



Representations in response to
South Derbyshire District Council
Local Plan Part 2 Review
Regulation 18 Consultation
Land south of Mickleover

January 2026

Representations to the South Derbyshire District Council Local Plan Part 2 Review Issues and Options Regulation 18 Consultation

Land south of Mickleover, South Derbyshire

January 2026

Prepared for: Parker Strategic Land

Mickleover – South Derbyshire District Council Local Plan Part 2 Regulation 18

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Appendix 1 – Site Location Plan

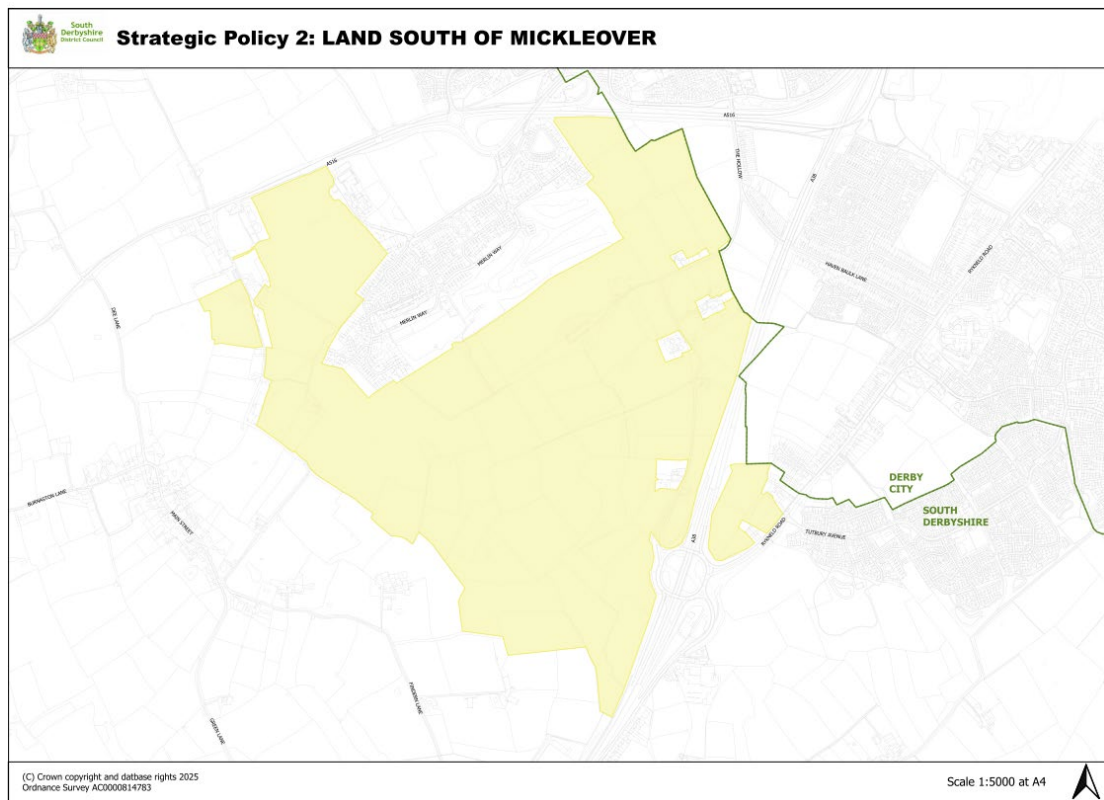
Appendix 2 – Residential Sequencing Plan – Indicative Early Delivery of Homes

1 Introduction

- 1.1.1 This Representation has been prepared by Twenty5 Planning Ltd (Twenty5) on behalf of Parker Strategic Land (the 'Principal Promoter'), in response to the South Derbyshire District Council (SDDC) Local Plan Part 2 Issues and Options Consultation that is open until 30th January 2026.
- 1.1.2 PSL is a family-owned company that promotes, manages and develops new places to live, work and play around the country. PSL controls all of the land that is the subject of this representation, which encompasses 58% of the 195 hectares of land proposed to be allocated under the reference Policy STRA2: Land South of Mickleover as part of the emerging Local Plan Part 1. This representation relates to the land part of the allocation, known as 'Mickleover South', shown at **Appendix 1** (the 'Site').
- 1.1.3 This Representation responds to the questions posed within the South Derbyshire District Council Local Plan Part 2 Issues and Options Consultation Document (Consultation Document).
- 1.1.4 These representations are structured as follows:
- **Section 2** – Site Description, Context, and Housing Delivery
 - **Section 3** – Regulation 18 Local Plan Response
 - **Section 4** – Summary

2 Site Description and Context

- 2.1.1 The Site is located entirely within South Derbyshire District and comprises undeveloped agricultural land located to the south of Mickleover. The Site Location is enclosed at **Appendix 1**.
- 2.1.2 The Site abuts an area of development that sits north of the proposals, comprising mainly post-war development around the former Pastures Hospital, now Duesbury Court and the Pastures Golf Club. Duesbury Court was a Victorian hospital and is now converted to residential development. The conurbation of residential development extends from Hospital Lane connecting to the A516 close to the administrative boundary of Derby City. The Site sits in a location which SDDC, as part of Local Government Reform, has proposed for the extension of the urban boundary of the City to assist in meeting the needs of both Derby City and South Derbyshire, where existing and planned infrastructure can support growth.
- 2.1.1 The site has been identified as part of the wider allocation at Policy STRA2: Land South of Mickleover of the emerging Local Plan Part 1.



Extract of Site Allocation Policy STRA2 from SDDC Local Plan Part 1 Review

- 2.1.2 The Site represents a key contribution to SDDC's Local Plan strategy for delivering the community, housing, and infrastructure needs of the local and wider area. PSL estimates that up to 2,100 new homes, key connectivity corridors, a Neighbourhood Centre, community, education and recreational facilities can be provided on land within its control as part of the wider c.3,300 homes that the allocation can accommodate.
- 2.1.3 The Site continues to be a suitable, available, achievable and deliverable opportunity for an exemplary new neighbourhood that is seamlessly connected to the wider Derby conurbation but is also as self-sustaining as possible to the benefit of both new and existing communities.
- 2.1.4 As the Principal Promoter, PSL will continue to work closely with SDDC and wider STRA2 land promoters with the aim to achieve a cohesive and coordinated vision for a new neighbourhood

underpinned by healthy living principles.

Housing Delivery

- 2.1.5 PSL has separately engaged in a Planning Performance Agreement (PPA) with SDDC to facilitate engagement on technical and policy matters with respect to the draft allocation and outline planning application. An EIA Scoping Request has been submitted to SDDC for consideration (LPA Ref: DMOT/2025/1599) and the associated Scoping Response is anticipated to be issued before the end of January. Good progress has been made with the preparation of an outline planning application, which is anticipated to be submitted in Spring 2026.
- 2.1.6 It is anticipated that the outline planning application could be determined during 2027, following progression of the Local Plan Part 1 Review examination and adoption. Applications for reserved matters would subsequently be prepared for the first phase of key infrastructure and housing including, access, key internal roads and drainage. Reserved matters for land parcels followed by the first phase 1 occupations are anticipated in 2030/31.
- 2.1.7 Anticipated Timescales:
- Spring 2026 - Outline Planning Application Submitted
 - End of 2027 – Outline Planning Application Determined
 - 2028 - Infrastructure and Phase 1 Reserved Matters Approved
 - 2029 – Residential Phase 1 Reserved Matters Approved and relevant conditions discharged.
 - 2030 / 2031 – First homes delivered and occupied
- 2.1.8 Due consideration has been given to the anticipated phasing of the site. An initial residential sequencing plan is enclosed at Appendix 2. This identifies that there is opportunity for outlets to deliver in tandem from the outset, with initial phases to the west of A38. This approach seeks to establish the community of the new neighbourhood. The focused development would more quickly reach the critical mass required to adequately support the local centre, and be supported by corresponding open space, highways and drainage infrastructure. The detail of the phasing will be further refined during the course of the application determination in conjunction with key stakeholders who will inform the requisite timescales for the supporting education, recreation facilities and associated infrastructure. Nonetheless, the residential sequencing plan provides an indicative picture of how the site and associated infrastructure will be brought forward.
- 2.1.9 Within representations submitted in response to the Regulation 19 Local Plan Consultation, it was highlighted that SDDC's Housing Trajectory expected the delivery of just 1,650 dwellings across the plan-period, a significant underestimate of anticipated delivery.
- 2.1.10 PSL consider the Site is capable of delivering an average of up to 50 to 60 dwellings per year per outlet, which at peak delivery could result in c.240 dwellings being delivered from four outlets on their land. Further delivery would be able to take place from other outlets on land controlled by the wider allocation land promoters.
- 2.1.11 This approach is reflective of information provided by SDDC, which demonstrates delivery at similar sites, in particular the Highfields Farm development which is situated to the east of the site:

“South Derbyshire has a track record of delivering large numbers of dwellings per annum on individual allocations, comfortably exceeding 200 completions per year on sites such as the now complete Highfields Farm development and the former Drakelow Power Station, currently under construction.” (Response to Regulation 18 representations (Response ID: 1242621))

- 2.1.12 This is further corroborated by research undertaken by Lichfields in their 'Start to Finish' paper published in March 2024. This demonstrates that at sites of 2,000 dwellings or more, the average build out ranges from 100 to 188 dwellings per annum, with maximum recorded build being 323 dwellings per annum.

3 Response to draft Local Plan Part 2

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?

3.1.1 **Response:** The Council should produce a Local Plan Part 2 Review under the existing planning system and subsequently prepare a full new Local Plan in accordance with the new system.

3.1.2 The Government has set a clear focus on delivery, with a commitment to bring forward 1.5 million new homes over the next Parliament. It is within this context that there is a need to ensure that both the emerging Local Plan Part 1 and Part 2 are robust and enable the delivery of sustainable development to achieve housing delivery.

3.1.3 The PPG highlights the importance of up to date local plans:

“The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise.... It is essential that plans are in place and kept up to date.” (Paragraph: 001 Reference ID: 61-001-20190315 – underlining added for emphasis)

3.1.4 Chapters 1 and 2 of the Consultation Document explain the wider context of planning reform and the implications for the Plan making in South Derbyshire. Strong support is given to the Council’s desire for full Local Plan coverage as stated at page 4 of the Consultation Document:

“The Council is keen to have full Local Plan coverage (i.e. an adopted Local Plan Part 1 Review and an adopted Local Plan Part 2 Review) prior to Council reorganisation (detailed above). It is considered that this would support a plan-led approach to development, would help secure a robust long term housing supply significantly exceeding minimum requirements and as such would help to resist un-planned speculative development, and it would be consistent with the HMA Councils in the new combined Authority in line with the agreed Statement of Common Ground...”

3.1.5 It is approaching 10 years since the adoption of the current Local Plan Part 1. SDDC has recently been unable to demonstrate a five year housing land supply (PINS Ref: APP/F1040/W/25/3368728). It is clear that the current Local Plan is no longer fit for purpose. It is therefore vital that an up-to-date Local Plan is established to enable the identified strategic sites, including Policy STRA2: Land South of Mickleover, to come forward and start delivering much needed new homes. PSL strongly encourages SDDC to submit the Part 1 Plan for Examination as soon as possible.

3.1.6 With respect to the Local Plan Part 2, the updated South Derbyshire Local Development Scheme December 2025¹ sets out the following timescales for the preparation of the Local Plan Part 2.

Phase of Local Plan Part 2 Preparation	Timeline
Issues and Options Local Plan Consultation (Reg 18)	Autumn 2025
Pre-submission Local Plan Consultation (Reg 19)	Summer 2026
Submission of draft Local Plan to Secretary of State	Winter 2026
Examination	Spring 2027
Adoption	Summer 2027

3.1.7 The Planning Practice Guidance was updated on 27th November 2025 to clarify that

¹ [LDS December 2025.pdf](#)

Planning Authorities preparing Local Plans with the intention to submit the emerging Local Plan for Examination before 31st December 2026 can continue under the provisions of the National Planning Policy Framework December 2024. It is noted that Local Plan Part 1 is seeking to be progressed under the requirements of the NPPF 2023, given that the Regulation 19 consultation took place in accordance with the March 2025 deadline. At present SDDC's approach to plan making will positively respond to the Government's aims to achieve national coverage of Local Plans and as such is supported.

3.1.8 It is noted that SDDC also seeks opinions about the preparation of a single full LP under the new system. It is considered that a single full LP will be required to be produced under the new system but only after the emerging LP has been adopted.

3.1.9 There is a statutory requirement for Local Plans to be reviewed every five years, further the emerging National Planning Policy Framework identifies at draft policy PM2 that commencement of the preparation of the next local plan should be prepared earlier where:

a. an Inspector at examination of the current plan has made a recommendation to prepare a new plan earlier; or

b. there has been a significant change in local circumstances, including where an area's housing requirement has significantly increased following the adoption of a spatial development strategy.

3.1.10 It is acknowledged that draft Policy REV1 of the Local Plan Part 1 requires an immediate review of the Local Plan upon adoption.

3.1.11 For the purpose of these representations, in the absence of information to state otherwise, it is assumed that SDDC will continue to prepare its emerging Local Plan Part 2 against the requirements of the current planning system and will submit both the Part 1 and Part 2 Local Plans for Examination before the end of 2026 as intended by the LDS, which will in turn enable the delivery of much needed homes to be delivered.

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

3.1.12 At page 8 of the Consultation Document, it is identified that there is an anticipated shortfall of 57 homes over the plan period to meet the minimum plan requirement for the Local Plan Part 2, although there is no updated housing trajectory to inform SDDC's findings. Further, the NPPF advises at paragraph 22 that strategic policies should look ahead over a minimum 15 year period from adoption, as such there is likely to be a need to extend the plan period beyond 2041.

3.1.13 PSL is promoting land identified as part of the proposed allocation at Policy STRA2: Land South of Mickleover. As explained in detail at Section 2 of this representation and previous representations made in response to the Regulation 19 Local Plan Part 1 consultation, it is considered that the site can deliver more quickly, and therefore more homes, within the current plan period (2041) than anticipated by SDDC.

3.1.14 The benefit of delivering development more quickly as part of this strategic allocation, at the urban fringe, is that the new homes will come forward with supporting infrastructure including school provision, local services and green infrastructure.

3.1.15 The estimated timescales for delivery are robust and based upon local factual evidence. Further, the preparation of the outline application at the Site is at an advanced stage having been the subject of detailed site assessment, and ongoing technical engagement with stakeholders to inform and refine proposals at the site.

3.1.16 It is requested that SDDC review its housing trajectory to better align with the anticipated rates of housing delivery at STRA2, consider extending the plan period, identify if there is a residual shortfall, and if so, identify its scale.

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)?

- 3.1.17 Yes, there are various opportunities to seek to secure additional housing delivery however, as highlighted above, this should be considered in the context of an up-to-date housing trajectory.
- 3.1.18 If a demonstrable shortfall remains it would be possible for SDDC to identify additional suitable, available sites in sustainable locations to deliver the requisite housing.

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

- 3.1.19 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.)?

- 3.1.20 There is a requirement for the emerging Local Plan to meet the needs of different groups of the community. The NPPF states that:

“63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children ;older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.”

- 3.1.21 Further, Draft Policy HO1 of the emerging NPPF additionally refers to ‘specialist community based accommodation (where evidence of need is available for the relevant local authority)’. Where possible the emerging local plan should also respond to this requirement.
- 3.1.22 There needs to be a full understanding of the needs for each group, especially those where there is a statutory requirement to do so. Then assess how these are best addressed within the emerging local plan, considering if there are specific proposals to address such a need which could be allocated.
- 3.1.23 It is noted that Policy STRA 2 seeks the feasibility of a retirement village to be delivered as part of the scheme. The outline proposal incorporates this opportunity.
- 3.1.24 SDDC recognises the need to plan for the needs of looked after children. Page 10 of the consultation document identifies that SDDC is not the responsible authority for social care for adults and children. It is recommended that SDDC engages with the appropriate body to identify the need.
- 3.1.25 The consultation document explains that the Local Plan will need to contain a policy for the provision of children’s homes (Use Class C2) and anticipates this will be a criteria-based policy. Support is given to the Council’s identified approach to ensure that the Local Plan is inclusive but such a policy should be informed by robust evidence of the needs of different groups of the community.

- 3.1.26 In general, positively worded criteria based policies that encourage specialist accommodation and which respond to an identified need would also enable sustainable speculative proposals to be brought forward accordingly.

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

- 3.1.27 The consultation document states “*Policy H22 in the Local Plan Part 1 Review aims to deliver gypsy and traveller pitches through the strategic allocations at Infinity Graden Village (STRA1) and Land South of Mickleover (STRA2) at a ratio of 5 serviced pitches per 1000 dwellings up to a maximum of 15 pitches. Therefore, the Council is expecting up to a maximum of 20 pitches to be provided from strategic allocations*”.
- 3.1.28 Representations submitted on behalf of PSL in response to the Local Plan Part 1 Review Regulation 19 query the justification for gypsy and traveller provision at the STRA2 – Land south of Mickleover allocation. These comments still remain.
- 3.1.29 In addition, it is considered that SDDC should consider the guidance prepared by the National Policy Advisory Panel on Gypsy and Traveller Housing ‘Places we’re proud of’² which highlights there are a number of approaches to respond to needs. In respect of strategic sites an example is provided from Mid Devon Local Plan which makes it clear that pitches should be provided on-site in urban extensions unless it is demonstrated that off-site provision will achieve an ‘acceptable outcome’ for Gypsies and Travellers on pitch numbers, site facilities and accessibility to services. In further discussion with SDDC, it is understood that an off site solution would be supported in lieu of onsite provision. A financial contribution could be used by the Council to acquire land to delivery pitches.
- 3.1.30 It is noted that the ‘Social and Affordable Homes Programme (SAHP) 2026 to 2036’, which primarily makes funding available for the supply of new-build affordable housing, also supports the delivery of: traveller pitches. The Guide includes a case study of how a previous version of such funding was used to deliver a scheme of 13 pitches in Norwich. It is therefore considered that SDDC should consider the feasibility of a similar bespoke project where locational needs are justified.

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

- 3.1.31 No comment.

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

- 3.1.32 It is vital that the Local Plan Part 1 is submitted for examination as soon as practicable to facilitate the delivery of strategic sites. Further, it is essential that the Local Plan Part 1 is supported by a robust Infrastructure Delivery Plan which outlines the specific requirements for strategic allocations. This provides Developers with the clarity needed in order to assess, design, plan for the development.
- 3.1.33 PSL has commissioned extensive technical assessments of its land allocated as part of STRA 2– Land South of Mickleover. In addition PSL has engaged extensively with stakeholders including SDDC (including the Midlands Design Review Panel), Derby City Council, Derbyshire County Council, National Highways, and the local community in order to identify and respond to any matters raised prior to the submission of the planning application to understand all the issues, to design and mitigate effectively to a high quality, and to avoid prolonged delays to the determination of the application. At the time of writing PSL has submitted an EIA Scoping Request and is actively preparing a planning application expected to be submitted at the end of Spring 2026.
- 3.1.34 The intention would be to structure the outline planning permission in such a way that it

² [Places-Were-Proud-Of.pdf](#)

allows the phased delivery of development to expedite a start on site and the early enabling of community and highways infrastructure. This would simplify the requirements and timescales to commence development on site and enable multiple house builder outlets to progress through planning to delivery in parallel as discussed in Section 2 of this representation.

- 3.1.35 It is important that the Council has the necessary Officers available to consider the applications submitted as part of the determination process. The Government has recently announced funding for additional Officer resource, and although this is focused on the assessment of reserved matters applications it will assist where there are multiple delivery partners progressing through planning at once.

Question 23: Are there better/alternative mechanisms that the Council should use to secure the required infrastructure?

- 3.1.36 In respect of development at STRA 2– Land South of Mickleover, it is anticipated that there will be a detailed supporting S106 Planning Obligation which would secure the delivery of onsite supporting infrastructure such as the Local Centre, primary school, drainage, public open space and its maintenance. In addition, it is anticipated that there is likely to be financial contributions towards enhancement of existing services off site, for example secondary education and off site highway works.
- 3.1.37 The detail of the Planning Obligations will be informed by robust technical assessment to ensure the obligations comply with the statutory requirements of the CIL Regulation 122 and as set out at paragraph 58 of the NPPF.

“58. Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development”.

- 3.1.38 There are additional mechanisms to secure funding, such as Community Infrastructure Levy (CIL) which sets a rate per sqm of development dependent on proposed use. The idea of CIL is that it offers the potential for additional development to automatically contribute towards delivery of infrastructure therefore offering the potential to raise additional receipts. However, there are often issues with large strategic sites being able to afford CIL payments when there are already obligations for significant provision for on site infrastructure. As such strategic sites should benefit from reduced or nil rated CIL to account for this and to seek to avoid any double counting of contributions.

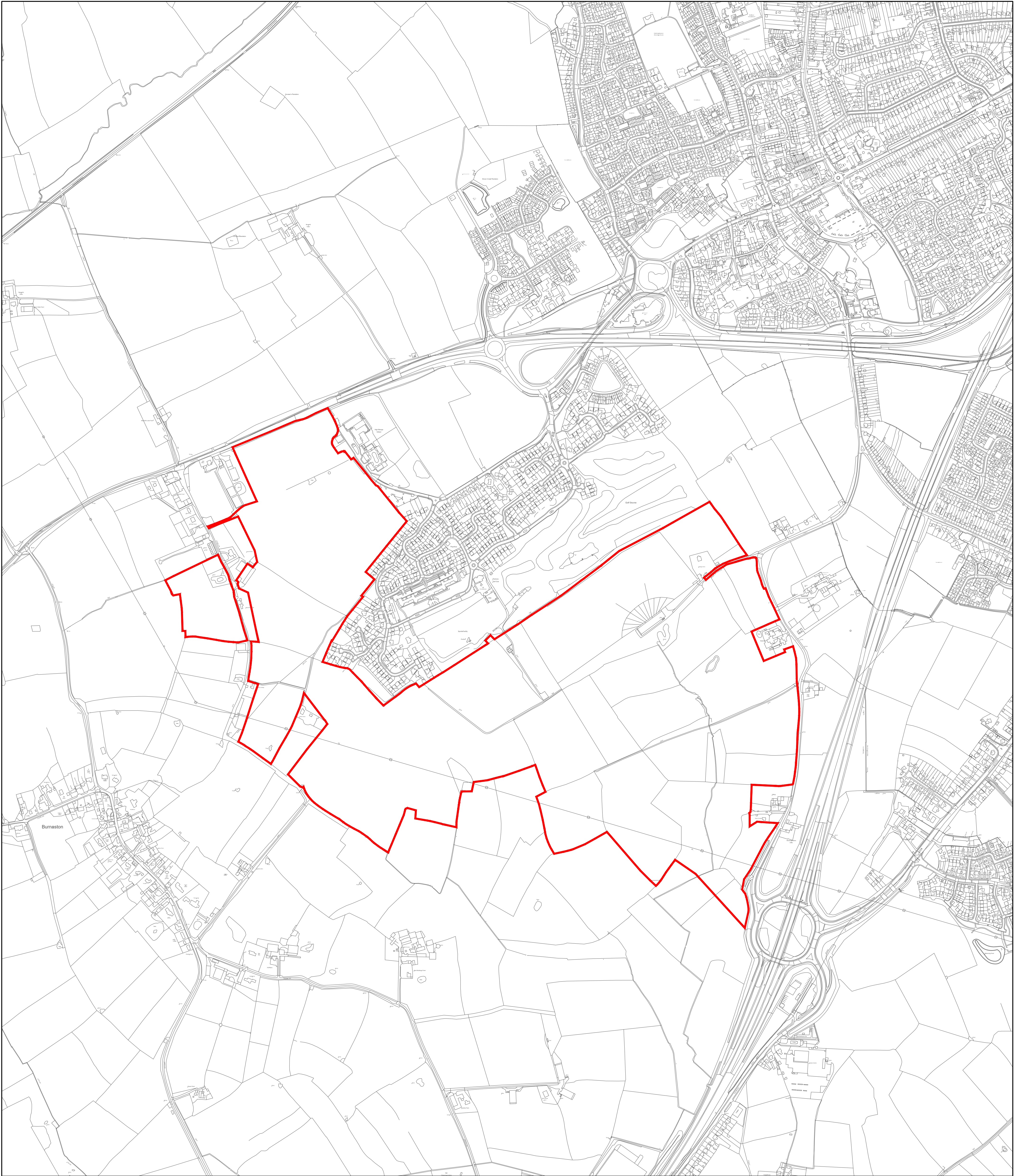
Question 24: Where there is the potential need for long-term management / maintenance of open space, SUDS or other infrastructure, should the Council introduce a policy requiring these to be adopted by a public authority unless there is clear evidence that this is not feasible. Yes/No Please provide a reason for your answer

- 3.1.39 Yes. It is preferable for the management of open space, SUDs and other on site infrastructure to be adopted by a public authority for ongoing maintenance. It is usual practice to first offer to the relevant public authority such as a Parish or Town Council and if there is no desire to take on the management, then a management company is formed.
- 3.1.40 If a formal policy is established, it would be necessary to ensure that developers are made aware of the public authorities' requirements, particularly in respect of drainage features and public open space, before a planning application is submitted to ensure the proposal can be designed to meet the necessary requirements for adoption.

4 Summary

- 4.1.1 This representation, prepared by Twenty5 Planning Ltd on behalf of Parker Strategic Land, responds to South Derbyshire District Council's Regulation 18 Issues and Options consultation for the Local Plan Part 2 Review.
- 4.1.2 It focuses on land south of Mickleover, which forms a substantial part of the proposed strategic allocation STRA2 in the emerging Local Plan Part 1. The document supports the Council's approach to progressing a Part 2 plan under the current planning system alongside the Part 1 Review, emphasising the urgency of adopting up-to-date plans to address housing delivery shortfalls.
- 4.1.3 The representation confirms that the Mickleover South site is suitable, available, and deliverable, with capacity to deliver housing at a significantly faster rate than assumed by the Council, supported by evidence from comparable strategic sites.
- 4.1.4 It sets out realistic delivery timescales, with first homes anticipated from 2030/31, and highlights the benefits of comprehensive, infrastructure-led development at the urban edge.
- 4.1.5 The submission also addresses specialist housing needs, infrastructure delivery mechanisms, and gypsy and traveller provision, broadly supporting plan-led, evidence-based policies that enable timely delivery of sustainable development.

Appendix 1 – Site Location Plan



Site Boundary - Parkers of
Leicester - 113.62Ha / 280.76Ac

Project

MICKLEOVER,
SOUTH DERBYSHIRE

Drawing Title

PARKERS OF LEICESTER
SITE BOUNDARY PLAN

Date

06.12.24

Scale

1:5000 @A1
1:10,000 @A3

Drawn by

M.D.

Check by

D.S.

Project No

333101169

Drawing No

STN-GEN-SW-DR-MP-01-1

Revision

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0 50 100 200

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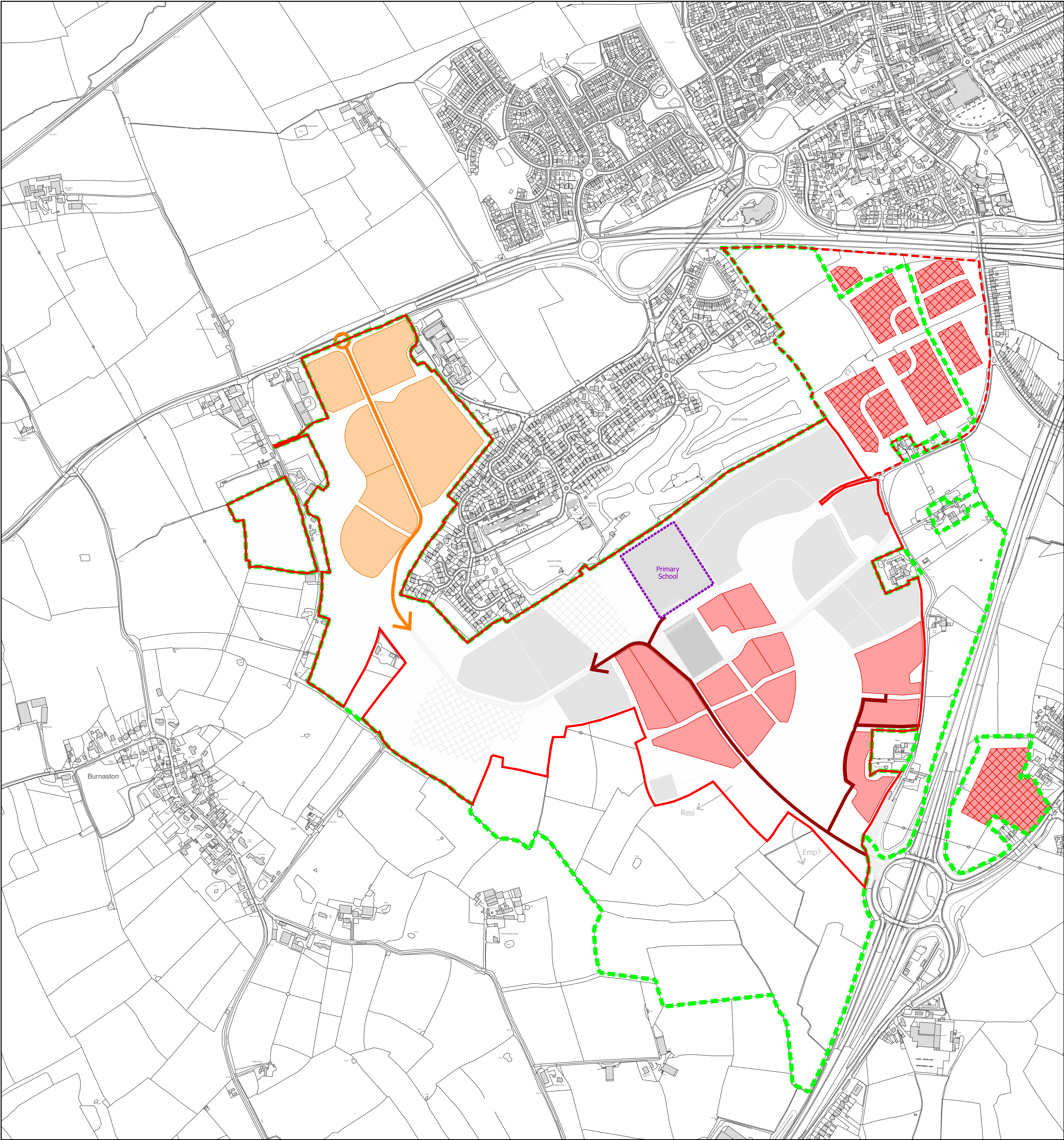
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U:\333101169\A4 - Drawings & Registers\Masterplanning\333101169 - STN-GEN-SW-DR-MP-01 - Site Boundary Plan.dwg - 01-1

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Appendix 2 – Residential Sequencing Plan – Indicative Early Delivery of Homes



- Site Boundary
- STRA 2 Allocation Boundary
- Catesby Ownership Boundary
- Initial Residential Sequencing *
- Initial Infrastructure Sequencing
- Development to be brought forward by other promoters
- Secondary Residential Sequencing *
- Secondary Infrastructure Sequencing

* Green infrastructure to be delivered in accordance with SDDC requirements

Initial Residential Sequencing - 627 units
Secondary Residential Sequencing - 526 units

NOTE: Phasing for residential development and strategic infrastructure will be refined during determination of the forthcoming planning application.

Project
MICKLEOVER,
SOUTH DERBYSHIRE

Drawing Title
INDICATIVE EARLY DELIVERY
OF HOMES

Date
28.01.26

Scale
1:5000@A1
1:10,000@A3

Drawn by
M.D.

Check by
D.S.

Project No
333101169

Drawing No
STN-GEN-SW-DR-MP-16-1B

Revision

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metres

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