

**Regulation 19 Addendum: Proposed Modifications to the South Derbyshire  
Local Plan Part 1 Review 2022-2041**

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING)  
(ENGLAND) REGULATIONS 2012

Regulation 19 Addendum  
**REPRESENTATION FORM**

The easiest way to **submit your comments is online** at <https://bit.ly/Part-1-Local-Plan-Review> or by scanning the QR code. We would encourage you to use the online form wherever possible. Where online is not possible, you can complete this form and return it to us using the postal address on the final page.



**Submission form**

**This form has two parts**

**Part A** – Personal Details: need only to be completed once.

**We will not be able to accept responses where personal details are not provided.**

**Part B** – Your representation(s): **Please fill in a separate sheet for each representation you wish to make relating to each individual policy.**

You will be asked to give details on whether you think the plan is legally compliant and why you consider the proposed modifications to the policies of the Local Plan to be sound or unsound, please be as precise as possible.

You will also be asked to set out the modification(s) you consider necessary to make the Local Plan legally compliant and the policies sound in respect of any matters you have identified. You will need to say why each modification will make the Local Plan legally compliant or policy sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**Privacy Notice**

**Representations (including your name) 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?**

Personal details will be protected although it may be necessary to disclose these to a Planning Inspector appointed by the Secretary of State at a later date. For further information, please visit our Privacy section of our website at [www.southderbyshire.gov.uk/privacy](http://www.southderbyshire.gov.uk/privacy) where you can see a full copy of our privacy notice.

For further information, please visit our Privacy section of our website at [www.southderbyshire.gov.uk/privacy](http://www.southderbyshire.gov.uk/privacy) where you can see a full copy of our privacy notice. Alternatively, you can request a hard copy by emailing [local.plan@southderbyshire.gov.uk](mailto:local.plan@southderbyshire.gov.uk)

### Part A: Personal Details\*

**We will not be able to accept responses where personal details are not provided.**

#### 1. Please provide your contact details.

Respondent details	Agent details (where applicable)
Name*: Mark Rose	Name*: Max Whitehead
Organisation: Define Planning & Design Ltd	Organisation: Bloor Homes
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[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](mailto:local.plan@southderbyshire.gov.uk)

**Part B: Please use a separate sheet for each representation you wish to make**

**3. To which part of the Local Plan does this representation relate?**

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each Proposed Modification that you wish to comment on.

Comment being made against:	Please tick only one		
PM1		PM23	
PM2		PM24	
PM3	X	PM25	
PM4		PM26	
PM5		PM27	
PM6		PM28	
PM7		PM29	
PM8		PM30	
PM9		PM31	
PM10		PM32	
PM11		PM33	
PM12		PM34	
PM13		PM35	
PM14		PM36	
PM15		PM37	
PM16		PM38	
PM17		PM39	
PM18		PM40	
PM19		PM41	
PM20		PM42	
PM21		Other (Please specify)	
PM22			

4. Do you consider the Local Plan is:		
	Please tick the relevant box	
	Yes	No
1) Legally compliant	X	
2) Sound  (If you check 'No', please also confirm below which of the 'tests' it fails to meet)	X	
a) Positively prepared		
b) Justified		
c) Effective		

d) Consistent with national policy		
------------------------------------	--	--

**5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.**

Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Local Plan does not comply with). If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The NPPF is clear that strategic policies should look ahead over a minimum period of 15 years, from adoption. Therefore, Bloor Homes Limited (BHL) welcome the Council's proposed modification to extend the plan period by a year to 2042. Assuming the LPP2R is submitted before the Government's December deadline for legacy local plans it is reasonable to assume adoption in 2027. However, any delay during examination could impact the suitability of the plan period.

The modifications also propose to update the housing requirement for the area to "at least 15,263", due to the extension of the plan period. In principle, this is supported by BHL, but representations made to the Council's Regulation 19 consultation in response to Policy S1 remain relevant with regards to setting an appropriate housing requirement for the area (including buffer for under delivery) and how it is met across the plan period. In that regard, BHL submit comments in response to PM4 which updates the number of dwellings expected from allocated sites over the plan period.

(Continue on a separate sheet /expand box if necessary)

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to previous representations to the Regulation 19 consultation with regards to Policy S1 and its supporting evidence work.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your

suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.**

**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Please check the relevant box

No, I do not wish to participate in hearing sessions

Yes, I wish to participate in hearing sessions

X

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Please refer to previous representations to the Regulation 19 consultation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**Part B: Please use a separate sheet for each representation you wish to make**

**3. To which part of the Local Plan does this representation relate?**

Please provide the reference of the policy, paragraph, policies map, evidence etc that your comment relates to. Please use a separate Part B form for each Proposed Modification that you wish to comment on.

Comment being made against:	Please tick only one		
PM1			PM23
PM2			PM24
PM3			PM25
PM4		X	PM26
PM5			PM27
PM6			PM28
PM7			PM29
PM8			PM30
PM9			PM31
PM10			PM32
PM11			PM33
PM12			PM34
PM13			PM35
PM14			PM36
PM15			PM37
PM16			PM38
PM17			PM39
PM18			PM40
PM19			PM41
PM20			PM42
PM21		Other (Please specify)	
PM22			

<b>4. Do you consider the Local Plan is:</b>		
	Please tick the relevant box	
	Yes	No
1) Legally compliant	<b>X</b>	
2) Sound  (If you check 'No', please also confirm below which of the 'tests' it fails to meet)		<b>X</b>
a) Positively prepared		<b>X</b>
b) Justified		<b>X</b>
c) Effective		<b>X</b>

d) Consistent with national policy		X
------------------------------------	--	---

**5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.**

Please be as precise as possible (e.g., if objecting on the basis of legal compliance, please quote the specific law that the Local Plan does not comply with). If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

PM4 updates the housing delivery expected on allocated sites over the plan period in the Part 1 Plan from 12,470 to 12,822 dwellings. This includes an update to add a further strategic allocation site (FLG1 – Brun Lane, Mackworth) which is expected to deliver 250 new homes. The number of homes expected from sites of 10 dwellings or more with planning permission, and windfall on sites under 10 dwellings is increased from 1,788 to 2,390. It is unclear what evidence sits behind these figures, and this should be published in support of the Local Plan.

Despite the housing requirement being increased by 763 dwellings under PM3, the number of homes expected to be delivered on allocated sites (noted under PM4) only increases by 352 dwellings. Whilst the dwellings from consents and windfall does increase, it would be appropriate for the Council to allocate additional sites to proactively meeting housing needs. Indeed, the Council’s Local Plan Part 2 Review: Regulation 18 consultation in December 2025/January 2026 confirmed that there is a shortfall to meeting the minimum plan requirement. Therefore, the Council must consider allocating suitable additional sites to meet its housing requirement, and provide a suitable buffer.

BHL’s site at ‘Land West of Castle Gresley’ has been actively promoted for allocation to deliver a sustainable extension to Castle Gresley and Swadlincote. It continues to be promoted as a sustainable and suitable option for meeting housing needs in the area either through this Plan or through the review of the Local Plan Part 2.

**Land West of Castle Gresley**

BHL’s site ‘Land West of Castle Gresley’ is located adjacent to the built confines of Swadlincote and Castle Gresley. Swadlincote is designated at the top of the settlement hierarchy in the adopted and emerging Local Plan reflecting its sustainability and the level of service provision.

The site itself is absent of any insurmountable constraints, is deliverable and has the capacity to deliver around 500 new homes and a primary school. A Vision Document has been submitted in support of previous representations providing further details about the site and the vision for its delivery.

The emerging Masterplan contained in the Vision Document is being revised further and will continue to develop as technical and environmental assessment of the site progress. Representations to the Council’s Regulation 19 consultation

demonstrate the site's capacity to deliver a beautiful, landscape-led new neighbourhood to Swadlincote with a true sense of place and community.

The Masterplan demonstrates an efficient use of land to deliver much needed new homes in a sustainable location and connected via a network of active travel routes within the site and to existing routes.

As set out in BHL's Regulation 19 representations, engagement with Harworth (who have land interests to the north) is continuing to ensure connectivity between the two sites, including to the primary school proposed on BHL's site, is achieved.

The site offers an opportunity to deliver much needed new homes in a suitable and sustainable location, adjacent to Swadlincote which is the District's principal settlement where development potential should be maximised. The development of the site for housing would make a significant contribution towards meeting South Derbyshire's housing needs and the unmet needs of Derby City and it should be further considered for allocation in the ongoing Part 1 and Part 2 Local Plan Review.

(Continue on a separate sheet /expand box if necessary)

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.** (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to previous representations to the Regulation 19 consultation with regards to Policy S4 and its supporting evidence work.

(Continue on a separate sheet /expand box if necessary)

Please note: In your representation, you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues identified during the examination.**

**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

Please check the relevant box

No, I do not wish to participate in hearing sessions

Yes, I wish to participate in hearing sessions

X

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

Please refer to previous representations to the Regulation 19 consultation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please return your completed representation form(s) by post to: Planning Policy Team, Council Offices, Civic Way, Swadlincote, DE11 0AH

Forms must be received by **5pm on Tuesday 16<sup>th</sup> June 2026.**