

VISION | DECEMBER 2022



LAND AT
SANDCLIFFE ROAD
SWADLINCOTE

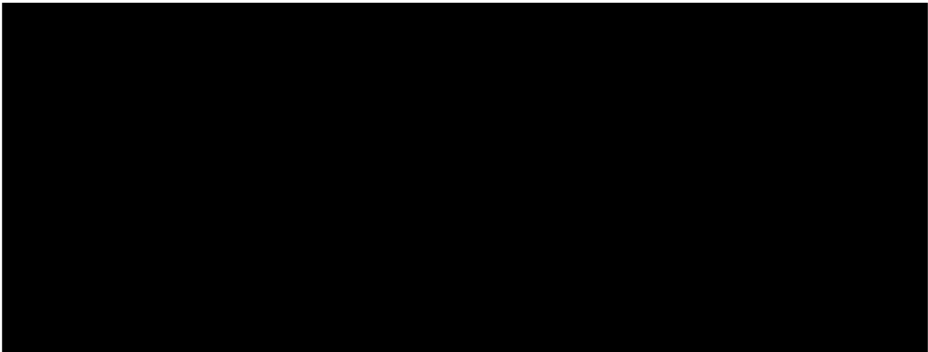
Bellway


**STRATEGIC
LAND**



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Sandcliffe Road

Coventry Close

Burton Road

Aerial Location Plan

1. INTRODUCTION AND VISION

This document considers the potential approach to a development site off Sandcliffe Road, Swadlincote. It will aid discussions with stakeholders and policy makers and assist in communicating development intentions.

It has been informed by an experienced consultant team, including Barton Willmore on design and RPS on planning and ecology with inputs from Mode on transportation, EDP on heritage, IDP on Landscape and Link Engineering on drainage and flooding.

It offers a high level overview on the vision for potential future development on the Sandcliffe Road site. It considers the planning context within which it sits, and its merits as a strategic development site set within the wider physical context of Swadlincote. Site opportunities and constraints are considered and illustrated. Preliminary design responses to these are then communicated along with high level design principles that would be used to guide the design development and subsequent deliverable development proposals.

Bellway Homes are one of the UK's largest home builders and last year delivered 11,200 homes with expertise at successfully promoting land through the development plan and planning application process. As a home builder Bellway deliver quality sites and this is consistently recognised by being awarded 5 star status from the Home Builders Federation in recognition of their continued high quality developments.

Since their beginning over 75 years ago, Bellway now operate from 22 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables our divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are attractive to our customers and help to build local communities. They are committed to delivering a high quality sustainable development for Swadlincote and would welcome working with the Council and community to achieve this.

“Our vision for high quality new homes that knit in with the existing fabric of Swadlincote, which respond to and reinforce the local character of the town.

The potential development site offers a number of opportunities to further enhance the town, provide the local community with increased amenity and enhance the northern settlement boundary whilst also providing a number of new homes to meet the local need.”





2. PLANNING POLICY AND CONTEXT

Overall Planning Context

Existing Local Plan

South Derbyshire District Council adopted Part 1 of its Local Plan in June 2016 to cover the plan period 2011-2028. Part 1 dealt with strategic policies, establishing a housing delivery target of 12,618 by 2028. Over 3,000 of the 12,618 are required to meet Derby City's housing need, reflecting the strong functional relationship between the Housing Market Area (HMA, which includes Derby City and Amber Valley). Part 1 of the Plan identifies that across the HMA, there is an agreed housing delivery target of 33,388 by 2028.

To assist with meeting Derby city's housing need, Part 1 of the Plan distributes a significant proportion of growth to the edge of Derby, (c.6,000 homes) with further growth being identified in urban areas, including Swadlincote and the edge of Burton, in addition to some key service villages.

As the largest settlement in South Derbyshire, Swadlincote (together with Woodville) is identified in Policy H1 (Settlement Hierarchy) as an Urban Area, which is the highest category of settlement and one of the most sustainable locations for growth. Part 1 of the Plan includes allocations within Swadlincote and Woodville totalling 1,508 dwellings. Part 2 of the Plan, which was adopted in 2017 and dealt with non-strategic housing policies, added a

further 152 dwellings. In total, Swadlincote and Woodville therefore provide for 1,660 dwellings. This represents approximately 13% of housing allocations - a relatively low proportion of the district's growth in relation to the size of the settlement.

The site falls within the Swadlincote Area boundary but outside of the settlement boundary and hence within the rural area of South Derbyshire, as defined within the Policy Map for Part 2 of the Local Plan.

Whilst the Local Plan is flexible to allow housing development outside of settlement boundaries (Policy BNE5 Development in Rural Areas), this is limited to where it is, inter alia, iii) unavoidable, i.e. circumstances where a 5-year supply of housing sites can't be demonstrated.

Part 1 of the Local Plan was adopted in June 2016 and is now more than five years old. In accordance with the NPPF, Local Plan Reviews should be undertaken at least once every five years and therefore Part 1 of the Plan is out of date.

National Planning Policy Framework (2021)

Since adoption of the Local Plan in 2016, the revised National Planning Framework (NPPF) has been adopted. Paragraph 33 establishes the need to review relevant strategic policies at least once every five years to take into account changing circumstances affecting the area or any relevant changes in national policy. Paragraph 25 of the NPPF also requires strategic policy making authorities to maintain effective cooperation and on-going joint working and, paragraph 66 requires them to establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Finally, to support the Government's objective of significantly boosting the supply of homes, paragraph 60 requires strategic policies to be informed by a local housing need assessment, conducted using the standard method in national planning guidance.

Local Plan Review

South Derbyshire's Local Plan was adopted in 2016 and as such is now out of date. Consultation on Issues and Options for a review of the Local Plan was undertaken between October and December 2022. The Council's most recently published Local Development Scheme indicates that they are aiming to submit the revised Local Plan for examination by early Spring 2024, although the Issues and Options consultation was originally due to take in Summer 2022, so some delay is anticipated.

The Issues and Options consultation identifies an annual housing requirement calculated using the standard method of 536 net additional homes per annum which, as set out in the Planning Practice Guidance (Reference ID: 2a-010-20201216), is a minimum starting point. The guidance goes on to explain that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. This minimum housing requirement for South Derbyshire is similar in scale to the portion of the housing requirement in the adopted Local Plan that was attributed to meeting the needs of South Derbyshire.

As was the case with the previous round of plan making the Issues and Options consultation for South Derbyshire notes that it is unlikely that Derby City will be able to accommodate its full housing need within the City's administrative boundary over the Emerging Local Plan

period to 2039. The Issues and Options consultation does not propose a figure that South Derbyshire will provide to address any shortfall in capacity in Derby City. It is expected however that South Derbyshire will again make a contribution towards meeting unmet housing need arising from Derby City as part of the Local Plan Review.

Derby Housing Market Area Growth Options Study August 2021

A growth options study was undertaken for the whole of the Derby Housing Market Area in 2021. This study included the consideration of a number of 'Broad Areas of Search' to assess whether they would be suitable for strategic growth (defined as accommodating a minimum of 1,000 homes). Area E4 North-East of Swadlincote was identified as one of only four areas suitable for strategic growth. The Sandcliffe Road site sits within the northern part of Area E4 and as such is therefore considered to be suitable for development.

It is expected that to meet both its own need and to accommodate unmet need arising from Derby City that South Derbyshire will need to allocate additional housing sites, and it is within this context that Bellway are promoting the site at Sandcliffe Road

Sandcliffe Road - The next logical extension to Swadlincote

The land at Sandcliffe Road, adjoins the north-eastern edge of Swadlincote. The town is the largest settlement in South Derbyshire with an estimated 17,000 dwellings compared to the next largest settlement, Hilton, which has just over 3,000 dwellings. Having accommodated just 13% of housing allocations during the previous round of plan making, the site at Sandcliffe Road is ideally placed to accommodate further growth at the district's most sustainable location and within the defined Swadlincote area boundary.

Lying within the National Forest and respecting the importance of maintaining a strong degree of separation between the urban edge of Swadlincote and the village of Hartshorne, the opportunity exists to create a new development with an extensive area of public open space incorporating significant areas of tree planting and screening to form a country park to the northern edge of the Town, linking through with the complementary landscape approach at the adjoining site at Broomy Farm. Indeed, an opportunity exists to create a cohesive and complementary sustainable extension to the northern edge of the town.

The new development can provide up to 500 new homes, designed to meet local and national standards and will include a range of homes to meet elderly and affordable needs in South Derbyshire. The development will seek to respond to the climate emergency by introducing energy efficient new homes in addition to the use of green and blue infrastructure, nature integration and biodiversity benefits.



A Deliverable Site

The Council has assessed the site using its Sustainability Appraisal Methodology and produced a Strategic Housing and Employment Land Availability Assessment (SHELAA). Land at Sandcliffe Road is assessed at site reference 45. The assessment does not identify any significant constraints to developing the site and considers it potentially available, achievable and suitable.

Suitable

Access can be achieved from Sandcliffe Road and visually the site can be assimilated into the town successfully with development softened at its northern edge by extensive open space with reinforced landscaping. There are no other environmental constraints to developing the site. In policy terms the site lies outside of the settlement boundary but on the very edge of the largest town in the district. It is therefore a highly sustainable location for future growth.

Available

The site is a greenfield site and no existing use would need relocating. It is in single ownership and controlled by a willing national developer with a record of delivery in the area. This includes the adjoining site at Broomy Farm, which, working closely with the Council and community, has been successfully developed and delivered by Bellway.

Achievable

The site is a greenfield site and can achieve a development quantum of approximately 500 homes, which can include a mix of housing and a policy compliant level of affordable homes. It is a viable development prospect, capable of delivering homes on the site early in the plan period.

This document represents the commencement of the promotion of this north-east sustainable urban extension to Swadlincote and it is envisaged that discussions with the Council's Development Plan officers will continue throughout 2023 in order that the proposals can be further investigated and refined.



Various Design and Planning Guidance Documents

Design Policy and Guidance

The design proposals will adhere to the best practice design guidance available; from both a strategic national level down to a local contextually appropriate level.

The conceptual design concept at this early stage through to any subsequent detailed design will all follow these design guidelines,

This guidance includes Better Design for South Derbyshire (SDDC, 2010) and South Derbyshire Design Guide SPD (SDDC, 2017) in addition to the NPPE, Urban Design Compendium and Car Parking What Works Where.

On a national level, the recently released National Design Guide (MHCLG, 2019) will be used to guide and develop the design approach. In particular, the ten key principles of good design have been used as a framework to shape the best practice design principles within this document. The contextually driven responsive approach will ensure a high design quality in the resultant development.



Key Design Principles, National Design Guide (MHCLG, 2019)



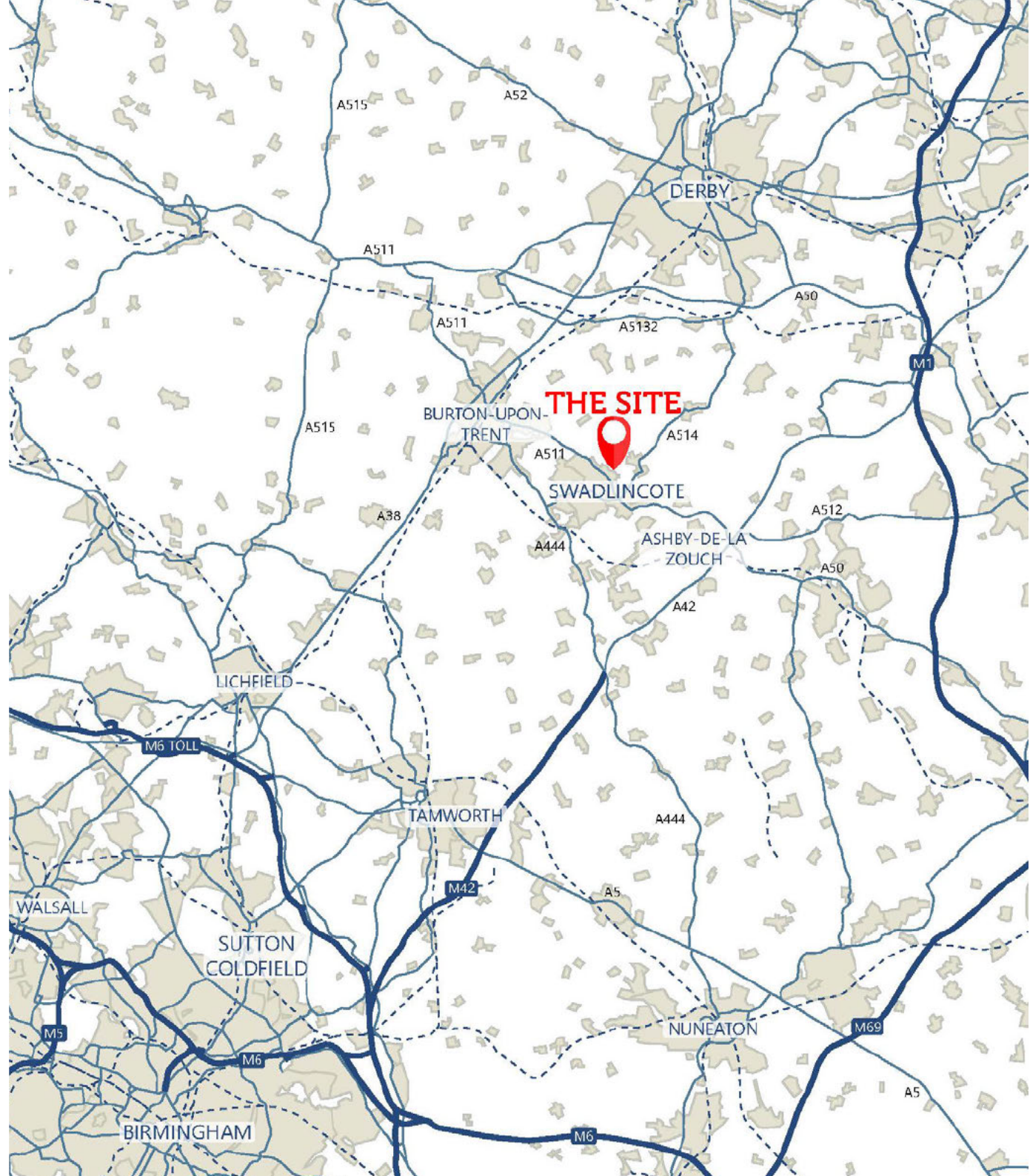
3. THE SITE

Site Location

Swadlincote is a town within Derbyshire. It is located near to the A511, approximately 6 miles south-east of Burton-upon-Trent and around 5 miles to the north-west of Ashby-de-la-Zouch.

The town consists of Swadlincote itself and the contiguous settlements of Newhall, Midway, Church Gresley and Woodvale. These combined, create an overall settlement population of circa 36,000 people.

Wider Location Plan

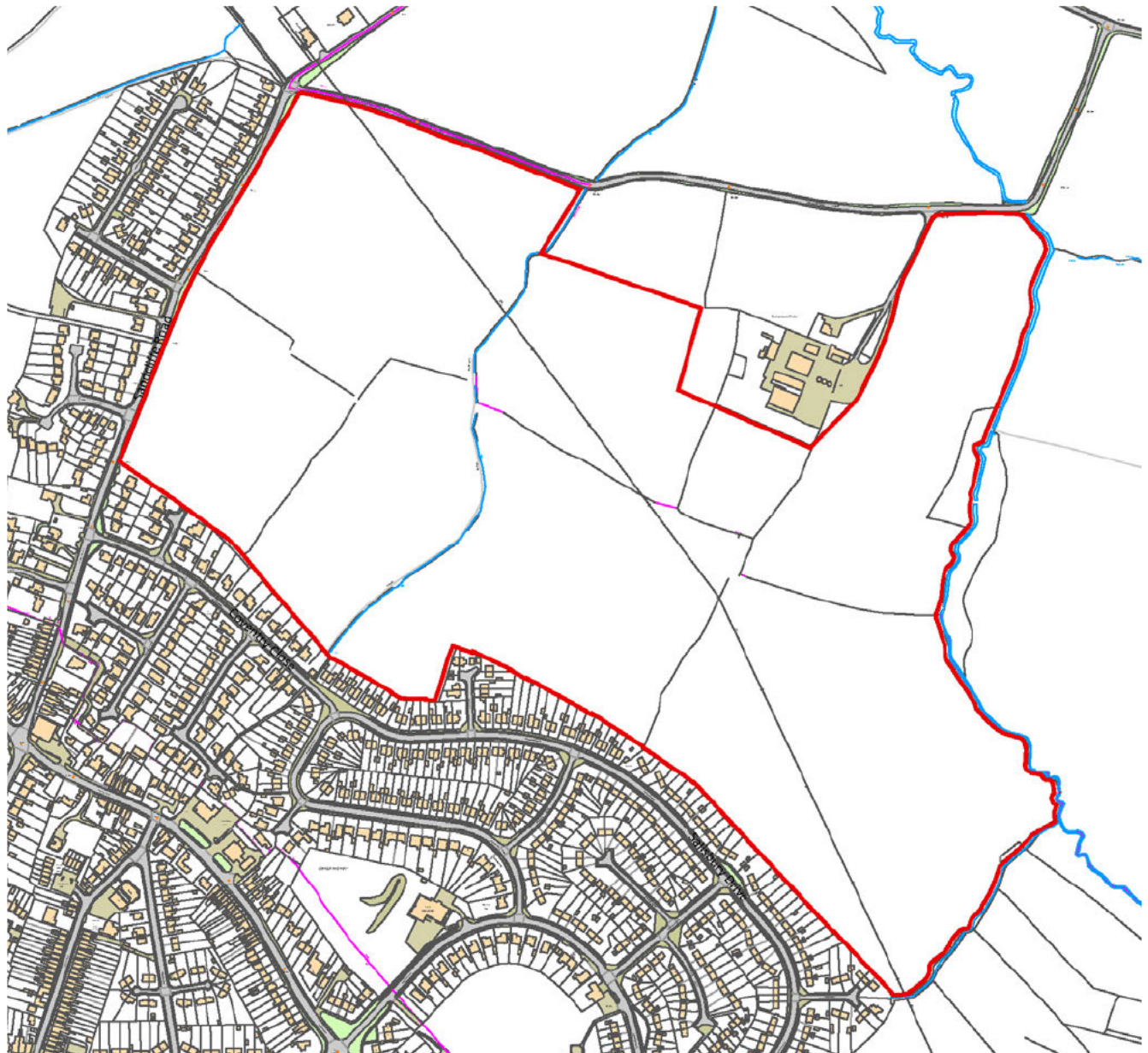


Site Boundary

The site is 42.2ha in area. It is bounded on the western side by Sandcliffe Road. The southern boundary is backed onto by rear gardens of properties which are located along Coventry Close and Salisbury Drive.

The eastern boundary of the site follows a brook running north-south, with Broomy Farm located east of here. The northern boundary of the site borders much of Dunnsmoor Lane on the north-western edge with the site boundary following around Dunnsmoor Farm and back up to Dunnsmoor Lane on the north-eastern edge.

Location Plan





4. SITE SUSTAINABILITY ASSESSMENT

Access to Local Services

The majority of trips that will be made by walking/cycling are for the purpose of short shopping trips, access to leisure/retail facilities, trips to school and trips to public transport stops as part of linked trips to other destinations. Not all facilities and services, not to mention job opportunities will be within a reasonable walk distance and therefore it is important to ensure that there are public transport services that are accessible from the site.

Of particular interest are the levels of facilities and services that can be accessed locally. This is important in reducing the intensity of car use. A detailed assessment of the accessibility of the site will be undertaken in due course as part of the formal Transport Assessment that would accompany any application. However, a high level assessment has been undertaken to help inform this Vision Document of the local facilities/amenities in relation to the proposed site. A summary of the local facilities/amenities in the vicinity of the proposed site is shown and tabulated with the corresponding distance and walking/cycling times from the site in the following table and diagram.

Facility/Amenity	Location	Distance (m)	Walk Time (mins)	Cycle Time (mins)
Sainsbury's Local	A511 (Burton Road)	300	4	1
Bus Stop (Service No. 24)	Winchester Drive	450	5	2
Bus Stops (Services No. 4 & 9)	B586 (Midway Road)	450	5	2
Bus Stop (No. 9)	B586 (Midway Road)	450	5	2
Eureka Primary School	Dunsmore Way	850	10	3
Springfield Junior School	Springfield Road	1200	14	5
National Cycle Route No. 63	Centre of Swadlincote	1500	18	6
Lidl	Belmont Street	1400	17	6
Granville Academy	A511 (Burton Road)	1500	18	6
Hepworth Retail Park	Coppice Side	1600	19	6
Elmsleigh Infant & Nursery School	Queens Drive	1900	23	8
The Pingle Academy	Coronation Street, Potters Croft	1900	23	8
Sainsbury's	Civic Way	1900	23	8
Hartshorne C of E Primary School	Main Streets, Hartshorne	2300	27	9
Bretby Business Park	Ashby Road, Bretby	2700	32	11
The William Allitt School	Sunnyside, Newhall	3000	36	12
Newhall Community Junior School	Chesterfield Avenue, Newhall	3200	38	13

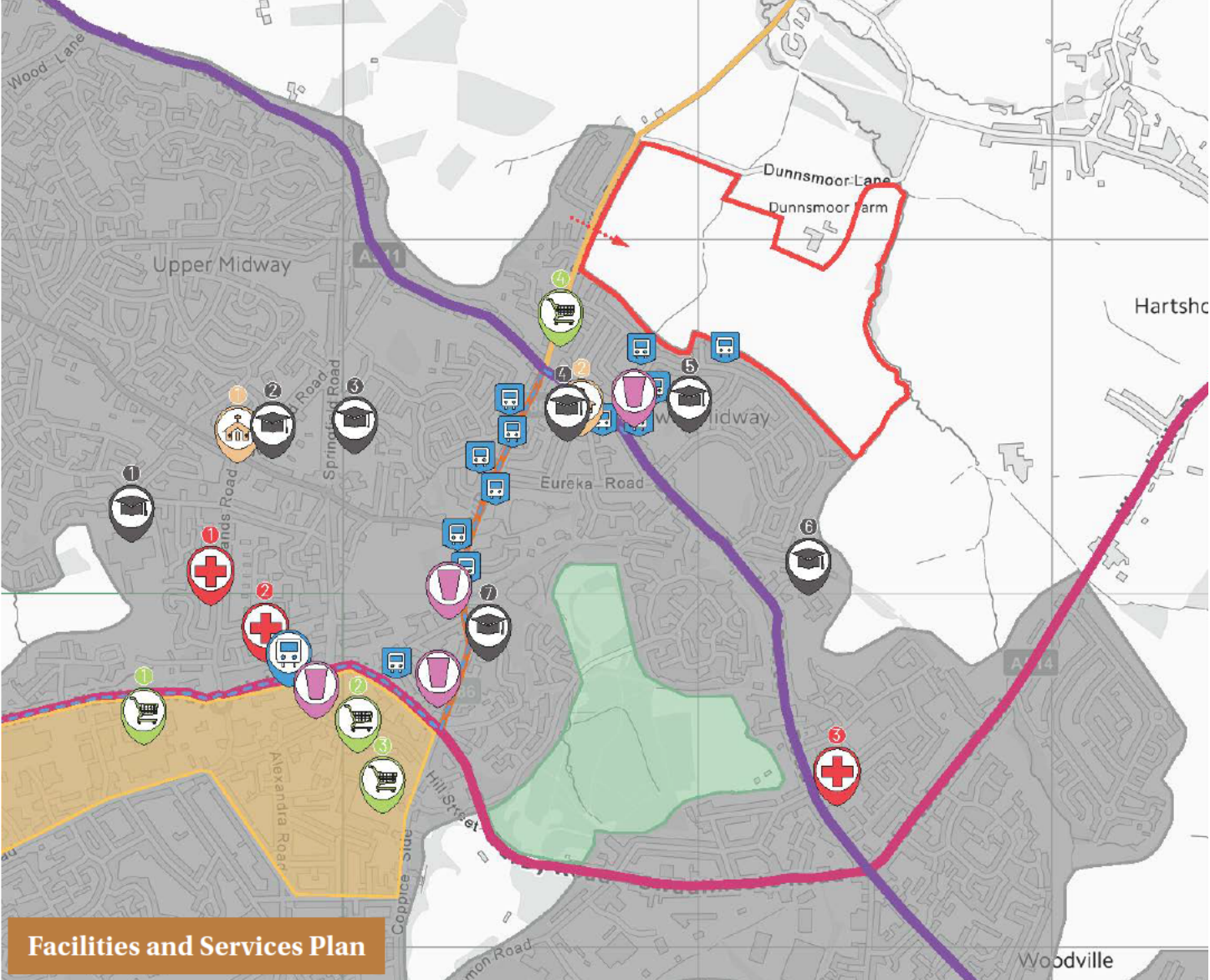
The roads within the vicinity of the site all benefit from designated pedestrian footways which result in a permeable site for pedestrians and cyclists. These provide safe and convenient locations for pedestrians/cyclists to access and egress the site, the local facilities/amenities and the public transport stops detailed above using the existing infrastructure.

Further links and improvements will be provided as part of the scheme which will further the accessibility credentials of the site and the overall permeability. These will be discussed in detail in subsequent sections.

Swadlincote Surgery



Springfield Junior School



- Site Boundary
- Primary Site Access
- Urban Areas
- Local Centre
 - Lloyds Bank
 - ODEN Cinema
 - Argos
 - National de Building Society
 - Petrol Stations
 - Restaurants and Bars
- Swadlincote Woods (National Parks Forest Park)
- A511
- A514
- Midway Road
- Sandcliff Road
- Bus Routes (4/8)
- Bus Stops
- Swadlincote Bus Station
- Pubs, Bars and Restaurants
- Retail
 - Sainsbury's
 - Morrisons
 - Aldi
 - Sainsbury's Local
- Medical Centres
 - Swadlincote Surgery
 - Heartwood Medical Practice
 - Woodville Surgery
- Schools
 - The Pingle Academy
 - St Edwards Catholic Primary School
 - Springfield Jr School
 - Midway Pre-School
 - Eureka Primary School
 - Granville Academy
 - Belmont Primary School
- Churches
 - St Peter & St Pauls Catholic Church
 - Rowland Memorial Methodist Church



Constraints to future growth - transport

To understand the local constraints and where the traffic generation from the proposed development would have a potential impact on the adjacent highway network and Strategic Road Network (SRN), a high level assessment of the 2011 Census has been reviewed. This has been undertaken for the Middle Super Output Area (MSOA) that the site is located in (South Derbyshire 007). The destinations for all car trips were identified and a percentage demand was derived for all of the destinations for car driver trips. A summary of the destinations and demand is provided in the table.

Through a review of recent applications within Swadlincote, the highway network has been reviewed allowing identification of areas of congestion which will need to be reviewed in detail as part of future formal assessment work. However, the Clock Roundabout (Burton Road/Swadlincote Road/Moira Road/Hartshorne Road) was identified as a junction with congestion concerns.

The Woodville Regeneration Link Road (Ref. 09/2017/1222) road has been recently been approved in order to relieve the traffic congestion at the five-arm Clock Roundabout south of the site and will provide a more suitable route away from the centre of Woodville for through-traffic (due for completion at end of 2021). This will connect the junction of Occupation Lane and Hepworth Road with the

A514 near the current junction with Woodhouse Street. It is needed to help deliver the regeneration of the Woodville and Swadlincote area by enabling the employment led redevelopment of land representing poorly restored former mineral workings at Occupation Lane in Woodville; improving access to Swadlincote Town Centre and alleviating traffic congestion and environmental impacts at the Clock Roundabout. This will provide a wider benefit to the local area of Woodville/Swadlincote.

A detailed traffic distribution has been undertaken to understand the assignment of trips on the network. A high-level review of these has been undertaken with specific reference to the Clock Roundabout and a summary is provided in the table below.

The Census data highlights that a significant proportion of all car trips are for destinations within Burton on Trent, Ashby de la Zouch, Swadlincote and Derby. The advantage of the strategic site to the north of Swadlincote is that as

Car Trip Destination	Resident Population Modal Share	Area	Direction of Travel	Avoidance of Clock Roundabout
East Staffordshire	28.11%	Burton on Trent	West/North	Yes
North West Leicestershire	14.64%	Ashby de la Zouch	North/East	No (part of)
E02004126: South Derbyshire 009	14.55%	Centre of Swadlincote	South	Yes
Derby	7.34%	Derby	North	Yes
E02006919: South Derbyshire 012	4.22%	Centre of Swadlincote and Church Gresley	South	Yes
E02004128: South Derbyshire 011	2.90%	Grangewood	South	Yes

demonstrated in the table, a large proportion of traffic would not travel via the Clock Roundabout, thereby limiting the impact on this sensitive section of the network.

Based on the location of the proposed accesses of the site and adjacent highway network, the majority of the movements to and from the site would travel south from the site to the A511 (75.9%) at the Sandcliffe Road/Burton Road (A511)/Midway Road signalised junction. Therefore, demonstration of an acceptable level of operation at this junction is an important factor in demonstrating deliverability at this site.

To help inform this Vision Document a specific review of this junction has been undertaken given its significance and proximity to the site to demonstrate that it can accommodate the traffic associated with the development and to give comfort to the LPA and LHA that this is not a limiting factor in terms of bringing the site forward.

The junction was modelled for a future year assessment of 2026 (inclusive of background traffic growth) in line with adjacent applications and additional developments within Swadlincote were also taken into account (Land at Broomy Farm, Broomy Farm extension and Woodville). Based on the above assessment parameters, the Degree of Saturation (DoS) of the signalised junction was reported at 85.7% for the AM peak and 78.9% for the PM peak. Based on this there is sufficient capacity within the junction to accommodate the proposed development.

Outside of this junction, the development impact would be assessed on the local junctions within Swadlincote. Initial discussions with DCC have indicated that the scheme would be formally assessed through a standard distribution and junction modelling approach in line with the other large-scale developments within Swadlincote. Where capacity would be identified as a concern, the proposed scheme would look to provide appropriate mitigation to address this in order to achieve nil-detriment.



A review of the associated highway assessments submitted as part of the wider applications, Woodville Regeneration Link Road (Ref. 09/2017/1222) and Land North of Woodville (Ref. DMPA/2019/0931) has been undertaken to establish the capacity on the wider network within Swadlincote and Woodville. A summary of the recorded capacities for the future year with development scenarios has been undertaken and the results for the worst case arm for each junction has been reported in the adjacent diagram.

This shows that with the exception of the Clock Roundabout, junctions to the south of Swadlincote and Woodville have been reported to be operating with spare capacity.

As discussed the Woodville Regeneration Link Road (Ref. 09/2017/1222) road has recently been approved in order to relieve the traffic congestion at the five-arm Clock Roundabout north of the site and provide a more suitable route away from the centre of Woodville for through-traffic. This will provide a wider benefit to the local area of Woodville/Swadlincote.

As part of the Broomy Farm site a link road was provided through the site to effectively bypass the Clock Roundabout.

There is a clear benefit of these pieces of infrastructure to the proposed scheme and both will be assessed as part of the formal assessment that will support the scheme.



Junctions Diagram

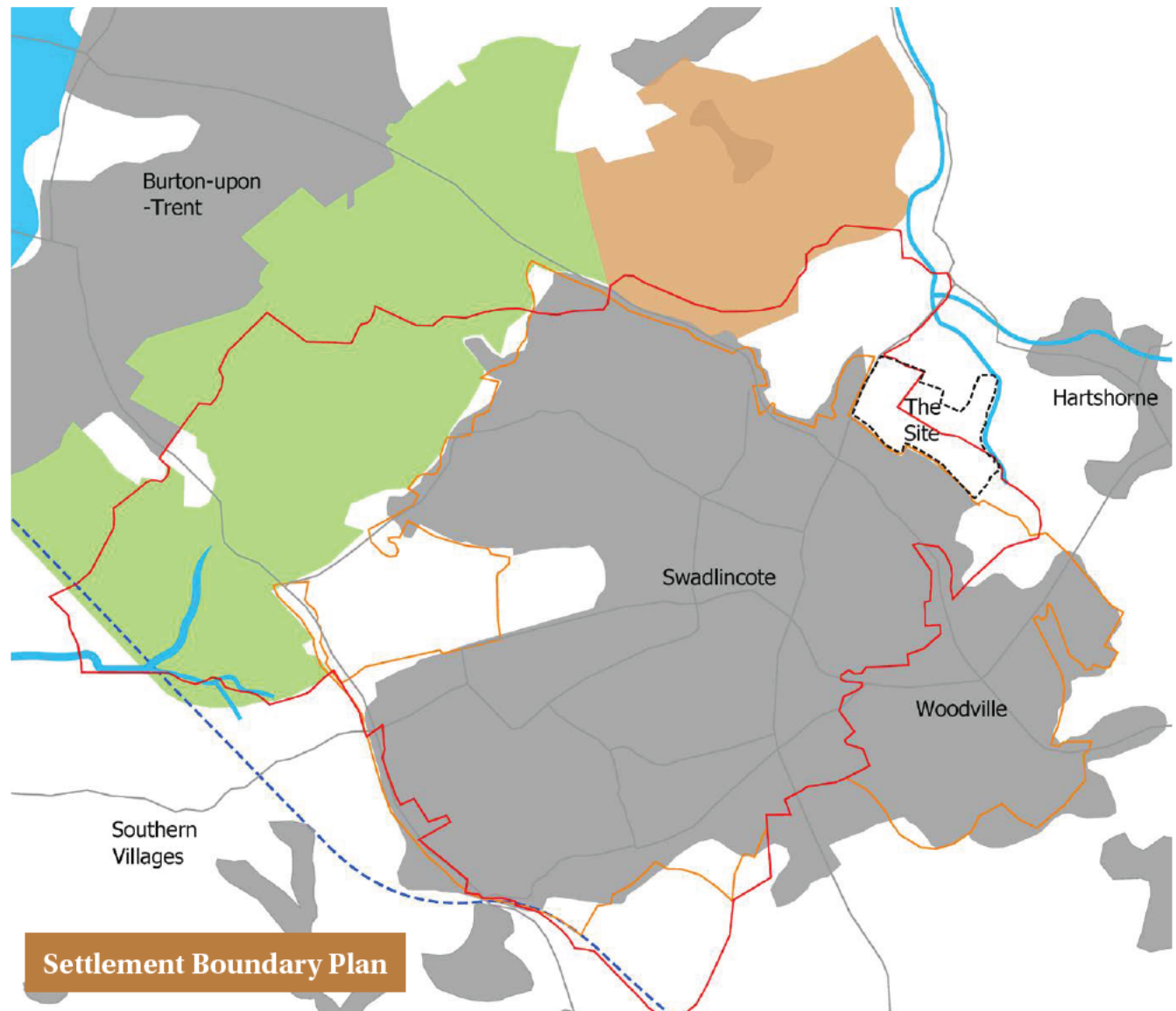
Constraints to future growth

Considering the longer term future growth of Swadlincote, the proposed development site provides a relatively unconstrained sustainable option. It adjoins the existing northern edge of the urban area and much of the site is within the Swadlincote Area Boundary.

It is within close proximity of the centre of Swadlincote. It is outside of the Green Belt area to the west and sufficiently far from the Historic Park in the north. Flood risk areas to the west and south-west, and to a lesser extent along the watercourses to the east, provide some constraints to future growth.

LEGEND

	Site Boundary (42.2 Ha)
	Urban Areas
	Settlement Boundary
	Swadlincote Area Boundary
	Green Belt
	Historic Park and Garden
	Flood Risk Areas
	Railway Line





5. OPPORTUNITIES AND CONSTRAINTS

The proposed site offers a number of opportunities for development. The site is easily accessed from Sandcliffe Road. A stream runs through the development and another borders the site on the eastern edge. In addition to these, an extensive network of hedgerows is present across the site, this offers opportunity to accommodate these within the public realm and add to the attractiveness of the development. A public right of way runs across the site, which should be retained within the proposals and positively responded to. It also offers the opportunity to create a more sensitive development edge on this northern part of Swadlincote.

There are some constraints to development on the site, although all of these can be overcome. Proposed development should make allowances for the utilities running across the site. Similarly, it should respond appropriately to neighbouring development.

LEGEND

	Site Boundary (42.2 Ha)		Existing Vegetation on Site
	Proposed Primary Access		Rears of Adjacent Property
	Overhead Lines		Fronts of Adjacent Property
	Flood Zone 2		Underground Gas line & E
	Flood Zone 3		Underground Water Main
	Public Rights of Way		



Heritage

On the basis of the investigative work undertaken to date, the following conclusions have been drawn in respect of the site:

- There are no ‘in principle’ constraints to the development of the site, in respect of potential impacts on the historic environment;
- There are a number of listed buildings and one Registered Park and Garden in the vicinity of the site, although the nature of the surrounding topography, intervening settlement and woodland cover is such that, overwhelmingly, the settings of these designated assets would remain unaffected by development within the site;
- The Derbyshire HER data identifies ridge and furrow (cultivation) earthworks within the eastern part of the site, but the walkover survey confirmed that they no longer survive; no doubt having been destroyed by more recent ploughing.
- The destruction of the previously recorded ridge and furrow earthworks also suggests truncation across the remainder of the site and therefore quite probably a significant degree of disturbance to any other archaeology.
- No further heritage assets are indicated within the site by the Derbyshire HER, and the known assets within the wider area of the site do not suggest that it is situated in an area of notable archaeological potential.
- Given the information above, any archaeological remains which do exist within the site are unlikely to be of sufficient importance or extent to warrant preservation in situ and are unlikely to adversely affect the suitability or capacity of the site for development.

In light of the available evidence, it is considered that the site represents a reasonable and appropriate location for development in terms of the historic environment.

Ecology

The site is not covered by any statutory or non-statutory ecological designation, and nor are there any immediately adjacent.

- There are three Sites of Special Scientific Interest (SSSIs) within 5km, and 32 non-statutory Local Wildlife Sites (LWS) or Potential Local Wildlife Sites (PLWS) are situated within 2km; but in each case ecological connectivity between these and the site is limited, such that it is considered that they are unlikely to constrain the site’s deliverability or capacity for development.
- The site is dominated by intensively managed arable habitats, which possess limited suitability to support protected species, although it does have potential to support a variety of farmland birds. Further ecological survey work will establish the presence/likely absence of water vole and white clawed crayfish in the eastern boundary stream, and reptiles along the banks, as well as confirming the status of bats, badger and farmland birds within the site boundary to inform any safeguarding and ecological enhancement measures in respect of a planning application.



- Vegetated boundary features and the hedgerows and associated ditches within the site are likely to act as wildlife corridors (particularly the stream along the eastern boundary). Whilst they do not constrain the deliverability of the site for development, wherever possible they should be retained for their Green Infrastructure value, as well as to maintain habitat connectivity.
- The provision of additional planting to create a landscape buffer along the southern and western boundaries, enhancement of the internal hedgerows and the creation of attenuation ponds in close proximity to the ditch in the centre of the site would serve to increase the benefits of the scheme for biodiversity and potentially result in a biodiversity net gain; thus aligning with the requirements of national planning policy set out in the NPPF.

Given the size of the site, and the likely extent of open space which will be available, there is no reason to believe or expect that appropriate mitigation or compensation measures cannot be put in place to adequately address any issues in respect of protected species. This includes the on site provision of an Ecological Wildlife area designed to provide a 10% biodiversity net gain (BNG) increase from the pre-development biodiversity value.

It is therefore concluded that there are no ‘in-principle’ constraints to development of the site in terms of ecological impacts.

Flooding and drainage

Based on the latest Flood Zone Mapping, issued by the Environment Agency, the site area is predominately located in Flood Zone 1. The eastern boundary of the site shows areas of Flood Zone 2 and 3 but this is contained to the watercourse corridor.

The proposed development area will be located wholly within Flood Zone 1 and Flood Zone 1 is defined as very low risk and that each year this area has a chance of flooding of less than 0.1%.

Two watercourses are present within and adjacent to the site area. In due course hydraulic modelling will be undertaken to confirm any additional impacts and ensure all development remains in Flood Zone 1.

Surface Water Flood Risk Mapping shows the majority of the site is designated to be at low to medium risk. There are areas of high risk surface water flooding along the routes of the existing watercourses and suitable standoff distances will be provided as part of the development layout.

In respect of surface water drainage, soakage testing will be completed in due course, however local geology maps indicate the presence of mudstone and so soakage is unlikely to be feasible. Therefore attenuation ponds will be required, with discharge to the adjacent watercourses.

Landscape and Visual Assessment

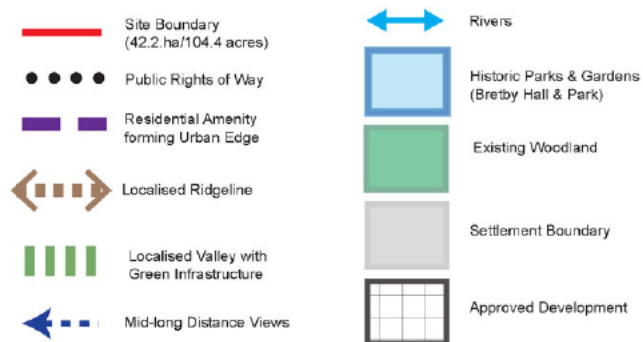
The site lies to the northeast edge of Swadlincote adjacent to a residential area known as Lower Midway. The area of land is bordered by Sandcliffe Road to the west, Dunnsmoor Lane to the north, and a watercourse to the east. The southern boundary is formed by the existing urban edge of residential properties with a very open aspect, prominent on the elevated land. The land is primarily arable fields with a large field pattern and weak hedgerows with the occasional Oak trees that form striking features within the open landscape. Dunnsmore Farm is accessed from Dunnsmoor Lane and is surrounded by the arable land included within the Site. The brook to the east weaves along the valley and is enclosed by trees and scrub and provides a pleasant green finger through the landscape, continuing north to eventually join the River Trent north of Repton.

The local landscape character is identified as ‘Coalfield Village Farmlands’ in the Leicestershire & South Derbyshire Character Assessment, with much of the landscape affected by historic opencast coal mining:

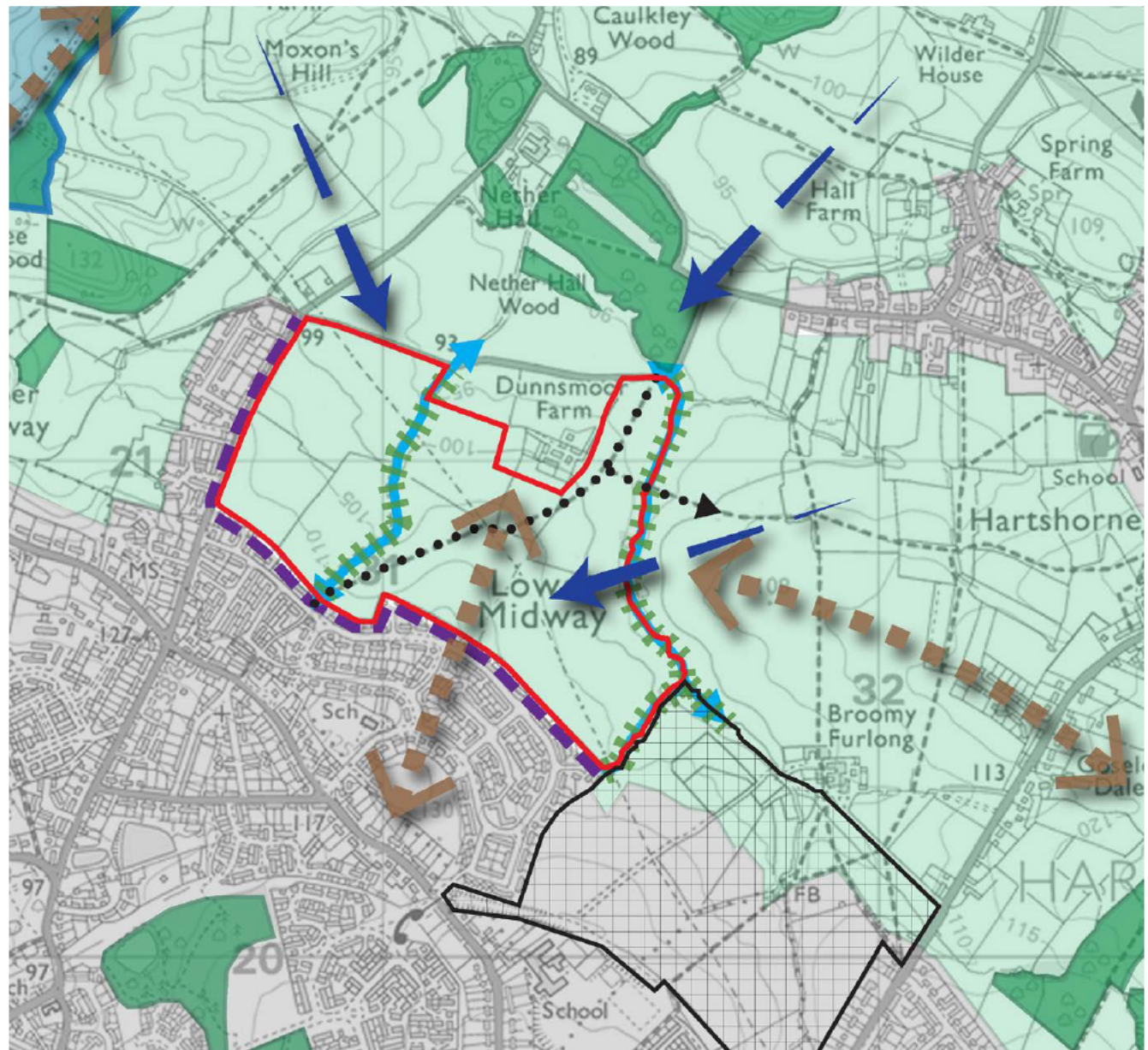
“The Coal Measure geology gives rise to an undulating landform with gentle ridges and shallow valleys. Once open in character, extensive areas of woodland have been planted. However, there is a scarcity of hedgerow trees and hedges tend to be low cut. The land-use is predominantly mixed farming but, where arable dominates, some fields have been enlarged and hedgerows have all but disappeared.”

The topography allows mid- to long-distance views from the surrounding countryside towards the exposed edge of the settlement, where urban impacts are tangible. New housing development is currently under construction at Broomy Farm to the southeast of the site and will form a significant extension to the current urban edge.

This landscape lies within the National Forest and is being subject to large scale woodland planting allied to other landscape and nature conservation improvements.



Landscape and Visual Sensitivity Plan





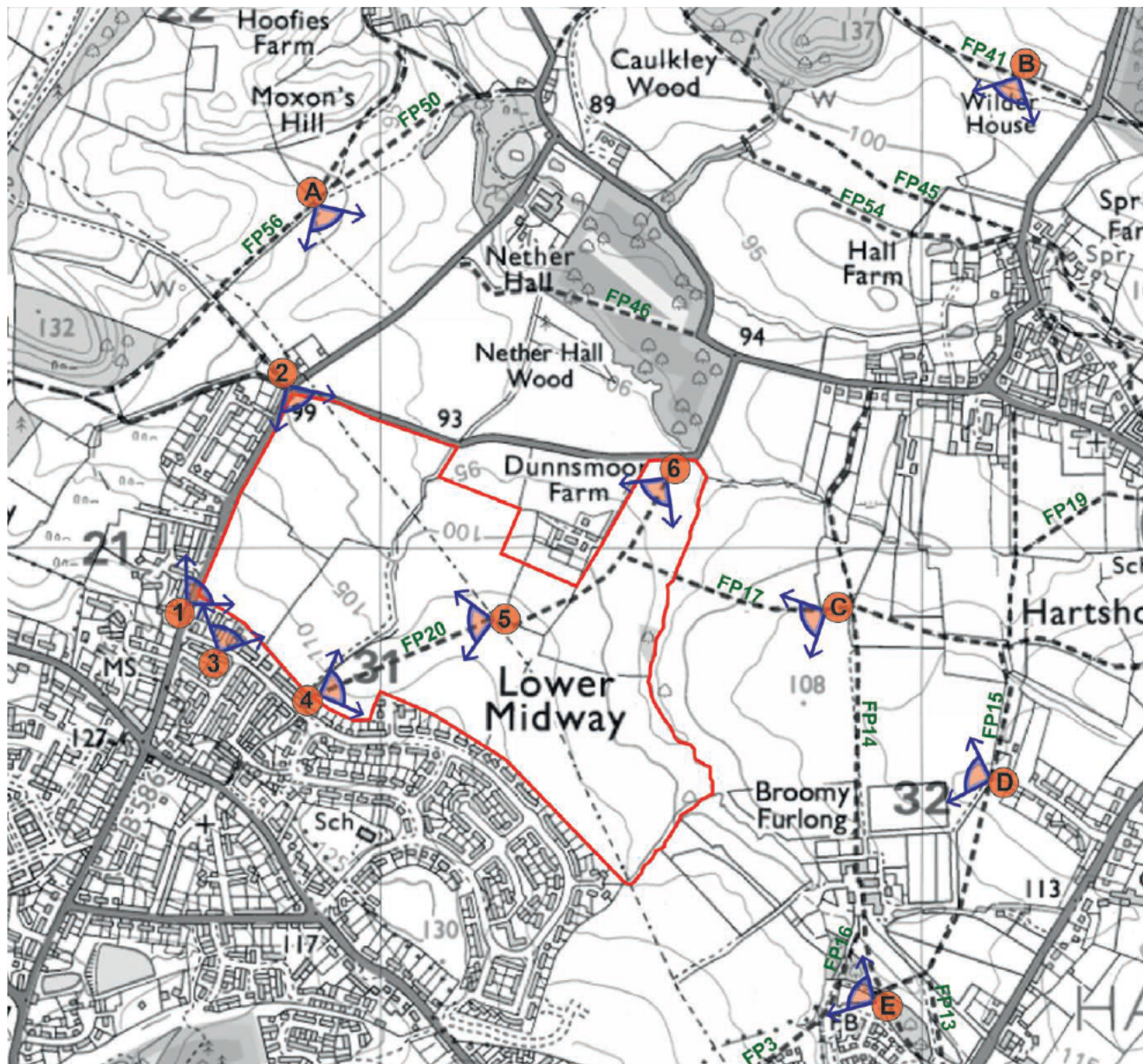
Visual Amenity

As part of the site appraisal, fieldwork has been undertaken to identify the visual context within which the site is situated, and to establish the extent of visibility. The site lies on a north facing slope, beyond which is a localised valley and undulating topography. Large blocks of woodland are present in the wider landscape which curtail long-distance views beyond approximately 2km from the site. There are some mid-distance views from the local footpath network up to 1.5km away, and these are represented by Viewpoints A-E. The Site is visible in these views sloping away from existing urban edge which is often seen forming the horizon and very prominent with little or no landscape structure or screening.

Viewpoints 1-6 illustrate the Site from various public vantage points along Public Rights of Way (PRoW) or local roads. The exposed nature of the site is apparent from these views, and the weak landscape structure that currently exists.

-  Study Area
-  Proposed Viewpoint Locations
-  Public Rights of Way

Viewpoint Locations Plan



Properties along Sandcliffe Road

Hedgerows on Western Boundary

The Site



Viewpoint 1 - View from Sandcliffe Road looking north along road corridor

Dunnsmoor Lane

The Site beyond vegetation

Properties along Sandcliffe Road



Viewpoint 2 - View from Sandcliffe Road at the junction with Dunnsmoor Lane looking south



Viewpoint 3 - View from Coventry Close looking towards the site along York Close



Viewpoint 4 - View from Dunns Moor Lane towards the site

Existing exposed Urban Edge

Public Right of Way

The Site



Viewpoint 5 - View from Public Right of Way through the site looking south west

Existing Urban Edge

The Site

Dunnsmoor Farm

The Site

Dunnsmoor Lane



Viewpoint 6 - View from Dunnsmoor Lane towards the site



Viewpoint A - *View from Public Right of Way on Moxon's Hill to north west of the site*



Viewpoint B - *View from Public Right of Way to north east of the site on elevated slopes of ridge*



Viewpoint C - *View from Public Right of Way*



Viewpoint D - *View from Public Right of Way in vicinity of Goseley Dale to the east of the site*



Hartshore Bellway Development

Existing urban edge of Lower Midway

The Site



Viewpoint E - View from new Broomy Farm development looking north west towards the site

Landscape & Visual Implications

As established in the preceding baseline assessment, the landscape character is one of historic opencast coal mining and therefore has an exposed nature and landscape structure is weak surrounding the northeast edge of Swadlincote. It is considered that the site is of moderate landscape value due to its ordinary and unremarkable appearance and lack of green infrastructure. Extensive areas of woodland have been planted but these are some distance away from the site, and the large-scale afforestation by the National Forest in places is yet to be realised closer to the urban edge.

The potential development of the Site would provide a significant opportunity to deliver new housing as well as considerable green infrastructure to the urban edge of Swadlincote. The proposal is to create a landscape buffer on the north-eastern edge of the site which would enhance physical links between existing isolated woodland and hedgerows and contribute to the large-scale planting managed by the National Forest. This would enhance the local landscape character and provide an improvement to the integration of the urban edge into the landscape.

The undulating topography allows views from the surrounding countryside towards the existing exposed edge of the settlement. These views are often open and panoramic with the backdrop of the existing urban edge sat high on a ridge and very prominent. With the potential development of the site, there would be a localised impact due to the loss of the arable fields close to the urban edge. However, these impacts would be able to be mitigated through the planting of substantial landscape buffers that contribute to the characteristics of the area and seek to soften the urban edge in line with Landscape Character Assessment guidelines and planning policy.

Therefore it is considered that the landscape and visual analysis of the site demonstrates that the existing hard north-eastern edge of Swadlincote could be softened and improved with the new proposals.



Photos showing the existing hard urban edge at the boundary of the site



6. TRANSPORT

Contextual Analysis and Approach

Based on the proposed quantum of development a full Transport Assessment and Residential Travel Plan will be submitted as part of a planning application. The Transport Assessment will consider the impact of the proposed development on the local highway network through traffic generation, distribution, assignment and future year scenarios. It will also consider the suitability of access to the development for sustainable modes, private vehicles and service vehicles. The assessment will determine the level of traffic expected to be attracted to the proposed development during peak hours and examines the impact on the local highway network in terms of operational efficiency.

The documents will be produced in accordance with local and national policy and the scope will be agreed with DCC during pre-application discussions.

Early discussions with DCC have indicated that the site will be formally assessed through a standard distribution and junction modelling approach in line with the other large scale developments within Swadlincote.

Access Strategy

In terms of the design principles, the site access will be designed against local and national standards outlined (Manual for Streets (MfS) 1 and 2 and Design Manual for Roads and Bridges (DMRB) if required).

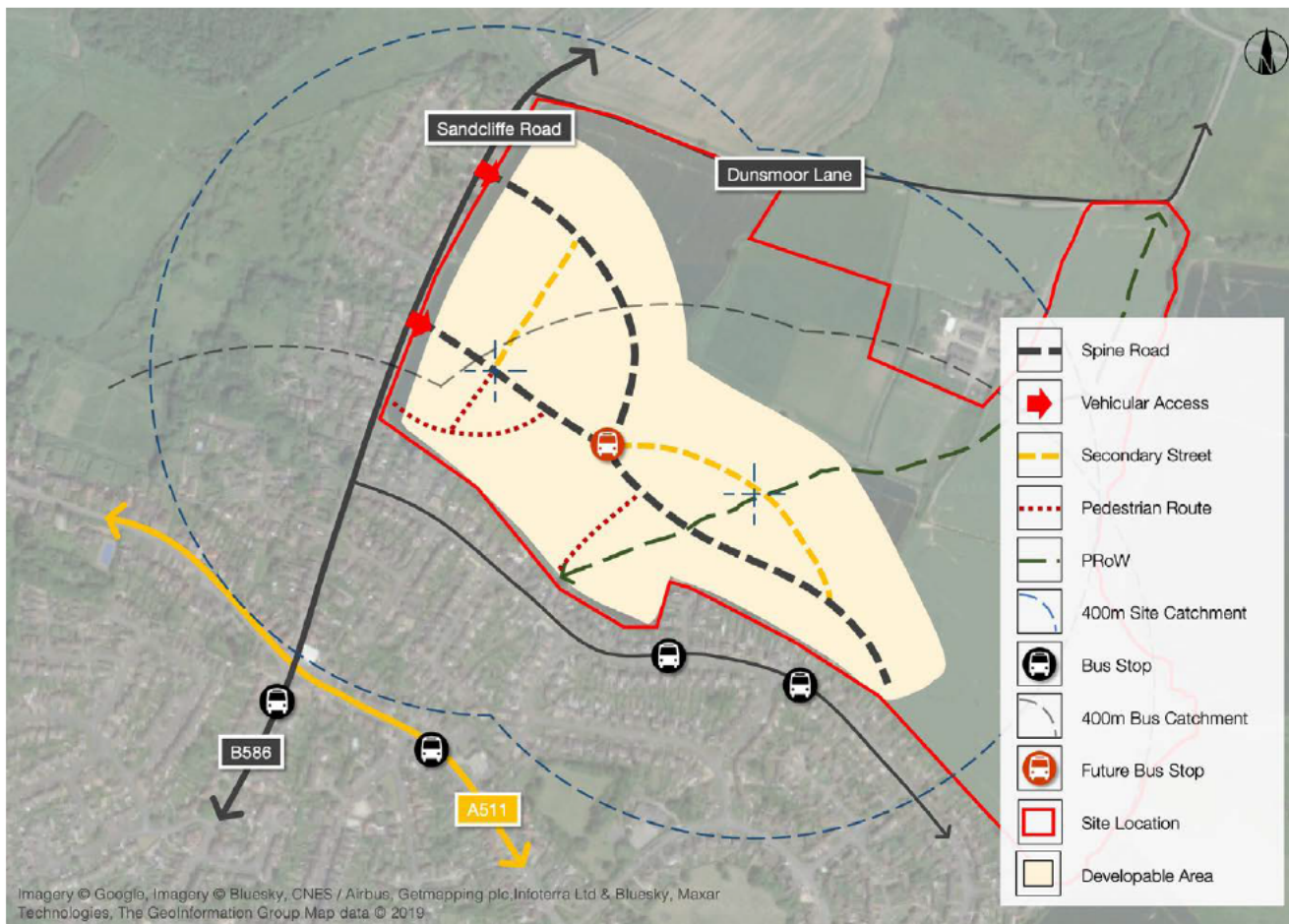
Sandcliffe Road forms the western perimeter of the site, broadly runs in a north to south direction and is subject to a 30 mph speed limit. The road is residential in nature and existing properties benefit from private off street driveways. The speed of the road increases to the national speed limit to the north of Dunns Moor Lane on Nether Hall Road. There is sufficient frontage along Sandcliffe Road to provide the appropriate site access strategy. Depending on the final quantum of development, a secondary access may be required. This could either take the form of standard secondary access or an emergency access. This will be determined at the application stage once the final quantum of development is known and discussed with DCC. Sandcliffe Road has the potential to serve the site via either two formal site accesses or a site and emergency access arrangement. Visibility splays will be based on the recorded speeds and assessed in both the vertical and horizontal alignment.

The indicative access strategy is shown in the figure opposite. Pedestrian and cycle access to the site would be via the vehicle accesses along Sandcliffe Road with

additional links provided to the south where possible which will link to Coventry Close. These will tie into the existing network of roadside footways that provide a comprehensive and coherent network within the vicinity of the site. The site will also link into the existing Public Right of Way (PRoW) network that runs through the site.

As part of the future application a review of the sustainable access to the site will be undertaken. Existing bus stops are located on Midway Road (B586) and Burton Road (A511) both served by the No.4 and 9 services and Winchester Drive served by the No. 24 service. As shown in the drawing opposite a 400m isochrone from each of these stops covers a large part of the developable area of the site. As part of this a bus access review will be undertaken to see if there is the potential to divert an existing service into the site or to potentially provide a new service depending on demand. This will be discussed with local operators and DCC during pre-application discussions. The design of the accesses has been provided to allow access via a bus if this option was to be taken forward and considered suitable.

An on-going transport planning process at the site will be required in line with government policy to ensure the efficient operation of the site; an outline Residential Travel Plan will also be prepared, which will include incentives to encourage sustainable travel from the onset of occupation.



Junction Assessments

Any forthcoming applications would review the following offsite junctions which were consistent with the Broomy Farm application:

- Burton Road/Sandcliffe Road/Midway Road;
- Derby Road/Civic Way/Church Street;
- Derby Road/Sir Herbert Wragg/Frank Bodicote Way;
- 'The Clock' Roundabout;
- A511/Ashby Road;
- Burton Road/Eureka Road/Dunsmore Way;
- Amended Lincoln Way/Broomy Farm Site Access junction; and
- Hartshorne Road/Broomy Farm Site Access junction.



7. STRATEGIC DEVELOPMENT FRAMEWORK AND GUIDING DEVELOPMENT PRINCIPLES

Development Concept

The development concept addresses the opportunities and constraints as outlined within this document and proposes a contextually responsive framework for potential future development.

Working with the existing network of hedgerows and introducing additional tree planting to filter and soften views from the north, the proposals offer the opportunity to enhance the northern edge of Swadlincote. The proposals link into the existing movement network which offer public open space and amenity within the development.

Site Area =	42.2ha
Approximate Development Area =	14.0ha
Approximate no. Dwellings (at 35 dph) =	500 homes

In addition to new homes, there is potential for new public open space, play areas including a NEAP, community orchards, recreational routes, enhanced public rights of way, space reserved for biodiversity and enhanced ecology habitats and increased landscape buffer planting.

LEGEND

	Site Boundary (42.2 Ha)
	Primary Access & Route
	Secondary Route
	Private Drives
	Residential Use
	Rear Gardens
	Existing Hedgerows
	Proposed Landscape
	Proposed SUDs
	Proposed Public Open Space
	Public Footpath / Cyclepath
	Overhead Power Lines
	Development Under Consideration

NUMERICAL KEY

- | | |
|---|--|
| ① | Primary Access to Site |
| ② | Primary Road |
| ③ | Secondary Road |
| ④ | Attenuation Area |
| ⑤ | Existing Hedgerows |
| ⑥ | Tree Belts to Filter Views |
| ⑦ | Cycle & Pedestrian Access Point |
| ⑧ | Public Right of Way |
| ⑨ | Community Orchard |
| ⑩ | Central Green Space |
| ⑪ | Central Playground (NEAP) |
| ⑫ | Existing Watercourse |
| ⑬ | Dunnsmoor Farm |
| ⑭ | Informal Northern Development Edge |
| ⑮ | Ecology Wildlife / 10% BNG Net Gain Area |



Sandcliffe Road

Concept Plan



Form, Massing and Scale

The proposed development should follow broad design principles as set out within this document to ensure a contextually appropriate high quality new neighbourhood.

In order to reinforce the sense of place and hierarchy within the development, whilst ensuring that the buildings sit within the landscape, storey heights within the proposals will be controlled. All buildings throughout the whole of the development will be low-rise and a maximum of three storeys.

The area in the south-west of the site, along the main access road into the site should feature the taller buildings, up to a maximum of three storeys. This will enable good enclosure to the gateway and primary street. Some buildings up to 2.5 storeys in height will be appropriate on the western part of the site, towards Sandcliffe Road and the existing development edge. Development on the eastern side should be smaller in scale and a maximum of two storeys, to create a softer new development edge to Swadlincote.



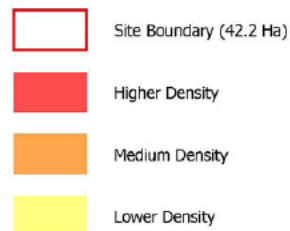
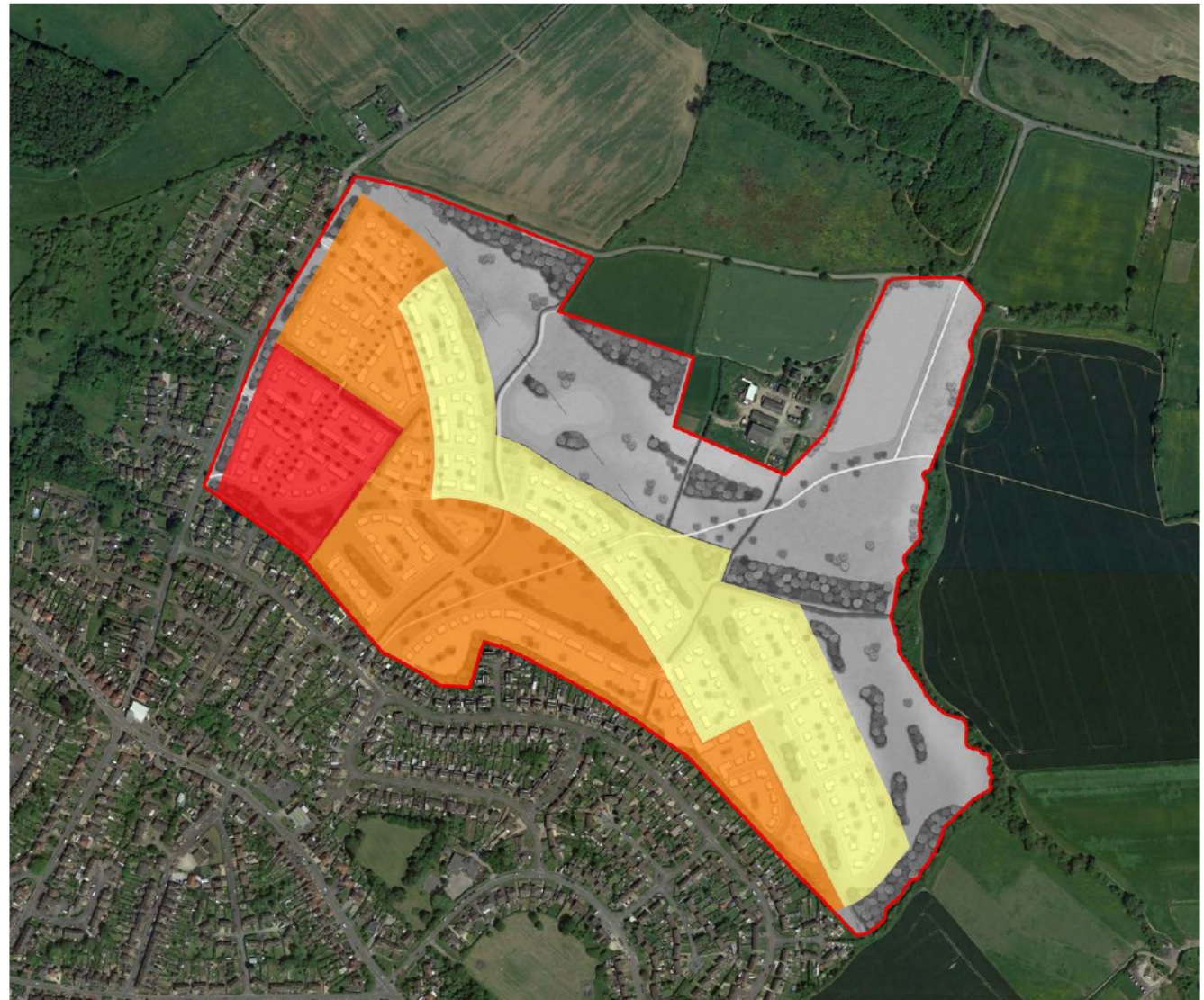
Density

The proposed densities within the site are closely aligned with the Storey Heights plan. The higher density areas (although still relatively low density) should be located in the south-western corner, closer to the main accesses into the site, Sandcliffe Road and closer to Swadlincote centre itself.

The medium density areas should be located along the southern boundary, adjacent to the existing homes and along the western boundary along Sandcliffe Road.

Lower density homes should therefore be located along the northern and eastern parts of the developable area. These lower density areas will allow for increased landscape planting, which will filter views and form a softer more attractive development edge.

These density areas are relative to each other, with the overall average density of the proposals expected to be 35 dph.



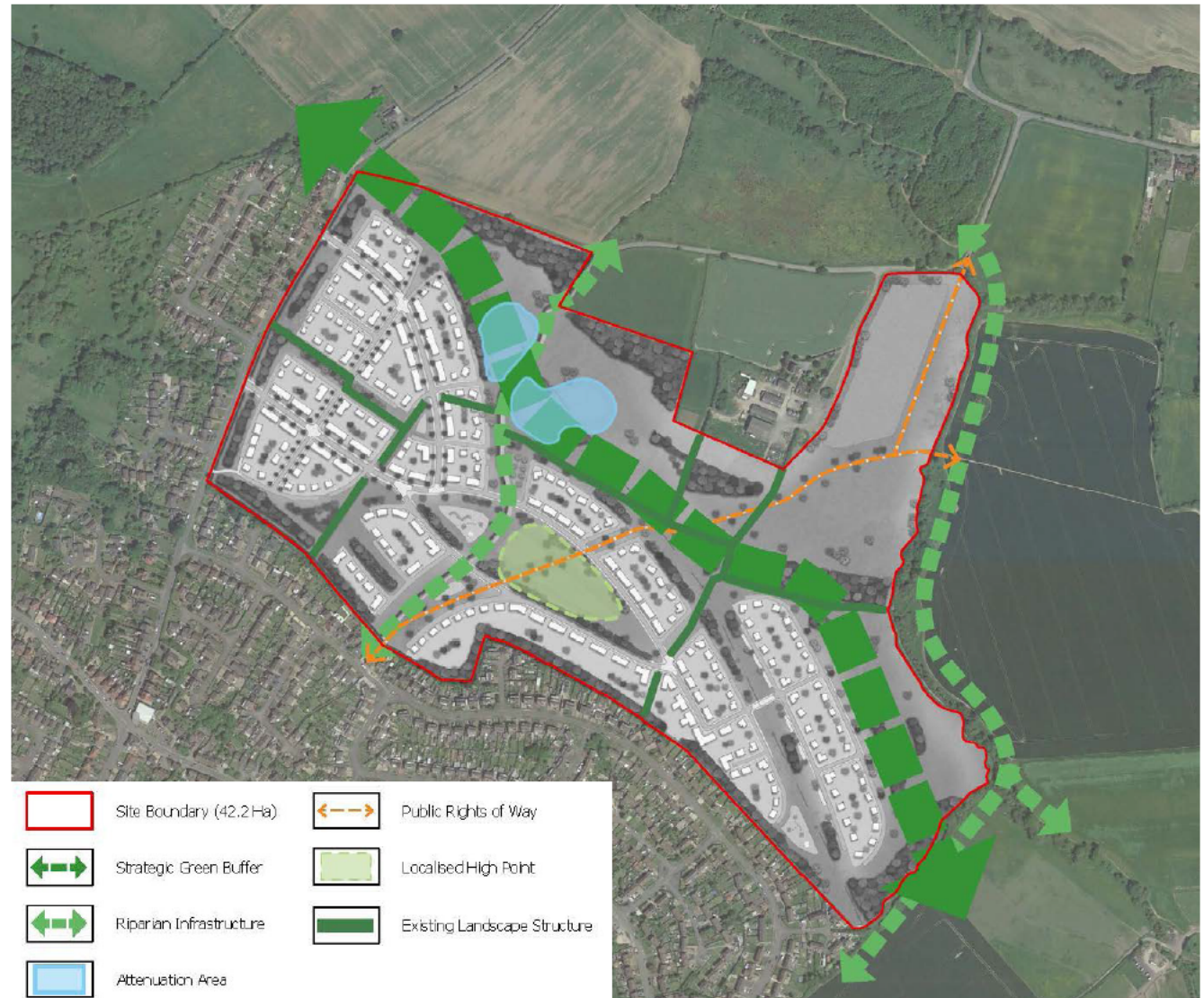


Green Infrastructure

The green infrastructure responds to the existing constraints of the site, retaining the existing landscape structure, topographical features and respecting the character of the local area. A strategic green buffer is proposed to the northern edge of the development to provide increased woodland cover within the National Forest area, and a public amenity resource making land available for recreation and biodiversity enhancements. The character of the existing site and setting is thinly vegetated with scattered small woodlands and hedgerow.

The Planting and Management Guidelines for the LCT are:

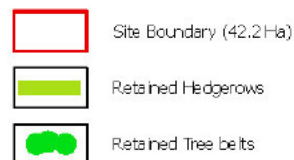
- Re-establish and enhance physical links between existing isolated woodland and hedgerows.
- Ensure the management and enhancement of hedgerow trees, through selection and natural regeneration, or by planting.
- Enhance the visual and ecological continuity of river corridors by management, natural regeneration and planting of riparian trees.
- Ensure the conservation and management of mature/veteran trees within hedgerows.
- Refer to National Forest Strategy and Guidance for vision.



Hedgerow and Woodland Retention

The proposed concept masterplan maximises the retention of the existing hedgerow network, including those along the site boundaries, as demonstrated by the adjacent plan. In addition to hedgerows, the proposals will also retain the existing tree belt along the eastern edge of the site, with the plan highlighting retained trees which fall within the site boundary.

This retained green infrastructure will enhance the biodiversity, wellbeing and character of the proposals whilst adding to this with new green infrastructure across the site.





Movement Network and Access

A clear street hierarchy will aid way-finding throughout the development and assist in the legibility of the scheme, helping users navigate throughout.

Vehicular access into the site will be from Sandcliffe Road. A Primary Street will loop between these two main access points, with a Primary Street extending across to the eastern parcel. These are the highest order streets within the development.

Creating additional movement loops, Secondary Streets will link onto these Primary Streets. In turn, these secondary order streets will serve tertiary streets and private driveways towards the edges of the development.

The existing Public Right of Way will be retained and enhanced with positive frontages and planting treatments. Additional key pedestrian routes will provide further permeability through the site and linkages into the surrounding movement network.

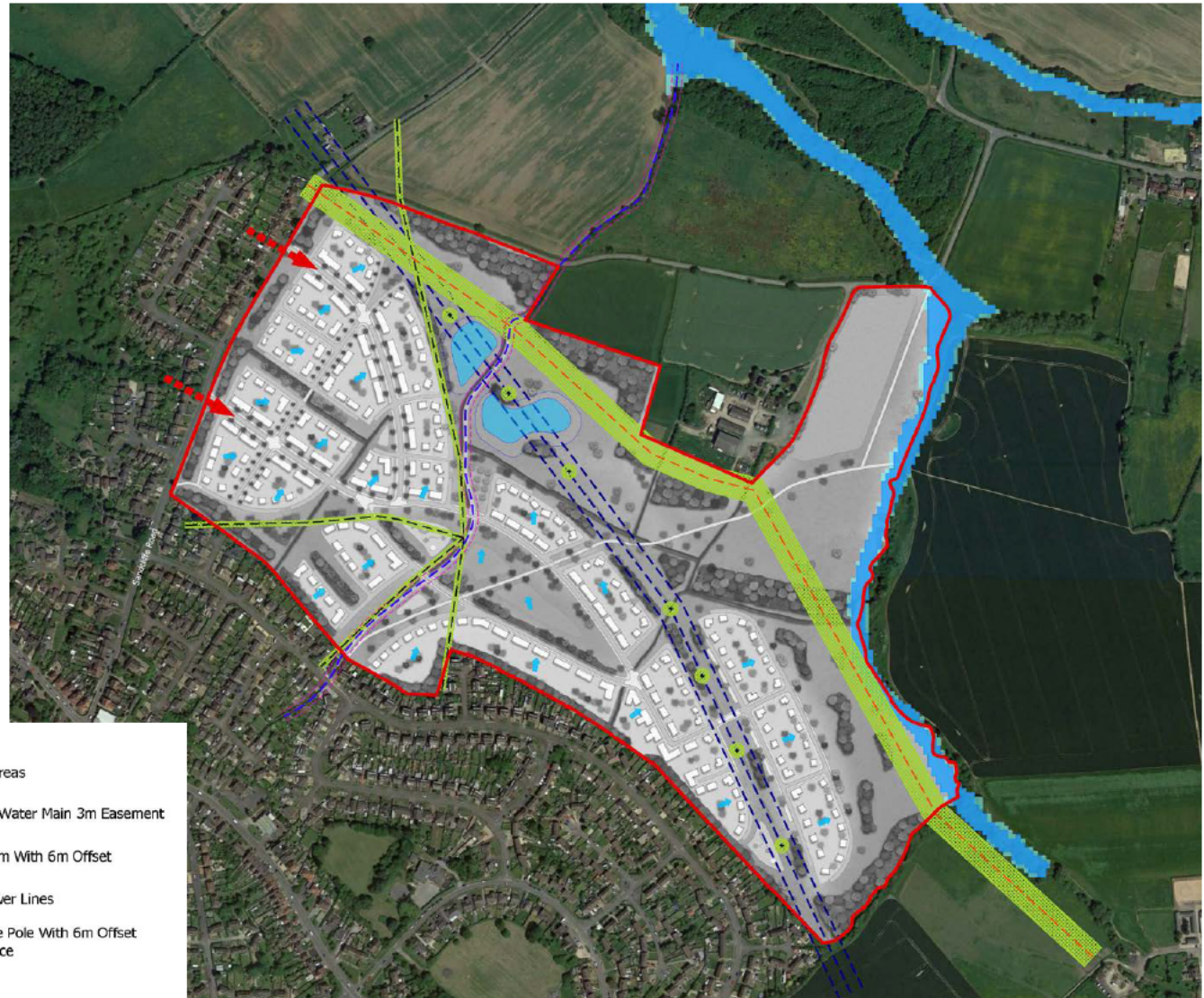
	Site Boundary (42.2 Ha)		Secondary Road
	Vehicular Access Point		Private Drive
	Main Spine		Public Right of Way
	Primary Road		Pedestrian / Cycle Link



Drainage Strategy

The surface water strategy for the site assumes a positive drainage system with outfalls to the watercourse running centrally through the site. Two attenuation ponds providing approximately 8,000m³ of storage will be provided and will cater for up to the 1 in 100 year storm event plus 40% climate change. Discharge rates will be limited to QBar providing significant betterment over greenfield runoff rates.

Foul water will drain by gravity to existing sewers located within the site area. Some of these sewers may be diverted to facilitate the development proposals and where not in the adopted highway 6m easements will be provided. Further discussions will take place with Severn Trent Water in due course regarding capacity however in accordance with the Water Industry Act capacity will be made available to facilitate new connections



	Site Boundary (42.2 Ha)		Attenuation Areas
	Proposed Primary Access		Underground Water Main 3m Easement
	Indicative Drainage Directions		Existing Stream With 6m Offset
	Flood Zone 2		Overhead Power Lines
	Flood Zone 3		Overhead Line Pole With 6m Offset for Maintenance
	Underground Gas line & 15m Easement		



Character Areas

The overall masterplan takes design cues from the local context with a responsive approach to character and sense of place. Within the development smaller character sub-areas will aid legibility and wayfinding.



A - Sandcliffe Mews - More formal higher density development with more regular building lines will be focussed on the south-western part of the site adjacent to Sandcliffe Road. Short runs of terraces complemented by occasional use of apartments and semi-detached homes will give a more formal character to the area. Building heights along the main road and at key nodal points may be higher to reinforce the primacy of these spaces.



B - Sandcliffe Gardens - Adjacent to Sandcliffe Road towards the northern part of the site will be the slightly less formal character area, providing a transitional character between the development and the green edge. Building heights may be higher along the main road and at key nodal points to give enclosure and active frontage onto these spaces. Short runs of terraces along with apartments and semi-detached homes will be punctuated with some detached buildings on the northern edge.



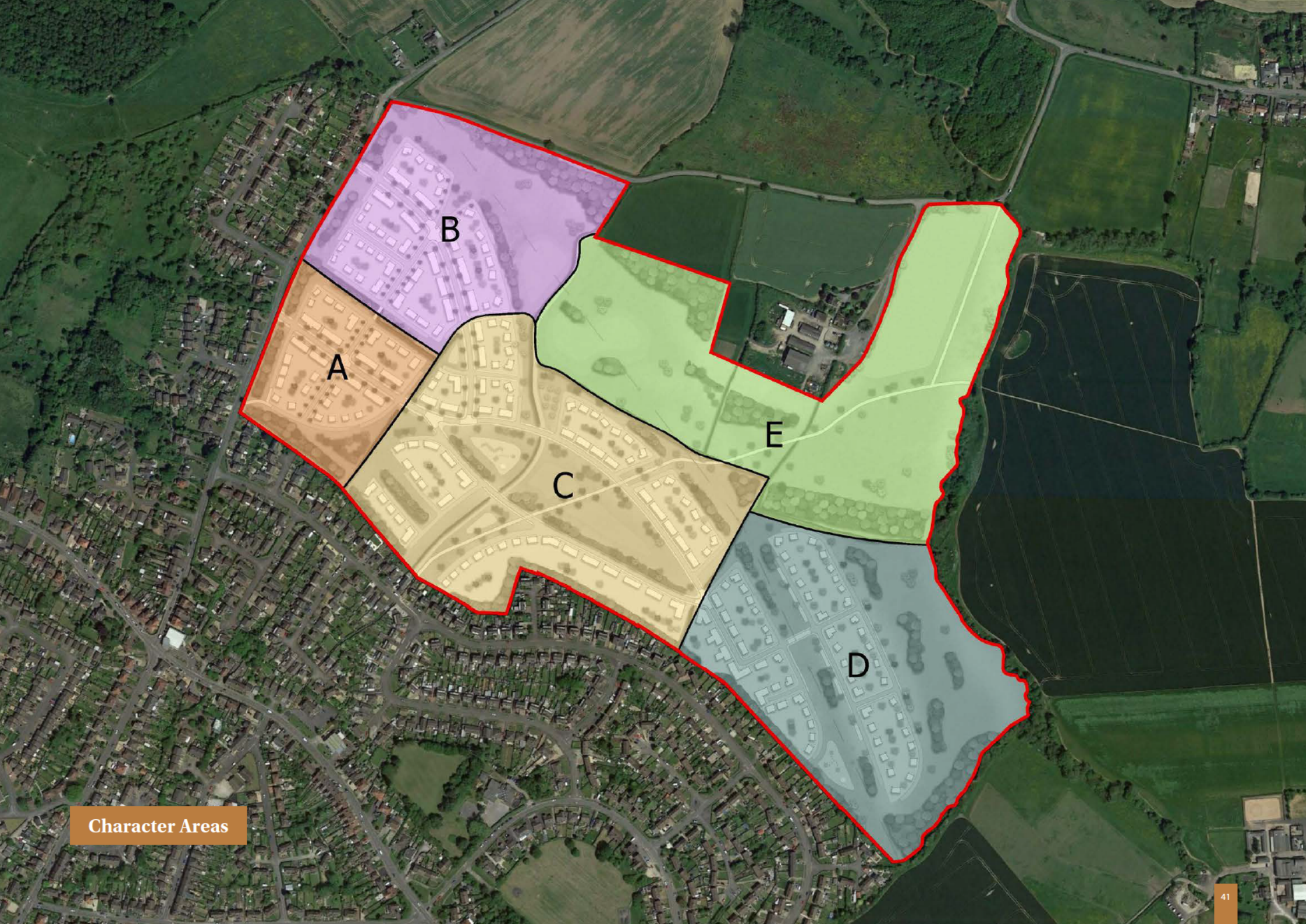
C - Central Green - The Central Green provides a focal point to the proposals. Located on the high point of the site, the public open space is strategically located and planted to filter long distance views of the proposals. Strong frontage will enclose the Central Green as it provides a transitional element from the higher density more formal western edge to the less formal lower density eastern edge.



D - Eastern Green - The least formal in character, the eastern part of the site will include more detached homes with increasing proposed landscape to provide a more organic agrarian character to this eastern edge. It will be lower in both density and in building heights; providing a soft transitional edge to the open countryside beyond.



E - Dunnsmoor Parkland - There are no homes proposed for the northern part of the site. Instead the large green area will provide a green buffer to the new northern edge of Swadlincote softening and filtering views of the development.



Character Areas



8. DELIVERABILITY & BELLWAY HOMES EXPERIENCE

Deliverability and Experience

Bellway are an FTSE 250 major PLC housebuilder delivering just over 11,200 new homes across the UK last year. They are a five star housebuilder as a result of emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.

Since their beginning over 75 years ago, Bellway now operate from 22 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables our divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are attractive to our customers and help to build local communities.

Bellway control this highly sustainable site in Swadlincote. Their experienced multi-disciplinary consultant team have assessed the site and consider it is available, suitable and developable and can therefore provide a deliverable site of up to approximately 500 new homes including affordable housing and other potential community uses. The landowners have carefully chosen Bellway as their development partner to ensure a positive legacy locally and seek to deliver community benefits too.

Bellway are fully committed to building and delivering a sustainable development for Swadlincote and would like to work with the Council and the community to make this happen.



Bellway Homes Experience - Economic Footprint 2021-22

Bellway's Sustainability Policy

Sustainability is at the heart of Bellway's business and through sustainable construction they aim to create new and sustainable communities. Bellway's new strategy "Better with Bellway", embodies their approach to responsible and sustainable business practices, "putting people and the planet first".

Bellway's eight strategic business priorities are design to help the company thrive now and into the future, putting a long-term commitment to responsible and sustainable practice at the core of their operational strategy.

Bellway is committed to reporting annually on its approach to sustainability and has established targets and KPIs to enable others to judge their performance. This policy does not replace existing policies in relation to environmental issues and health and safety but instead works in conjunction with them.

Bellway have a number of sustainability targets relating to their eight priorities including :

- Bellway is committed to the delivery of Future Homes by 2025
- Bellway is seeking to be Carbon Net Zero by 2050
- To increase their year-on-year 9-month National House Building Council score to at least 90% by July 2026
- To reduce their scope 1 and scope 2 emissions by 46% by 2030

Through their eight priorities, Bellway will deliver better homes, communities, and help to protect the environment. These eight priorities are:



9. SUMMARY

This document provides a high level look at the key opportunities and constraints for the proposed development site off Sandcliffe Road in Swadlincote, and its suitability for new development.

The 42.2 ha site has the potential for approximately 14.0 ha of developable area. At an overall average density of 35 dph, this would yield approximately 500 new homes, in addition to new public open space, play areas and other amenity.

From a planning and design perspective, although not yet an allocated site, there is no reason why development on this site should not be acceptable.

The visual sensitivity analysis of the site shows that the existing hard northern edge of Swadlincote could be softened and improved with the new proposals.

In terms of ecology, by working with the existing field boundaries and trees, it will be possible to retain much of the existing habitats and provide new enhanced habitats for ecology and wildlife in order to deliver 10% biodiversity net gain as part of the development.

From a heritage perspective there is no reason why development on the site should not come forward. Similarly, in terms of drainage, the proposals are not within a flood area, and the drainage strategy can be implemented with the attenuation ponds as shown.

Access to the site is possible from Sandcliffe Road, and the surrounding road network has shown capacity for an additional 400-500 dwellings in this area.

Overall the site offers potential to create a highly attractive new development that links into the existing fabric of Swadlincote and enhances the northern development edge whilst providing new homes for the local community.



Proposed Development

Development Concept within the context of Swadlincote

[REDACTED]

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CAUTION! This Email was sent from outside SDDC. Only open links and attachments you're expecting.

[Report](#)

Good morning

Please find attached our response on behalf of Bellway in regard to their interests at Swadlincote.

regards

[REDACTED]

Dear Consultee

Local Plan Part 2 Review Issues and Options

South Derbyshire District Council has begun work on reviewing the adopted Local Plan Part 2, which sets out non-strategic policies and allocations against which future planning applications will be determined.

Consultation is a key part of the local plan process, and this Issues and Options (Regulation 18) consultation is the first public consultation on what the Local Plan Part 2 Review should include.

How to have your say...

The consultation commences on 24th November 2025. Information regarding the consultation can be found on our website at: www.southderbyshire.gov.uk/issuesandoptionsPart2Review

Reference copies of the consultation documents and paper copies of the questionnaire can be found at the following locations (during opening hours) as reasonably practical following the start of the consultation.

- South Derbyshire District Council, Civic Offices, Civic Way, Swadlincote, DE11 0AH
- All South Derbyshire libraries and the following libraries outside of the District: Burton on Trent, Chellaston, Mickleover and Sinfen

A series of drop in events are to be held around the District throughout December and January, as listed below. The events are open to all, and you do not have to attend your nearest one. As always, we would like you to extend the invitation far and wide. Please do tell your family, friends and neighbours about this consultation and the opportunity to respond to shaping the District.

Venue	Date	Time
Frank Wickham Hall, Portland Street, Etwall, DE65 6JF	Monday 8 th December 2025	4pm – 7pm
Melbourne Sporting Partnership, Cockshut Lane, Melbourne, DE73 8DG	Tuesday 9 th December 2025	4pm – 7pm
Sharpes Pottery Museum, 23 West Street , Swadlincote, DE11 9DG	Friday 19 th December 2025	4pm – 7pm
Hilton Village Hall, Peacroft Lane, Hilton, DE65 5GH	Friday 9 th January 2026	4pm – 7pm
All Saints Heritage Centre, Shardlow Road, Aston on Trent	Wednesday 14 th January 2026	4pm – 7pm
Rosliston and Cauldwell Village Hall, Main Street, Rosliston, DE12 8JW	Friday 16 th January 2026	4pm – 7pm
Findern Village Hall, Castle Hill, Findern, DE65 6AL	Friday 23 rd January 2026	4pm – 7pm

Comments made in response to this consultation need to be made in writing. We encourage you to submit your responses online (through the Councils website), where you can register and submit your comments.

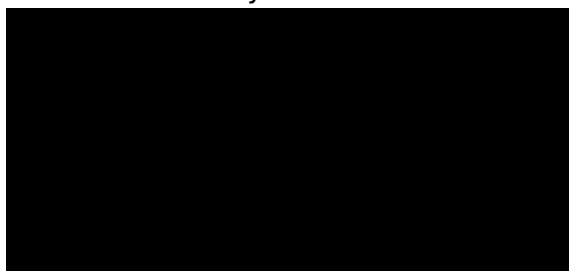
If you have received this notification via email, your address can be used to login and submit a response online. If you have not used the consultation software previously, you will need to create a password. You can do so by clicking on the “I forgot my password” on the consultation website.

Alternatively, you can submit your completed questionnaires by email to local.plan@southderbyshire.gov.uk or

Post to: South Derbyshire District Council, Civic Offices, Civic Way, Swadlincote, DE11 0AH

We welcome your comments on the consultation document and the Local Plan Part 2 Review Scoping Report until **5pm on 30th January 2026**.

Yours faithfully



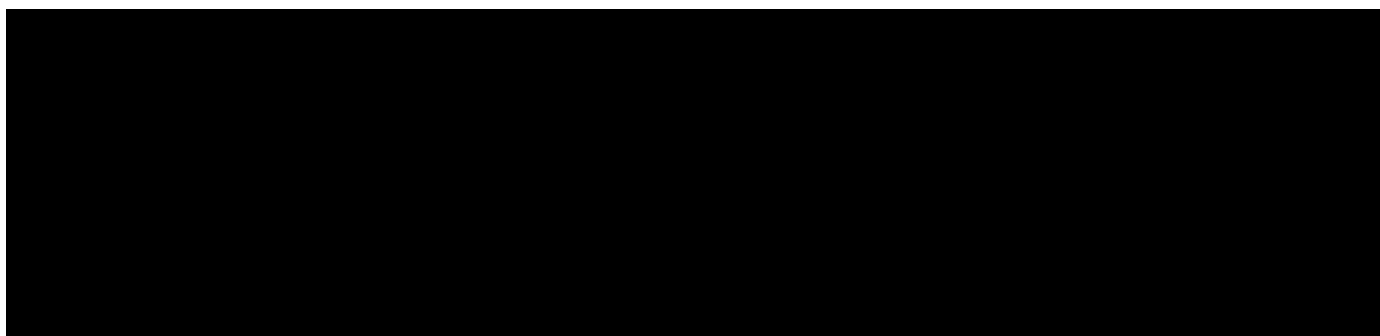
South Derbyshire Issues and Options Part 2 Local Plan Review Paper Response Form

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.



*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

Privacy Notice - How is your information used?

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?

South Derbyshire District Council Planning Services. Personal information is not shared with any other department or agency, will not be sold and will not be used for any other purpose.

For further information, please visit our Privacy section of our website at 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

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)

We strongly recommend the Council, in the first instance, produces a single Full Local Plan under the new system. We set out our reasoning below.

First, we acknowledge the Council's desire to have full plan coverage (based on a two-part local plan) prior to Local Government Reorganisation in April 2028. Conversely, the Council acknowledge that to achieve this would be 'ambitious' as both parts of the Local Plan (LPP1 and LPP2) would need to be ready for submission to Planning Inspectorate by 31 December 2026.

The Council intend on undertaking and completing all the tasks (legal, procedural and to ensure soundness) necessary to get both LPP1 and LPP2 plans through the examination process (for LPP1) and be ready for submission (for LPP2) in the next 12 months. This would assume that both plans will move forward with no delays and no unforeseen events or circumstances to slow down their progress towards adoption and / or submission. This, in our experience, is simply not a realistic proposition.

Second, and related to our first point, the intention to pursue a 'two-tier' plan approach in 2026 has clear implications for the public consultation process. In particular, it is notable on page 4 of the IO document that the Council states:

"To achieve this the Council would need to follow an ambitious timeline to conclude this [issue and options] consultation, consider the responses and draft a Local Plan, carry out

further consultation and then submit the plan for Examination by December 2026.”

(emphasis)

The Council is suggesting that it will carry out only one more consultation stage prior to submission of the LPP2 for examination, which we assume will be under Regulation 19 (pre-submission) version of the Plan. However, this consultation only covers issues and options and does not present any draft policies or proposals to be taken forward in the LPP2 at this stage. Whilst we recognise there is flexibility at the Regulation 18 stage, as PPG ID61-034 makes clear, the process has to comply with Regulation 18. Regulation 18 makes clear what is expected of local planning authorities with respect to requirements for consultation on the local plan. Regulation 18(3) states that *“In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1)”*. The intention to move straight to Regulation 19 version of the LPP2 without consulting on a draft set of policies would be inconsistent with the Regulation 18(3) and undermines the effectiveness of public engagement, contrary to paragraph 16(c) of the NPPF 2024.

The lack of effective engagement at Reg 18 stage also has implications for subsequent stages of plan preparation. In particular, Regulation 19 stipulates that before submitting a local plan for examination, the Council must publish the ‘proposed submission documents’ and make these available for inspection. The proposed submission documents, in accordance with s17(d) of the same regulations, must include a Consultation Statement. The Consultation Statement must include *“a summary of the main issues raised by those representations, and how those main issues have been addressed in the local plan”* in accordance with Regulation 19(d)(iii) and (iv). The Plan that is published for consultation at Regulation 19 stage should therefore be the plan that the Council intends to submit to the Planning Inspectorate for examination. They must also submit a ‘statement’ that addresses the requirement of s17(d) based on representations received at the regulation 18 stage. At present, the Consultation Statement will not include any summary of the main issues raised on any draft set of policies or proposals

because there are none. This is again a fundamental failure in the process being followed for the LPP2 review.

In order to be in a position to prepare and publish both the plan and the s17(d) Consultation Statement, the Council are obliged to invite representations on the draft set of policies and proposals as part of preparing a draft Plan under Regulation 18. They should then consider those representations before they publish the Regulation 19 version of the LPP2 review. This is critical to ensuring the plan-making process is fair and transparent for all parties because regulation 19 does not allow for any subsequent modifications or amendments to be made to the Reg 19 Plan prior to its submission for examination.

Similarly, the LPP2 review should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements, in accordance with paragraph 33 of the NPPF 2024. Furthermore, the PPG makes clear that the development and appraisal of proposals in plans needs to be an *iterative* process, with the proposals being revised to take account of the appraisal findings (PPG ID: 11-018 20140306). However, the Sustainability Appraisal issued for this consultation is only at the 'Scoping' stage and does not present any appraisal of the preferred policies and proposals in light of reasonable alternatives, as required under SEA Regulations and national policy. On this basis, we contend that the process of preparing the LPP2 does not currently meet these requirements. There is clearly a need for more than one consultation on the LPP2 as it moves forward, to include a consultation on a draft set of policies and proposals.

In this context, there will be no real opportunity for local stakeholders to influence the content of the LPP2 or provide their views on how the likely significance of effects of the draft policies and proposals have been taken into account. This is because the next formal consultation will be in response to the pre-submission versions of both the LPP2 and (final) SA under Regulation 19 of the plan-making regulations prior to submission (assuming these remain in force for transitional plans). It also conflicts with the Council's Statement of Community Involvement (SCI) which notes the need for more than one

consultation as necessary at this stage (SCI, Table 1, March 2024 draft). In our view, moving forward with only one consultation under Regulation 18 (on a high level Issues and Options document) significantly undermines the effectiveness of the public consultation and engagement process for the LPP2. In this context, the preparation of a single local plan can ensure that local stakeholder views can be properly considered in accordance with regulations and policy.

Third, taking forward the current 'two-tier' plan approach is likely to add considerable and unnecessary complexity to the planning framework, in particular for determining future planning applications in South Derbyshire. This is because 50% of the Local Plan (LPP1) will have been prepared under the transitional arrangements based on an outdated NPPF (December 2023) whilst the other 50% (LPP2) will need to be consistent with the upcoming revisions to the current NPPF (issued in December 2024) that are likely to be published in 2026. However, the Council does not explain how differences between the 2023 and subsequent versions of national policy are to be taken into account at the planning application stage which creates uncertainty and risks delays in how proposals are considered. The two-tier approach also risks undermining the Government's wider objective of creating a more standardised, digitised and 'more streamlined' development plan system under new planning legislation currently being brought forward. A more streamlined and less complex approach would be through a single local plan.

Fourth, we also consider that a two-tier approach represents a costly process, placing an increasingly heavy burden on public finances which, in our view, is an unnecessary public cost to the local communities of South Derbyshire. A more cost-effective approach would be to prepare a single local plan.

Question 2: Where should the housing needs be met?

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

The Council states there is a current shortfall of 57 homes over the plan period to meet the minimum plan requirement. The Council also states the requirement figure is a

minimum amount and so 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. The shortfall will need to be addressed through new allocations and/or other policies. (on page 8 of the IO document)

However, the IO document does not offer any view on where growth should be directed. Any further growth identified through the LPP2 should be directed in accordance with the settlement hierarchy. The Council is currently updating the hierarchy through the LPP1 review. This assigns growth primarily to sites on the edge of the Derby City boundaries, and sites at Swadlincote (as the District's principal settlement). The LPP1 review focuses growth almost exclusively on the edge of Derby sites. The edge-of -Derby proposals are, in our view, addressing the needs of Derby City's population, which the Council considers to be *"the most appropriate place given the level of need arising from Derby City"* (IO document, page 6). Consequently, we would recommend that any shortfall, however moderate this may be, should be directed to Swadlincote. This will help to ensure an appropriate mix and distribution of sites can be provided to help address the full needs of the District.

In this context, we support the Council's observation (on page 9) which acknowledges the potential to allocate additional sites to deliver in the middle/latter part of the plan period to ensure that there is a consistent land supply exceeding minimum requirements and in doing this to provide protection from speculative development. A recent appeal decision in Melbourne¹ has clarified that South Derbyshire does not have a minimum five year supply of deliverable sites in accordance with national policy (NPPF 2024, para 78). This is another reason to allocate a wider range of sites, in addition to those directed to the edge of Derby through the LPP1 review.

Bellway Homes has been promoting Land at Sandcliffe Road, Swadlincote (with options to bring homes forward immediately and over the medium term). The Council is aware of

¹ Appeal Ref: APP/F1040/W/25/3368728 Land South of Kings Newton Lane, Melbourne

this site, but we attach the site details previously submitted for reference (Appendix 1). This remains our client's latest position.

Bellway has a proven track record of delivering in South Derbyshire, as demonstrated through the development of the adjacent land at Broomy Farm, Swadlincote. If the LPP2 review is taken forward, the site at Sandcliffe Road is a clear and obvious option for addressing the identified housing shortfall in the short term and as a means to add additional flexibility to the overall supply. The site is available and can be brought forward in the early phase of the plan period (within the next five years). The wider site could then be considered as a 'next phase' through the subsequent single plan process, or to provide additional flexibility.

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)

Yes. It should be recognised in the LPP2 review (and LPP1 review) that not all needs can or should be sought solely on allocated sites. This is an unrealistic and undeliverable approach, and there is nothing in national policy that requires this.

In this context, the Council should create a broadly positive policy framework which acknowledges that land can be sustainably-located to existing services and facilities, but which also lies adjacent to existing built-up areas and may not be allocated in a development plan. Such an approach can be delivered through effectively worded policies criteria that are linked to location and accessibility, and not solely driven by whether a site is within a settlement or allocation boundary.

This approach can help to support the achievement of sustainable development, and could be a more effective means of directing growth to appropriate locations in the

District, as well as helping to maintain the supply of housing land. This can be addressed through appropriately worded criteria in policy.

If the Council is minded to identify indicative broad locations/areas for future growth adjacent to existing settlements, then clearly locations around the edge of Swadlincote settlement should be a priority focus for additional development. This would align with the Derby HMA Growth Options Study (GOS) dated August 2021. The GOS defines an 'Area of Search' which includes the Land at Sandcliffe Road defined as 'Suitable for Strategic Growth' (E4), which traverses the northern edge of Swadlincote. This is shown in the extract below.



This area was one of four such growth areas identified across the Derby HMA. The growth area north of Swadlincote was the only suitable growth area identified outside the fringes around Derby City.

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)

Policies should be drafted so they accord with the following objectives, including:

- *Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings (NPPF 2024, para 15);*
- *be prepared positively, in a way that is aspirational but deliverable (para 16);*
- *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs (para 35); and*
- *(LPAs] should approach decisions on proposed development in a positive and creative way (para 39).*

In this context, the delivery of much-needed housing, including affordable housing, can be achieved through measures not exclusive to the allocation of land.

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 response.

Question 6: What could the Council do to speed up delivery on strategic allocations?
(Please provide details)

It is important that whilst plans should provide certainty for applicants in defining policy requirements for specific sites, these must not undermine the deliverability of the plan and must meet the three tests for planning contributions and obligations, in accordance with national policy. Policy criteria should not extend beyond these considerations, unless supported by clear evidence.

Question 7: Should the Council allocate land South of Mackworth for development within the plan period?

☐ Yes

☒ No

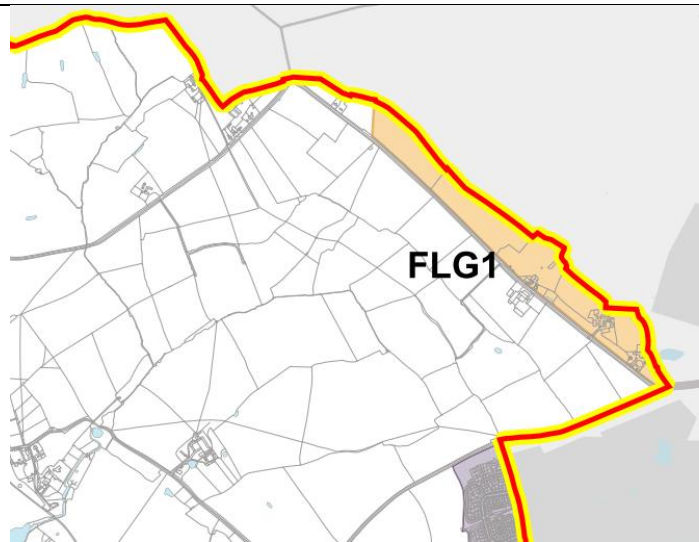
(Please provide a reason for your answer)

The Land South of Mackworth (FLG1) is situated on the edge of the administrative boundary of South Derbyshire, but lies adjacent to land proposed for allocation in the Amber Valley Local Plan (AVLP, ref. Brun Lane FLG1). The IO document highlights that the Mackworth site would be delivered in conjunction with the Brun Lane site. As we understand, the Brun Lane site will not be allocated in the AVLP because the site is not deliverable or developable (not available)². The AVLP Inspector has recommended through main modifications that the AVLP, on adoption, identifies a *Strategic Area for Future Housing Growth* beyond the plan period (in effect, beyond 2040)³.

It is clear the modification to the AVLP is required in order to ensure the AVLP is soundly-based. The AVLP Inspector does not consider the Brun Lane site to be justified, effective, positively-prepared, or consistent with national policy. Despite the modification outlined above, the IO document states (page 11) the Council is now proposing to take forward the element of the wider site on the South Derbyshire side (the Land south of Mackworth) independently from the rest of the Brun Lane SGS. The justification for this change in approach is based on the possible provision of a vehicular access into the site from the South Derbyshire side.

² AVLP exam doc AV08a

³ Schedule of proposed modifications to the submitted local plan policies maps July 2025, AVLP



(extract from LPP1 review policies map. Land South of Mackworth, FLG1)

Under the AVLP main modifications⁴, it remains the case that a cross-boundary, strategic approach must be taken in bringing forward the Brun Lane Growth Area. This includes working collaboratively with neighbouring authorities (notably, South Derbyshire and Derby City) and stakeholders on the future masterplanning of the site. In effect, there is no expectation that development will commence on the Brun Lane site any time before 2040. However, South Derbyshire District Council now propose a separate approach in advance of the wider masterplanning process advocated through the AVLP examination. This, in our view, does not represent effective engagement on cross-boundary issues and undermines the recommendations of the AVLP Local Plan Inspector, contrary to national policy on effective engagement in plan-making (NPPF 2024, paras 24-27).

The development of the Mackworth site on its own would also result in development being completely detached from the existing built footprint of Derby City, creating an incongruous and unrelated extension of ribbon-like development jutting out into the countryside. Furthermore, even if the principle of development were accepted, it is unclear how a suitable urban design solution could be achieved on such a narrow sliver of land. For example, there is no existing public footpath along the entire length of the boundary of the B5020. It is unclear how a suitable pedestrian access route could be achieved given its width and presence of hedgerows along the entire length of the road in this location. As a consequence, access would predominantly be for vehicular

⁴ MM36

movements, which significantly undermines the sustainability credentials of the site in transport terms.

Furthermore, from a deliverability perspective, from our client's experience, it is highly unlikely the site would be attractive to any developer in isolation given its location, configuration, and its relationship to the Brun Lane Growth Area, which abuts the site along its northern boundary.

On this basis, the Land south of Mackworth should not be allocated within the plan period unless it is brought forward through a comprehensive and integrated masterplan, including the Brun Lane Growth Area. This will ensure the site is delivered in manner consistent with the Amber Valley Local Plan Inspector's recommendations.

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 response

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)

No response

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)

We have reviewed the Settlement Boundary Assessment Principles in Appendix 1 and set out our comments below:

Principle 1: Where practical settlement boundaries will be drawn tightly following defined physical features, such as walls, fences, hedges, roads etc.

- We acknowledge that settlement boundaries should follow identifiable, physical features.
- However, there are clear differences in the 'nature and form' and scale of larger settlements (Swadlincote) where growth is directed, and other more remote rural settlements, where growth is resisted.
- These differences in context need to be reflected in how prescriptive the settlement boundaries are applied when considering proposals across the settlement hierarchy.

Principle 2: Settlement boundaries do not always need to be continuous. In some instances it may be more appropriate to define more than one element of a settlement, due to a settlement's nature and form.

- The approach under this principle would align with the process of defining a boundary around the southern edge of Derby City where a 'continuous' boundary cannot be drawn effectively, as parts of the settlement in question lie outside South Derbyshire.
- However, this principle would appear to contradict principle 1 which is based on tightly drawn boundaries that follow defined physical features.
- We suggest that settlement boundaries need to be continuous so that they are effective in guiding development to appropriate locations.
- If a boundary cannot be drawn continuously around a settlement, then it should not be defined on the policies map.

Principle 3: Settlement boundaries will include...

(a) Housing allocations: Sites which are allocated for housing within the Local Plan Part 1 and 2 will be included within settlement boundaries.

- We broadly agree, but only where settlement boundaries are continuous.

(b) Existing housing and employment commitments, (i.e. unimplemented planning permissions and implemented planning permissions) which are physically/functionally related to the settlement. The review will be undertaken against a snap-shot in time. This provides a cut-off

date for existing commitments to be included within the settlement boundary review. Any planning permissions granted after this date will not have been taken into account.

- Settlement boundaries considered in the assessment should be underpinned by relevant and up to date evidence and which should be adequate and proportionate, in accordance with national policy on preparing and reviewing plans.
- In this context, the use of any 'cut off' date is not justified as it could potentially exclude evidence that is relevant to the assessment and which should be taken into account.

(d) Undeveloped land allocated within the 1998 adopted local plan, which relates closely to the character of the built form of the settlement.

- We disagree with this principle, in principle.
- The fact a site allocation has not been brought forward over such a long timeframe raises clear deliverability concerns.
- The retention or roll forward of any site allocation that has not been brought forward to date must be underpinned by 'relevant and up to date evidence' to demonstrate the site is deliverable or developable. This will need to be considered and addressed through the LPP2 examination process.

We broadly agree with **Principle 4** (Settlement boundaries will exclude...).

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

(Please provide a comment)

We would recommend that if settlement boundaries are to be reviewed (and updated), then the supporting policies underpinning those boundaries should reflect the differing scale, nature and purpose of settlements in the hierarchy, and the role and function of settlements in supporting the delivery of the strategic policies.

In particular, settlement boundary policies should not be applied in a blanket or 'one size fits all' basis, but should recognise that certain settlements, notably Swadlincote (as principal settlement) is a key foci for growth under the adopted and emerging LPP1 where growth should be encouraged where this will deliver sustainable development.

Question 12: Do you agree with the retail hierarchy?

☐ Yes

☐ No

(Please provide a reason for your answer)

No response

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 response

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

(Please provide details)

No response

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 response

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)

If the Council intends on adopting a 'locally-specific' policy which defines what is 'disproportionate' and 'limited infilling' of existing villages, then this must be underpinned by a credible and robust evidence base which has been tested through the examination process, in accordance with national policy.

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

n/a

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)

The Council states in the IO document (page 13-14) that:

“it was determined through the Local Plan Part 1 Review site selection process that the authority did not need to allocate land within the Green Belt for housing or employment needs as development needs could be met on land which was not designated. Exceptional circumstances do not exist to change the Green Belt Boundaries in the District and as a result a Green Belt boundary review has not been undertaken.” (emphasis)

The Council’s position in regard to Green Belt policy is fairly clear (though we have contested this through our submission to the LPP1 review process). Consequently, it is unclear now why the Council is now seeking views on the need or basis for Green Belt review through the LPP2 review, given their stated position.

The decision to review and, if necessary, to update the Green Belt boundary in South Derbyshire, in principle, is clearly a matter most relevant to the strategic policies (currently being addressed through the LPP1 review). However, the LPP2 review deals with non-strategic matters and site allocations and should not seek to reopen the debate on the principle of Green Belt release.

We would also be concerned if the Council were seeking to use a Green Belt review as part of the LPP2 review to somehow pre-judge or pre-determine any subsequent assessment of Green Belt sites in the context of a future plan where Exceptional Circumstances may justify releasing Green Belt to meet future needs.

In our view, considerations regarding the justification and methodology for reviewing the Green Belt is a matter more appropriately addressed through the preparation of a new single plan for South Derbyshire.

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

(Please provide details)

No response

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

(Please provide details)

No response

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

☒ Yes

☐ No

(Please provide a reason for your answer)

Supporting the delivery of more affordable housing in the district

The Council highlights in the IO document (page 6) that the LPP1 review seeks to flexibility in regard to site delivery and to help match affordable housing need with delivery as closely as possible. However, in representations submitted to the LPP1 review on behalf of our client, we highlighted the significant and persistent shortfall in delivery of affordable homes against the identified need since 2011.

Furthermore, based on available information (which we draw on in our LPP1 review submissions) we highlighted at the HMA-wide and local level that this situation is likely to worsen as new plans are brought forward. For example, affordable delivery has averaged 382 affordable homes per annum between 2011 and 2024 across the HMA; compared to a future need for 1,428 homes per annum for the same period. Whilst at the local (South Derbyshire) level, annual completions have totalled 142 homes per annum, against a future need for 214 affordable homes.

On this basis, we argue that more positive and concerted action is required to increase the delivery of affordable housing in order to tackle the historic under-provision evident at both an HMA-wide and local-level, and to address the level of future affordable housing need. This can be done through provision of additional housing allocations identified through the LPP2 review process for South Derbyshire. This would be consistent with policy guidance set out in Planning Practice Guidance, which remains a relevant consideration for transitional plans (PPG-ID: 2a-024-20190220).

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)

No response

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 response

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 response

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

(Please provide details)

Sustainability Appraisal – Scoping Report

We have reviewed the SA Scoping Report issued alongside the IO document and wish to make the following comments.

Table G of the SA Scoping Report acknowledges that:

“Insufficient affordable dwellings have been delivered in recent years to meet local need and has consistently been below the target of 30% per annum.”

The under-delivery of affordable housing in South Derbyshire is a notable failing of the adopted Local Plan. We have also highlighted this problem in our representations on the LPP1 review mentioned elsewhere in our submissions.

The SA scoping exercise for LPP2 review has (rightly) identified the under-provision of affordable housing as a ‘key sustainability issue’. This is reflected as one of the sustainability objectives (SO2)⁵ underpinning the SA Framework for assessing the significance of the plan policies and proposals, which is *“...to provide decent and affordable homes that meet local needs”*.

Appendix 3 of the scoping report highlights that house prices as of March 2021 were 6.95 times median gross workplace earnings. However, whilst the figure for 2025 is slightly lower (6.6) the five-year average (2020 – 2024) is higher, at 7.43. We agree the problem of housing affordability in South Derbyshire is a key issue that needs to be properly addressed in the LPP2 review.

However, the effect of housing costs amongst households is only judged to have a ‘moderate’ impact on the LPP2 in the scoping exercise (Appendix 3). We disagree with this analysis, which seeks to downplay the issue of affordability in South Derbyshire. In our view, the impact assessment has ignored the accepted position set out in Table G that insufficient affordable dwellings have been delivered in recent years to meet local need.

⁵ SO2 Housing: To ensure everyone has access to sustainable housing, which is affordable, and meets the needs of all residents including the elderly and other vulnerable groups.

We contend that housing affordability issues facing households across the district is of key relevance and so should have a 'high' impact on the LPP2 review, reflective of local evidence. Consequently, the impact score should be adjusted to 'high' and reflected on accordingly in the next iteration of SA.