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Planning Policy and Local Plan
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29/04/2026

Dear Sir/Madam,

RE: Northeast Derbyshire Local Plan Issues and Options Consultation on the Strategic Approach to the Location of Development and Refined Sites (March 2026)

This representation provides Gladman Development Ltd.'s (Gladman) response to the North East Derbyshire Local Plan Issues and Options Consultation on the Strategic Approach to the Location of Development and Refined Sites (March 2026).

Gladman responded to North East Derbyshire District Council (the Council) Local Plan Issues and Options Consultation which took place in Summer 2025. Information contained within our previous representation is not repeated here except in cases where it's required for context.

Development Needs and the Spatial Strategy

It is confirmed in the Development Needs section that the Council is meeting its Local Housing Needs (LHN) in full by planning for a housing requirement of 12,000 dwellings over the plan period of 2024-2044. Gladman welcome the Council confirming that it's the Councils intention to accommodate its housing need requirement in full. The PPG is clear, however, that the standard method identifies a minimum annual housing need figure, and that local planning authorities can plan for growth above this minimum where justified.

Gladman consider it important for the Council to be mindful of the delivery risks associated with relying heavily on a small number of large Sustainable Urban Extensions (SUE), namely Duckmanton Moor Village, Duckmanton Moor Extension and Eckington South. While such strategic sites are capable of making a significant contribution to housing supply, they are often complex to deliver and can be susceptible to delays due to infrastructure provision, lead-in times, land ownership and phasing.

The emerging Local Plan is aligned to meeting the LHN, leaving limited flexibility should delivery not come forward as anticipated from any of these large allocations. In that context, the over-concentration of growth on a limited number of SUEs increases the risk of under delivery across the plan period.



To ensure a robust and resilient spatial strategy, Gladman encourage the Council to consider planning positively beyond the LHN figure, in line with national policy and guidance. This could include incorporating an appropriate buffer such as a 10% uplift to the housing requirement. Such an approach would provide greater flexibility, improve choice and competition in the land market, and help ensure delivery is maintained should one or more strategic sites not deliver as expected. This flexibility is also particularly important in the context of ongoing cross-boundary matters

Effective Cooperation and Potential Unmet Needs from Neighbouring Authorities

Gladman consider that the emerging spatial strategy should retain sufficient flexibility to respond to potential unmet development needs arising from neighbouring authorities, including Sheffield City Council and Chesterfield Borough Council. While the Government has removed formal Duty to Cooperate under the new plan-making system, the requirement for effective cooperation remains firmly embedded in national policy.

Paragraphs 24–28 of the National Planning Policy Framework (NPPF) continue to emphasise that local planning authorities should maintain effective cooperation throughout the plan-making process, and that joint working is integral to producing a plan that is positively prepared and underpinned by a justified strategy for supporting growth and meeting identified development needs. The NPPF makes clear that such cooperation should assist in identifying strategic priorities, including the provision of infrastructure, and in considering whether development needs that cannot be met wholly within one plan area could be accommodated elsewhere.

Given the constrained nature of some adjoining authorities, there remains the potential for unmet housing needs to arise over the plan period. At the time of writing, there is no confirmation that the Council has agreed to accommodate unmet needs from neighbouring authorities. However, it is important that the Local Plan is sufficiently flexible to respond to such matters should they arise as discussions progress.

In this context, Gladman reiterate that planning only to meet the minimum LHN leaves limited scope to respond to any future requests for assistance from neighbouring authorities without triggering an early plan review. The inclusion of an additional buffer within the housing requirement would provide valuable headroom, enabling the Council to engage constructively in cross-boundary discussions and support sustainable growth where appropriate, in accordance with national policy. Such an approach would help ensure the Local Plan remains resilient, adaptable, and capable of addressing strategic housing matters over its full plan period.

Green Belt Review and the Identification of Grey Belt Land

Gladman welcome the Council's decision to undertake a new Green Belt Review to inform the emerging Local Plan. This is an important piece of evidence which will assist the Council in fully understanding the role and function of Green Belt land within the district and in identifying opportunities to meet development needs in a sustainable manner.

In particular, the assessment and identification of land which may appropriately be categorised as "grey belt" has the potential to play a meaningful role in meeting the Council's LHN in full. The

outcomes of the Green Belt Review will therefore have direct implications for the Council's ability to deliver its housing strategy and maintain flexibility over the plan period.

At this stage, it remains unclear how the findings of the Green Belt Review and the identification of potential grey belt sites will translate into the overall housing requirement and spatial distribution of growth. However, given the reliance on large strategic sites, Gladman consider it essential that the Council allows the results of the Review to meaningfully influence the scale and spread of allocations, where this would contribute to a more resilient and deliverable strategy.

In this context, the incorporation of an additional buffer above the minimum LHN would provide the Council with greater scope to respond positively to the findings of the Green Belt Review, bring forward suitable grey belt sites where appropriate, and ensure that housing needs can be met in full. Such an approach would support a flexible, plan-led release of land and help avoid the need for early review of the Local Plan.

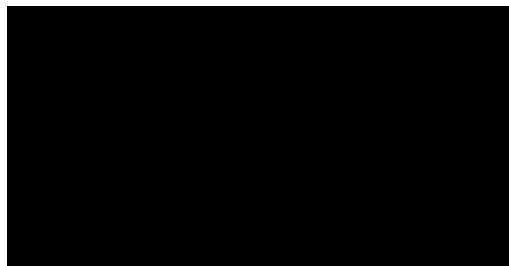
Summary

Gladman support the Council's commitment to meeting its LHN in full and welcome the progress being made through the emerging Local Plan. However, the current approach is closely aligned to the minimum housing need figure and relies heavily on a limited number of large strategic allocations, which introduces delivery risk and limits flexibility over the plan period.

To ensure a robust and resilient spatial strategy, Gladman encourage the Council to plan positively beyond the minimum LHN by incorporating an appropriate buffer within the overall housing requirement. This would provide greater flexibility to respond to delivery delays, potential unmet housing needs from neighbouring authorities, and the outcomes of the Council's ongoing Green Belt Review, including the identification of suitable grey belt sites.

Embedding flexibility at this Regulation 18 stage will help safeguard housing delivery, support effective cross-boundary engagement, and ensure the Local Plan remains adaptable and capable of meeting identified development needs in full over the period to 2044.

Should you have any questions in relation to this representation please do not hesitate to contact me.



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Gladman Developments Ltd.