

24 April 2026

Helen Fairfax
Planning Manager (Policy & Environment)
North East Derbyshire District Council
2013 Mill Lane
Wingerworth
Chesterfield
Derbyshire
S42 6NG

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

Michael Davies
E: MPDavies@savills.com
DL: +44 (0) 121 634 8436

55 Colmore Row
Birmingham B3 2AA
T: +44 (0) 121 200 4500
F: +44 (0) 121 633 3666
savills.com

Dear Helen,

**NORTH EAST DERBYSHIRE LOCAL PLAN REVIEW: STRATEGIC APPROACH TO THE LOCATION OF DEVELOPMENT AND REFINED SCHEDULE OF SITES CONSULTATION
LAND SOUTH OF MARKHAM VALE, LONG DUCKMANTON, M1 J29A (SITE ID: 45041)**

Savills (UK) Ltd is instructed by Wilson Bowden Developments ('WBD') to promote land south of Markham Vale, Long Duckmanton (Site ID: 45041) ('the Site') for strategic industrial and logistics ('I&L') development.

Introduction and Scope

The Site has been identified in the consultation as one of various sites being consulted on as part of a 'Refined Schedule of Sites' which have passed the site assessment process. These representations provide a detailed response to the Council's strategic approach to the location of development, along with a response to the assessment of the Site within both the consultation document, the Employment Land Availability Assessment ('ELAA') (2026) and the Sustainability Appraisal Addendum (March 2026).

In short, WBD considers that the Site is available and suitable for strategic-scale I&L development, and that the constraints identified in the ELAA can be suitably mitigated at the planning application stage. As set out in the below representations, the Site is considered to represent the only promoted land within the District which can contribute towards meeting the wider sub-regional strategic I&L need, and therefore we consider that the Site should be allocated in the Regulation 19 Local Plan.

This submission is accompanied by the following supporting documents:

- Appendix 1: Parameter Plan (ref: 17-060 MP09-002);
- Appendix 2: Markham Vale Sustainability Appraisal Scoring Review;
- Appendix 3: Heritage Statement (Pegasus Group, February 2026);
- Appendix 4: Landscape and Visual Site Appraisal (Pegasus Group, February 2026);
- Appendix 5: Landscape Strategy Plan and Sections (Pegasus Group, March 2026);
- Appendix 6: Economic Benefits Infographic (Pegasus Group, March 2026);
- Appendix 7: Alternative Sites Note (Savills, March 2026);
- Appendix 8: Preliminary Transport Assessment (BSP, February 2026);
- Appendix 9: Phase I Geo-Environmental Assessment (BWB, May 2019); and
- Appendix 10: Preliminary Flood Risk Assessment and Drainage Strategy report (April 2026).

The Opportunity at Land South of Markham Vale

Land south of Markham Vale comprises 35.5 hectares (87.8 acres) of agricultural land located directly to the east of the M1 motorway and south of the A632 Chesterfield Road. The red line for the purposes of the site promotion is provided at Appendix 1 of these representations. It should be noted that this red line area has

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2805138. Registered office: 33 Margaret Street, London, W1G 0JD



been amended following our previous submission to the Local Plan in 2025. The original submission red line included a wider land ownership parcel which aligned with the title for the land. However, following further consideration of masterplanning options for the Site, the red line has been reduced to include only the land which WBD is feasibly able to develop, and therefore promote.

The Site is located to the south of the existing Markham Vale employment area and the former Coalite mixed use development site which is currently being developed as 'Horizon 29'. Both Markham Vale and Horizon 29 provide I&L development (Use Class B2/B8). Land south of Markham Vale would provide a new strategic scale I&L opportunity which would form a logical extension of Horizon 29 and would be attractive to inward investors, as well as providing good supply chain opportunities for nearby businesses. It is envisaged that the Site could provide c.700,000 sqft (c.65,000 sqm) of I&L floorspace across a number of units, as shown indicatively on the submitted parameter plan (Appendix 1).

The Site is in single ownership and is relatively free of constraints. We also understand that, importantly, there is available electricity capacity to serve the development. The Site therefore represents a deliverable and achievable option for meeting the strategic employment needs of the FEMA, and can be developed within 3-5 years. As part of this submission an Economic Benefits Infographic (Appendix 6) has been provided to set out how the development of the Site could boost the local and sub-regional economy.

National planning policy is supportive of planning policies helping to create the conditions in which businesses can invest, expand and adapt, stating that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Additionally, the December 2025 consultation draft NPPF, which provides a clear indication of the direction of travel of national policy, includes a proposed presumption in favour of I&L development where a need can be evidenced. This is set out in detail at Policy S5 (1)(j)(ii) of the draft NPPF. Therefore, we consider that national planning policy provides a clear basis for land south of Markham Vale to come forward and that this could attract both local, regional and potentially foreign investment in the District.

Response to Regulation 18 Issues and Options Representations

We note that our representations to the 2025 Issues and Options consultation are recorded as representation ref: PE146. Having reviewed the Consultation Statement issued in March 2026, we note that Appendix 2.4 (Focus Group Findings) states at paragraph 3.4 that *"councillors emphasised that housing growth must be aligned with employment opportunities. They stressed the need to consider where people actually work—whether that is Sheffield, Chesterfield, or locations with strong motorway links—to ensure new communities are well-connected and sustainable. They noted that an understanding of commuting patterns, including routes through places like Dronfield and Killamarsh, should inform the spatial strategy."* (Savills emphasis)

WBD agrees with the above comments and considers that it is appropriate to ensure that housing and economic growth are aligned. In light of North East Derbyshire's relatively small settlements which sit in close proximity to larger settlements outside of the borough such as Chesterfield, Sheffield and Bolsover, we also consider that proximity to these labour forces should be taken into account when determining the most appropriate location for strategic I&L growth in the region. Following the success of relatively recent developments at Markham Vale and Horizon 29, we consider that it is appropriate to situate such development around J29A of the M1 motorway at land south of Markham Vale.

Strategic Approach to the Location of Development

WBD **objects** to the Strategic Approach to the Location of Development set out in the consultation document. Large and strategic-scale I&L schemes have a specific locational requirement to be located on key junctions of the Strategic Road Network ('SRN'), and should therefore be assessed separately to the four priority locations set out in Figure 7 of the consultation document, which are more relevant to housing growth than to strategic I&L.

It is important for strategic I&L development to be located in close proximity to the SRN for a number of reasons, not least to provide easy access to the SRN for HGV vehicles which consequently keeps vehicle emissions and amenity impacts on residential areas to a minimum. Locating I&L development near to strategic road networks is also the most efficient way to ensure that wider supply chains can serve / be served by I&L sites. This is significantly different from that of residential development, which naturally needs to be located close to key services and facilities such as schools, GP surgeries and supermarkets. The same cannot be said for I&L uses and therefore, we consider that a different methodology should be utilised for this type of development.

It is noted that the Council's Settlement Role and Function Study (March 2026) considers the sustainability of existing settlements within the District, providing information about the level of services and facilities each settlement currently provides. This information has directly influenced the proposed settlement hierarchy within the Local Plan consultation document, which has culminated in a hierarchy ranging from 'Level 1' (i.e. largest/most sustainable) settlements down to 'Level 4' settlements. The Local Plan consultation proposes to distribute development using a cascade approach, with Level 1 settlements prioritised for the most development and Level 4 settlements accommodating significantly less development. Whilst WBD recognises that this study enables the Council to build a picture as to which settlements are the most sustainable places to locate residential development, this is not necessarily the case for strategic-scale I&L development, which benefits from being located on key SRN junctions. These do not always correlate with the largest settlements with the most services and facilities, and it is not necessarily the case that I&L development needs to be located close to these facilities to be sustainable, for example in the case of schools. Therefore, an alternative spatial strategy should be developed for employment uses, to provide a specific focus on the key SRN locations for the allocation of I&L sites.

Paragraph 10.47 of the Bolsover, Chesterfield and North East Derbyshire Economic Needs Assessment Study ('ENA') (Lichfields, March 2025) sets out nine SRN junctions which are considered to represent "areas of opportunity" for strategic I&L development (Use Class B2 / B8). Paragraph 10.44 of the ENA explains the reasoning behind this, stating that *"the analysis involved identifying existing clusters of logistics parks across the study area, and then defined broad areas of search, based primarily on proximity to the strategic road network, which is generally one of the core motivations behind land searches for road-based logistics operators"*.

Of the 9 opportunity junctions, 3 fall within the North East Derbyshire LPA area, as identified by red circles on the map below:

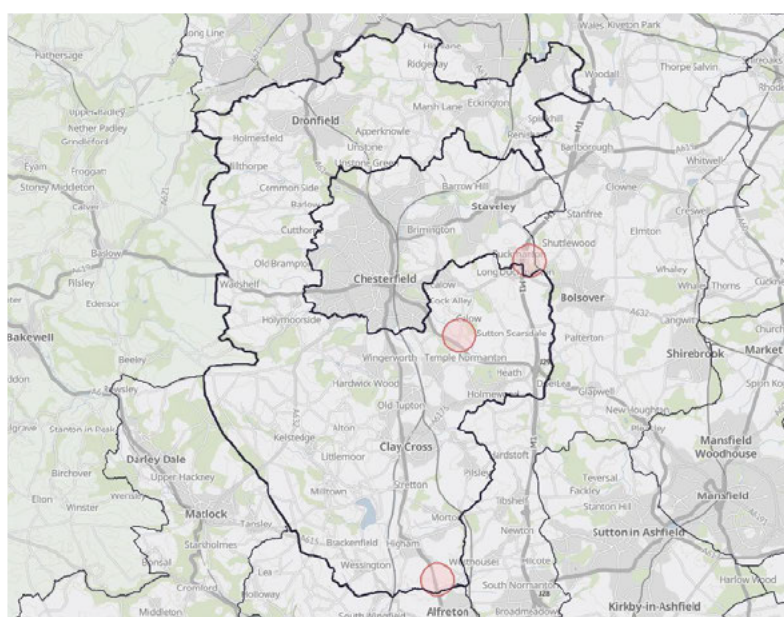


Figure 1: Plan showing the three "areas of opportunity" (circled red) within North East Derbyshire District (Bold black line)

Savills has prepared an Alternative Sites Note, which is provided as Appendix 7 to these representations. This note sets out a review of potential alternative locations to meet the strategic need identified in the ENA, both in North East Derbyshire District and also in neighbouring Chesterfield / Bolsover. This review concludes that land south of Markham Vale represents the only available and suitable site. Whilst the identified strategic employment need is a sub-regional one, we consider that the Council should take a positive and proactive approach to plan-making and act now to allocate land to contribute towards this significant economic need. This would represent positive plan-making and would assist the emerging Local Plan in meeting the tests of soundness, as set out at paragraph 36 of the NPPF, as well as attracting significant inward investment and growth for this strategically important part of the district.

NPPF paragraph 87 further emphasises the need for planning policies to take account of specific locational requirements of different sectors, including making provision for *“storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation”* (Savills emphasis).

Paragraphs 3.24 – 3.29 of the Settlement Role and Function Study also set out how the number of local employment opportunities within/adjacent to each settlement has been taken into account in assessing the sustainability of the District’s existing settlements. Applying this approach when assessing the sustainability of settlements to accommodate residential development is considered to be an acceptable approach. However, we object to the use of this methodology to assess the sustainability (and consequent settlement hierarchy) as it relates to the provision of new employment development. Using this methodology will result in new employment development being focused on market facing areas which already have significant levels of jobs, which is backward-looking and ignores the current locational requirements of specific employment sectors such as strategic-scale I&L.

WBD considers that it would be unsound to apply the current proposed strategy to site allocations for employment uses, as this would not take into account the relevant evidence as set out in the ENA and would not fulfil the requirements of paragraph 87 of the NPPF. We consider that it would be more appropriate to prepare a separate strategic approach and spatial strategy Local Plan policies for employment development given its fundamental differences to residential development, particularly at the strategic scale, and to recognise that the identified settlement hierarchy is not relevant to employment development.

It should be recognised that a consultation on a revised draft NPPF has recently concluded (10 March 2026). Whilst the final revised NPPF has yet to be published, the consultation draft provides an indication of the direction of travel of national planning policy going forward. Draft Policy S5 (*‘Principle of development outside settlements’*) provides details of a clear presumption in favour of sustainable development outside of settlements at paragraph 1. Paragraph 1(j)(ii) confirms that this includes proposals comprising major development for storage and distribution purposes, where the development would address an evidenced unmet need. It is therefore considered that national planning policy is likely to be amended significantly to encourage additional logistics development outside of settlements, and we therefore consider that the Council should seek to plan positively for this type of development, which has distinctly different locational requirements when compared with residential development.

Comments on the Refined Schedule of Sites

The consultation document also includes a Refined Schedule of Sites which are being consulted on for potential allocation. This includes sites which have passed the initial site assessment undertaken by the Council. WBD welcomes the inclusion of text within the consultation document stating that *“further evidence that may be forthcoming from the site promoter and responses to this consultation will inform the Preferred List of Sites that will be included in the Publication Draft Local Plan”*. We consider that this represents a positive approach to plan-making, which should be evidence-led to ensure that the most appropriate sites are selected. With this

in mind, WBD has prepared a suite of technical work to respond to the initial comments on the Site which are included in the consultation document. A summary of this work is included in Table 1 below:

Table 1: WBD response to NEDDC comments on land south of Markham Vale (ref: 45041)

Comment	WBD Response
This site comprises approximately 41 hectares of land which could provide opportunity to provide an employment site to meet the needs of the sub-regional/regional logistics sector.	We agree and consider that the Site is the only promoted site assessed in the ELAA which can accommodate this need. Further information on this is set out in the submitted Alternative Sites Note (Appendix 7). The wide-ranging economic benefits of allocating land at Markham Vale are also set out in the submitted Economic Benefits Infographic (Appendix 6).
The site is visually prominent, particularly from elevated positions to the east including Bolsover Castle. Landscape assessment has identified the development of the site may have moderate level impact.	A Landscape and Visual Site Appraisal (Appendix 4) and Landscape Strategy Plan / Sections (Appendix 5) have been prepared by Pegasus Group to demonstrate that a landscape-led approach to the development of the Site can result in landscape and visual impacts being sufficiently mitigated to make the development acceptable in LVIA terms. This will include sensitive building design and orientation, as well as ensuring that earthworks and strategic landscaping minimise the visual prominence of the proposed development.
Both initial landscape and heritage advice have pointed towards a potential impact on the setting of grade I Listed Buildings Sutton Scarsdale Hall, Bolsover Castle and Hardwick Hall.	A Heritage Statement has been prepared by Pegasus Group and is provided as Appendix 3 to these representations. The assessment demonstrates at paragraph 7.12 that the Site makes, at most, a minor positive contribution to the significance of nearby heritage assets. It also demonstrates that any harm arising from development in principle would fall within the category of less than substantial harm, and that there is clear scope for mitigation through site-specific policy requirements relating to layout, scale, massing, landscape treatment and materials. Paragraph 7.13 states that, subject to the inclusion of appropriate heritage-led design principles within any site allocation policy, such as controlling building heights, breaking up massing, responding to topography, and requiring landscape buffering, the allocation of the Site would be consistent with national policy, including the NPPF requirement to conserve heritage assets in a manner appropriate to their significance.
The Derbyshire Historic Environment Record provides evidence of archaeological remains previously found on the site.	A Heritage Statement has been prepared by Pegasus Group and is provided at Appendix 3 to these representations. This statement includes a desk-based assessment of archaeology potential, concluding that the HER provides very limited evidence for archaeological activity within the site itself. Although geophysical surveys carried out at the nearby former Coalite site suggested the

	potential for Iron Age or Romano-British activity, subsequent trial trenching revealed only post-medieval features. Archaeological remains, if any, are expected to be of local or regional significance only. It is therefore considered that archaeology should not pose a constraint to the site being allocated.
Desktop ecology assessment has identified the main habitats as arable, modified grassland and tall herb.	This is noted.
A small part of the site extending towards the River Doe Lea comprises a priority habitat area and is designated as a Local Wildlife Site. Ecology advice finds a medium level impact upon biodiversity.	It is noted that the red line boundary submitted at Call for Sites stage included land in the south-eastern corner of the Site which overlapped with the 'Peter Fidler Reserve & The Goit Railway' Local Wildlife Site ('LWS') and priority habitat. This part of the Site is not considered to be developable due to the shape and size of the small 'finger' of land containing the LWS, and has been removed from the red line boundary of land WBD are seeking to secure an allocation on. It is therefore considered that the Site can come forward without impacts on the LWS.
Creating a new access from the A632 would require sections of the existing footpath, grass verge and hedgerow to be removed or realigned.	It is recognised that there will be a need to remove vegetation to facilitate a suitable site access, however this is likely to be the case for many greenfield developments across the district. At planning application stage, due consideration will be given to minimising ecological and arboricultural impacts as far as possible. A new pedestrian / cycle access is proposed to be delivered from the main site access to facilitate sustainable travel into and within the Site.
Development on the site would be likely to affect the strategic road network, and impacts on the M1 motorway in particular Junction 29 will need to be considered.	A Preliminary Transport Assessment has been prepared and is submitted with these representations (Appendix 8) to provide an initial overview of the potential impacts of the proposed development on the strategic road network. This concludes that initial junction capacity assessments at the proposed site access indicate that this junction will operate well within capacity at the future assessment year of 2034. The Preliminary Transport Assessment has been submitted to National Highways and Derbyshire County Council Highways for comment and a response is awaited. WBD will continue to engage with both parties with regards to potential impacts on nearby M1 Junction 29A.
The site is at risk of some surface water flooding.	A Preliminary Flood Risk Assessment and Drainage Strategy report has been provided with this submission (Appendix 10). This demonstrates that the site is relatively unconstrained by flood risk, with the exception of some localised areas of surface water flood risk, most notably in the north-eastern corner of the site. The report concludes that the proposed development can be made safe from flood risk and that the limited areas of surface water flood

	risk (primarily in the north-eastern corner of the site) do not present a significant constraint to development and can be dealt with via appropriate design and mitigation measures.
Natural England's provisional agricultural land classification of the area is Grade 3.	There are numerous other areas within the District which comprise Grade 3 agricultural land, and therefore it is not considered to be reasonable that all development of Grade 3 land is avoided. In this case, land south of Markham Vale is considered to be the only suitable site which can accommodate the District's strategic employment need, and therefore the economic benefits are considered to significantly outweigh any harm arising from the loss of agricultural land.
If this site were taken forward as an employment allocation, mitigation measures for the above constraints will need to be considered and any Local plan policy text should include the requirement to address and mitigate the constraints listed above.	It is recognised that mitigation will be required, should the Site come forward for I&L development. However, as set out in the appended technical work, the identified potential constraints can be suitably mitigated through careful landscape-led design.

In summary, it is considered that the potential technical constraints highlighted in the consultation document can be addressed through suitable mitigation which would come forward at the planning application stage. **Therefore, the Site is suitable for allocation in the Local Plan.**

Sustainability Appraisal: Regulation 18 Addendum to the Issues and Options SA (March 2026)

It is noted that an addendum to the Issues and Options Sustainability Appraisal ('SA') Scoping Report has been published to support this consultation. The SA Addendum assesses a total of 351 reasonable alternative sites which NEDDC has put forward for consideration. This includes 272 sites for residential uses, 4 sites for strategic mixed-use development, 54 employment sites and 21 gypsy and traveller sites.

The Site has been assessed as site reference 45041 (Land south of Markham Vale, Long Duckmanton). We have provided a detailed review and response to any areas of the SA where the Site has scored negatively and this is set out at Appendix 2 of these representations. In summary, it is considered that with appropriate mitigation and amendments to the red line boundary for the Site, there are no reasons why the Site should not score favourably in the SA and be considered for allocation in the upcoming Regulation 19 plan. **We request that any further iteration of the SA takes account of the revised red line boundary for Site 45041, alongside the technical work provided as part of this submission.**

Summary and Conclusions

In summary, WBD considers that land south of Markham Vale represents a unique opportunity to deliver large-scale I&L development within the NEDDC area: an opportunity which none of the other promoted sites are able to accommodate. The Site should therefore be allocated for Strategic I&L development to contribute towards the clearly identified need set out in the ENA. As set out in the accompanying Economic Benefits Infographic (Appendix 6), the development of the Site is estimated to generate £39 million annual economic output and 971 full-time equivalent jobs, with c.£1.2 million in business rates paid per annum. This is in addition to the significant (c.£65 million) estimated construction investment during the build programme, with £67 million GVA and 102 on-site jobs supported during the construction period.

I trust these representations are useful and look forward to receiving confirmation of safe receipt. We would welcome the opportunity for continued positive dialogue with officers.

Yours sincerely

A solid black rectangular box used to redact the signature of Michael Davies.

Michael Davies
Planning Director