages, notably at Melbourne and Etwall where MLPL is promoting sites which are sustainably located adjacent to the existing settlement boundaries and adjacent to locations where new development has recently been deemed acceptable. Details for these sites have been submitted previously to accompany the Local Plan Part 1 Regulation consultations and the opportunity presented by these sites is summarised further below.

Melbourne

Melbourne has a range of existing community facilities and public transport connectivity and is therefore considered to be a sustainable location for accommodating additional residential development. The facilities within Melbourne include: a supermarket and other shops; pubs and restaurants; place of worship; and infant and junior schools. The bus stops in Melbourne provide services to Burton upon Trent, Derby, Swadlincote, Kings Newton and East Midlands Airport.

The existing adopted Development Plan already includes an allocation (adopted Local Plan Policy H23D) for residential development (c.46 dwellings) off Station Road to the east of Melbourne, located to the west of the MLPL land, which demonstrates the sustainability and suitability of Melbourne in general, and more specifically of land off Station Road, for new residential development. This allocated land now benefits from planning permission and construction has progressed. Further residential development (6 dwellings) has also been recently approved and constructed on the north-western boundary of the site pursuant to outline planning permission ref. 9/2017/0170.

MLPL is promoting a 5.3ha site immediately to the east of the existing allocation. The location of this site is shown below edged in red. Existing allocation H23D is shown shaded in orange.



Station Road, Melbourne, is therefore a location which is already deemed suitable for housing development to meet the needs of Melbourne and the wider District in recent years through both the adopted Local Plan and through the planning application process.

The MLPL site is currently comprised of 2 fields in agricultural use and is bordered by: Station Road and Carrs Brook (with residential development and a small grassed field beyond between the Brook and Station Road) on the western boundaries; commercial / industrial units at Station Yard on the north / north-eastern boundaries; agricultural land to the east beyond a hedgerow; and agricultural land with a sewage works beyond to the south-west.

The site is largely well contained by existing landscape features and built development and there are opportunities to provide additional / enhanced landscape features along the site boundary as part of the development proposals for the site. The site is at a lower level to land to the south east and north west and is therefore not considered to be a prominent feature within the landscape and would be viewed in the context of the adjacent built development.

Submissions have been made previously by MLPL in relation to this site through the Call for Sites process. Please refer to the SHELAA Call for Sites Form and letter from Stantec dated 12 December 2019 and the additional letter from Stantec responding to points of clarification dated 10 December 2020 submitted to the Council previously. Please also refer to the Savills letter dated 4th April 2024, which responded to the SHELAA consultation (Site 098) and provided further clarification on matters relating to: biodiversity & geodiversity; population & health; material assets, soil, water & air; climate change; and landscape. Further copies of these documents can be provided if required.

This site has also been promoted through the emerging Local Plan Part 1 process. The representations have included a Development Area Masterplan (854-D5A-00-XX-DR-A-001 Rev P02. Date 07/09/2022) and Landscape and Visual Review (Station Road, Melbourne Landscape & Visual Review Rev A. Dated July 2022).

The Development Area Masterplan demonstrates that the site being promoted by MLPL could have the capacity to accommodate a high quality strategic development of circa 90 dwellings with associated open space and sustainable drainage infrastructure in an appropriate layout configuration, whilst giving due regard to incorporating an appropriate offset from the Carr Brook, retention of the majority of existing trees (apart from a few poor quality trees to facilitate provision of vehicular access) and retention of the existing PRoW within a green corridor. Vehicular access into the site from Station Road has been designed through consultation with Derbyshire County Council Highways. The Development Area Masterplan demonstrates that housing development on this site is capable of forming a logical, natural extension to the built form of the settlement.

The latest Flood Map for Planning mapping revisions, which now considers climate change, maps the site to be at risk when climate change is accounted for. However it should be noted that the revised Flood Map for Planning mapping appears to originate from broad-scale modelling techniques. Within broad-scale modelling the capacity of the culverts, such as the one under Station Yard which allows the Carr Brook to discharge into the Ramsley Brook, is usually either approximated or possibly ignored altogether. Therefore the Flood Map for Planning mapping revisions may not be entirely reflective of the flood risk at the site, especially if the culvert has not been accounted for/is undersized. A hydraulic modelling study is therefore being undertaken to refine the flood zone extents, and therefore the potential development zone extents, to create a more accurate representation of both the Station Yard culvert and the Ramsley Brook hydraulic structure under Station Road. We will update the Council once the modelling has been completed.

The MLPL Station Road site: does not contain any, and is not within the setting of any, Listed Buildings; is not within or affecting the setting of a Conservation Area; and is not designated as Local Green Space. As highlighted in the 4th April 2024 Savills letter the Council has confirmed that trees on this site are not subject to TPOs. The site is also close to the Cloud Trail, which is a walking and cycling route along a disused railway line. This site is available, suitable and achievable for residential development within the next 5 years and could accommodate a variety of different types and tenures of housing to meet the local needs of Melbourne.

Etwall

Paragraph 77 of the December 2024 NPPF (as carried forward from paragraph 74 of the December 2023 NPPF) identifies that the supply of large numbers of new homes can often be best achieved through planning for larger scale developments, such as significant extensions to existing villages, and in identifying suitable locations for such developments LPAs should consider the opportunities presented by planned investment and the area's economic potential.

MLPL welcomes the ongoing recognition within the emerging Local Plan that land is safeguarded at Egginton Common for a Strategic Rail freight interchange. This will be a significant source of employment within South Derbyshire District and will create an opportunity for additional complementary housing to be delivered at the nearby village of Etwall in order to maximise the sustainability benefits of this location. The facilities in Etwall include: shops; village hall; scouts hut; public library; leisure centre; places of worship; primary school; high school and sixth form college; theatre; restaurant; pub; and hotel. Bus stops are located on Hilton Road and Egginton Road, providing services to Burton upon Trent, Derby, Barrow upon Trent, Repton and Littleover. There is also an opportunity for making financial contributions through the S106 Agreement accompanying new residential development at Etwall for enhancing the education facilities at the existing schools in Etwall, if required, to mitigate the impact of new residential development.

The existing adopted Development Plan includes an allocation for residential development on the southern edge of Etwall which demonstrates the sustainability and suitability of Etwall in general, and more specifically of land to the south of Etwall for new residential development. This allocated land now benefits from outline planning permission and reserved matters approvals and the development is substantially completed. MLPL is promoting a 10ha site immediately to the south of the existing allocation, between this and the A50, immediately to the north of the Egginton Common site. The location of this site is shown below edged in red. Existing allocation H23B is shown shaded in orange.



Submissions have been made previously by MLPL in relation to this site through the Call for Sites process. Please refer to SHELAA Call for Sites Form and letter from Stantec dated 10 December 2020 submitted to SDDC previously. Please also refer to the Savills letter dated 4th April 2024, which responded to the SHELAA consultation (Site 060) and provided further clarification on matters relating to: biodiversity & geodiversity; population & health; material assets, soil, water & air; climate change; and landscape. Further copies of these documents can be provided if required.

This site has also been promoted through the emerging Part 1 Local Plan process. The representations have included a Masterplan Report (Land at Etwall Masterplan Report. Ref 865-D5A-00-XX—RP-A-0001. Dated 09/11/2022) and a Landscape & Visual Review (dated September 2022). The Masterplan Report demonstrates that the site being promoted by MLPL could accommodate a high quality strategic development of circa 120 dwellings with associated open space and sustainable drainage infrastructure in an appropriate layout configuration, whilst giving due regard to mitigating noise from the A50, landscape considerations and the suitability of vehicular and pedestrian access.

The Landscape & Visual Review (“L&VR”) identifies that the site is not covered by designations relating to its landscape value and there are no listed buildings, Scheduled Monuments or Registered Parks and Gardens within 1km of the site and accordingly development on the site would not result in any direct harm to areas or features designated for their landscape value. The L&VR highlights that the integrity of the landscape in this location has been reduced by development, including: the A50 dual carriageway and its bridge to the south; the car factory to the east; and the new residential development immediately to the north. The L&VR also concludes that the site already benefits from good screening from the wider area, which can be enhanced with additional tree planting, and any development will not result in any dominant changes to important views.

In accordance with the recommendations made within the L&VR development on the site will: seek to retain existing trees and hedgerows, but where this is not possible (e.g. to create new access points) replacement trees and hedgerows will be planted; conserve the existing field pattern; retain the overall structure of the mature vegetation surrounding the site boundaries; connect to and respect the existing nucleated settlement pattern of Etwall; provide opportunities to enhance the management of the existing pond; incorporate generous areas of public open spaces and new planting; and screen distant views of new development on the site from Willington Lane through providing enhanced landscaping on the eastern boundary of the site.

In this way it is considered possible for a scheme to be developed for the site which does not adversely expose Etwall village residents (either new or existing) to adverse levels of (noise / light) pollution from either the A50 or Toyota manufacturing plant, whilst still providing a landscaped edge to Etwall and respecting the sensitivities of the wider landscape around Etwall.

Whilst it is noted that the draft Etwall Neighbourhood Plan proposes to include the site within an Area of Landscape Sensitivity (ALS6), the draft Neighbourhood Plan has not yet been subject to Regulation 16 consultation and, in any case, MLPL considers that the inclusion of the site within an Area of Landscape Sensitivity is not justified on the basis of the landscape commentary set out above. Separate representations will be made to the draft Neighbourhood Plan to this effect.

This site therefore provides the opportunity to deliver development which can form a logical, natural extension to the built form of Etwall, defined by clear physical boundaries. It is considered that this site is available, suitable and achievable for residential development within the next 5 years and could accommodate a variety of different types and tenures of housing to meet the local needs of Etwall.

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)

Paragraphs 22-23 of the December 2024 NPPF (as carried forward from paragraphs 22-23 of the December 2023 NPPF) identify the opportunity to set a longer term vision through the plan-making process and identify broad locations for development on a key diagram.

Therefore notwithstanding the need to allocate land to ensure that there is a sufficient and flexible supply of housing allocations to meet the identified housing need the Council also has an opportunity to identify additional land in sustainable locations where development would be supported in principle should the need arise.

Furthermore the Council has an opportunity to extend settlement boundaries through this new Local Plan Part 2 to include not only land which is allocated (as proposed through consultation Question 9), but also additional land which would give rise to sensible settlement boundaries, taking into account the presence of existing physical features in the landscape (as set out in the response to consultation Questions 10 & 11).

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)

No comment.

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)

No comment

Question 6: What could the Council do to speed up delivery on strategic allocations?

(Please provide details)

No comment.

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)

MLPL notes that Mackworth is on the fringe of Derby City and that the proposed strategy for this site involves a cross-boundary development with land in Amber Valley. MLPL considers that the Council should be ensuring that the approach that is taken to housing growth is one where new development is distributed across the South Derbyshire District.

Paragraph 83 of the December 2024 NPPF (as carried over from paragraph 83 of the December 2023 NPPF), states that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”

It is therefore important to not deny the communities within the existing stand-alone settlements in South Derbyshire the investment and community vitality benefits arising from receipt of new development as a result of focussing new allocations on the edge of Derby City. As explained in response to consultation Question 2, the Local Plan Part 2 should be including additional allocations at the Key Service Villages to: ensure flexibility in supply; maintain the five year housing land supply; and assist with meeting the particular housing needs of those communities.

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)

No comment.

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)

To provide certainty and consistency in the decision-making process MLPL considers that settlement boundaries should be revised to include new allocations. MLPL also considers that there is an opportunity for settlement boundaries to be revised to include additional land which logically ought to be considered as part of the settlement boundary even if it is not currently deemed to be required for an allocation to meet the emerging Local Plan housing need (as set out in the response to consultation Questions 10 & 11).

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)

MLPL would agree with an approach to drawing settlement boundaries which follow existing defined physical features, but considers that the settlement boundary does not need to tightly follow the edge of the existing / proposed built form of a settlement.

MLPL considers that in drawing up revised settlement boundaries there is an opportunity for land on the edge of settlements which would provide a logical new boundary to the settlement and does not form an important part of a settlement's landscape setting to also be included within the settlement boundary. This is particularly the case in instances where a field on the edge of a settlement is bounded by both the existing built settlement edge and a large defined physical landscape feature / topographical change. Such land is arguably more related to the settlement than the wider landscape. Examples of this situation can be found on the edge of both Etwall and Melbourne.

On the southeastern edge of Etwall the A50 is a very defined and elevated physical feature in the landscape. The irregularly shaped field located between the new housing being constructed on the existing housing allocation to the south of Etwall and the A50 has significantly more association with the settlement than the wider countryside and therefore ought logically to be included within the settlement boundary.

In a similar fashion land to the south of Station Road in Melbourne has been increasingly subjected to housing development in recent years. With the industrial units at Station Yard to the east, housing development along Station Road to the north / northwest, a sewage works to the southwest and a rising landform to the southeast this land should logically be considered to have a closer relationship with the existing built edge of Melbourne than with the wider countryside to the southeast of Melbourne. There is therefore considered to be a strong argument for this land, along with the full extent of Station Road, to be included within the Melbourne settlement boundary.

On the basis that the Local Plan Part 2 should be allocating additional land on the edge of Key Service Villages (as explained in the responses to consultation Questions 2 and 7) the land on the edge of Etwell and Melbourne which is highlighted above should be allocated for the delivery of new housing as part of this strategy.

However it is also possible for previously undeveloped land to be included within settlement boundaries without it being specifically allocated. Future built development on such land will be controlled by the general policies of the Local Plan, notably those relating to development in settlement boundaries. This can also be linked to any policy directions for broader development locations / reserve housing sites, should it be deemed necessary to include such policies within the Local Plan Part 2 (as introduced in consultation Question 3).

Accordingly MLPL proposes that the principles for assessing the settlement boundaries set out in Appendix 1 of the Local Plan Part 2 Issues and Options consultation document should be refined to more closely reflect and acknowledge the value of including specific areas of undeveloped land within settlement boundaries as part of the delivery of a robust, responsive and flexible development strategy.

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

(Please provide a comment)

Please refer to the answer to consultation Question 10.

Question 12: Do you agree with the retail hierarchy?

☐ Yes

☐ No

(Please provide a reason for your answer)

No comment

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)

No comment.

Question 14: What issues regarding Swadlincote Town Centre redevelopment should the Council consider?

(Please provide details)

No comment.

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)

No comment.

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)

No comment.

Question 17: If you answered yes to question 16, what should the policy consider?

No comment.

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)

No comment.

Question 19: What other sites and/or options should the Council consider for providing Gypsy and Traveller accommodation?

(Please provide details)

No comment.

Question 20: Are there any other issues that the Council should consider when meeting the needs of Gypsies and Travellers?

(Please provide details)

No comment.

Question 21: Are there any additional policies/other issues that the Local Plan should address?

☐ Yes

☐ No

(Please provide a reason for your answer)

No comment.

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)

Local Plan policy provisions will all need to take on board the requirements of the published NPPF, as well as any new requirements brought in following the December 2025 consultation on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system'.

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)

No comment.

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)

No comment.

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

(Please provide details)

No comment.