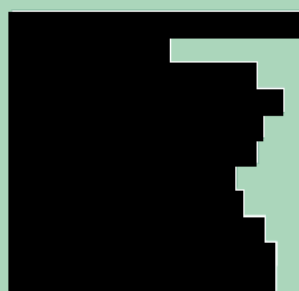
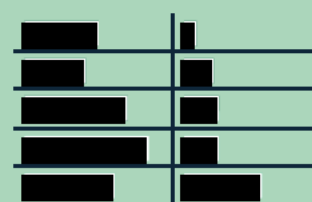


LAND NORTH OF ASHBY ROAD, WOODVILLE VISION DOCUMENT

January 2026



Prepared on behalf of
Caddick Group



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AN INTRODUCTION TO CADDICK GROUP

Caddick Group is one of the country's leading property and construction organisations. We describe ourselves as a 'family of businesses', all of whom are leading in their sector and specialism.

Founded in 1979, the company has grown steadily and now represents a project pipeline with billions of pounds deployed and invested across the UK. We remain privately owned and retain a family business atmosphere that places people and communities at the forefront of our work.

The Caddick Group family of businesses includes: Caddick Developments, Moda Living, Oakgate Group, Caddick Construction, Caddick Civil Engineering and Caddick Land. The Group also owns Headingley Emerald Stadium and Leeds Rhinos Rugby League Team.

Caddick Group ESG Strategy - Places for Life

In 2023 we launched our ESG strategy named 'Places for Life' as we further strengthen our position as one of the UK's leading property and construction businesses and make way for a brighter future.

Our vision is that by 2025, we will lead in creating the best places in the country; redefining what it means to support people and the environment. To work towards this, we have set long-term goals that will ensure we take meaningful, measurable, and impactful actions and is aligned with the UN Sustainable Development Goals (SDGs).

As part of our strategy development process, we have also created an ESG Taskforce – a group of designated employees responsible for contributing to the development of our strategy, who will also be responsible for ensuring Places for Life is implemented across all levels on the business. Our 2025 goals fall under three main categories – our communities, our environment and our business.

Our Communities

We understand people are at the heart of our places. We will ensure our communities are supported through embedding needs and priorities into our operations, designing inclusive spaces, and by taking proactive action in creating a just and well society.

Our Environment

We are committed to stewarding the natural world. We will do this through measuring, controlling and decreasing our consumption and by building our places to the highest environmental standards.

Our Business

We are a caring family business. We will secure our business for generation through strong governance, partnerships, and innovation; creating an inclusive and transparent culture.



OUR VISION

Caddick's vision for Land North of Ashby Road is to create a vibrant, new residential development in the heart of Woodville, which will deliver approximately 900 new homes along with a new road around the north east of Woodville which can address known highways constraints in the area. The development will include public open space, landscaping and new pedestrian routes to promote sustainability, recreation and wellbeing



Up to 900 new homes, including a mix of open market sale and policy compliant affordable housing provision.



New access road from Ashby Road to Woodville Road which avoids the Clock Roundabout.



Creation of public open space and pedestrian routes connecting to the wider area.



Creation of open spaces, allowing for a variety of recreational uses.



Enhancement of local biodiversity and habitat including a new green infrastructure.



Safe and achievable access.



Sustainably located close to a range of facilities, services and excellent employment opportunities locally, which are easily accessible to the Site.



INTRODUCTION

Stantec has prepared this Vision Document on behalf of Caddick Group to present their vision for a sensitive extension to Woodville.

Purpose of the Document

The purpose of this document is to support the promotion of the Site to accommodate a mixed use development and associated public open space. The key aims and objectives of the document are to:

- Present a vision and design framework which has guided and shaped the proposals;
- Review the Site in the context of current Planning Policy;
- Present an understanding of the Site and the local context, and collate key opportunities and constraints affecting the Site and design proposals; and
- Present the emerging concept masterplan, supported by an explanation of the key design principles that have informed it.

Site Context

The Site is located to the east of Woodville, Swadlincote and adjoins the existing settlement on almost three sides. It is formed of largely agricultural land with a number of hedgerows and pockets of trees.

The Site is broadly triangular in shape with existing developments on two of its three sides.

Boundaries:

Northern Boundary: To the north adjacent to the Site is agricultural land, woodland belts and solar farm developments and the wider Woodville and Swadlincote settlements are to the north.

Eastern Boundary: Land to the east is characterised by agricultural fields, mostly with hedgerow boundaries.

Southern Boundary: The Site is bound to the south and southeast by the A511 and associated residential development and allotments.

Western Boundary: To the west lies further residential areas and the wider Woodville and Swadlincote settlements.

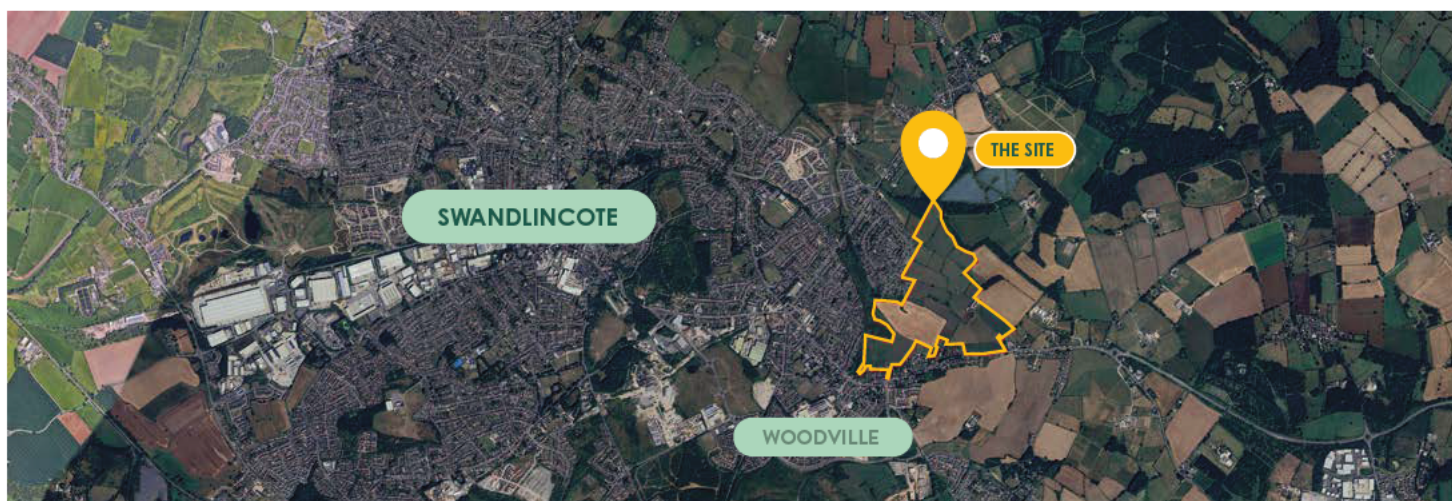


FIGURE 1: SITE CONTEXT PLAN

FIGURE 2: SITE LOCATION PLAN



LOCAL LIVING

The Site is within a 10 minute walking distance of Woodville’s key amenities. An existing bus stop is located immediately adjacent to the northern boundary, which provides quick and easy access to other nearby settlements.

Local Living and 20 minute neighbourhood

This concept supports residents walking, wheeling or cycling to access 'key local infrastructure' within a return journey of 20 minutes.

Together with new and existing active travel and public transport facilities, the new neighbourhood at Ashby Road presents an opportunity for provision of a sustainable 20-minute neighbourhood.

Existing Key Local Infrastructure

There are a number of local amenities within appropriate walking and cycling distances to the development. These include, but are not limited to:

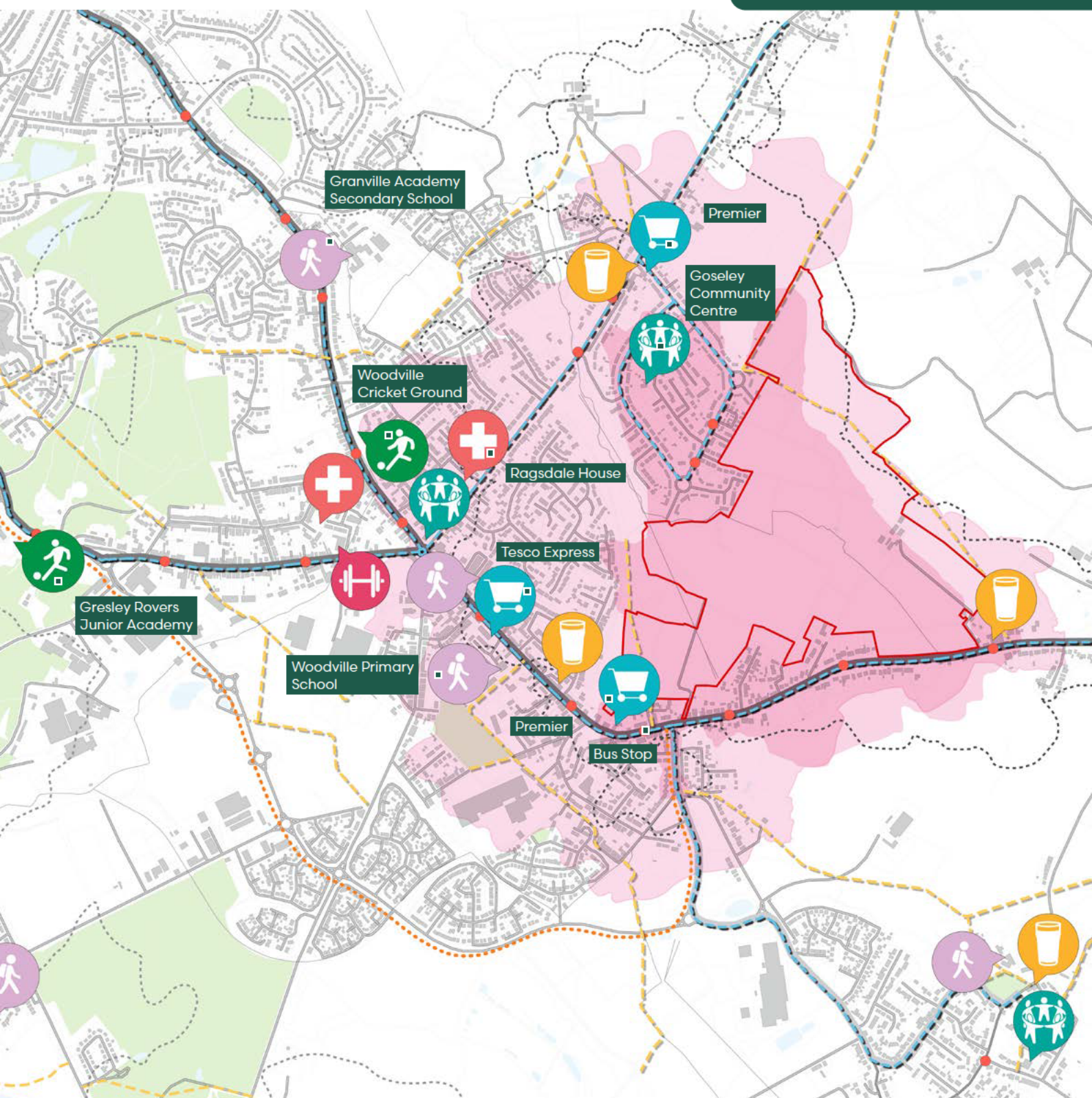
- Schools - including Blackford St Margarets C of E School, Woodville Nursery School, Woodville Infant school and Granville Academy;
- Local shops - including Tesco Express on Woodville High Street and Swadlincote town centre.
- Bars, restaurants and cafes - including The Greyhound Inn, The Joiners Arms and Bombay Spice and;
- Recreation facilities and green spaces - including Woodville Cricket Ground, Swadlincote Woodlands and Park and Woodville Play Area.

Additional facilities and services are found within Swadlincote town centre.

Existing Sustainable Transport Links

Travel Type	Proximity to Site	Links
Active Travel	Throughout the Site and surrounding the Site. (ex: Vale Road)	Interlinked PRow with direct access to Woodville High Street via Station Road.
Bus Services	100 m to the closest bus stop.	Route 9 (Queens Hospital-East Midlands Airport), running every half hour. Route 29, 29A/ 29 B (Leicester- Swadlincote), runs hourly from Monday-Friday. Number 4 (Swadlincote-Burton), running twice a day from Monday to Friday.
Rail Services	10.5km north from the Site (Burton-on-Trent).	Direct rail services to larger settlements such as Tamworth, Nottingham, Derby and Birmingham. Regional and National connections to Leeds, York, Bristol and Edinburgh.

FIGURE 3: LOCAL LIVING PLAN



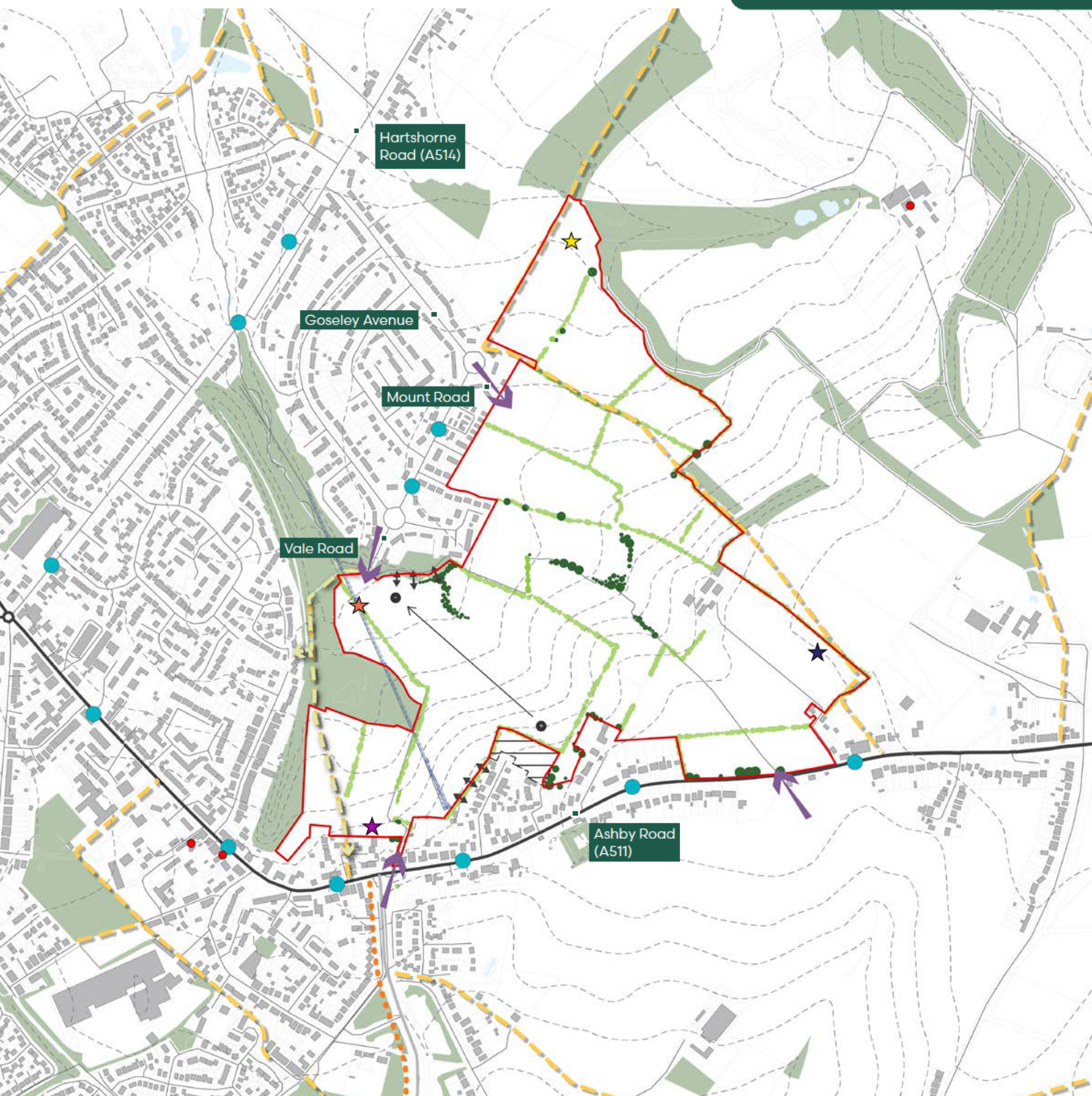
- | | | |
|---|--|--|
| — Site Boundary (c. 47ha) | - - - 5 Minute Cycle | + Gym |
| — Public Green Space | - - - 10 Minute Cycle | + Sports Ground |
| — Bus Stop and Route | — 10 Minute Walk | + Pubs, Restaurants, Cafes |
| — A Road | — 20 Minute Walk | |
| — PRoW | + Community Facility | |
| • • • Shared footway/
cycleway | + Supermarket and stores | |
| | + Schools | |
| | + Medical centres | |

SITE ASSESSMENT

This section provides a summary of the Site considerations, which informed the production of the Site Masterplan, ensuring it is deliverable and supporting high-quality placemaking.

Consideration	Assessment
Green Infrastructure	<ul style="list-style-type: none">Modified grasslands are in poor condition and there is the opportunity to enhance biodiversity.Enhancement of existing green infrastructure within the Site.
Transport and Highways	<ul style="list-style-type: none">Safe and suitable pedestrian access off Ashby Road can be achieved and vehicular, pedestrian cycle access off Vale Road.The development will respect existing rights of way.Potential link roads between Mount Road and Ashby Road, easing traffic in the centre of Woodville.
Landscape and Visual Sensitivity	<ul style="list-style-type: none">The Site is located on the edge of the existing settlement and provides an opportunity for a proportionate and sensitive urban extension with a strong landscape framework.The Site is well contained, and visual impact can be effectively mitigated through localised and structural planting meaning that it integrates well within its built form and landscape context.
Heritage and Archaeology	<ul style="list-style-type: none">The development is unlikely to affect any heritage assets, as there are no known heritage and archaeology assets in the area.
Ecology	<ul style="list-style-type: none">Biodiversity Net Gain can be achieved.Mitigation strategy will be implemented across the Site for habitat loss and there are additional opportunities to support increased diversity of habitat and fauna species.
Flood Risk and Drainage	<ul style="list-style-type: none">The Site is within Flood Zone 1.The topography of the Site, which falls from east to west will inform a sustainable drainage solution for the Site with new attenuation ponds.Flood risk to the Site is very low and therefore is considered suitable for residential development.
Facilities, Services and Connectivity	<ul style="list-style-type: none">The proposal has the potential to provide new pedestrian and cycle routes, which would offer sustainable travel opportunities to the centre of Woodville and to nearby employment sites.

FIGURE 4: SITE ASSESSMENT PLAN



- | | | |
|--|---|--|
| — Site Boundary (c. 47ha) | + High Point | --- Existing HV Pylons |
| — Existing Green Buffers and Planting | - Low Point | ↔ Housing Backs |
| — Waterways | ↘ Gradient Decline | ● Listed Buildings |
| --- Contours (5m) | — Road Network | ★ 170m AOD |
| --- PRoW | ▨ Allotments | ★ 149m AOD |
| ● Existing Trees | ● Bus Stops | ★ 125m AOD |
| — Existing Hedgerows | ➔ Existing Access Point | ★ 120m AOD |

TECHNICAL CONSIDERATIONS

This section provides a summary of the relevant technical considerations that influence the development of the Site.

Ecology

An Ecological Opportunities and Constraints report has been produced by FPCR Environment and Design Ltd. (FPCR), which has outlined that the modified grassland and bramble scrub habitats which comprises the Site were not identified as ecologically important features. These habitats are species-poor and are common and widespread habitats within the wider environment.

Therefore, the habitats present within and around the Site do not pose a constraint to development. It is considered that the on-Site greenspace could provide suitable mitigation and enhancement for such species.

Transport

PJA have compiled a Transport Strategy to consider transport and highways opportunities and provide a high level transport and access strategy for developing the Site.

The Site is located in close proximity to bus stops, which provide access to key destinations both regional and national.

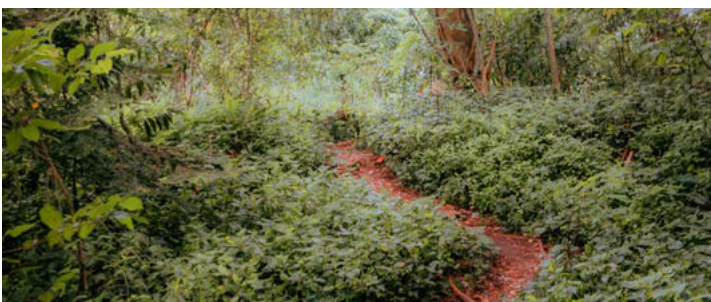
The impact on vehicle flow from the Site development

is considered to be modest and can be accommodated on the existing highway network.

Safe and accessible vehicular access will be provided from Vale Road, Mount Road, Ashby Road

which will accommodate active travel. A pedestrian and cycle access will be provided to the South on the A511.

From a transport perspective, the Site performs well and can support housing.



Drainage

Link Engineering have produced a Flood Risk and Drainage Feasibility Review for the Site. The Site lies within Flood Zone 1 and is at low probability of flooding. All land uses can be deemed to be compatible within the proposed development. The Site is also, predominantly, at very low risk from surface water.

In summary the flood risk to the development is very low and as such, the development feasibility is not compromised. This is beneficial for the Site and as such, it is suitable for housing.

Landscape

A Landscape Statement has been prepared by FPCR.

The site is within two landscape character areas; Coalfield Village Farmlands and Melbourne Parklands - Sandstone Slopes and Heaths.

The site and its wider landscape context are not subject to any national, local or other landscape designations, nor is it subject to any designations or have notable heritage, cultural, or recreational value.

Whilst agricultural in nature, and enclosed by some hedges and trees, the overall character has a

settlement edge character rather than a rural character, being enclosed on virtually 3 sides by the existing settlement edge.

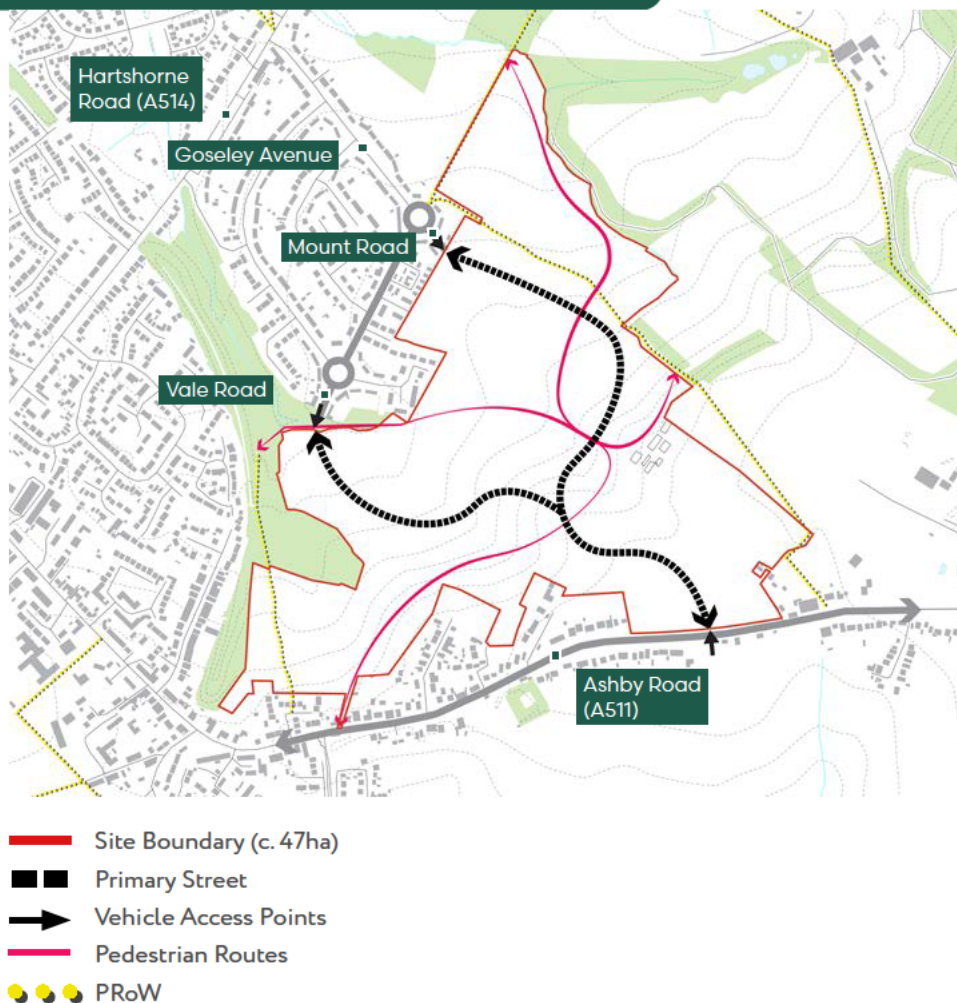
Whilst there would be inevitable change to the site, the effect on the wider landscape would be limited. As shown on the concept development plan, there are good opportunities for mitigation and for the provision of green space, that would deliver strong landscape principles which align with the Derbyshire landscape character assessment and aims of the National Forest.



DESIGN CONCEPT

The concept's high level design principles and strategies that informed the illustrative diagram are summarised below.

FIGURE 5: ACTIVE TRAVEL AND MOVEMENT PLAN



Access and Movement

The identified primary vehicle access points are located along Mount, Vale and Ashby Road. Primary street connecting Ashby Road to Hartshorne Road (A514) via Mount Road / Goseley Avenue.

The Primary street provides direct vehicle access throughout the Site, connecting all areas of the mixed development.

Pedestrian access points are also located along these above mentioned streets, providing access from the north, west and south of the Site. Additional access points connect to the existing PRow routes.

Pedestrian routes are integrated throughout the scheme, with new routes that connect to the PRow. Footpaths follow the primary street network, creating a permeable and legible movement framework that encourages and supports active travel throughout the Site.

FIGURE 6: LANDSCAPE AND LANDFORM



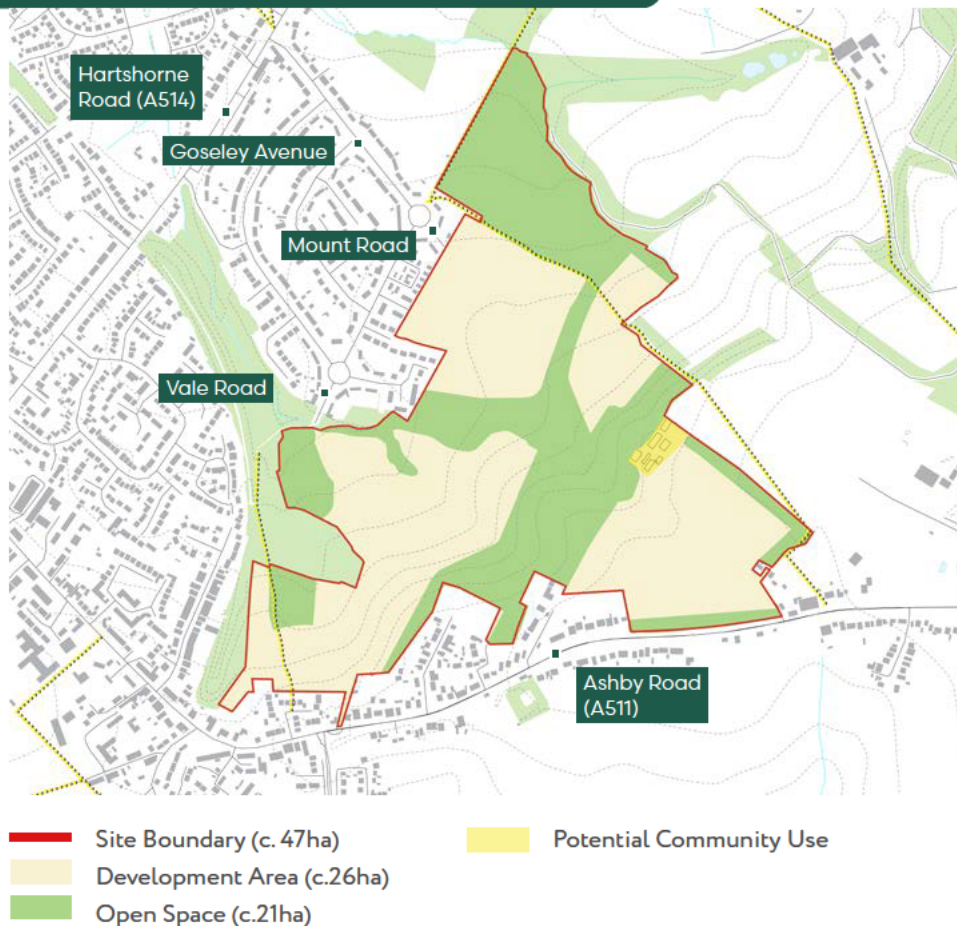
Landscape and Landform

Retained existing Vegetation and the landscape to the north, west and east boundary shaped the open spaces on the Site, creating a diverse and varied green network. The key open spaces are located in the heart of the project.

Open spaces can provide opportunity for social interactions as well as the potential for informal play.

The green areas are also key contributors to BNG enhancement, providing a range of new habitats and increasing the Site's biodiversity net gain.

FIGURE 7: LAND USE



Landscape and Landform

The development area has been shaped primarily by the topography, access and landscape features.

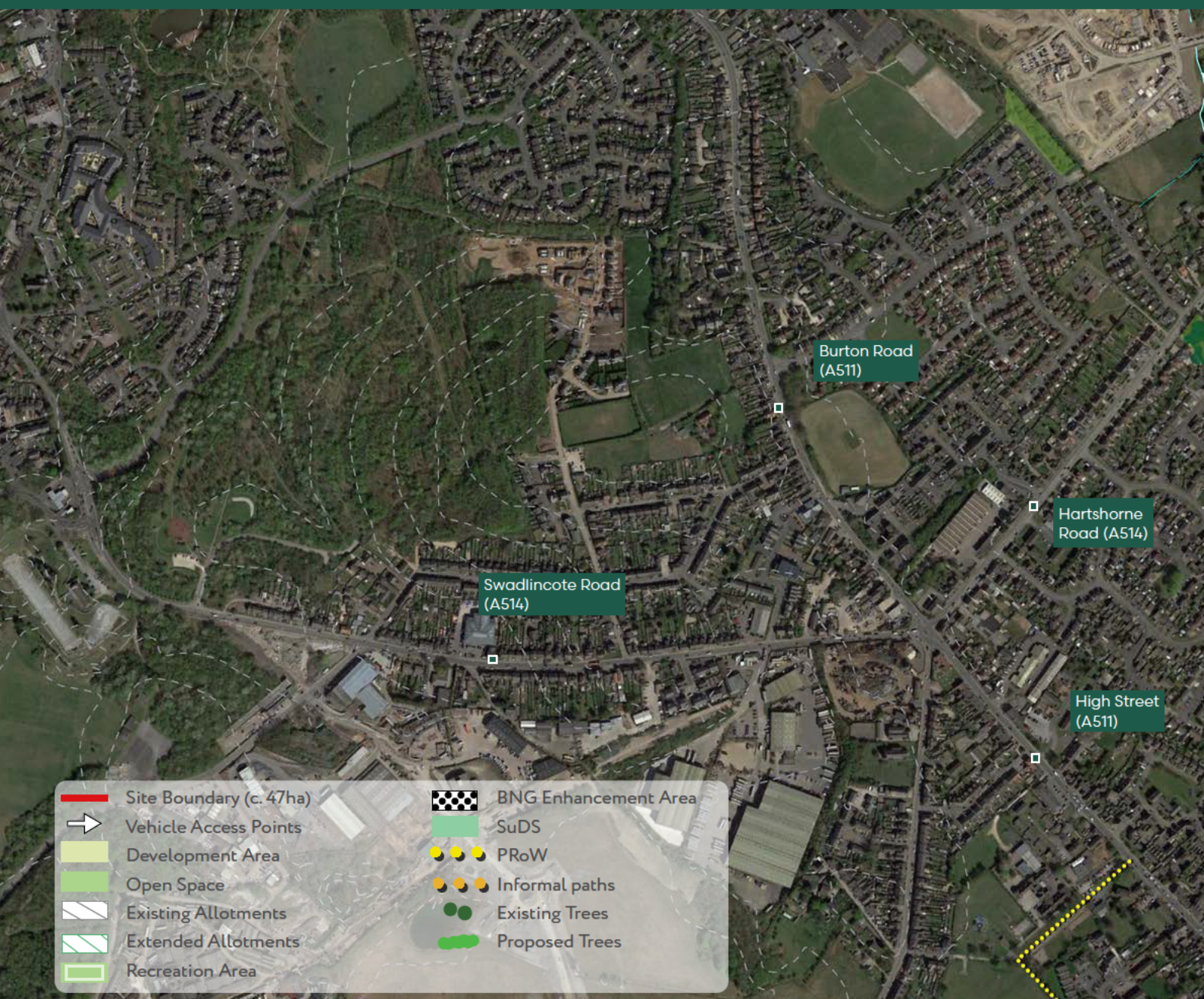
A primary open space (c. 21ha) sits in the centre of the Site, surrounded by four substantial development areas (c. 26ha).

The balance of green spaces and development areas provides an opportunity for a sustainable urban extension.

ILLUSTRATIVE MASTERPLAN

The illustrative masterplan has been prepared in response to the Site Assessment, planning policy context and concepts outlined in the previous section.

The Development Area is shaped by the Site's existing vegetation, which informs the overall structure and land-use approach. The proposals establish a balanced relationship between development and green infrastructure, accommodating residential-led development within a sustainable and high-quality environment.



Key Design Principles

- ① Proposed Primary Access through the site, with vehicle access points from Ashby Road (A511) , Vale Road and Mount Road.
- ② Pedestrian and Cyclist Access Points on multiple points along the boundary, connecting to an extensive path network throughout the Site.
- ③ Proposed new green spaces and parks, with retained and added trees.
- ④ An extensive path network throughout the Site, connecting to the existing Core Path network.
- ⑤ SuDS ponds to manage surface drainage and create a unique bio- rich wetland.
- ⑥ Proposed extension of existing allotments, catering to the new and existing residents.
- ⑦ Capacity to deliver approximately 900 new homes, comprising a mix of housing types and tenures, including affordable provision, to support a diverse and sustainable community.
- ⑧ New recreation areas including courts, changing rooms will be added to cater to the new and existing residents.
- ⑨ Existing Core Path Network, connecting to the Site network.
- ⑩ The BNG Enhancement Area enhances biodiversity and greenspace to create a connected green-infrastructure network, contributing to Biodiversity Net Gain and supporting protected species.
- ⑪ Primary street connecting Ashby Road to Hartshorne Road (A514) via Mount Road / Goseley Avenue.

FIGURE 8: ILLUSTRATIVE MASTERPLAN



SUMMARY OF KEY BENEFITS

- Provision of approximately 900 new homes, made up of market housing and policy compliant affordable housing.
- The creation of a safe and accessible new access off Vale, Mount and Ashby Road, creating a link road relieving congestion on the High Street.
- Creation of public open space within the Site, whilst providing new pedestrian and cycle links to connect to the wider network.
- Enhancement of green infrastructure on-Site, maximising ecological enhancements and achieving a Biodiversity Net Gain.
- The Site is well served by public transport and within close proximity to the larger settlement of Swadlincote.
- The Site is well served by the local facilities within Woodville, such as pubs, hotels, pharmacies, shops and primary schools.
- Excellent employment opportunities locally.

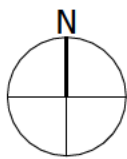






Legend

- Site Boundary (c. 47ha)
- Vehicle Access Points
- Development Area
- Open Space
- Existing Allotments
- Extended Allotments
- BNG Enhancement Area
- SuDS
- PRoW
- Informal paths
- Existing Trees
- Proposed Trees



Project
Land at Woodville, Swadlincote

Drawing Title
Woodville Illustrative Masterplan

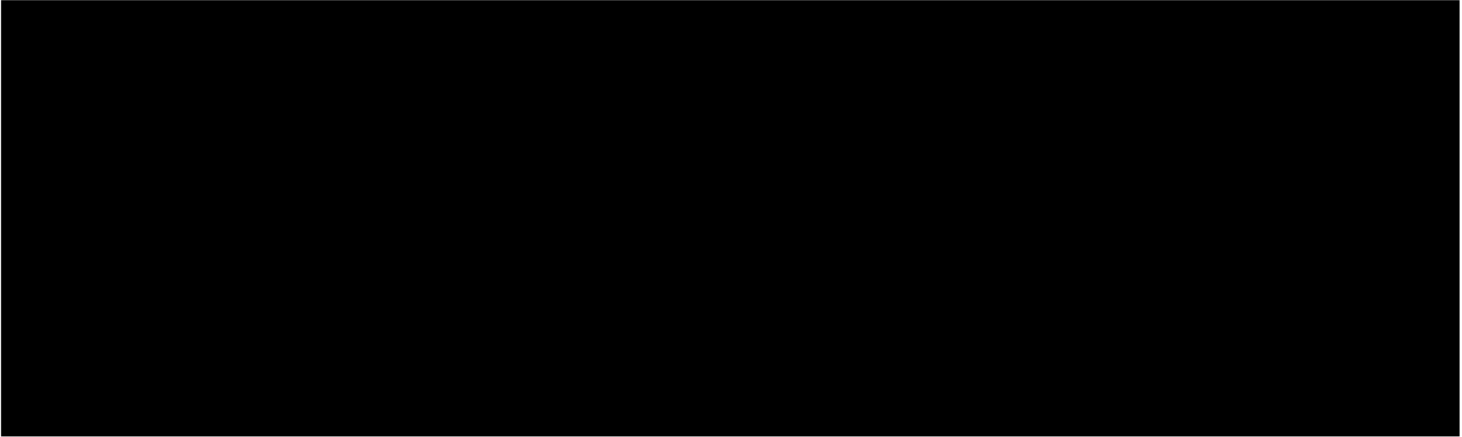
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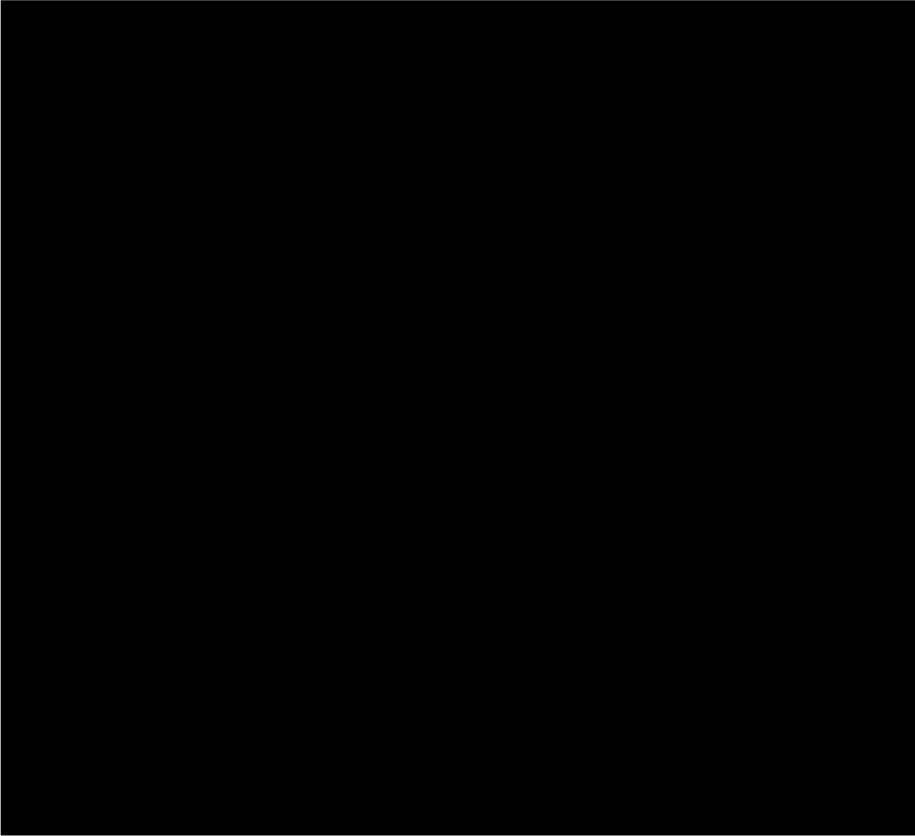
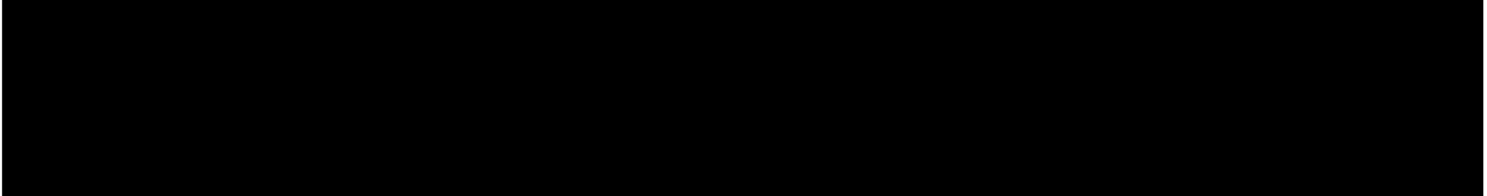
Good afternoon,

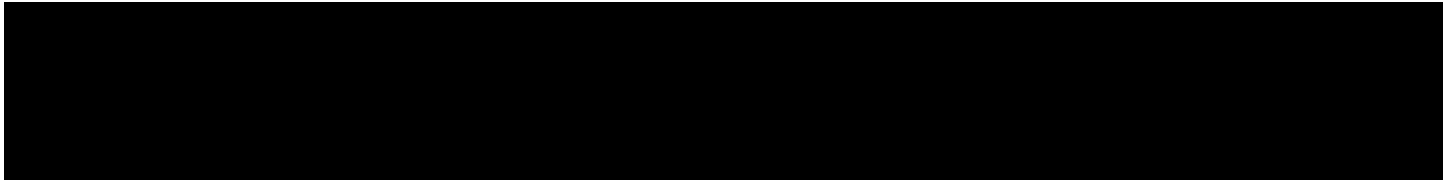
Hope you are well.

We submit the attached site to the South Derbyshire Call for Sites exercise. This is relating to Land North of Ashby Road, Woodville on behalf of our client, Caddick Land.

It should be noted that a smaller parcel of land here was previously submitted for consideration (Land North of Ashby Road, Woodville). A larger area of land has now become available. It should be noted that both the smaller and larger options are deliverable and the larger option has been designed to integrate with the smaller area previously submitted. The larger option provides additional infrastructure including a link road that would relieve traffic in the area.

Please do confirm receipt.

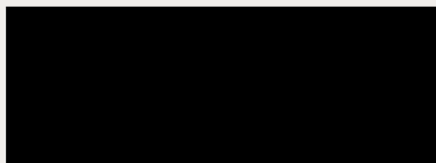




Land North of Ashby Road, Woodville

**South Derbyshire Part 2 Local Plan Issues and Options
Consultation (November 2025)**

Representations on behalf of Caddick Land



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1 Introduction

1.1 The representations

- 1.1.1 Stantec is instructed by Caddick Land ('our Client') to submit representations to the South Derbyshire Local Plan Part 2 Issues and Options Consultation which is currently subject to public consultation at the Regulation 18 stage. Stantec previously submitted written representations on behalf of Caddick pertaining to the Regulation 18 and 19 versions of the Local Plan Part 1.
- 1.1.2 Caddick considers the Part 2 Plan Review is premature due to the clear uncertainties around the progress and adoption of the Part 1 Plan Review, and any changes to the Part 1 Plan would have consequential impacts on the Part 2 Plan. Progressing separate Part 1 and Part 2 Plan reviews now would extend the plan period by 15 years but provide very little additional housing. Therefore, whilst the plans are purported to deliver new housing, in reality they will serve to throttle back delivery in the coming years. The logical answer is progress a wholly new Local Plan which addresses all strategy, policy, and allocation matters now and provides a clear long term approach to delivering development.

1.2 Caddick's interests in South Derbyshire

- 1.2.1 Caddick has an interest in land north of Ashby Road, Woodville ('the Site') which is a suitable, available and deliverable site for residential development. Part of the site was promoted for around 250 homes in previous stages of the local plan and Part 1 Review, and a wider area of land is now available and therefore being promoted through the plan alongside the smaller allocation option.
- 1.2.2 The larger site extends to approximately 47ha and could deliver approximately 1,000 new homes and associated infrastructure. The site is located to the east of Woodville and adjoins the existing settlement on three sides. It is a logical and sustainable location for much needed future growth in the area. The land is not subject to significant constraints and indeed any identified constraints could be readily addressed through the design and development process. A larger allocation and development on the site and scheme would deliver more benefits to the locality, including the potential for:
- A new distributor style road which would relieve traffic in the area, particularly at the Clock Roundabout, by routing vehicles around the east and north of Woodville;
 - A link around the east / and north-east of the site;
 - A main recreation route along with new pedestrian and cycle links to connect to the wider area;
 - Contributions towards the local infrastructure including a potential extension to the existing allotments, a community orchard and tree planting;
 - Accessible green spaces and wooded areas which benefit both existing Woodville residents and future residents of the potential development;
 - A high-quality design to promote a mixed community in keeping with the locality;
 - Enhancement of green infrastructure, with ecological benefits and Biodiversity Net Gain;
 - The creation of a safe and accessible new access off Vale Road, including active travel links to the surrounding area;
 - Jobs, growth and investment during both the construction phases;

- Additional expenditure in the area generated by local expenditure from the new residents.
- 1.2.3 The Site is well served by public transport and benefits from access to services in Woodville and Swadlincote, and nearby larger settlements such as Burton, Derby, Nottingham, and Leicester are within a reasonable travel time. The site there has access to extensive local and regional employment opportunities, as well as local facilities and services within Woodville and Swadlincote.
- 1.2.4 A vision document has been submitted which highlights the benefits of development. The site is available, is a suitable location, and subject to planning could deliver new homes within five years.

1.3 Overall position on the Local Plan Reviews

- 1.3.1 Caddick consider the approach to the Local Plan review is unsound and that a broader full new local plan consultation is needed to effectively deliver the required housing growth. This need for a holistic full plan review is strongly underpinned by the 2024 National Planning Policy Framework (NPPF) and increase in housing need resulting from the updated Standard Method.
- 1.3.2 The primary concerns focus on:
1. The scope of the local plan review, both at Part 1 and Part 2 Review stage;
 2. Inconsistencies and a lack of clarity over the application of NPPF transitional arrangements;
 3. The focus on development at the edge of Derby, and reliance on two large sites, as envisaged in the Part 1 Plan Review and
 4. Consequential lack of a proactive strategy for delivering growth elsewhere in the District.
- 1.3.3 The draft plan fails to, but must, consider the benefits of a variety of sites of different scales, from small to medium and large sites that are sustainable and well-located so that growth can be delivered within the envisaged timescales. By continuing to focus growth on the edge of Derby the plan as a whole also fails to distribute growth across the main settlements in a sustainable manner. Disproportionate level of growth directed to the edge of Derby will be at the detriment to other settlements and would negatively impact the economic growth of South Derbyshire and its main settlements. In turn, this undermines the growth ambitions and overall objectives of both the adopted and emerging plans.
- 1.3.4 The approach taken in the Part 2 Review in relation to NPPF (2024) transitional arrangements is also unclear. It is stated the Part 1 Local Plan will be assessed against the 2023 version of the NPPF but the Part 2 Local Plan will be assessed against the 2024 version. However, it is unclear whether paragraph 234(c) of the transitional arrangements is engaged on the part 2 Local Plan.
- 1.3.5 Such matters must be addressed in a full local plan review.

1.4 Report structure

- 1.4.1 The remaining report is structured as follows:
- Section 2 – notes the relevant national policy.
 - Section 3 – provides representation to the proposed local plan consultation process.
 - Section 4 – comments on the consultation document chapters
 - Section 5 – provides further detail on the proposed development opportunity
 - Section 6 – summarises the representations and provides conclusions.

2 National Policy

2.1 National Planning Policy Framework (December 2024)

- 2.1.1 National Planning Policy matters are not repeated in full in these representations, however, it is relevant to note that whilst an updated NPPF was adopted in December 2024 the emerging Part 1 and Part 2 Plans may be assessed under different versions of the NPPF. The plans are therefore subject to transitional arrangement as per Annex 1 of the NPPF which is relevant when considering housing needs and relevant policies.
- 2.1.2 Irrespective of the NPPF version which is considered, both the 2023 and 2024 versions are clear that local plans must be positively prepared, justified, effective, and consistent with national policy. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and plans should be kept up to date. Plans are considered 'sound' only where they are:

Positively prepared – *providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

Justified – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

Effective – *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

Consistent with national policy – *enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

Transitional arrangements

- 2.1.3 The 2024 NPPF also sets out transitional arrangements with a relevant extract below:

For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply:

a. the plan has reached Regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need...

c. the plan includes policies to deliver the level of housing and other development set out in a preceding local plan (such as a joint local plan containing strategic policies) adopted since 12 March 2020 (Paragraph 234).

- 2.1.4 The emerging Local Plan must be prepared in accordance with the NPPF. However, as set out in these representations, the Local Plan Part 2 is based on the spatial strategy and housing approach from a partial review of the Part 1 Local Plan and this is an 'unsound' approach as it is not positively prepared or justified and is not an effective document to deliver required growth over the plan period. Therefore, it is not consistent with national policy.

2.2 Standard Method for calculating housing need

- 2.2.1 The 2024 NPPF also requires that local plans demonstrate a five-year supply of deliverable housing sites, reinforcing the Government's objective of significantly boosting the supply of homes. The approach reaffirms the importance of maintaining a rolling supply of suitable, available, and achievable sites to meet housing need across the plan period.
- 2.2.2 The NPPF also confirms the 'Standard Method' for calculating housing need should be used. The revised Standard Method which would apply to a plan being considered under the 2024 version of the Framework, increases the South Derbyshire annual housing requirement from 507 to 580 dwellings per annum. This equates to a minimum of 11,039 dwellings over the plan period.
- 2.2.3 The 2024 NPPF however provided a transitional arrangement for Local Plans allowing 80% of the housing target to be included within Local Plans where the plan has reached Regulation 19 version on or before 12th March 2025 (which would equate to 8,831 homes for South Derbyshire). The Part 1 Regulation 19 document technically provided the required figure, but it is important to note that the Regulation 19 Plan was submitted two days before the transitional arrangement deadline at NPPF paragraph 234 and based on a partial review rather than the previously indicated full plan review.
- 2.2.4 This narrow window raises concerns about the robustness of the Plan's long-term housing strategy in both of the parts. The NPPF transitional arrangements for allowing 80% of housing needs to be met was included as a temporary concession and does not reflect the District's full housing need. Planning for a reduced figure would hinder South Derbyshire's ability to respond flexibly to changing demographic and economic circumstances, it risks suppressing market demand, and could enable or entrench under-delivery that will need to be addressed in future reviews. To be positively prepared and consistent with national policy, the Plan should provide a clearer justification for relying on the reduced figure and set out a contingency strategy to meet the full need of 11,039 dwellings, particularly in the latter part of the plan period.
- 2.2.5 There is also a lack of clarity over whether the transitional arrangements would also apply to the Part 2 Local Plan document. This is because the consultation document notes that the Part 1 Local Plan is assessed against the 2023 NPPF but that the Part 2 Local Plan would have to be assessed against the 2024 NPPF. Despite the lack of clarity over whether the transitional arrangements apply to the Part 2 Local Plan, if they did apply, the housing provision and target has been based on the Part 1 Local Plan rationale. Therefore, the same criticisms can be levelled at Part 2, that the timing of submissions had been driven by procedural deadlines rather than by robust plan making principles.
- 2.2.6 A full new Local Plan should be prepared, ensuring that housing need is robustly met.

2.3 National Planning Policy Framework Consultation (December 2025)

- 2.3.1 The Government released an updated NPPF consultation document in December 2025. This sets out a number of changes to the Framework, namely in the introduction of national policies for plan making and decision making.
- 2.3.2 It is stated in Annex A under Paragraph 8 that:

Any other plans being prepared should be produced in accordance with the version of this Framework published in December 2024, unless any of the transitional arrangements in Annex 1 to that Framework apply (in which case those transitional arrangements continue to apply).

3 The Local Plan Review Process

3.1 The Part 1 and Part 2 approach

- 3.1.1 South Derbyshire District Council undertook an initial review of the adopted Local Plan Part 1 (2016) and Local Plan Part 2 (2017) in 2021, in accordance with paragraph 33 of the NPPF, which requires local plans to be reviewed at least once every five years. At that point, both Plans had reached, or were nearing, the five-year threshold, prompting the Council to determine that a full replacement Local Plan was necessary. Work on a new Plan commenced in 2021, culminating in an Issues and Options (Regulation 18) consultation in late 2022.
- 3.1.2 The Council subsequently progressed a Preferred Options document which was not consulted upon and launched a 'Call for Sites' in 2023 to help inform the emerging spatial strategy. The Ashby Road site was submitted during that process due to its clear suitability for residential allocation.
- 3.1.3 On 19th September 2024, the Council resolved to place the preparation of the new Local Plan on hold and instead pursue a Partial Review of the existing Local Plan Part 1. This decision was made with the aim of progressing a document that could be submitted ahead of the 30th June 2025 deadline (not extended to 31st December 2026) set out in the NPPF transitional arrangements. The Council reasoned a Partial Review could be progressed more swiftly, thereby relying on the ability to provide only 80% of the latest housing needs figure, while still addressing (in its view) the District's housing and spatial planning priorities.
- 3.1.4 On 18th November 2025, the council approved the Local Plan Part 2 Review Issues and Options document for consultation. The report to the committee concedes that this expedited approach is to meet the 31st December 2026 deadline for plan submission. This expedited approach is seemingly favoured over a comprehensive and evidence-led full local plan review which would meet development needs in full. The timing of this submission has been driven by procedural deadlines rather than by robust plan-making principles
- 3.1.5 This approach is unsound. The decision to review Part 1 of the Local Plan and then the Part 2 separately, fails to reflect the integrated nature of the existing planning framework in South Derbyshire. Both Parts 1 and 2 of the adopted Local Plan form the development plan for the District, and both are required to be reviewed together to ensure a comprehensive and coordinated approach to growth.
- 3.1.6 The Council's Issues and Options consultation in 2022 signalled a full review of both Local Plan Parts at the same time. No clear justification has been provided for the decision to not undertake a wholistic review, and this undermines the coherence and effectiveness of the emerging plan.
- 3.1.7 The Part 2 Plan Review, which is the subject of these representations is at the Regulation 18 Issues and Options consultation stage and sets out broad chapters and areas for consultation rather than specific policies. The document follows on from the Part 1 Local Plan Regulation 19 Consultation document from early 2025 that has not yet been adopted. The remaining sections of these representations comment on the specific chapters in the Issues and Options document.

4 Comments on the Consultation Document Chapters

4.1 Chapter 1 – background

- 4.1.1 Chapter 1 of the plan sets out the national policy and legal background associated with local plan making. It is noted that the planning system is in a state of change given recent changes and imminent changes to the National Planning Policy Framework. It is noted that the Government is currently consulting on an updated NPPF (December 2025) until spring 2026. The plan also notes the ongoing Local Government reorganisation intentions with the eight Derbyshire Councils being reformed to become two unitary councils from April 2028.
- 4.1.2 The chapter continues that the Part 1 Local Plan partial review, in line with the transitional arrangements at NPPF Paragraph 234(a), would be assessed against the NPPF 2023. However, it is also stated the Part 2 Plan review must be assessed against the 2024 NPPF or any later renditions.
- 4.1.3 There are no questions included on Chapter 1; however, our client's comments are below.
- 4.1.4 There needs to be clarity provided over whether the transitional arrangements apply to the Part 2 Local Plan. Contradictory statements are included within the consultation document. It is not sound to apply the same housing requirement between both of the plan parts given concessions in the transitional arrangement, despite concluding that Parts 1 and 2 come forward under the 2023 and 2024 versions of the Framework respectively.
- 4.1.5 A new full Local Plan needs to be brought forward and clarified as assessed under the same Framework for it to be sound to ensure a consistent approach and to ensure the most up to date housing need number is met and included in the plan and allocations are included accordingly.

4.2 Chapter 2 – approach to the local plan

- 4.2.1 This chapter of the consultation sets out the rationale behind the approach to the emerging Local Plan. It stated that the Council are aiming to have an adopted Part 1 and 2 Local Plan before the Derbyshire Council reorganisation. It is stated by the Council that an ambitious timeline is required to conclude the consultations and to submit the plan for examination by December 2026. In fact, the below timeline is included in the consultation document which shows how ambitious an undertaking of parallel reviews of Parts 1 and 2 would be:

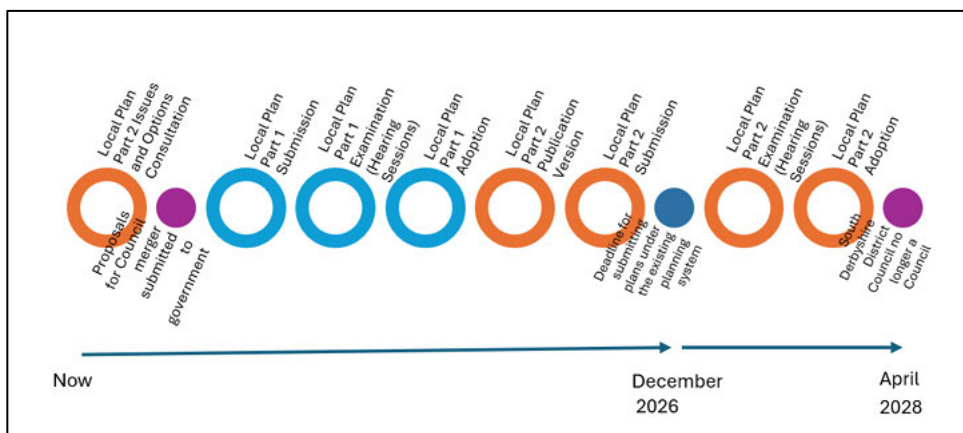


Figure 4.1 – Local Plan process

- 4.2.2 The plan also outlines the option to pause the Local Plan Part 2 process, complete the Part 1 process and then undertake a whole plan review under the new system when uncertainties have been resolved. It is noted that if the Council were to review the plan as a whole then all policies and allocations could be reviewed, if the Council were to undertake a Local Plan Part 2 then issues dealt with under the Local Plan Part 1 could not be revisited.

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?

- 4.2.3 Due to significant changes to the NPPF, an increase shift in plan housing numbers, and further plan making regulations, separate Part 1 and Part 2 Local Plans are no longer appropriate.
- 4.2.4 As seen in the proposed timeline, the Council proposes Local Plan Part 1 examinations in 2026 alongside the drafting of a Regulation 19 Part 2 plan for consultation and submission by the end of the same year. This is extremely ambitious, as admitted by the Council themselves, and it seems that the process is mismatched given that the Part 1 has even been submitted for examination. Further, the lack of clarity over whether the transitional arrangements apply to the Part 2 Plan generates confusion and this needs to be clarified by the Council.
- 4.2.5 Additionally, the Council proposes to move from a Regulation 18 Issues & Options draft to a Regulation 19 Publication draft consultation just after the examination of the Part 1 Local Plan. Such an approach is unnecessarily rushed and means that the adopted Local Plan Part 1 will not truly inform the Part 2 Regulation 19 Plan. There would also be further delays and uncertainty surrounding the Part 2 Plan if the Part 1 examination timetable were delayed. If Part 1 Plan Review adoption were delayed, the Part 2 Local Plan would not meet the transitional arrangements by the deadline of December 2026 and so the approach would be completely unviable.
- 4.2.6 The Part 1 Local Plan was also regarded as a partial review, and the Part 2 Local Plan follows suit, relying on the same housing requirement set out. However, both parts effectively extend the plan period up to 2041, some 13 years beyond the end of the plans they are updating (in reality creating a 30 year plan period based on the current plan start date being 2011). Yet the Part 1 Plan seemingly allocates only two new sites in order to meet thirteen years of new housing need, it cannot be sound that such little housing is proposed as part of a full plan review. The Part 2 Plan only outlines the need to allocate 57 units which will not provide the long term growth strategy to meet the needs of the District, however this figure is predicated on the Part 1 Plan Review and proposed strategic sites being adopted in full.
- 4.2.7 Therefore, the Council needs to bring forward a holistic plan in more realistic timescales, in line with up to date national policy and inclusive of the most up to date housing figure.

4.3 Housing Allocations

- 4.3.1 It is welcomed that South Derbyshire is proposing to help meet Derby's unmet need. However, more housing needs to be allocated for this unmet need to account for the Standard Method requirement for South Derbyshire. The housing delivery number is based on that included in the Part 1 Local Plan which sets out that 9,633 dwellings will meet the needs of South Derbyshire with the rest meeting Derby's unmet need despite the fact the Standard Method requirement is 11,039. Therefore, there is a shortfall of 1,406 dwellings in meeting the latest Standard Method requirement, accepting the plan is to be considered against the Part 1 Review requirement which itself is only required to meet the lower housing figure.
- 4.3.2 This temporary flexibility must not be used to justify long-term under-provision. The reduced figure for the purpose of transitional arrangements and the NPPF does not reduce the District's actual housing need. South Derbyshire's full requirement of 11,039 homes remains the true measure of need and will ultimately have to be met. By adopting a significantly lower housing requirement now, the plan risks

creating a backlog of unmet need, undermining long-term housing delivery, and placing undue pressure on subsequent plan reviews to compensate for this shortfall.

- 4.3.3 A genuinely sound and positively prepared plan would seek to meet the District's full needs wherever possible. Rather than relying on transitional allowances to suppress housing numbers, the plan should be future-proofed, delivering the homes South Derbyshire actually needs now and reducing the risk of persistent under-delivery later.
- 4.3.4 Our representations on the Part 1 Local Plan Regulation 19 document also raised significant concerns regarding the supply and trajectory of housing, namely based on the effectiveness, and whether there was sufficient evidence to support it. Some 7,970 homes are proposed on sites that were adopted as allocations in 2016, to deliver by 2028. With only two years remaining on the plan period, none of these sites have delivered, resulting in a shortfall of almost 8,000 homes. The Council in relying on this as a plan review have therefore simply retained these allocations with no apparent assessment of deliverability, suitability or availability. No windfall evidence is provided. Whilst some sites are coming forward elsewhere, a full re-assessment of these sites and their ability to deliver, with detailed justification based on previous failure to deliver should have been carried out.
- 4.3.5 These sites have again been included in the housing supply set out in the Part 2 Local Plan. Delivery of these allocations is questionable and cannot be relied upon to meet needs.
- 4.3.6 We also question the sustainability of allocating only two new sites on the edge of the Derby Urban Area through the Part 1 Plan Review. This approach means that towns and sustainable areas across South Derbyshire will not see the benefits of housing growth. This unbalanced growth pattern will place undue pressure on the infrastructure at the Derby fringe, while failing to capitalise on the regeneration opportunities, service capacity, and locational sustainability of locations such as Swadlincote and Woodville which sit at the top of the settlement hierarchy. It risks exacerbating housing market imbalances and congestion in the north of the District.
- 4.3.7 There is therefore a stark imbalance in the distribution of housing growth. The Derby Urban Fringe is allocated a significantly larger proportion of dwellings compared to Swadlincote and Woodville. This represents a fundamental inconsistency within the spatial strategy and undermines the credibility of the settlement hierarchy as a guiding principle for growth across the emerging Part 1 and Part 2 plans. If both locations are deemed to perform similar strategic roles, it is not justified to direct such a disproportionate level of growth to one area over the other, particularly when Swadlincote and Woodville are existing urban areas with clear capacity and infrastructure to support additional housing.
- 4.3.8 Therefore, housing allocations need to be further spread out amongst sustainable locations within South Derbyshire to ensure a balanced approach to growth.

4.4 Housing Supply and Need

Question 2: Where should the housing needs be met?

- 4.4.1 Housing allocations need to be distributed in the towns and sustainable areas of South Derbyshire such as Swadlincote and Woodville instead of being concentrated on the Derby Urban Fringe. Additional allocations are also needed to meet needs and provide flexibility.
- 4.4.2 The consultation document sets out the composition of housing supply:

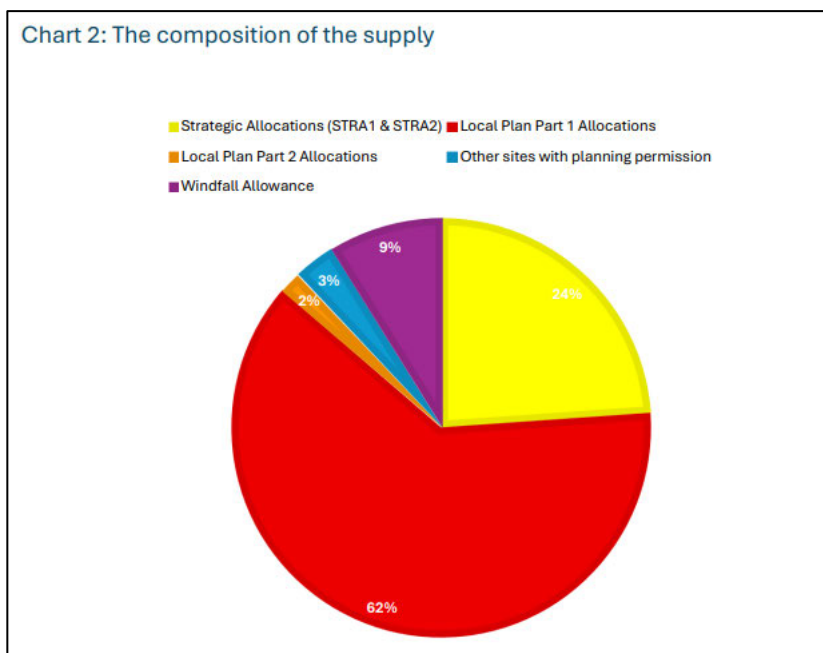


Figure 4.2 – Part 2 Plan Review composition of allocations

4.4.3 The consultation only identifies the need for 57 dwellings (2%) to be allocated in the Part 2 Local Plan. However, this is predicated on the assumptions:

1. The Part 1 Local Plan will be adopted.
2. There are no significant changes to the Part 1 Plan
3. Existing allocations which are being rolled over into the Plan Review will be delivered
4. New allocations (on the edge of Derby) will deliver as envisaged
5. There are high levels of windfall development

4.4.4 Given the soundness issues raised within our client's representations on the Part 1 Local Plan, the Inspector could well find the plan to be unsound in its examination. The Part 2 Plan does not have an adopted reference point on which to base its composition of housing supply. Additionally, the Part 1 Plan Review examination may result in significant changes to the plan, yet the Part 2 Plan would come forward when the examination of the Part 1 Plan has not yet begun and so there could be integral changes made that would alter the course and housing supply composition of the Part 2 Plan.

4.4.5 Even then there is no proposed flexibility to protect against any of the Part 1 Plan sites not coming forward. If some do not come forward, the Council will not meet its housing requirement. The allocation of only two strategic sites in the Part 1 Plan Review increases the risk of non-delivery.

4.4.6 The plan also assumes that all existing remaining allocations will be delivered. However, various allocations from the currently adopted Local Plan are simply rolled over into the housing supply composition which informs the Plan Review. However, the component parts of this plan were adopted in 2016 and 2017, and those sites were envisaged to deliver by 2028. If they are not delivered, the Council will have a housing shortfall. The shortfall must be met by other sites.

4.4.7 Additionally, the plan assumed a high windfall allowance. However, the extent of windfall sites would naturally decrease after a plan is adopted on the basis there are allocated housing sites within the trajectory and fewer opportunities for windfall development. Therefore, if the number of windfall sites

reduces the Council will again have a housing shortfall. It is therefore sensible to allocate additional land now to avoid a shortfall.

- 4.4.8 Therefore, more sites need to be allocated to ensure delivery and that the housing requirement is met throughout the plan period.

4.5 Accelerating Housing Delivery

- 4.5.1 The Council outlines that the quick delivery of the two strategic sites for housing would accelerate the delivery of housing and reduce development pressure elsewhere.

Question 8: Are there other steps that the Council could take to accelerate housing delivery on other sites?

- 4.5.2 It should be noted that the reliance on two strategic allocations places significant risk on the council. A more appropriate approach which can accelerate delivery is to have a mix of sites of varying sizes in various locations.
- 4.5.3 The scale and complexity of the two proposed strategic allocations demand a significant package of supporting infrastructure including new local centres, schools, country parks, and active travel networks. While these are essential components of sustainable placemaking, their delivery is inherently long-term, phased, and highly susceptible to economic, funding, and delivery uncertainties. An overreliance on these sites to meet the District's housing needs introduces substantial risk to housing delivery.
- 4.5.4 Typically large-scale housing developments (over 2,000 dwellings) in England and Wales take an average of 6.6 years from the validation of the first planning application to the completion of the first home, i.e beyond an immediate five-year period for land supply calculations. Post this initial phase, these schemes often deliver at a modest pace, averaging between 100 and 188 dwellings per annum, influenced by factors such as market conditions, housing mix, and the number of sales outlets. These figures demonstrate that such schemes cannot be relied upon to deliver early or at the scale required in the short to medium term.
- 4.5.5 Any delays, whether due to viability issues, infrastructure dependencies, legal or technical constraints, would have a serious impact on the housing trajectory. With no meaningful contingency elsewhere in the plan, this overreliance renders the strategy fragile and inflexible. This approach is fundamentally unsound and contrary to paragraph 73 of the NPPF, which requires plans to be flexible and responsive to rapid change.
- 4.5.6 A more resilient and deliverable spatial strategy would include a mix of strategic and medium-sized sites, distributed in accordance with the settlement hierarchy. Sustainable and deliverable sites such as Land North of Ashby Road, Woodville present an important opportunity to diversify and strengthen the District's housing delivery pipeline, providing both early delivery and long-term flexibility.

4.6 Settlement Boundaries

- 4.6.1 It is outlined that settlement boundaries define the built limits of a settlement and distinguish between the main built form of a settlement and the countryside. The Council notes that they may need to be reviewed and update them to ensure that they are logical and reflect what is on the ground.
- 4.6.2 Settlement boundaries should be reviewed and sites should be allocated accordingly. The site at Ashby Road would effectively round-off the settlement pattern of Woodville and so it is logical that the site is allocated for development and the settlement boundary adjusted accordingly.

5 Land north of Ashby Road, Woodville

- 5.1.1 The site at Land North of Ashby Road, Woodville, is deliverable. It is available now, located in a suitable area for development, and capable of delivering housing within five years. Allocating this site would contribute to a robust five-year housing land supply, offer flexibility in housing delivery, and support a more balanced spatial strategy aligned with the settlement hierarchy.
- 5.1.2 The NPPF requires local plans to demonstrate a five-year supply of deliverable sites, ensuring alignment with the Government's long-term housing objectives. The updated framework reinforces the policy support for considering new housing proposals favourably. This strengthens our position that the site at Land North of Ashby Road, Woodville, is an appropriate location for residential development.
- 5.1.3 Allocating additional sites beyond the Derby urban edge is vital for South Derbyshire's broader growth strategy. This approach is crucial to meeting Derby's unmet housing needs, as it provides the means to deliver benefits throughout the District, ensuring sustainable growth in key areas.
- 5.1.4 Whilst the site is beyond the built-up areas of Swadlincote and Woodville, it adjoins the settlement and is in a sustainable and logical location. The site is well-positioned for growth, and the development can be sensitively integrated into its context. There are no known technical constraints that cannot be addressed through careful design and site layout. The site is deliverable because:
- **Availability:** The site is available for development now, with a single land promoter in place who has agreements with the landowners. There are no insurmountable constraints to development.
 - **Suitability:** The site is an ideal location for residential development. It is adjacent Woodville's built form and within walking or cycling distance to key services, with good access to public transport.
 - **Achievability:** Housing can realistically be delivered within five years, with no significant technical barriers. The site makes efficient use of land and can be developed quickly, particularly when compared to strategic allocations that may face slower lead times.
- 5.1.5 The local plan review process should take a more comprehensive approach, considering the allocation of the most suitable and deliverable sites to meet residential needs in the most sustainable locations.
- 5.1.6 There is a clear mismatch between the strategic allocations and the Settlement Hierarchy in the Part 1 and Part 2 emerging plans. The allocated development sites fail to provide opportunities for short- to medium-term housing delivery, which is unsound. Sites such as that north of Ashby Road, are vital to maintaining housing delivery and meeting the immediate housing needs in the District. The site can also address existing infrastructure capacity constraints in the area, including a new road that could alleviate pressure on the existing Clock Roundabout.

6 Summary

- 6.1.1 These representations have been prepared on behalf of Caddick in response to the South Derbyshire Local Plan Review Part 2 (Regulation 18 Consultation). They set out concerns with the Plan's current spatial strategy and the approach to housing distribution within the Part 1 Plan Review, which is overly concentrated in the Derby Urban Fringe and fails to respond appropriately to the settlement hierarchy or the full range of sustainable development opportunities across the District.
- 6.1.2 There is also uncertainty over the delivery of sites in the Part 1 Plan (both the adopted plan and ongoing Part 1 Plan Review). The Part 2 Plan is based on assumptions of delivery in the Part 1 Plan Review, even though the Part 1 Plan has not been submitted for examination. Notably the Part 1 Plan sought to carry over a series of allocations of sites which failed to deliver in the last plan period and supplemented these with two large urban extensions in order to meet the shortfall. Therefore, housing delivery is reliant on historic undelivered allocations and the delivery of these urban extensions which is a risky approach, given the statistics on delivery evidenced in the Start to Finish report.
- 6.1.3 There needs to be a variety of different scale sites brought forward and further allocations to meet the minimum housing requirement set out by the Standard Method.
- 6.1.4 The focus of housing growth in the Derby Urban Fringe is unsound and does not provide a growth strategy in line with the settlement hierarchy. Given Swadlincote/ Woodville's positioning in the settlement hierarchy, additional allocations should be brought forward here given the area's sustainability. Our Client's site would effectively round off the settlement pattern of Woodville and would be a suitable area to accommodate the growth to fulfil South Derbyshire's requirements.
- 6.1.5 The timescales of the Local Plan review are also, as admitted by the Council, very ambitious. As seen in the proposed timeline, the Council hope to hold Local Plan Part 1 examinations in 2026 alongside the drafting and publication of a Regulation 19 Part 2 plan for consultation and submission by the end of the year. Further, on the Part 2 Plan, the Council is moving straight from Regulation 18 Issues and Options to a Regulation Publication draft consultation just after the examination of the Part 1 Local Plan which is a rushed approach. This means that the adopted Local Plan Part 1 will not have had time to be fully considered during the preparation of the Part 2 Regulation 19 Plan.
- 6.1.6 Clarity also needs to be provided over whether the Part 2 Local Plan meets the transitional arrangements set out in the 2024 NPPF.
- 6.1.7 A full new Local Plan should be prepared, ensuring that housing need is robustly met and this would ensure that the plan is brought forward under the same version of the Framework. This would incorporate a variety of housing allocations in the most sustainable places in line with the settlement hierarchy. In its current format, the plan is not sound and should not be submitted for Examination.