Derby City Local Plan.

Regulation 19 Consultation Representations.

On behalf of a Consortium consisting of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd.

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1. Introduction

1.1. These representations are submitted by Pegasus Group on behalf of a Consortium consisting of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd to the Derby City Local Plan Regulation 19 consultation published in July 2026. Our clients have engaged in the preparation of the Local Plan, making representations to the Regulation 18 consultation in March 2026.

1.2. These representations are made in relation to our clients' land interests within the proposed housing allocation at Rykneld Road, Littleover (Policy HA1). Policy HA1 is a proposed allocation for a minimum of 800 new homes. **Figure 1** shows the extent of land interests within the Derby City administrative boundary. A Site Location Plan is included at **Appendix A** and an Illustrative Masterplan at **Appendix B**.

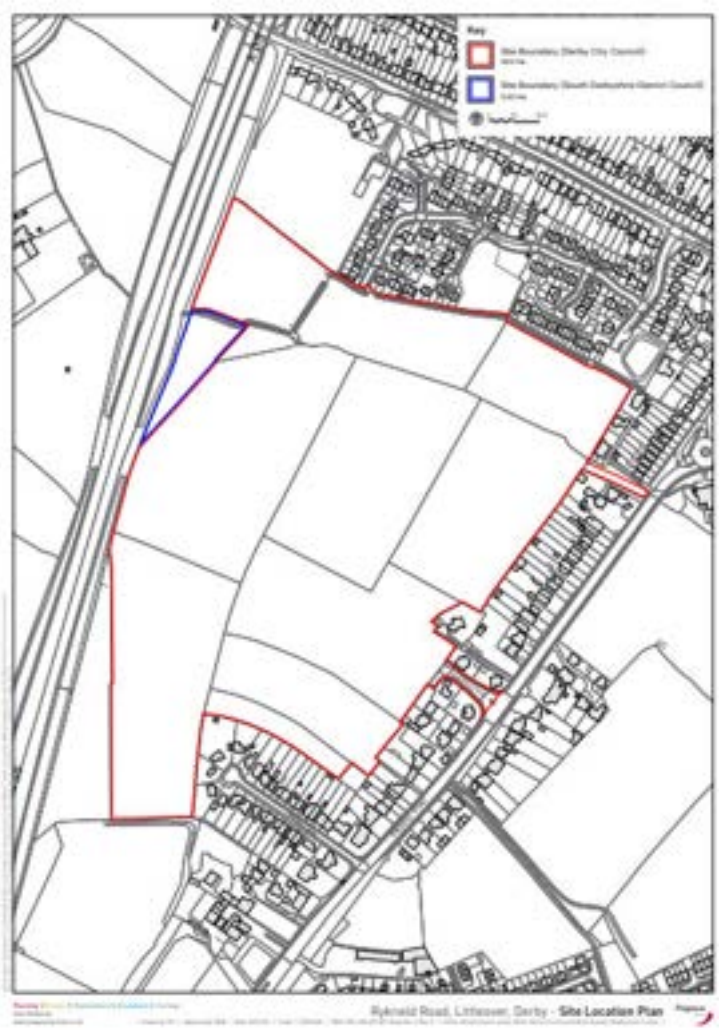


Figure 1: Site Location Plan

1.3. The site currently forms part of a live outline planning application on the western part of the current AC20 allocation for up to 425 dwellings, which is pending determination by the Local Planning Authority (application reference number: 22/01771/OUT). Land shown in blue on

Figure 1 lies within South Derbyshire and has planning permission to deliver open space linked to the allocation.

1.4. The Consortium comprises two housebuilders and a private development company, who are well placed to deliver the site. Miller Homes is a major privately owned UK householder, and William Davis Homes is a long-established privately owned Midlands housebuilder.

1.5. The Consortium supports the continued allocation of Policy HA1 because it represents a deliverable and strategically important housing allocation capable of contributing to Derby's early housing supply, but requests targeted modifications to ensure the wider policy framework is justified, effective, proportionate and avoids unnecessary duplication of national policy and Building Regulations.

2. Personal Details

2.1. Please find below the respondent details:

	Client Contact Details	Agent Contact Details
Name		
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3. General Development Principles

General Development Principles Policies

3.1. The Local Plan sets out a number of policies covering general development principles, including place-making principles (GD1), character and context (GD2), amenity (GD3), accessible places (GD4), resilient places and community safety (GD5), health and well-being (GD6) and comprehensive and coordinated development (GD7). There are also policies on Enforcement (GD8) and Infrastructure and Developer Contributions (GD9).

3.2. We have set out below more detailed comments on the wording of three of these policies but as a more general comment, the first seven policies all primarily deal with matters of design and therefore could and should be condensed into a single design policy focused on locationally specific elements. As proposed, these policies are considered to be too detailed, overly prescriptive and repeat national policy and guidance already available.

3.3. The new NPPF states that "*development plan policies which are in any way inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework*." (Annex A, paragraph 2).

3.4. These policies will therefore need to be considered against the national decision-making policies in the NPPF (August 2026). Where there is an inconsistency between a development plan policy and a national decision-making policy, the development plan policy should be afforded very limited weight, unless it has been examined and adopted against the new NPPF.

3.5. A large number of policies in the Local Plan are not considered to be necessary as they repeat national policy and practice. There are also instances where policies are repeated within the document, for example in relation to density (GD1 and H2).

Policy GD1: Placemaking Principles

Part of Local Plan Representation relates to:	Policy GD1
Do you consider the Local Plan is: Legally Compliant Sound	 Yes Yes
Which of the tests the Local Plan fails to meet?	
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

Density

3.6. Policy GD1: Placemaking Principles sets out at (d) under the heading 'Built Form' that proposals should make efficient use of land through compact forms of development and optimising development densities.

3.7. Compact forms of development may not be appropriate in edge of City locations. It will therefore be important that sufficient flexibility is provided for developments to respond to the suburban, lower density character of locations on the edge of the built-up area of the City and to ensure development integrates with the existing built form and future development beyond the City boundary in the neighbouring authority.

3.8. Whilst a minimum density is set for the City Centre, it is welcomed that a minimum density is not set for non-City Centre development in this policy. Although it is noted that Policy H2: Residential Development does include a minimum density of 35 dwellings per hectare outside the City Centre. This policy includes a caveat that this is unless there are clear environmental reasons for a lower density, which is welcomed.

3.9. In this context the final part of the policy, which sets out that all proposals will be assessed in terms of their response to these placemaking principles, taking account of context, function and cumulative impacts, is welcomed.

Policy GD6: Health and Wellbeing

Part of Local Plan Representation relates to:	Policy GD6
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Consistent with National Policy Justified
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

3.10. Policy GD6: Health and Wellbeing advises that Health Impact Assessments may be required to be submitted as part of planning application for major development proposals. A screening assessment should be undertaken to assess if a full Health Impact Assessment is required.

3.11. This is an unnecessarily onerous additional requirement. Larger residential applications will already be supported by significant evidence. This will include, as necessary, a Design and Access Statement, Transport Assessment, Travel Plan, Noise Assessment, Air Quality Assessment, Lighting Strategy, Contaminated Land Assessment and Flood Risk Assessment. The current significant evidence required to support any major application will deal with all the issues that a Health Impact Assessment would address.

3.12. The requirement for a Health Impact Assessment is unnecessary duplication of existing evidence and not supported. As currently drafted, Policy GD6 does not establish a clear threshold or sufficiently evidenced justification for when an HIA would be required. The requirement for a screening assessment also introduces an additional procedural requirement for major development proposals without demonstrating that this would provide proportionate additional value in decision-making. The policy is therefore considered not justified and not effective and should be deleted or substantially amended.

Modifications to the Local Plan

3.13. Delete the Health Impact Assessment requirement from Policy GD6 or amend it so that any requirement is triggered only by a clearly evidenced, proportionate and locally justified threshold.

Policy GD9: Infrastructure and Developer Contributions

Part of Local Plan Representation relates to:	Policy GD9
Do you consider the Local Plan is: Legally Compliant Sound	 Yes Yes
Which of the tests the Local Plan fails to meet?	
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

3.14. Policy GD9: Infrastructure and Developer Contributions sets out that there may be occasions where the Council will require additional contributions including for example for public realm improvements and public art and protection or enhancement of cultural heritage.

3.15. It is important that any such developer contributions are fully justified in line with the CIL tests of being necessary, directly related and fairly and reasonably related in scale and kind.

3.16. The priority for contributions towards affordable housing, education, transport and biodiversity ahead of other contributions where there is a viability issue is welcomed and is helpful to inform discussions in these circumstances.

4. Housing

Policy H1: Housing Delivery

Part of Local Plan Representation relates to:	Policy H1
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Consistent with National Policy Effective
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

4.1. Policy H1: Housing Delivery sets out the approach to the delivery of 12,500 new homes over the plan period 2023 to 2043. Policy H1b) makes clear that Derby City will work with neighbouring local authorities to coordinate and plan extensions to the City. The clear indication that meeting the full housing need of the City will require delivery within South Derbyshire and Amber Valley is welcome.

4.2. The Planning Data (England) Regulations 2026 mandate that local planning authorities publish plan timetables and housing requirements in standardised formats. The regulations states that the housing requirement is the minimum number of homes that a local plan expects to be provided during the period of the plan.

4.3. It is also vital that housing requirement is expressed as an annual figure so that monitoring, including housing delivery and housing land supply can be calculated as required by NPPF paragraph 78.

4.4. Policy H1 does not clearly set out an annual housing requirement for the plan period and is therefore inconsistent with national planning policy and the requirements for housing requirement data under the Planning Data (England) Regulations 2026. The policy as currently drafted fails to provide a clear and effective housing requirement for monitoring purposes.

Modifications to the Local Plan

4.5. Amend Policy H1 to set out a total figure for the full housing need for Derby City, as well as the capacity of the City to meet this need, and also set out an annual housing requirement to ensure it is clear what the Council's housing land supply and housing delivery should be measured against.

Policy H2: Residential Development - General Criteria

Part of Local Plan Representation relates to:	Policy H2
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Effective Consistent with National Policy
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Density

Detailed Comments

4.6. Policy H2: Residential Development sets a minimum average density of 35 dwellings per hectare for all non-City Centre residential developments, unless there are clear environmental reasons for a lower density. This caveat is welcomed but should be expanded to include reasons related to the character of the neighbouring development and other design considerations. It would be helpful if the supporting text could also set out that this is a net developable area density, for the avoidance of any doubt.

Modifications to the Local Plan

4.7. Amend Policy H2 and its supporting text to confirm that the 35 dwellings per hectare figure applies to net developable area only and is subject to local character, design, environmental constraints and site-specific circumstances.

Accessibility and Adaptability Standards

4.8. Policy H2 also includes requirements for all new build dwellings to be constructed to comply with the option Building Regulations Part M4(2) 'Accessible and Adaptable Dwelling' standards. On sites over 25 dwellings, the requirement proposed is for 5% of market homes to be at Part M4(3)a 'Wheelchair Adaptable' standard and 10% of affordable homes to be at Part M4(3)b 'Wheelchair Accessible' standard.

4.9. The Government response to consultation on raising accessibility standards for new homes states that the Government proposes to mandate the current optional Part M4(2) standard as a minimum for all new homes, with Part M4(1) applying in only exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through Building Regulations.

4.10. Paragraph 16 (f) of the 2024 National Planning Policy Framework (NPPF) advises that Local Plans should avoid unnecessary duplication and, given the Government intends to mandate Part M4(2) of the Building Regulations, Policy H2's reference to Part M4(2) would represent unnecessary duplication of Building Regulations. Furthermore, Annex A, paragraph 2 of the 2026 NPPF states that development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in the Framework should be given very limited weight.

4.11. The proposal to include further requirements, for a percentage of homes to meet the Part M4(3) optional standard, needs to be supported by sufficient robust evidence to justify this approach, in accordance with the Planning Practice Guidance which outlines the evidence necessary to justify a policy requirement for optional standards. Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors.

4.12. The recent Charnwood Borough Council Charnwood Local Plan Inspectors' Report (November 2025) removed the M4(3) requirement as it was only supported by general evidence in the Housing Needs Assessment similar to that available in the Derby and South Derbyshire Housing Needs Assessment. The Inspectors concluded at paragraph 125 that:

> *'The M4(3) requirement is not supported by any evidence of specific housing need as required by the PPG and the impact on viability has not been tested. Overall, the M4(3) requirement is not justified and MM107 is necessary to remove it from Policy H2'.*

4.13. It is therefore important that specific housing need evidence is provided to justify the proposals.

4.14. There is an extra cost in delivering M4(2) ahead of it being mandated and even greater costs of delivering M4(3). This policy must therefore be considered as part of the Local Plan Viability Assessment when it is prepared to ensure that any proposed approach does not compromise viability of development.

4.15. The proposed requirements in Policy H2 in relation to accessible and adaptable housing are not supported because they are not justified.

4.16. Additionally, the Government has, through the 2026 NPPF, established a national minimum expectation that at least 40% of new housing delivered over the course of a plan should be provided to M4(2) or M4(3) standards. Policy HO5(1)(b) also makes clear that requirements for M4(2) should reflect locally assessed need. There is no evidence that this national approach is inappropriate for Derby City or that a higher local requirement is justified by evidence of local need.

Modifications to the Local Plan

4.17. Policy H2: Residential Development – General Criteria (g) should be deleted as there is insufficient evidence in terms of need, and the requirement is not justified.

Policy H4: Affordable Housing

Part of Local Plan Representation relates to:	Policy H4
Do you consider the Local Plan is: Legally Compliant Sound	 Yes Yes
Which of the tests the Local Plan fails to meet?	
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

4.18. Policy H4: Affordable Housing sets out a flexible approach to delivering affordable housing needs, which is supported. The policy includes different percentages of affordable housing required on Green Belt Land, City Centre Sites and Sites Outside the City Centre / Green Belt.

4.19. Sites outside the City Centre and Green Belt are required to provide up to 25% affordable housing, on site, with 80% of these homes available for social rent unless it can be justified that this is not achievable.

4.20. It is noted that the maximum amount of affordable housing required will be expected on sites, but we welcome the inclusion of other factors that will be considered in assessing individual sites including the presence of competing planning objectives, evidence of local need for affordable and other types of specialist housing and viability evidence.

Policy HA1: Rykneld Road, Littleover

Part of Local Plan Representation relates to:	Policy HA1
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate. The Consortium controls the site west of Rykneld Road at Policy HA1 and wish to participate in hearing sessions, including matters concerning the soundness, deliverability, capacity, infrastructure requirements and policy requirements associated with the site.

Detailed Comments

4.21. The proposed continued allocation of land at Rykneld Road, Littleover is supported and represents a logical proposal in light of the Council's requirement to deliver housing within its own boundary. The Consortium's land interests cover land west of Rykneld Road, which is subject to a live planning application (ref: 22/01771/OUT).

4.22. The policy now sees the whole site allocated for a minimum of 800 high quality new homes. This number is considered to be more achievable and recognises the constraints of the site and the infrastructure requirements required that limits the development (e.g. BNG Habitat, Primary School Provision, Noise, Open Space and Drainage requirements). With these considerations identified it is suggested that the Policy is updated for the total dwellings to read as a maximum instead of a minimum of 800 high quality homes given the two live planning applications (east and west of Rykneld Road) across the allocation total 729 dwellings, and there being scope for approximately a further 60 dwellings on the site of the previously safeguarded employment land, now under the control of William Davis. The approach and the potential dwelling numbers outlined is robust and realistic. The Council have not justified the minimum figure suggested.

4.23. Policy HA1 does not introduce new policy requirements beyond those already expected by the current Development Plan (Derby City Local Plan – Part 1 Core Strategy, 2017). The live planning application ref: 22/01771/OUT already demonstrates development in accordance with the emerging policy. A summary of how the current development proposals meet the requirements of Policy HA1 is set out below:

- *a) consideration of how the site relates to and connects with the adjacent Highfields Farm site in South Derbyshire, in particular seeking high quality pedestrian and cycle connectivity*

Criterion a) is not applicable to the west of Rykneld Road proposals, notwithstanding the proposed development seeks to deliver high quality pedestrian and cycle connectivity through and out of the development to provide linkages between the proposed primary school site and the nearby local centre.

- *b) a new Primary School to be provided on site which will be open at an appropriate time in the phasing of the residential development, and financial contributions to the extension of local Secondary Schools*

A safeguard primary school site is included within the existing development proposals for the site, phasing for the delivery of this is still to be agreed. Financial contribution to the extension of local secondary schools will also form part of a S106 Obligations Package which will be agreed between the applicant and the City Council.

- *c) the expansion of Heatherton Local Centre to provide additional shopping facilities and/or community uses within the site and, where possible, improved connectivity between the site and the local centre at Heatherton. Such new uses should be adjacent to the existing Heatherton Local Centre.*

It is noted that the policy seeks the provision of additional shopping facilities and community uses, it is suggested that this area of the policy is expanded to be more explicit to allow additional housing to be brought forward in this area of the allocation.

- *d) the provision of an improved local bus service to serve the development, such as the extension of the weekday 20 minute 'Harlequin' bus service along Rykneld Road. The provision of pedestrian links between the development and bus stops will also be required in order to ensure that residents are within a reasonable walking distance to public transport opportunities.*

As part of the development proposals discussions are ongoing as to improvements to bus services in and around the development, a final package will be agreed as part of a S106 agreement. The development has acknowledged that there will be a requirement for future residents to be able to access these stops and have provided pedestrian links from the main access and an emergency access to ensure that these are accessible to future residents by foot.

- *e) applicants to demonstrate that high quality and useable active travel routes are provided within the site and strong links are made between these and existing or proposed routes beyond the site. Development must prioritise high quality walking, wheeling and cycle routes through the site, and establish linkages with adjacent existing and proposed routes to create a sustainable neighbourhood/community.*

The proposed development has been designed to deliver high quality and useable active travel routes, with linkages provided where possible to the existing pedestrian, cycling and public transport network.

- *f) the provision of off-site road and junction improvements, or alternative active travel schemes to offset the impact of development traffic.*

A comprehensive Transport Assessment has been submitted detailing appropriate interventions and where necessary has identified off-site road and junction improvements.

- *g) attenuation measures for noise generated by vehicles on the A38 on the western side of the site.*

The current application identifies and incorporates potential mitigation measures to reduce road traffic noise to acceptable levels, as recommended in BS 8233. The following mitigation measures are available:

- Plots bounding/closest to the road could be orientated such that any garden areas are protected by the building envelope;
- Gaps between dwellings fronting the roads could be kept to a minimum to avoid noise creep into the gardens behind;
- Public open space or nature corridors along boundaries with the noise source could be advantageous as these provide a buffer to the plots;
- Localised acoustic barriers around the garden areas; and
- Acoustic barriers along the Site boundary.

The site has been designed to mitigate noise impact from vehicles on the A38.

- *h) appropriate flood mitigation measures to be implemented in accordance with Policy CL1.*

A comprehensive Flood Risk Assessment and Drainage Strategy has been submitted as part of the application that appropriately mitigates the development from flood risk. The Drainage Strategy outlines an appropriate strategy to deal with surface water on site.

- *i) measures to be taken to enhance the green infrastructure and biodiversity network in line with the Local Nature Recovery Strategy.*

The application was submitted before the implementation of the statutory 10% Biodiversity Net Gain requirements. Nevertheless, the proposed development has sought to retain existing features of importance, including trees and hedgerows across the development. The site will also safeguard and manage an important grassland habitat in the north-eastern corner of the development, which has constrained the upper dwelling threshold.

- *j) public open space to be provided on-site consistent with Policy EN3.*

The proposed development will deliver public open space on-site in accordance with current open space standards.

- *k) infrastructure contributions in accordance with Policy GD9.*

The proposed development will deliver an appropriate, necessary and robust package of infrastructure contributions via S106 agreement.

4.24. The policy as drafted is considered an appropriate means of facilitating the delivery of the Rykneld Road site. It is anticipated that the application will be approved prior to adoption of the Local Plan. Delivery assumptions for the Consortium's land west of Rykneld Road and adjoining the Local Centre are detailed in **Table 1**. This demonstrates that delivery is expected

within the next five years across up to three outlets, thereby boosting the supply of housing in Derby.

4.25. Table 1 demonstrates that 250 dwellings could be delivered within the first three years of the trajectory and 485 dwellings in total across the period shown, making the Rykneld Road site an important contributor to Derby's housing supply position and to the soundness of the Plan's housing strategy.

Table 1 Expected Delivery on Consortium's Land Interest at Rykneld Road

Year	**Annual Delivery**
2027/28	50
2028/29	100
2029/30	100
2030/31	100
2031/32	100
2032/33	35
Total	**485**

4.26. The Consortium will continue to work positively with the Council to bring forward their element of the allocation ahead of the adoption of the Local Plan.

Modification to the Local Plan

4.27. Amend Policy HA1 to read as a maximum instead of a minimum of 800 high quality homes.

5. Natural Environment

Natural Environment Policies – General Comments

5.1. We have set out below more detailed comments on individual policies, but as a more general comment, as with the general development principles policies, it is considered that many of these policies are unnecessarily detailed, prescriptive and lengthy, duplicating current national policy and, in some cases, going beyond what is necessary to address locally specific matters. While the Plan will be examined against the December 2024 NPPF in accordance with the applicable transitional arrangements, the Council should also have regard to the August 2026 NPPF, which introduces a substantially more detailed set of national decision-making policies and seeks to avoid unnecessary repetition of national policy in development plans. Where policies in the Plan are inconsistent with the national decision-making policies in the August 2026 NPPF, they may subsequently attract very limited weight in decision-making. Given the level of detail included in the draft policies, there is significant potential for such inconsistencies to arise.

Policy EN1: Green and Blue Infrastructure

Part of Local Plan Representation relates to:	Policy EN1
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

5.2. Policy EN1: Green & Blue Infrastructure sets out the Council's approach to safeguarding and enhancing the City's network of green and blue infrastructure.

Detailed Comments

Retention of Existing Features

5.3. The policy includes reference in criteria c) to providing and enhancing natural connections to the surrounding GI network using features such as existing planting, trees, groups of trees, wetland, hedgerows and opportunities for wild food foraging for animals as the key starting point for green infrastructure proposals, and retain, reinforce and embed them into the design of the development. Whilst this is supported in principle, there will be occasions where existing planting, trees or hedgerows need to be removed to achieve safe access to a site or good design.

5.4. It is important that Policy EN1 includes some flexibility and recognises that whilst existing features will provide a starting point for design decisions, it may not always be possible or appropriate to retain all existing features. It is suggested that an addition of the wording 'where possible' is added to the end of criteria c).

5.5. Policy EN9: Trees and Hedgerows also deals with existing trees and hedgerows (another example of duplication between policies) and starts with 'Where possible, existing trees should be retained in new developments' and states 'where appropriate' in relation to hedgerows, and therefore the proposed addition of 'where possible' to Policy EN1 would be consistent with this later policy.

Modifications to Local Plan

5.6. Amend Policy EN1 criterion c) to require the retention, reinforcement and integration of existing natural features 'where possible' to ensure consistency with Policy EN9 and practical deliverability.

Urban Greening Factor

Detailed Comments

5.7. Policy EN1 also requires all major development to maximise the provision of on-site green infrastructure and, where viable, for residential development on greenfield land to provide an Urban Greening Factor score of at least 0.5.

5.8. Whilst the principle of urban greening is supported and greenfield development provides good opportunities for the surface cover types required to meet the standard (such as natural/semi-natural vegetation, street trees, SuDs and hedgerows), the key concern about this policy requirement is how it will interact with the need for efficient use of land and a 10% biodiversity net gain on a site.

5.9. The full implications of this proposed policy are not well understood as this is not a policy requirement we have previously encountered. It is unclear from the consultation documents what evidence there is to justify this policy or whether the implications have been assessed from a practical and viability perspective. It is suggested that the Council consider some worked examples to understand the implications of this additional policy requirement and it will be important this requirement is considered as part of the Whole Plan Viability Assessment.

5.10. The proposed caveat of 'where viable' is supported. We note that the Natural England standards are for major residential development to meet a National Urban Greening Factor of at least 0.4. It only states 0.5, where appropriate, for residential greenfield development. It does not appear that any work has been undertaken to establish whether this would be appropriate in the Derby context in light of other policy requirements, and therefore this is unjustified. The policy is not justified as the Council has not demonstrated why 0.5 rather than 0.4 is locally necessary.

Modifications to the Local Plan

5.11. Reduce the residential greenfield Urban Greening Factor requirement to 0.4 unless the Council can evidence that 0.5 is locally justified, viable and compatible with housing delivery, biodiversity net gain and efficient land use.

Policy EN3: Open Space, Sport and Recreation Buildings

Part of Local Plan Representation relates to:	Policy EN3
Do you consider the Local Plan is: Legally Compliant Sound	 Yes Yes
Which of the tests the Local Plan fails to meet?	
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

5.12. The Policy EN3 requirement for 1.4 hectares per 1,000 population of amenity green space and 2.4 hectares per 1,000 population of major open space, together with the provision of long term maintenance is noted.

5.13. The policy's reference to cross-boundary development and the need for the Council to work with neighbouring authorities to ensure a consistent and co-ordinated approach to the provision of public open space is also noted.

Policy EN10: Biodiversity Net Gain

Part of Local Plan Representation relates to:	Policy EN10
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Consistent with National Policy
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

5.14. Policy EN10: Biodiversity Net Gain is an unnecessary duplication of national policy. A 10% Biodiversity Net Gain is a mandatory requirement with significant national guidance available to guide the process of achieving it. Paragraph 16 (f) of the NPPF advises that Local Plans should avoid unnecessary duplication. Furthermore, the 2026 NPPF states that materially inconsistent policies should be given very limited weight.

5.15. The policy also adds an unnecessary sequential element to how off-site units are secured. Nationally, off-site units already have a sequential element applied to their value if located outside the LPA area or National Character Area. It is considered that the City Council's proposed approach overreaches beyond national policy and law by adding further complexity through a ward-by-ward assessment. The Council should evidence the availability of registered units on a ward-by-ward basis and demonstrate whether the outlined approach is feasible, necessary, appropriate and viable.

5.16. In addition to this, there does not appear to be the necessary evidence on the availability of registered units on a ward by ward basis to support this approach in any event and therefore there are questions about whether this approach is feasible. The added local considerations go beyond those set out in law and are unnecessary, inappropriate and impractical.

5.17. There is no indication that this ward by ward approach will deliver better biodiversity outcomes, in fact a biodiversity improvement close to the site could be less important than one strategically placed within an important corridor.

5.18. Policy EN10 is not consistent with national policy or justified because it unnecessarily duplicates the statutory biodiversity net gain regime and imposes an additional ward-by-ward approach to securing off-site biodiversity units without evidence that this is necessary, and the policy as drafted is therefore not justified.

Modifications to the Local Plan

5.19. Policy EN10 should be deleted in order that there is no unnecessary duplication of statutory requirements and national policy.

Policy EN11: Air Quality

Part of Local Plan Representation relates to:	Policy EN11
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Effective
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

5.20. Policy EN11: Air Quality sets out that development proposals should seek opportunities to identify and improve air quality and should not reduce air quality. This policy appears to go beyond mitigating the impacts of development by requiring improvements to air quality in criteria g) and h). It is important that the policy does not go beyond what is directly related to the development; improvements can be encouraged but should not be required.

5.21. Again, there is significant duplication between this policy and EN13: Pollution. It is unclear why a separate policy on Air Quality and Land Contamination is needed when the Pollution policy also covers these matters.

5.22. Policy EN11 is not justified or effective because it imposes additional requirements to improve air quality beyond mitigating the impacts of development, without evidence that these requirements are necessary or would deliver better outcomes, while also unnecessarily duplicating the matters addressed by Policy EN13 and national policy.

Modifications to the Local Plan

5.23. Policy EN11: Air Quality (g) should be modified to be clear that air quality improvements are encouraged rather than required. Without modification the Policy is unjustified and unsound.

6. Historic Environment

Policy HE1: Conserving and Enhancing the Historic Environment and Policy HE6: Archaeology and Scheduled Monuments

Part of Local Plan Representation relates to:	Policy HE1 and Policy HE6
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Effective
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

6.1. Policy HE1 criterion (e):

6.2. "require proposals for new development, located within Archaeological Alert Areas, or other areas of archaeological potential to initially be accompanied by a desk-based assessment of available evidence. Where appropriate further archaeological evaluation may also be required. This should be submitted before the planning application is determined to inform design and enable an informed and reasonable planning decision".

6.3. This requirement is duplicated in Policy HE6: Archaeology and Scheduled Monuments, another example of the repetition between policies. Policy EN18 sets out that the archaeological assessment may comprise archaeological desk-based assessment, field evaluation or other investigative techniques as appropriate, undertaken in accordance with a written specification agreed with the Council.

6.4. It is unclear why the provision of this information is required before any decision can be taken. It is common for the written specification to be agreed post decision or for this to be agreed and conditioned as a pre-commencement condition, particularly for outline applications which aim to establish the principle of development. This policy as drafted could delay decision making unnecessarily and would not change the ultimate outcome achieved.

6.5. Policy HE1 (f) states:

> *"ensure that development within the city avoids or minimises harm to the significance of heritage assets located outside of the city boundary, within adjoining local authority areas,*

particularly through impacts upon the setting of assets, both through individual and cumulative impacts".

6.6. This appears to be higher test than the national policy requirements where less than substantial harm can be weighed against public benefits. This approach is not consistent with national policy.

Modifications to the Local Plan

6.7. Policy HE1 criterion (e) should be modified to remove the requirement for archaeological assessment to be undertaken before any decision can be taken, as this is unnecessary and unjustified.

6.8. Policy HE1 criterion (f) should be modified so that the reference to harm is consistent with national planning policy.

Climate Change

Climate Change Policies – General Comments

6.9. We have set out below more detailed comments on individual policies, but as a more general comment, it is considered that many of these policies are unnecessarily detailed, prescriptive and lengthy, duplicating current national policy contrary to paragraph 16 (f) of the NPPF and potentially being superseded by emerging National Decision-Making Policies where inconsistencies arise.

Policy CL1: Flood Risk and Water Management

Part of Local Plan Representation relates to:	Policy CL1
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Consistent with National Policy
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

6.10. Policy CL1: Flood Risk and Water Management repeats national policy on the sequential test and Sustainable Drainage Systems and is another example of unnecessary duplication of a national policy. Paragraph 16 (f) of the 2024 NPPF advises that Local Plans should avoid unnecessary duplication.

6.11. The proposed policy includes reference to proposals demonstrating that there is adequate wastewater infrastructure and water supply capacity to serve the development. The policy notes that where it is likely to create a specific shortfall or exacerbate existing deficiencies, developers will be required to adequately mitigate or compensate for those deficiencies.

6.12. Paragraph 201 of the 2024 Framework also states that planning decisions should assume that other regulatory regimes will operate effectively. This has been strengthened in the new NPPF through Policy DM7: Relationship with Other Regulatory Regimes and introduction of National Decision-Making Policies identifies it as a core principle that planning decisions should be based on whether development would be an acceptable use of land, and that other regulatory regimes should be assumed to operate effectively unless they have land-use implications.

6.13. This paragraph in the policy related to wastewater infrastructure and water supply capacity is therefore inconsistent with the current and emerging national policy.

Modifications to the Local Plan

6.14. CL1: Flood Risk and Water Management should be modified to remove policy elements which duplicate national policy so that it is consistent with paragraph 16 (f) of the NPPF.

Policy CL3: Sustainable Design & Construction

Part of Local Plan Representation relates to:	Policy CL3
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Consistent with National Policy
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

Sustainability Statement

6.15. Policy CL3: Sustainable Design & Construction requires all developments to be supported by a Sustainability Statement; this requirement is also included within Policy CL6: Embodied Carbon and therefore represents duplication between policies.

6.16. This is also a further document which will need to be prepared in support of a planning application and is particularly onerous for smaller developments.

6.17. The Council will need to consider how this interacts with the Government's proposals for a more consistent and proportionate approach to local information requirements for validation.

6.18. It is considered that the approach is not consistent with paragraph 16 (d) and (f) of the Framework as the policies are not clearly written and unambiguous, and present unnecessary duplication.

New Development

6.19. The policy notes that new builds need to meet the fabric energy efficiency required under Part L of the Building Regulations. This is already required by the Building Regulations and is therefore unnecessary duplication, which paragraph 16 (f) of the NPPF advises Local Plans should avoid.

Energy Efficiency

6.20. Policy CL3 states that new builds need to meet the fabric energy efficiency required under Part L of the Building Regulations.

6.21. The part of policy CL3 is unnecessary duplication with other regulatory regimes and is not consistent with paragraph 16 (f) of the NPPF.

Water Efficiency

6.22. This policy requires all new dwellings to achieve the Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described in the Building Regulations. This is the national Optional Technical Housing Standard.

6.23. Building Regulations require all new dwellings to achieve a 125 litres per day per person (Part G), so this policy goes beyond the current national requirements. The policy should therefore clearly distinguish between the mandatory national standard and the optional requirement.

6.24. Water efficiency is a matter dealt with through Building Regulations and there is insufficient evidence provided for a locally needed lower requirement. There is no indication of consultation with key stakeholders such as Severn Trent Water or the Environment Agency. There is also no evidence that the impact on viability has been tested and therefore the implications on housing supply.

6.25. In the absence of such evidence, the requirement is not justified and is therefore unsound. The policy should either be deleted or amended to require the 110 litres per person per day standard only where the Council has demonstrated the necessary local justification.

Modifications to the Local Plan

6.26. Policy CL3 should be modified to:

- Clarify the role of the required Sustainability Statement.
- Remove the reference to meeting Building Regulations as this is unnecessary duplication with other regulatory regimes and is not consistent with paragraph 16 (f) of the NPPF.
- Remove the reference to local water efficiency requirements as these are not justified by evidence.

Policy CL6: Embodied Carbon

Part of Local Plan Representation relates to:	Policy CL6
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Effective Consistent with National Policy
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

Sustainability Statement

6.27. Policy CL6: Embodied Carbon and Policy CL3: Sustainable Design & Construction require all developments to be supported by a Sustainability Statement. This is a further document which will need to be prepared in support of a planning application and is particularly onerous for smaller developments.

6.28. The Council will need to consider how this interacts with the Government's proposals for a more consistent and proportionate approach to local information requirements for validation.

6.29. Policy CL6 and Policy CL3 are not justified or effective, and are potentially inconsistent with national policy, because they impose a blanket requirement for a Sustainability Statement on all developments without demonstrating that such information is necessary or proportionate to the scale and likely impacts of development. This risks creating an unnecessary validation and application requirement, particularly for smaller schemes, contrary to the national objective of ensuring that information requirements are proportionate and limited to the minimum necessary to determine an application.

Modifications to the Local Plan

6.30. Combine the Sustainability Statement requirements in Policies CL3 and CL6 into a single proportionate requirement, applied only where necessary and aligned with national validation guidance.

7. Transport and Movement

Policy T3: Servicing, Accessibility and Parking

Part of Local Plan Representation relates to:	Policy T3
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Effective
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

7.1. Policy T3: Servicing, Accessibility and Parking sets out that all new development should provide appropriate levels of parking for cars, powered two wheelers and bicycles, having regard to the standards set out in Appendix 4.

7.2. Appendix 4 includes a standard of 1 space per bedroom for cycle parking. This will have significant implications for the design and layout of development and is not supported. This would mean for each 3 or 4 bed home, space to park three or four bikes would be required.

7.3. The proposed cycle parking standard of one space per bedroom is not considered sound. Whilst the Council has prepared a Parking Study Report by Systra, this is focused on parking provision in the City Centre and there is no clear evidence that the study establishes a need for cycle parking to be calculated on a 1 space per bedroom basis, on residential developments. Furthermore, there is no proportionate evidence demonstrating that this level of provision is necessary or appropriate, or that the implications for viability and deliverability have been properly assessed. It may also undermine the effectiveness and deliverability of the Plan where the requirement cannot reasonably be accommodated within layouts. The Council should therefore provide clear evidence demonstrating the justification for this standard, or otherwise the policy should be amended to provide a more proportionate and flexible standard based on the size and type of development and anticipated demand, rather than applying one cycle space per bedroom as a blanket requirement.

Modifications to the Local Plan

7.4. Replace the one cycle space per bedroom standard with a flexible, evidence-based requirement that reflects dwelling type, layout, tenure and anticipated demand.

Policy T5: Electric Vehicle Charging Facilities

Part of Local Plan Representation relates to:	Policy T5
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet?	Justified Consistent with National Policy
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

7.5. Policy T5: Electric Vehicle Charging Facilities sets out a requirement for new development to make provision for electric vehicle charging infrastructure, using dedicated charge points specifically designed for charging all types of electric vehicle in accordance with, or exceeding, the requirements of the Building Regulations, Part S.

7.6. This requirement is unnecessary because the provision of EV charging infrastructure is already regulated through Building Regulations Part S. Paragraph 16 (f) of the 2024 NPPF confirms that policies should avoid unnecessary duplication. The policy adds no clear planning policy value and risks duplicating Building Regulations.

7.7. Furthermore, the new NPPF (August 2026) at Policy PM6(1)(c) confirms that plan-makers should "not duplicate, substantively restate or modify the content of national decision-making policies unless directed by other policies in this Framework". More specifically, Policy PM13 seeks to prevent local standards covering matters already addressed by Building Regulations, subject to limited exceptions. The Government identifies limiting duplication of Building Regulations as an express objective of the reforms.

7.8. The Council has not demonstrated a clear local justification for reproducing the Part S requirements through Policy T5. The policy should therefore be deleted, or substantially amended, to avoid unnecessary duplication of Building Regulations, in accordance with paragraph 16 (f) of the 2024 NPPF.

Modifications to the Local Plan

7.9. Delete Policy T5 or amend it to cross-refer to Part S of Building Regulations only, ensuring there is no additional local requirement unless justified by robust evidence.

Appendix A: Site Location Plan

Land Interests in Derby City

Key

Site Boundary (Derby City Council)
18.12 Ha

Site Boundary (South Derbyshire District Council)
0.42 Ha

0 25 50m

A38

HAVEN BAULK LANE

BYRON CLOSE

KEATS CLOSE

WENDLESHOE WAY

CHERWOOD CLOSE

CHILTON GARDENS

NICHOLSON CRESCENT

CASTLEFORD DRIVE

HAVEN

RYKNELD CLOSE

BURGHLEY WAY

RYKNELD WAY

RYKNELD ROAD

FORTIS WAY

RADC

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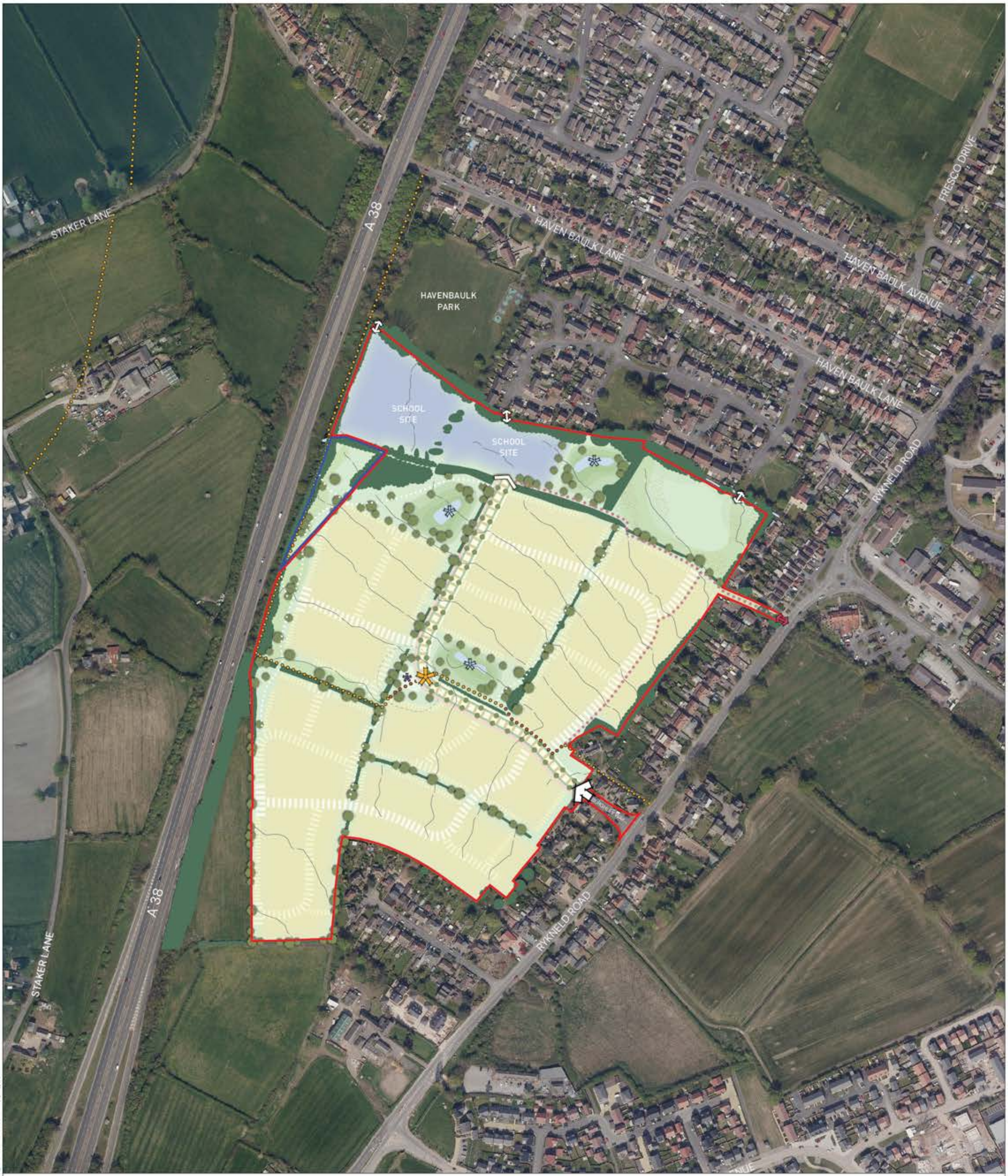
Planning | Design | Environment | Economics | Heritage
East Midlands
www.pegasusgroup.co.uk

Rykneld Road, Littleover, Derby - Site Location Plan

Pegasus Group

I Drawn by: KC I Approved by: WJB I Date: 03/11/22 I Scale: 1:1250 @ A0 I DRG: P22 1430_DE_001 Sheet No: 4 Rev: C I Client: William Davis Limited, Miller Homes Limited and Miller Gadsby (Heatherton) Limited I

Appendix B: Illustrative Masterplan



Key

Site Boundary (South Derbyshire District Councl) 18.12 Ha	Site Access
Site Boundary (Derby City Council) 0.42 Ha	Primary Street
Residential Development 10.77 Ha @ 32dph - circa. 345 dwellings @ 34dph - circa. 370 dwellings @ 36dph - circa. 390 dwellings	Street
School Site 1.70 Ha	Lane
Private Drive	3m Cycle Route
Public Right of Way (Star symbol indicates indicative PRoW crossing)	Pedestrian Site Access
Realigned PRoW (subject to RM)	Cycle / Pedestrian / Potential Emergency Site Access
Pedestrian Movement	Retained Existing Hedgerow
Retained Existing Trees	Proposed Trees
LEAP	Illustrative Drainage

0 50 100 m

Planning | Design | Environment | Economics | Heritage
East Midlands
www.pegasusgroup.co.uk

Rykneld Road, Littleover, Derby - **Illustrative Masterplan**

| Drawn by: KC | Approved by: WJB | Date: 01/11/22 | Scale: 1:2500 @ A0 | DRG: P22-1430_003 Sheet No: 1 Rev: H | Client: William Davis Limited, Miller Homes Limited and Miller Gadsby (Heatherton) Limited |

Pegasus Group

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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Derby City Local Plan.

Regulation 19 Consultation Representations.

On behalf of Infinity Park Derby LLP .

Date: September 2026 | Pegasus Ref: P24-3134

Author: [redacted]

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Appendices contents.

Appendix A: Site Location Plan

Appendix B Logistics Needs Assessment Prepared for Infinity Park Derby LLP June 2025

Appendix C Addendum Update to 2025 Logistics Need Assessment September 2026

Appendix D Marketing Activity

1. Introduction

1.1. These representations are submitted by Pegasus Group, on behalf of Infinity Park Derby LLP, to the Derby City Draft Local Plan Regulation 19 consultation published in July 2026. These representations relate to our client's land interests within the draft Policy E5 allocation associated with Land South of Wilmore Road (Infinity Park).

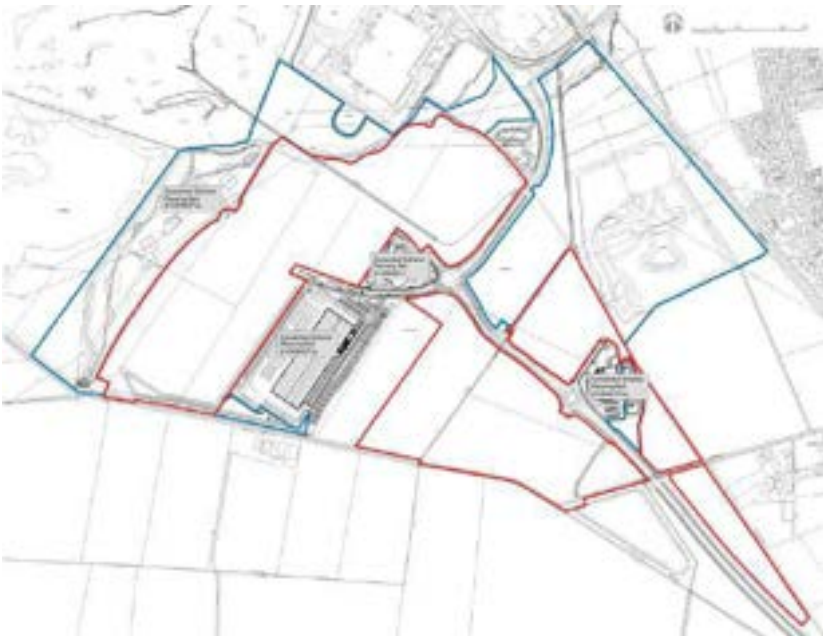
1.2. A Site Location Plan has been included in Appendix A and reproduced below for ease of reference,

1.3. Infinity Park Derby LLP is a partnership between Wilson Bowden Developments Ltd. and Peveril Securities Ltd. Peveril Securities is the wholly owned investment and development division of Bowmer and Kirkland.

1.4. Wilson Bowden is the commercial development division of Barratt Redrow. As part of one of the largest UK house builders, the nationwide product portfolio includes a wide range of commercial property, comprising offices, retail, leisure, industrial and distribution; one of the few developers with both commercial and residential expertise.

1.5. Wilson Bowden has a strong track record in developing high-quality buildings across all sectors and size ranges from 1,000ft² to 850,000ft². The company works in partnership with occupiers to ensure that buildings are constructed to the required specification, delivered on time and to budget. Wilson Bowden have been promoting their land interests at Infinity Park for over 20 years.

1.6. Wilson Bowden Developments Ltd. with Barratt Redrow also have land interests that extend beyond the above into South Derbyshire. The land within South Derbyshire forms part of the proposed strategic allocation within the South Derbyshire Part 1 Local Plan, Infinity Garden Village (STRA1).



2. Personal Details

2.1. Please find below the respondent details.

	Client Contact Details	Agent Contact Details
Name		
Job Title	Senior Planning Manager	Principal Town Planner
Organisation	Infinity Park Derby LLP	Pegasus Group
Address	Cartwright Way Forest Business Park Bardon Hill Leicestershire	4 The Courtyard Church Street Lockington Derbyshire
Postcode	LE67 1UB	DE74 2SL
Telephone Number		
Email		

3. Policy E1: New Employment Locations

Part of Local Plan Representation relates to:	Policy E1: New Employment Locations
Do you consider the Local Plan is: Legally Compliant Sound	 No No
Which of the tests the Local Plan fails to meet? Positively Prepared Justified Effective Consistent with National Policy	 No No No No
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

3.1. Our client considers Policy E1 to be unsound because the amount and type of employment land is not justified by evidence, reasonable options for the scale of logistics employment and not been adequately tested in the Council's Sustainability Appraisal, and is inconsistent with National Planning Policy, specifically paragraph 32. An explanation of these points is set out below.

Justification for Scale and Type of Employment

3.2. Policy E1 states that:

> *"In contributing to EMCCAs Vision for Growth, 133 hectares of new employment land is allocated in a variety of accessible locations to accommodate a range of employment generating activities, including offices (E(g)(i))) B2 and B8 development, research and development (E(g)(ii)) and other industrial processes (E(g)(iii))".*

3.3. Policy E1 continues:

> *"The majority of demand for new land will be met at five strategic employment locations including: (amongst other sites)*
>
> *b) Land South of Wilmore Road, including Infinity Park Derby (75ha) (see Policy E5)".*

3.4. In terms of the amount and type of employment land, the Council relies upon a single report for its justification: Employment Land Review, Derby City Council and South Derbyshire District Council Final Report October 2023. (ELR 2023).

3.5. Our client has commissioned specialist employment advice from Savills which is appended to this representation which is in two parts:

1. Logistics Needs Assessment Prepared for Infinity Park Derby LLP June 2025 (LNA 2025) Appendix B to representation.

2. Addendum Update to 2025 Logistics Need Assessment August 2026" (*Employment Addendum 2026*). Appendix C to this representation

3.6. Section 2 of the LNA 2025 outlines that the Council's ELR 2023 has not sufficiently considered relevant market signals. The LNA 2025 notes that (particularly post-COVID), market trends have shifted substantially online, meaning that the reliance placed by the Council's evidence base on backward-looking methods for establishing logistics demand are likely to underestimate the need for logistics floorspace.

3.7. It should also be noted that, local authorities surrounding Derby City and South Derbyshire have undertaken independent assessments that focus on logistics supply and demand, including (1) Bolsover, Chesterfield and North East Derbyshire HMA authorities; (2) Greater Nottinghamshire Core and Outer HMA authorities; and (3) Leicestershire and Leicester FEMA authorities. They undertook their own more detailed logistics studies to understand the demand for strategic warehousing and logistics facilities within their study areas given that the authorities are located within the wider 'Golden Triangle' for logistics. Although Derby and Derbyshire are also within the wider 'Golden Triangle' there is no such detailed study or understanding of the strategic logistics need within this HMA (or within the Derby Functional Economic Market Area, which overlaps the Greater Nottinghamshire and Leicestershire authorities).

3.8. The Employment Addendum 2026 states that there does not appear to be any Council evidence that demonstrates the need or the rationale for a fixed 50% cap on B8 floorspace. The number appears to be arbitrary and unsupported by evidence. The Employment Addendum 2026 also points out that the evidence base underpinning both the adopted and emerging local plans lacks quantitative justification for limiting B8 development. The lack of evidence is unusual because most local authority evidence bases explicitly distinguish between the market dynamics for B2 and B8 uses. The need for this detailed analysis is more important where councils introduce policies that impact the balance between the two uses. The Employment Addendum 2026 points out that where the Council's employment forecasts distinguish between manufacturing (B2) and logistics (B8), they indicate negative demand for B2 floorspace.

3.9. For the reasons set out above, the Council's evidence conflicts with paragraph 32 of the 2024 NPPF as it relies on methodologies which do not take sufficient account of market signals. For context it should be noted that 2026 NPPF Policy E1 1 (a) maintains the requirement to take account of market signals, confirming this is an established policy direction of Government. The Council's evidence on logistics is flawed and is likely to underestimate the need for employment land for logistics purposes. The proposed Policy E1: New Employment Locations is therefore not justified.

Testing of Reasonable Alternatives through Sustainability Appraisal

3.10. Our client considers that, had the Council carried out a robust assessment of the need for logistics uses, this would have identified other reasonable alternatives that would require assessment through the Council's Sustainability Appraisal.

3.11. Our client considers that the Council has not met its duties under the SEA Regulations to test reasonable alternatives.

Modifications to the Local Plan

3.12. The Council should update its Employment Land evidence to ensure that it takes appropriate account of market signals for logistics demand, and Policy E1: New Employment Locations should be modified to include the updated requirement for logistics B8 requirements.

Participation in Hearing Sessions

3.13. Infinity Park Derby LLP request to participate in the relevant hearing session to discuss the issues raised in this representation.

4. Policy E3: Local Labour Agreements

Part of Local Plan Representation relates to:	Policy E3: Local Labour Agreements
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet? Positively Prepared Justified Effective Consistent with National Policy	 **No** **No**
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Policy E3 Effectiveness

4.1. Policy E3: Local Labour Agreements states:

> *"Where appropriate, applicants proposing major development will be encouraged to enter into a 'Local Labour Agreement' with the Council to ensure that local people are given the opportunity to work and develop their skills" (emphasis added)*

4.2. The use of the phrase 'where appropriate ' lacks clarity and it is unclear how a decision maker on a development proposal should apply Policy E3. The Policy is therefore not effective and is inconsistent with NPPF policy 16 of the 2024 NPPF. Policy E3 should therefore be modified to clearly explain the circumstances in which the Policy should be applied.

Modifications to the Local Plan

4.3. The use of the phrase 'where appropriate ' lacks clarity and it is unclear how a decision maker on a development proposal should apply Policy E3. The Policy is therefore not effective and is inconstant with NPPF policy 16 of the 2024 NPPF. Policy E3 should therefore be modified to clearly explain the circumstances in which the Policy should be applied.

Participation in Hearing Sessions

4.4. Wilson Bowden request to participate in the relevant hearing session to discuss the issues raised in this representation.

5. Policy E5: Land South of Wilmore Road (Infinity Park)

Part of Local Plan Representation relates to:	Policy E5 : Land South of Wilmore Road (Infinity Park)
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet? Positively Prepared Justified Effective Consistent with National Policy	 No No No
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

5.1. Our client supports the principle of allocating land at Land South of Wilmore Road (Infinity Park) for employment uses, as the site is in a suitable location, and is fundamental to ensuring that employment land needs of Derby City are met. However, our client strongly objects to Policy E5: criterion C which states:

> *[The Council will] "limit the amount of B8 development across the whole site to 50% of overall floorspace, excluding complementary uses"*

5.2. *Paragraph 346 of the draft Plan states:*

> *"To align with the objectives and to safeguard the nationally significant potential of the site, the Council will not permit more than 50% of the overall floorspace (excluding complementary uses) to be used for logistics (B8)."*

5.3. Our client considers that the above restriction is not justified by evidence and is unnecessary for the Council to achieve the stated objectives of the Local Plan.

Evidence

5.4. Our client has commissioned specialist employment advice from Savills which is appended to this representation which is in two parts:

> Logistics Needs Assessment Prepared for Infinity Park Derby LLP June 2025 (LNA 2025) Appendix B to representation.

Addendum Update to 2025 Logistics Need Assessment August 2026" (*Employment Addendum 2026*). Appendix C to this representation

5.5. Section 2 of the LNA 2025 outlines that the Council's ELR 2023 has not considered relevant market signals and it is considered that it underestimates the current and future demand for logistics land. The LNA 2025 notes that (particularly post-COVID), market trends have shifted substantially online, meaning that the reliance placed by the Council's evidence base on backward-looking methods for establishing logistics demand substantially underestimate the true level of demand.

5.6. The Council's employment land evidence conflicts with paragraph 32 of the NPPF as it relies on methodologies which do not take sufficient account of market signals. For context it should be noted that 2026 NPPF Policy E1 1 (a) maintains the requirement to take account of market signals, confirming this is an established policy direction of Government. The Council's evidence on logistics is therefore flawed.

5.7. The Employment Addendum 2026 includes a review of the Council's evidence base in the context of 2024 and 2026 national planning policy.

5.8. Employment Addendum 2026 finds that that neither the policy framework nor the evidence base provide a clear quantitative justification for limiting B8 development to 50% of total floorspace of site allocation Policy E5. The restriction is also inconsistent with market signals, occupier requirements and the way that modern industrial occupiers actually operate.

5.9. The 2026 NPPF recognises that Development Plan policy needs to take account of way modern industrial markets operate, and Policy E1 (2) states:

5.10. "Given changing commercial property requirements, development plans should not be overly prescriptive about the types of uses or unit sizes that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage)".

5.11. Employment Addendum 2026, Section 3 finds limited analysis undertaken by the Council which distinguishes between demand for B2 and B8 uses and no evidence that demonstrates why a 50% cap is required.

5.12. Where the Council's evidence does distinguish between manufacturing and logistics demand (ELR 2023 Appendix 14), the forecasts indicate negative demand for manufacturing floorspace and more favourable demand for logistics floorspace.

5.13. Savills experience and research also demonstrates that the distinction between B2 and B8 uses is becoming increasingly blurred in the I&L sector. Modern industrial occupiers increasingly co locate manufacturing, assembly, storage, fulfilment and distribution functions. Across a range of sectors, logistics facilities perform a critical role in supporting manufacturing activity through the storage of raw materials, inventory management, freight consolidation and the distribution of finished products. The policy approach of the Council treats B2 and B8 uses as separate, isolated functions that do not reflect how contemporary supply chains are structured.

5.14. The market assessment shows that demand for industrial and logistics floorspace remains strong across Derby and the wider market area, with availability rates indicating ongoing

supply constraints. Occupiers continue to compete for a limited amount of available stock and the market is constrained by supply rather than a lack of demand.

5.15. It should be noted that our client is very willing to deliver advanced manufacturing uses (and always have been). The fact that such uses have not been taken forward is a reflection of the lack of demand for such uses on this site, rather than a preference for B8 uses on the site from our client.

5.16. In conclusion, the specific percentage restriction of B8 uses set out in Policy E5: criterion c is not justified by the Council's evidence. Furthermore, the Council's evidence uses a methodology which is at odds with NPPF paragraph 32 as it does not take sufficient account of market signals.

Policy Effectiveness

5.17. Policy E5 criterion f) a) refers to both biodiversity resources, rights of way and amenity of nearby residential areas. The content with disparate policy areas within a single criterion makes the criterion difficult to interpret and also to make an assessment as to whether the policy requirement are met. The policy is not effective and not consistent with NPPF paragraph 16 as it is not clear how a decision maker should react to a development proposal. The reference to residential amenity is not justified as the site is not close to residential property.

Justification for Landscaping Requirements

5.18. Policy E5 criterion f) b) to d) set out various landscaping requirements, but which do not feature within the planning permission granted for the site. Development is therefore demonstrably acceptable without these additional landscaping elements, there is no justification for including these specific requirements.

Modifications to the Local Plan

5.19. Policy E5 should be modified to delete criterion C, as the requirement is not justified by evidence, is inconsistent with the 2024 NPPF and 2026 NPPF, and poses a risk to the deliverability of the allocation.

5.20. Policy E5 f) should be separately articulated for various policy requirement contained in this criterion and the reference to residential amenity should be removed as this is not justified.

5.21. Policy E5 f) b) to d) should be deleted as they are not justified.

Participation in Hearing Sessions

5.22. Infinity Park Derby LLP request to participate in the relevant hearing session to discuss the issues raised in this representation request to participate in the relevant hearing session to discuss the issues raised in this representation.

6. Policy GD6: Health and Wellbeing

Part of Local Plan Representation relates to:	Policy GD6: Health and Wellbeing
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet? Positively Prepared Justified Effective Consistent with National Policy	 **No** **No**
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

Requirements for Health Impact Assessments

6.1. Draft Policy GD6: Health and Wellbeing indicates a requirement for Health Impact Assessments for all major development proposals.

6.2. This is an unnecessarily onerous additional requirement. Major applications (including EIA development) will already be supported by significant evidence. This will include, as necessary, a Design and Access Statement, Transport Assessment, Travel Plan, Noise Assessment, Air Quality Assessment, Lighting Strategy, Contaminated Land Assessment and Flood Risk Assessment. The current significant evidence required to support a planning application addresses the matters covered by Health Impact Assessment. The requirement for Health Impact Assessment therefore adds no value but adds to the burden of preparing a planning application.

6.3. The requirement for a Health Impact Assessment is unnecessary duplication of existing evidence, adds no value, is not consistent with the NPPF and is not justified.

Modifications to the Local Plan

6.4. Policy GD6: Health and Wellbeing should be modified and the requirement for Health Impact Assessment should be removed. The requirement does not satisfy the tests of soundness as it is not justified and does not add any value to supporting evidence for major planning applications.

Participation in Hearing Sessions

6.5. Infinity Park Derby LLP request to participate in the relevant hearing session to discuss the issues raised in this representation.

7. Policy GD9: Infrastructure and Developer Contributions

Part of Local Plan Representation relates to:	Policy GD9: Infrastructure and Developer Contributions
Do you consider the Local Plan is: Legally Compliant Sound	 No No
Which of the tests the Local Plan fails to meet? Positively Prepared Justified Effective Consistent with National Policy	 No
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

7.1. Draft Policy GD9: Infrastructure and Developer Contributions sets out that there may be occasions where the Council will require additional contributions including, for example, for public realm improvements and public art, and enhancement of cultural heritage.

7.2. Developer contributions should be fully justified in line with the Community Infrastructure Levy tests of being necessary, directly related and fairly and reasonably related in scale and kind.

7.3. It is however unclear how the requirements listed in criteria j, k and l can satisfy the tests in Community Infrastructure Levy.

Modifications to the Local Plan

7.4. Policy GD9: Infrastructure and Developer Contributions should be modified to confirm that developer contributions will only be sought where they satisfy the Community Infrastructure Levy tests of being necessary, directly related and fairly and reasonably related in scale and kind. Some of the requirements of Policy GD9 appear to go beyond what Community Infrastructure Levy Regulations allow, and without such clarification, appear to support the collection of contributions which do not meet legal tests.

Participation in Hearing Sessions

7.5. Infinity Park Derby LLP request to participate in the relevant hearing session to discuss the issues raised in this representation.

8. Policy EN1: Green & Blue Infrastructure

Part of Local Plan Representation relates to:	Policy EN1: Green & Blue Infrastructure
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet? Positively Prepared Justified Effective Consistent with National Policy	 **No** **No**
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

8.1. The policy includes reference in criterion c) to providing and enhancing natural connections to the surrounding GI network using features such as existing planting, trees, groups of trees, wetland, hedgerows and opportunities for wild food foraging for animals as the key starting point for green infrastructure proposals, and retain, reinforce and embed them into the design of the development. Whilst this is supported in principle, there will be occasions where existing planting, trees or hedgerows need to be removed to achieve safe access to a site or good design.

8.2. It is important that Draft Policy EN1 includes some flexibility and recognises that whilst existing features will provide a starting point for design decisions, it may not always be possible or appropriate to retain all existing features. It is suggested that an addition of the wording 'where possible' is added to the end of criterion c).

8.3. Policy EN9: Trees and Hedgerows also deals with existing trees and hedgerows (another example of duplication between policies) and starts with "Where possible existing trees should be retained in new developments" and then states "where appropriate" in relation to hedgerows. The proposed addition of "where possible" to policy EN1 would therefore be consistent with this later policy.

Maximising Green Roofs

8.4. The policy includes reference to criterion d) whereby major development proposals will be expected to maximise the use of green roofs and walls and demonstrate that the feasibility of integrating and maintaining these measures has been fully investigated. Green roofs on employment buildings are installed at the expense of openings for natural light (which goes against the energy hierarchy and reducing energy demand as part of the design) and adds

significant weight requiring structural reinforcement resulting in high installation costs and the need for expensive, ongoing maintenance to ensure there are no water leakages or fire hazard. Some occupiers do not want green roofs due to operational reasons. It should also be noted that there is an opportunity cost for green roofs as it prevents the possibility of installing solar panels which play an important part in meeting energy needs, reducing carbon emissions and mitigating climate change.

8.5. The policy therefore needs to be flexible to consider these implications and also this requirement will need to be tested through the Local Plan viability appraisal to ensure it is justified and positively prepared.

Urban Greening Factor

8.6. Draft Policy EN1 also requires all major development to maximise the provision of on-site green infrastructure and, where viable, for mixed-use or commercial development to provide an Urban Greening Factor score of at least 0.3.

8.7. Whilst the principle of urban greening is supported and greenfield development provides good opportunities for the surface cover types required to meet the standard (such as natural/semi-natural vegetation, street trees, SuDs and hedgerows), the key concern about this policy requirement is how it will interact with the need for efficient use of land and a 10% biodiversity net gain on a site.

8.8. The full implications of this proposed policy are not well understood as this is not a policy requirement we have previously encountered. It is unclear from the consultation documents what evidence there is to justify this policy or whether the implications have been assessed from a practical and viability perspective. It is suggested that the Council consider some worked examples to understand the implications of this additional policy requirement and it will be important this requirement is considered as part of the Whole Plan Viability Assessment.

Modifications to the Local Plan

8.9. Policy EN1: Green & Blue Infrastructure should be modified to ensure the Policy is effective in the following respects:

1. include wording ‘where possible’ is added to the end of criterion c) to ensure the policy is effective.

2. set out circumstances such as for construction or energy uses where green roofs may not be appropriate

3. set out how the urban green will operate alongside statutory Biodiversity Net Gain.

Participation in Hearing Sessions

8.10. Infinity Park Derby LLP request to participate in the relevant hearing session to discuss the issues raised in this representation.

9. Policy EN10: Biodiversity Net Gain

Part of Local Plan Representation relates to:	Policy XXX
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet? Positively Prepared Justified Effective Consistent with National Policy	 **No** **No**
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

9.1. Draft Policy EN10: Biodiversity Net Gain is an unnecessary duplication of a national policy. A 10% biodiversity net gain is a mandatory requirement with significant national guidance available to guide the process of achieving the requirements. Paragraph 16f of the NPPF advises that Local Plans should avoid unnecessary duplication.

9.2. The policy also adds an unnecessary sequential element to how off-site units are secured by seeking a sequential approach to prioritising offsite gains within the same ward as the development followed by adjacent wards and other sites within Derby. The biodiversity metric already incentivises offsite gains to be close to the development site. This is so that communities local to the development benefit from increases in biodiversity. The metric also provides an incentive to achieve off-site biodiversity gains in areas of strategic significance as set out in the local nature recovery strategy.

9.3. The City Council's proposed approach overreaches beyond existing guidance and adds a further level of complexity and constraint that is not required, and therefore inconsistent with the NPPF paragraph 16f

Modifications to the Local Plan

9.4. Policy EN10: Biodiversity Net Gain should be deleted as it unnecessarily duplicates or contradicts national policy on Biodiversity Net Gain.

Participation in Hearing Sessions

9.5. Infinity Park Derby LLP request to participate in the relevant hearing session to discuss the issues raised in this representation.

10. Policy EN11: Air Quality

Part of Local Plan Representation relates to:	Policy XXX
Do you consider the Local Plan is: Legally Compliant Sound	 Yes No
Which of the tests the Local Plan fails to meet? Positively Prepared Justified Effective Consistent with National Policy	 **No** **No**
Do you consider it necessary to participate in the hearing sessions?	Yes, we do wish to participate

Detailed Comments

10.1. This policy appears to go beyond mitigating the impacts of development, in criteria g) and h), requiring improvements to air quality. It is important that the policy does not go beyond what is directly related to development, any improvements can be encouraged but should not be required.

10.2. Furthermore, there is significant duplication between this policy and EN24: Pollution. It is unclear why a separate policy on Air Quality and Land Contamination is needed when the Pollution policy also covers these matters.

Modifications to the Local Plan

10.3. Policy EN11: Air Quality should be modified to delete criteria g) and h) as these are not justified and otherwise unnecessary.

Participation in Hearing Sessions

10.4. Infinity Park Derby LLP request to participate in the relevant hearing session to discuss the issues raised in this representation.

Appendix A: Site Location Plan

Rev | Date | By | Description

Consented Scheme
Planning Ref:
21/00460/FUL

Consented Scheme
Planning Ref:
01/14/00011

Consented Scheme
Planning Ref:
21/00585/FUL

Consented Scheme
Planning Ref:
21/00601/FUL

FIGURE 1.2

Site Location Plan

DRWG No: - REV: -

Date: 11/10/2022

Scale: 1:2500 @ A1

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Appendix B Logistics Needs Assessment Prepared for Infinity Park Derby LLP June 2025

Appendix C Addendum Update to2025 Logistics Need Assessment September 2026

Infinity Park Derby

Addendum Update to 2025 Logistics Needs Assessment

Prepared for Infinity Park Derby LLP

September 2026

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1 Introduction and the Subject Site

1.1 Report Purpose

1.1.1 This report is an update to the Infinity Park Logistics Needs Assessment that was published in June 2025. The purpose of this 2026 report is to provide an update to key relevant parts of the earlier report. The following tasks have been undertaken:

- To investigate the justification for the policy limitation on B8 uses applied to Infinity Park. This is done through a review of the Council's evidence base.
- To analyse leasing activity in Derby to determine the balance of demand between B2 and B8 uses.
- To update the market assessment and estimations of future demand and supply of I&L floorspace.

1.1.2 Infinity Park Derby (the 'Subject Site') is covered by Policy AC15 - Land South of Wilmore Road, Sinfin (Infinity Park Derby) in the adopted Derby City Local Plan Core Strategy (2017). Policy AC15 and the subsequent planning permission on the Subject Site limits the level of B8 development to 50% of overall floorspace.

1.1.3 This report considers whether there is sufficient justification for the limitation on the amount of B8 floorspace at the Subject Site.

1.2 Key Findings

1.2.1 This report finds that:

- New national planning policy supports flexibility in employment allocations and states that development plans should not be 'overly prescriptive' about acceptable uses unless there is 'a clear and justified rationale'. Savills review has identified no evidence that demonstrates the need or the rationale for a fixed 50% cap on B8 floorspace. The number appears to be arbitrary, unsupported by evidence, contrary to market demand, and detrimental to economic growth.
- The evidence base underpinning both the adopted and emerging local plans lacks quantitative justification for limiting B8 development and this is unusual because most local authority evidence bases explicitly distinguish between market dynamics for B2 and B8 uses. The need to make this distinction is presumably higher in cases where councils have policies that impact the balance between the two uses. Where the Council's employment forecasts do distinguish between manufacturing (B2) and logistics (B8), they indicate negative demand for B2 floorspace.
- The policy reflects a misunderstanding of how industrial supply chains operate. B2 and B8 use classes are interdependent and their distinction is increasingly blurred. They are increasingly viewed as part of the same industrial eco-system. Modern B2 manufacturing operations require B8 logistics in close proximity for activities such as the fulfilment of just-in-time production; the storage of raw materials and

assembled/manufactured components; the distribution of finished goods; freight consolidation; and many others.

- Attempts to establish premises for advanced manufacturing through subsidies and public-private initiative have not succeeded in creating sustainable, viable manufacturing hubs. This is demonstrated by the iHub building being used as a training facility (instead of a hub for advanced manufacturing start-ups) and the Nuclear Advanced Manufacturing Research Centre failing to attract occupiers. The latter is now occupied by the University of Derby, having been repositioned as the Infinity Prototyping Centre.
- Industrial and logistics market dynamics indicate a shortage of available premises, with availability rates significantly below market equilibrium. There are clear signs that occupier demand for B8 floorspace is being constrained by a shortage of available space.
- Analysis of leasing activity across Derby and South Derbyshire shows that approximately 72% of floorspace transacted since 2020 has been for B8 uses, compared with 11% for standalone B2 uses. Current occupier requirements demonstrate a similar pattern, with around 79% of floorspace sought through active enquiries being for B8 uses and 21% for B2 uses.
- Savills forecasts indicate that around three-quarters of industrial and logistics land requirements are likely to be associated with B8 development. At the same time, Derby has a limited supply of immediately available and deliverable employment land for either use. In this context, greater flexibility at Infinity Park would assist the market in responding to identified demand.

1.3 Report Structure

1.3.1 This report is structured as follows:

- **Section 2** reviews relevant national policy and the Council's adopted and emerging policy framework and employment evidence base underpinning the restriction on B8 development at Infinity Park;
- **Section 3** analyses property market conditions for the I&L industrial and logistics (I&L) sector[1] including demand and supply trends, leasing activity, occupier enquiries, and future demand and supply projections for B2 and B8 uses;
- **Section 4** sets out the report's conclusions regarding the justification for the B8 restriction and the role of Infinity Park in meeting future employment land needs;
- **Appendix A** details Savills full methodology for estimating future I&L;
- **Appendix B** presents Savills review of I&L supply in Derby City and South Derbyshire; and

[1] When we refer to the I&L sector we mean Light Industrial (formerly Blc use class now part of Class E), General Industry (B2 use class), and Storage and Distribution (logistics) (B8 use class). Effectively the primary use classes that require warehouses and factories (including ancillary offices), and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

- **Appendix C** presents occupier requirements and enquiries relevant to Infinity Park Derby; and
- **Appendix D** presents Savills' detailed review and classification of lease transactions within Derby and South Derbyshire.

1.4 The Subject Site

1.4.1 Infinity Park Derby (the 'Subject Site') extends to approximately 48.8ha and comprises the majority of the 86.6ha of employment land that is covered by Policy AC15 - Land South of Wilmore Road, Sinfin (Infinity Park Derby) ('Policy AC15') in the adopted Derby City Local Plan and Draft Policy E5: Land South of Wilmore Road (Infinity Park) in Derby's emerging local plan.

1.4.2 The Subject Site (shown in **Figure 1.1)** has now reached the limit of the B8 floorspace development that can be achieved within the context of Policy AC15 but is seeking to have the limit removed to meet existing demand.

Figure 1.1 Map of the Subject Site (Infinity Park Derby) and Policy AC15



Source: Derby City Local Plan Part 7 Core Strategy 2077, Wilson Bowden

2 Employment Policy & Evidence Base Review

2.1 Introduction & Summary

2.1.1 This section provides a high-level review of the existing and emerging policies relevant to the Subject Site. It also reviews the employment evidence.

2.1.2 The review includes a summary of the relevant parts of the National Planning Policy Framework (NPPF). It also revisits the same evidence base documents that were reviewed in the 2025 Logistics Needs Assessment. This is to gain a more in-depth understanding of the Council's approach to assessing the dynamic relationship between B2 and B8 uses and the evidence that justifies the 50% policy limitation imposed on the Subject Site.

2.1.3 The key findings of the review are that:

- The newly adopted NPPF (August 2026) supports the need for B8 uses. It also states:

  '...development plans should not be overly prescriptive about the types of uses or unit sizes that would be acceptable on particular sites (other than where there is a clear and justified rationale...').

- Both Derby's existing and emerging local plan limit B8 uses to 50% of overall floorspace at the Subject Site. However, we have scrutinised the local plans and the Council's evidence base and they provide no clear and justified rationale for the limitation.

- In the few instances where the Council's three relevant evidence base documents present analysis that distinguishes between demand for B2 and B8 floorspace, the results are stark. Demand for B2 floorspace is strongly negative and demand for B8 is slightly negative to positive. This data provides justification for removal of the limitation on B8 floorspace in favour of B2 floorspace.

- In spite of the Council's policy that places limitations of B8 floorspace at the Subject Site, it is unusual that there is so little analysis or policy justification that distinguishes between the demand for B2 and B8 floorspace. Local authorities' evidence bases typically disaggregate demand between B2 and B8 floorspace demand to justify its policies. The Council does not.

- Based on Savills experience, the policy reflects a misunderstanding of how industrial supply chains operate. B2 and B8 use classes are interdependent and the distinction between them is becoming increasingly blurred. The two use classes are increasingly viewed as part of the same industrial eco-system. Modern B2 manufacturing operations require B8 logistics in close proximity for activities such as the fulfilment of just-in-time production; the storage of raw materials and assembled/manufactured components; the distribution of finished goods; freight consolidation; and many others.

2.2 National Policy

Superseded NPPF (December 2024)

2.2.1 The now superseded 2024 version of the NPPF was first published in December 2024 and subsequently amended in February 2025. It set out the government's planning policies for England and how these policies should be applied.

2.2.2 Paragraph 87 stated *'planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.'*

2.2.3 The 2024 NPPF paragraph 31 also specifically referenced the I&L sector:

The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses. as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land).'

Adopted NPPF (August 2026)

2.2.4 The Government published its latest version of the NPPF in August 2026. This version of the NPPF provides even more support for the modern logistics sector than the previous version.

2.2.5 The document makes clear that economic growth is the number one mission of this government. Towards this goal, it states:

'...build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth. innovation and improved productivity: ' *(page 5)*

2.2.6 It introduces significant provisions under Policies EI-E3 and S5 to support economic growth and modern logistics.

2.2.7 **Policy EI Providing the Conditions for Long Term Economic Growth** states:

To *support business investment and employment, development plans should, at the most appropriate level:[..]*

Allocate sites to implement the economic vision and strategy and meet existing and anticipated needs over the plan period. paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific locational requirements of different sectors. (page 40)

2.2.8 Part 2 of the draft policy states:

'Given changing commercial property requirements, development plans should not be overly prescriptive about the types of uses or unit sizes that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage)' (page 47)

2.2.9 **Policy E2 Meeting the Need for Business Land and Premises** states:

'To support business growth, substantial weight should be given to:

The economic benefits of proposals for commercial development which allow businesses to invest, expand and/or adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy, support improvements in freight and logistics and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones;' (page 47)

2.2.10 **Policy E3 Freight and Logistics** states:

'To support the effective and efficient movement of goods, development proposals for freight and logistics uses and associated infrastructure should:

a) Have good access to transport networks (including via sustainable transport modes where possible) appropriate to the type of development;

b) Be sited and designed to limit environmental impacts (such as through the co-location or intensification of facilities to limit vehicle movements, provision of electric vehicle charging infrastructure and sensitive building design and landscaping). The impact on local residents or other neighbouring uses should be acceptable, taking into account proposed mitigation, especially where night-time operations will be required; and

c) Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use...)' (page 47-42)

2.2.11 **Policy SS Principle of Development Outside Settlements** supports planning applications outside settlements that:

'Comprise major development for freight and logistics purposes which accords with policy E3.' (page 26)

2.3 Adopted Local Plan

2.3.1 The adopted local plan allocates Infinity Park (referred to as Land South of Wilmore Road) for employment uses.

2.3.2 Adopted **Policy AC15 (Land South of Wilmore Road, Sinfin)** sets out that Infinity Park is intended to be a high quality business park that accommodates BI, B2 and B8 uses. Specifically, the objective is to develop a unique, innovation and technology park.

2.3.3 The allocation policy limits the level of B8 development across the whole site (i.e. the

allocated area) to 50% of overall floorspace. The planning permission applicable to the Subject Site is covered by this restriction. The stated reasons for this limit are:

- To ensure that the development 'is generally in keeping with the vision for the area of the city' and
- To ensure the development 'does not prejudice the development of other employment sites within the City where large scale B8 development would be more desirable'.

2.3.4 This links back to the objective for Infinity Park to 'showcase and support innovation related to the automotive, rail, aerospace and energy sectors' as well as 'provide high quality accommodation for companies in the manufacturing and manufacturing services sectors.'

2.3.5 The Council considers that the development of further B8 floorspace is incompatible or not complementary with manufacturing uses and therefore the vision for the Subject Site. This conclusion does not recognise the linkages between B2 and B8 uses and the efficiency and productivity benefits from their co-location. It is Savills conclusion that the Council should not seek to dictate what the appropriate balance between the two uses should be.

2.4 Adopted Local Plan Employment Evidence

Derby Housing Market Area (HMA) Employment Land Review (2008) ('2008 ELR')

2.4.1 The 2008 ELR includes forecasts for employment land in the Derby HMA which is comprised of the Amber Valley, Derby City and South Derby based on past trends in employment land take-up using monitoring data from Derbyshire County Council. Gross land take-up between 1992-2006 was projected forward on a linear basis for the 2006-2026 period.

2.4.2 The ELR also reviewed econometric forecasts. BE Group reviewed forecasts in the East Midlands Land Provision Study (2006) prepared by Roger Tym and Partners for the East Midlands Regional Assembly. These forecasts are based on Experian economic forecasts for jobs calibrated to align with the level of housing provision proposed in the emerging regional plan.

2.4.3 Forecasts for floorspace and land requirements were then derived from this, using the approach of relating employment by sector to use classes; applying standard employment densities to this to derive floorspace forecasts; and using a 40% plot ratio to convert this to net requirements for additional land. BE Group then translated the forecasts to cover the 2006-26 period on a linear basis to provide estimates of employment land requirements over the plan period.

2.4.4 **Table 2.1** sets out the forecast demand for employment land between 2006 and 2026. Demand is negative for B2 uses and positive for B8.

Table 2.1 Forecast Demand for Employment Land (2006-2026) in Derby HMA

Sector	Derby HMA (ha)
Office	54
Industrial (B2)	-61
Warehouse (B8)	4
Total	**-3**

Source: Derby Housing Market Area (HMA) Employment Land Review (2008)

Derby HMA Employment Land Review: Forecasts Update (2073) ('2073 ELR')

2.4.5 This report updated the forecasts for employment land over the 2008-2028 period for each of the three local authority areas which together constitute the Derby Housing Market Area (HMA): Derby City, South Derbyshire and Amber Valley.

2.4.6 This report used three forecasting techniques:

- Labour demand;
- Labour supply policy-on; and
- Past take-up.

2.4.7 The report determined that the Labour Demand Scenario, based on the Experian forecasts, indicated a very limited requirement for additional employment land and that it was likely to be too pessimistic. The report also stated that the Past Take-Up Scenarios were likely to overestimate the level of additional employment demand. The Labour Supply Policy-On Scenario was determined to support employment growth in line with growth in labour supply. The forecasts for Derby are presented in **Table 2.2.** The information does not provide disaggregated demand by use class. This is unusual, especially for an evidence base document that was being used to support a local plan which has policies based on use class limits. There is no way to determine the relative level of demand for each of the use classes.

Table 2.2 Summary of Forecasts of Employment Land Demand in Derby (2008-2028)

Forecast Scenario	Land Requirement (ha)
Labour Demand	26.6
Policy-On Labour Supply	130.1
Past Take-up (20-yr Completions)	142.3
Past Take-up (10-yr Completions)	132.7

Source: GL Hearn

2.5 Emerging Local Plan

Local Plan for Derby 2023 to 2043 Regulation 79 Submission Draft Plan (2026) ('the Reg 79 Plan')

2.5.1 The most recent version of the emerging local plan is the Reg 19 Plan. It is informed by the 2023 ELR which is reviewed below.

2.5.2 **Draft Policy EI: New Employment Locations** sets out the strategic direction of Derby's approach to employment land. In quantitative terms, 133 ha of employment land is allocated for offices, research & development (R&D), manufacturing and logistics premises. The split of land across the different uses is not defined.

2.5.3 The Reg 19 Plan adopts the recommendation of the Derby City Council and South Derbyshire District Council Employment Land Review 2023 ('2023 ELR') to use the forecast method based on historic take-up rates to inform the allocation of new employment land. This results in an identified need of about 88.5ha. The allocation of 133 ha exceeds the need forecasted in the 2023 ELR.

2.5.4 The draft policy directs the majority of demand to five strategic employment locations including Infinity Park, which is expected to deliver 75ha. This is over half of the total draft allocations for employment land (133ha).

2.5.5 **Draft Policy ES: Land South of Wilmore Road (Infinity Park)** corresponds to adopted **Policy AC15 - Land South of Wilmore Road, Sinfin (Infinity Park Derby).** The policy seeks to promote the park for a mix of B2, B8, Eg(i-ii) uses.

2.5.6 Like the adopted policy, the draft policy limits the level of B8 development at the Subject Site to 50% of total floorspace. Reference is made to clean energy and advanced manufacturing.

2.5.7 Part C of the draft policy states:

'Limit the amount of B8 development across the whole site to 50% of overall floorspace, excluding complementary uses.'

2.5.8 The supporting text states:

"To align with the objectives and to safeguard the nationally significant potential of the site, the Council will not permit more than 50% of the overall floorspace (excluding complementary uses) to be used for logistics (B8)."

2.6 Emerging Local Plan Employment Evidence

Derby City Council and South Derbyshire District Council Employment Land Review 2023 ('2023 ELR')

2.6.1 This report was undertaken on behalf of the City of Derby and the District of South Derbyshire. Unlike the earlier ELRs, the 2023 ELR excludes Amber Valley which has a different timescale for its own local plan review.

2.6.2 The 2023 ELR uses three forecasting techniques:

- Historic Land Take-Up;
- Employment Based Forecast (Policy On/ Policy Off); and
- Resident Workforce Forecast.

2.6.3 The report states that all three forecasts have limitations (page 286). The report identified the Historic Land Take-Up as its preferred method. However, like the earlier ELRs, the method does not consider how demand is broken down by the different employment uses. (This is unusual, especially given that the existing and emerging local plan have used-based policies.) The results from a selection of employment land demand forecasts are presented in **Table 2.3.** The preferred Historic Land Take-up method is shown alongside a range of other forecasts which are relatively similar in scale.

Table 2.3 Employment Land Demand for Derby for Different Timescales

Timeframe	Historic Land Take-Up (ha)	Employment Based (Policy On) Oxford Economics	Employment Based (Policy On) Cambridge Econometrics	Employment Based (Policy On) Experian	Resident Based (Growth Sectors)
2022-2039	77.8	37.9	62.0	64.9	71.8
2022-2040	81.4	36.9	62.2	65.7	75.1
2022-2041	85.0	35.8	62.5	68.0	78.2

Source: Derby City Council and South Derbyshire District Council Employment Land Review 2023

2.6.4 In spite of the Council not setting out the relative balance of demand between the different uses, **Table 2.4, Table 2.5** and **Table 2.6** set out the employment forecasts most related to B2 and B8 uses for both Derby and South Derbyshire. For Derby, B2 manufacturing employment is expected to contract significantly which translates into negative demand for manufacturing floorspace. The demand for B8 floorspace is significantly less negative and in the case of Experian, positive.

Table 2.4 Oxford Economics Employment-Based Forecast (2021-2041)

Sector	Employment Growth	Floorspace Demand (sqm)
Derby		
Manufacturing (B2)	- 9,632	- 346,750
Transport and storage (B8)	- 679	- 22,824
South Derbyshire		
Manufacturing (B2)	- 2,394	- 86,184
Transport and storage (B8)	-130	- 4,373

Table 2.5 Cambridge Econometrics Employment-Based Forecast (2022-2041)

Sector	Employment Growth	Floorspace Demand (sqm)
Derby		
Manufacturing	- 984	- 35,424
Transport and storage	- 3	- 101
South Derbyshire		
Manufacturing	- 30	-1,080
Transport and storage	179	6,014

Source: Derby City Council and South Derbyshire District Council Employment Land Review 2023

Table 2.6 Experian Employment-Based Forecast (2022-2040)

Sector	Employment Growth	Floorspace Demand (sqm)
Derby		
Manufacturing	0	0
Transport and storage	1,700	57,120
South Derbyshire		
Manufacturing	1,000	36,000
Transport and storage	200	6,720

Source: Derby City Council and South Derbyshire District Council Employment Land Review 2023

2.7 Savills Observations of Employment Policy and the Council's Evidence Base

2.7.1 In spite of Derby's adopted and emerging local plans maintaining policies which limit the amount of B8 floorspace, Savills are unable to identify evidence in the Council's evidence base that justifies it.

2.7.2 The 2023 ELR provides floorspace demand figures for the manufacturing (B2) and transport & storage (B8) sectors. However, these show overwhelmingly negative demand for B2 uses and negative-to-positive demand for B8 uses. There is no evidence that justifies a 50% limit on B8 floorspace.

2.7.3 The only justification that Savills identify as justification for the limit is where the Council theorises that it helps to support the vision and objectives of the East Midlands Investment Zone (EMIZ). The vision of the EMIZ is set out on its website:

'Our vision is to establish ourselves as the national hub of excellence and the primary destination for clean energy technology and advanced manufacturing investors. This will drive local economic growth and enhance productivity, while protecting the environment for both current and future generations.'[2]

2.7.4 However, no evidence is provided which explains how the limitation helps to realise the vision. The employment evidence that underpins the adopted and emerging local plans does not meaningfully distinguish between demand for B2 and B8 floorspace. That is unusual for an evidence base document under any circumstance. (The vast majority of evidence base documents in the planning system assess the needs of each employment sector and then aggregates them to identify a total employment land demand figure.) It is particularly unusual for an evidence base that is underpinning policies based on setting floorspace limits on different employment use classes.

2.7.5 Not only does the Council's evidence base provide no evidence-based justification for the limit it places on the provision of B8 floorspace, but its position reflects a misunderstanding of how industrial supply chains operate. B2 and B8 premises are highly interdependent and the distinction between them has become increasingly blurred. Industrial companies are increasingly co-locating the two activities to increase their efficiency and productivity. Modern B2 manufacturing operators require co-located B8

[2] Downloaded from https://www.eastmidlands-cca.gov.uk/what-we-do/the-economy/east-midlands-investment-zone/

logistics for a range of activities that include the fulfilment of just-in-time production; the storage of raw materials and assembled/manufactured components; the distribution of finished goods; and freight consolidation.

2.7.6 With regard to advanced manufacturing operations in particular, Savills industrial agents suggest that the proportion of B2 floorspace within their premises is typically 25% to 30%, with the rest of the floorspace being for B8 activity. In this context the 50% limit on B8 floorspace is arbitrary and does not reflect how the production and distribution of manufactured goods is actually executed. No national benchmarks exist which set out the appropriate balance between B2 and B8 floorspace because it often varies from project to project because it is dependent upon the occupiers' operations requirements. However, B8 activities typically take up the majority of floorspace.

3 Market Assessment of the I&L Sectors

3.1 Introduction & Summary

3.1.1 This section revisits the assessment of demand and supply market signals for Derby, Derby & South Derby (DSD), and the wider property market area (PMA). The primary aim of this analysis is to focus on the market strength of the different components of the I&L sector, with particular focus on the B2 and B8 use classes.

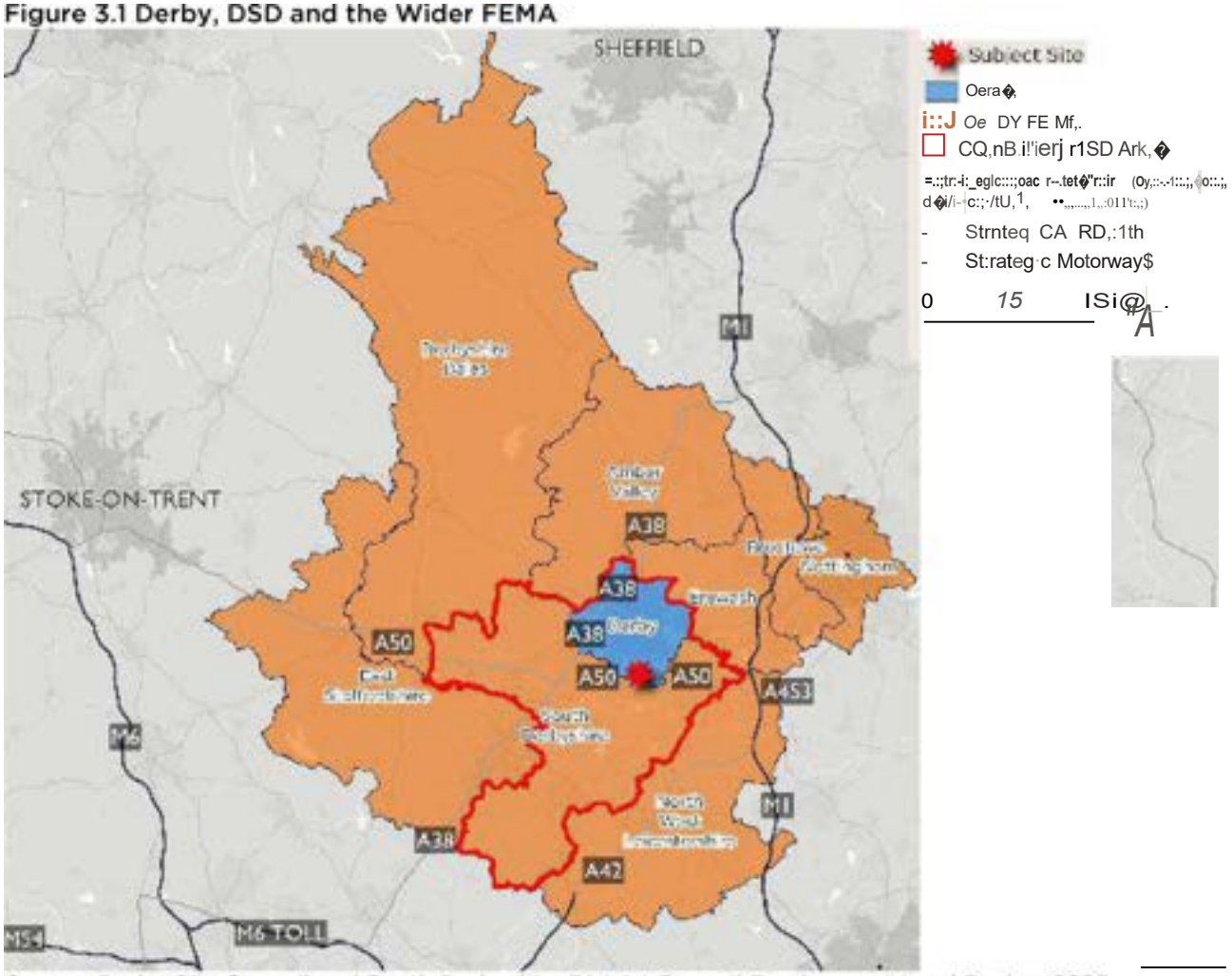
3.1.2 The key findings of this section are:

- The I&L market is supply constrained in all sectors and geographies covered.
- Demand for B8 floorspace is demonstrably stronger than B2. However, Derby's supply constraints are limiting B8 activity and thus, overall I&L market activity.
- Savills detailed analysis shows that at least 72% of floorspace leased was for B8 uses. 11% was for B2 uses. The rest of the transactions comprised combinations of different uses including B2/B8 (8%).
- The majority of floorspace in Derby and DSD is comprised of B2 premises in spite of the strong demand for B8 floorspace. Whilst inventory is growing in both sectors, the B8 sector is being constrained.
- Savills review of enquiries that incorporate Derby within the area of search estimates that about 21% of floorspace demand is for B2 uses and 79% is for B8 uses.

3.2 Property Market Area

3.2.1 The first step in the analysis is to establish the relevant geographies. Like in the earlier Savills 2025 Logistics Needs Assessment, we consider Derby, Derby & South Derby (DSD), and Derby's Functional Economic Market Area (FEMA) which we treat as the PMA. The geographies are shown in **Figure 3.1.**

Figure 3.1 Derby, DSD and the Wider FEMA



Source: Derby City Council and South Derbyshire District Council Employment Land Review 2023

3.3 Market Assessment

The J&L Market is Supply-Constrained in All Sectors

3.3.1 This subsection presents an assessment of market signals across the different I&L use classes. The key metrics are summarised in **Table 3.1.**

3.3.2 Within Derby and DSD, inventory in the B2 sector is greater than B8. This likely reflects the areas' base of traditional manufacturing and the symbiotic relationship between B2 and B8 floorspace. In the wider PMA, the majority of floorspace is for B8 uses.

3.3.3 With regard to floorspace availability, the market is supply constrained across all use classes and geographies in **Table 3.1.** An 8% availability rate is commonly referred to as the level in which demand and supply are in balance[3]. Below this level, available floorspace is scarce and rents tend to increase because occupiers compete for limited stock. The availability rates in Derby, DSD and the PMA are currently 3.6%, 4.2% and 4.7%

[3] An 8% equilibrium has been sourced as the point where a market is in balance in the following publications:
- GLA's Land for Industry and Transport Supplementary Planning Guidance (SPG) (2012);
- London Plan (2021);
- British Property Federation's CBPF') Levelling Up - The Logic of Logistics (2022); and
- 'Industrial and Logistics: The Infrastructure of Everything' (2026) reports.

respectively. They are significantly constrained. Across the different use classes, the rate of availability of B8 is slightly higher. This is due to the relatively strong supply response and the availability of older premises that are not viewed by the market as commercially attractive and unlikely to be taken up.

3.3.4 We have also reviewed the large unit segment of the I&L market (units over 9,290 sqm or 100,000 sqft) for Derby and DSD. This segment of the market is also supply constrained, with limited availability

3.3.5 With regard to demand and supply, since 2015 the average net absorption (demand) and net deliveries (supply) as a proportion of inventory have been broadly consistent. This suggests that when new floorspace is completed, it is taken up rapidly.

3.3.6 The analysis highlights the relative strength of the B8 sector compared to the B2 sector. The B8 sector has recorded the highest levels of net absorption and net deliveries as a proportion of inventory. The strength of B8 demand is more evident in the wider PMA where supply is less constrained. In Derby and DSD, the distinction in performance between B2 and B8 is less pronounced because the supply of B8 premises is artificially limited.

3.3.7 In the less constrained PMA, for the past decade, B8 demand represented about 85% of total demand. In Derby, B8 demand represented about 50% of total demand.

Table 3.1 Market Indicators for Derby, DSD and the FEMA

	Total Inventory (sqm)	Current Availability Rate	Available Floorspace	Average Net Absorption (2015-2025) (sqm)	Average Net Absorption as% Total Inventory (2025)	Average Net Deliveries (2015-2025) (sqm)	Average Net Deliveries as % of Total Inventory (2025)
Derby							
E(g)(iii)	187,999	2.9%	5,452	1,521	0.8%	1,581	0.8%
B2	1,069,814	2.8%	29,955	13,639	1.3%	15,110	1.4%
B8	948,903	6.4%	60,730	14,912	1.6%	17,155	1.8%
All I&L (>9,290 sqm)	1,319,035	3.9%	50,979	22,925	1.6%	27,515	1.9%
All I&L	**2,463,175**	**3.6%**	**88,674**	**31,780**	**1.3%**	**34,561**	**1.4%**
Derby & South Derby (DSD)							
E(g)(iii)	227,103	2.4%	5,450	799	0.4%	1,158	0.5%
B2	1,742,618	1.7%	29,625	17,881	1.0%	19,333	1.1%
B8	1,613,278	7.4%	119,383	22,153	1.4%	30,628	1.9%
All I&L (>9,290 sqm)	2,375,643	4.0%	95,437	33,313	1.3%	44,688	1.7%
All I&L	**3,845,745**	**4.2%**	**161,521**	**42,213**	**1.0%**	**51,744**	**1.3%**
PMA/FEMA							
E(g)(iii)	983,819	3.3%	32,466	-1,062	-0.1%	-376	-0.1%
B2	3,312,424	2.1%	69,561	24,919	0.8%	24,798	0.7%
B8	8,349,536	6.3%	526,021	165,731	2.0%	196,827	2.4%
All I&L	**13,743,781**	**4.7%**	**645,958**	**195,109**	**1.4%**	**224,641**	**1.6%**

Source: Savills analysis of Costar data (2026)

B8 Floorspace Demand (Net Absorption) is Dominant, With Intermittent Demand for B2

3.3.8 This section looks at demand across the different I&L sectors in greater detail. **Figure 3.2, Figure 3.3** and **Figure 3.4** present the historic net absorption in the I&L market across the different I&L sectors. B8 demand has accounted for the largest share of occupier demand across the three geographies. However, in Derby there have been several instances in which B2 demand has been particularly strong. That was in 2016 and 2023 and were largely due to single large transactions.

3.3.9 Whilst demand for B2 uses is an important component of overall demand, the consistently stronger absorption of B8 floorspace suggests that it is the principal driver of net occupier demand.

Figure 3.2 Annual Net Absorption in Derby's I&L Market by Use Class (2015 - 2026 YTD)

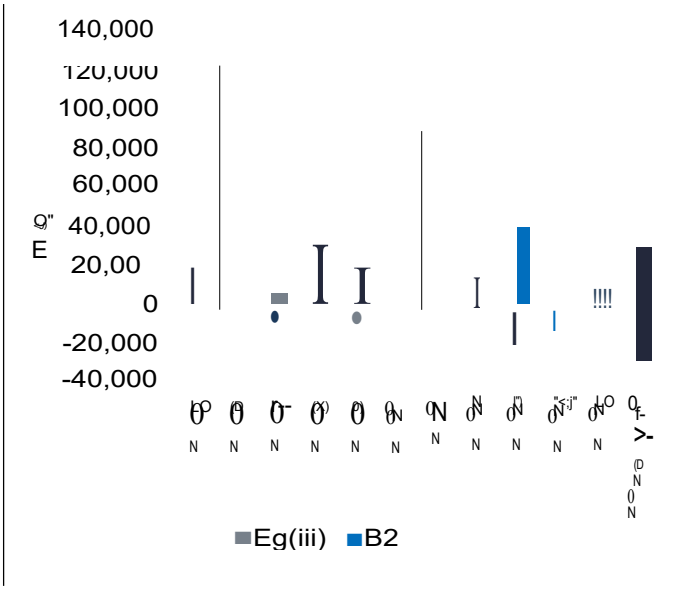


Figure 3.3 Annual Net Absorption in DSD's I&L Market by Use Class (2015 - 2026 YTD)

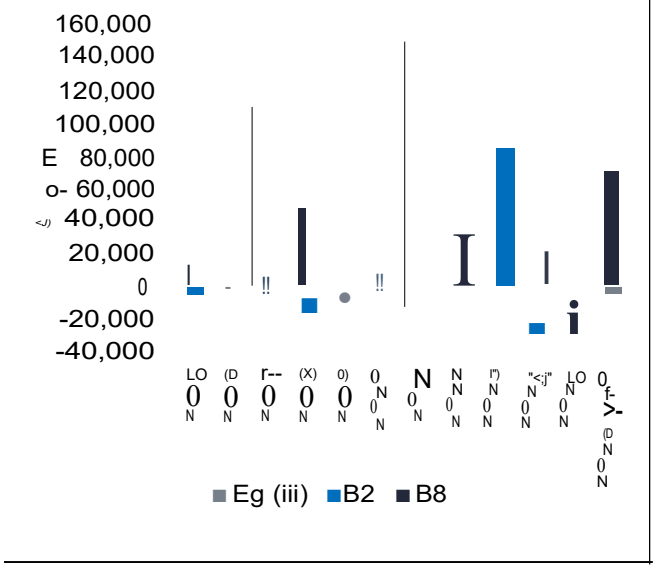
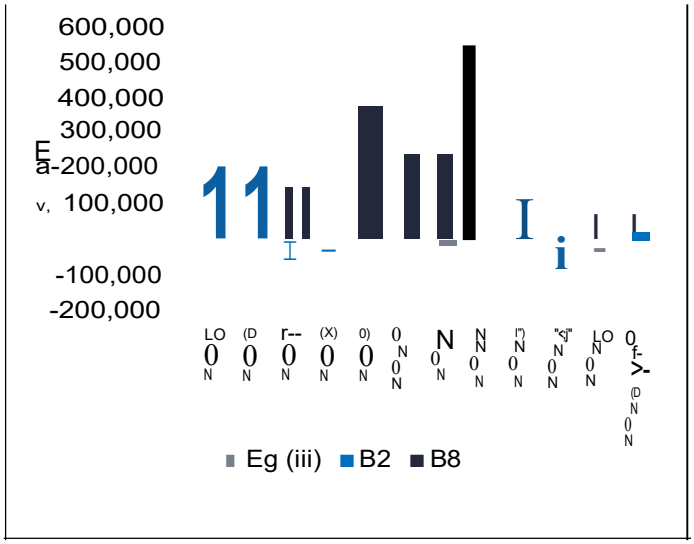


Figure 3.4 Annual Net Absorption in the FEMA's I&L Market by Use Class (2015 - 2026 YTD)



Source: Savills analysis of Costar data (2026)

B2 Inventory in Derby and DSD has been Maintained But the BB Sector is Constrained

3.3.10 This section assesses the size of the I&L sectors in Derby relative to the overall population and to the working age population. This is an update of the analysis that was undertaken in the 2025 Logistics Needs Assessment. Derby has a significantly smaller B8 sector relative to its B2 sector which is shown in **Figure 3.5.** Derby's B2 sector comprises 3.9 sqm per capita compared to just 3.3 sqm of B8 floorspace. That is 18% more B2 floorspace than B8 floorspace on a per capita basis. The ratio of B2 to B8 is marginally smaller: the B2 sector has about 7% more floorspace per capita than the B8 sector.

3.3.11 A similar trend is found when comparing I&L inventory to the total population of these areas. Given the relative strength of demand for B8 premises, the relatively limited supply

of B8 floorspace limits Derby's capacity to participate in the sector's growth and economic potential.

3.3.12 In spite of Derby's concentration of B2 premises and strong demand for B8 premises, the inventory of B8 premises has grown just slightly faster than B2 premises over the past decade, as shown in **Figure 3.6**. Since 2015, B8 inventory grew 24%, compared with 19% of B2 inventory. Despite the strong growth and supply response within the B8 sector, the expansion of B2 inventory has been maintained.

Figure 3.5 Derby and DSD I&L Floorspace Provision

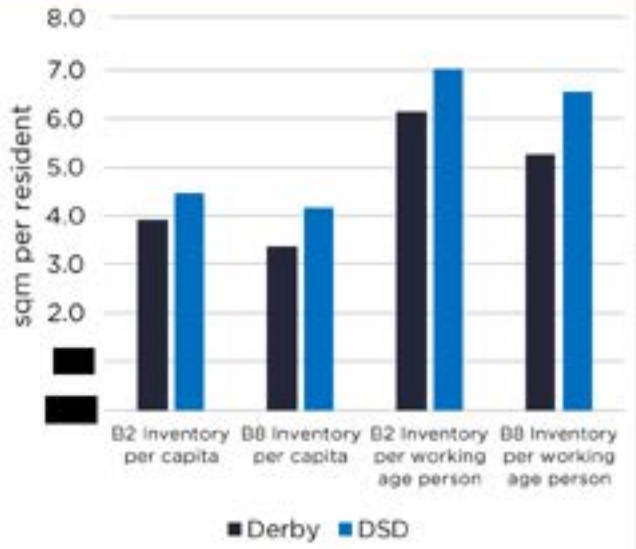
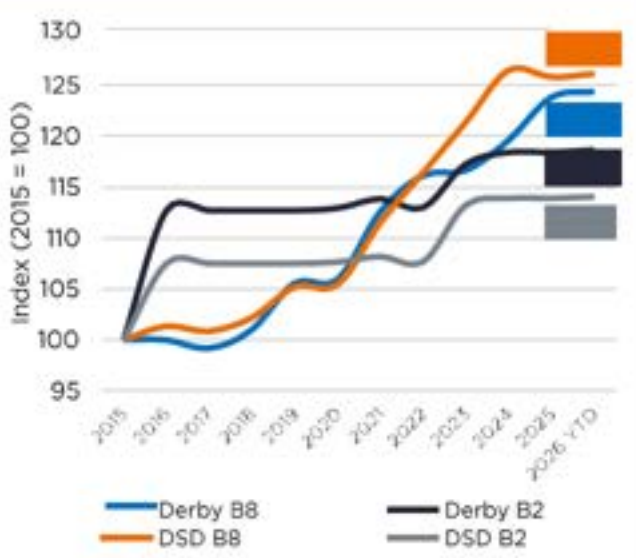


Figure 3.6 Derby and DSD Inventory Growth (2015-2026 YTD)



Source: Savills analysis of CoStar data (2026)

I&L Rental Growth has outpaced inflation, Especially in the B8 Sector

3.3.13 Rental growth is another market indicator related to the balance between supply and demand. When demand exceeds supply, rental growth is typically higher as occupiers compete for limited stock. This in turn drives up rents. **Figure 3.7** and **Figure 3.8** show that overall, I&L rents in Derby and the FEMA grew by 56% and 65% respectively between 2015 and 2025. This is significantly above the rate of inflation (38%) over the same time period.

3.3.14 B8 rents have experienced the strongest growth of all I&L use classes, increasing by 61% in Derby and 69% across the FEMA between 2015 and 2025. In both markets, B8 was the only I&L use class to outperform the All I&L average highlighting the extent of the imbalance between supply and demand.

Figure 3.7 Indexed Rental Growth in Derby's I&L Sector vs Inflation (2015-2025)

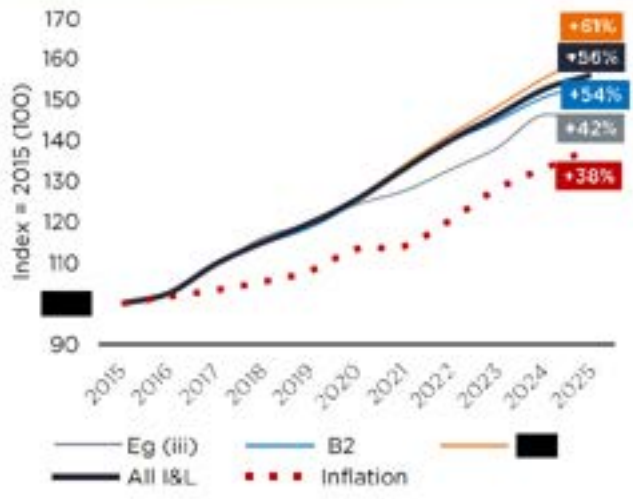
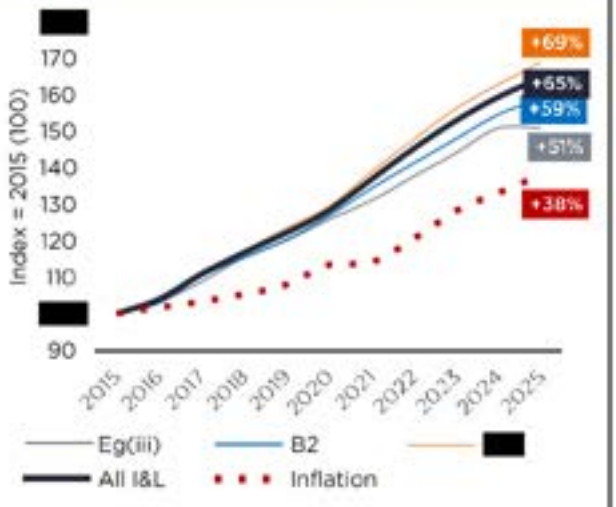


Figure 3.8 Indexed Rental Growth in the FEMA's I&L Sector vs Inflation (2025-2025)



Source: Savills analysis of CoStar data (2026)

3.4 Detailed Lettings Analysis

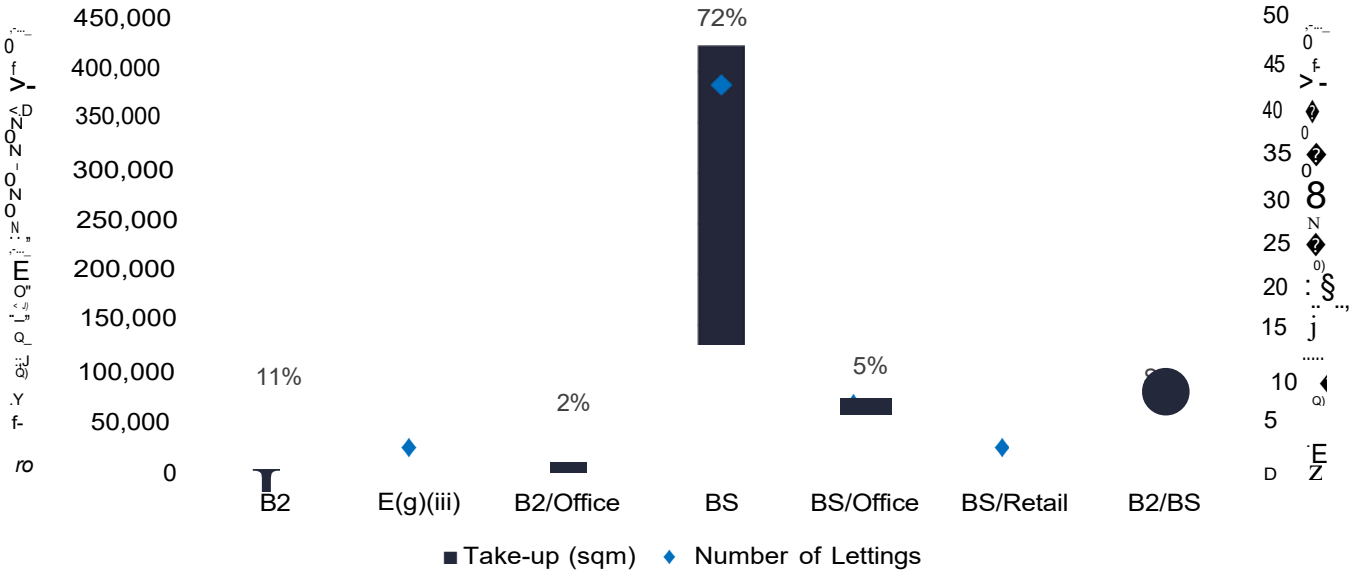
Lettings Review in DSD Points to Demand for B8, As well as Some B2 and Mixed B2/B8

3.4.1 This section presents a detailed review of lease transactions in the combined DSD area. (The details of the leases is presented in **Appendix D.**) This is the geography linked to the Council's evidence base and to analysis that was undertaken in the Savills 2025 Logistics Need Assessment. The aim of the exercise is to understand the actual activities within the premises being leased based through in-depth research. The analysis provides more detailed analysis to complement the high-level reporting that is found in the CoStar database.

3.4.2 Savills reviewed all I&L lease transactions in DSD since 2020. The focus was primarily on transactions of over 929 sqm (10,000 sqft). At this floorspace size, the nature of the activity can be more clearly ascertained through complementary research. We identified the occupiers' activities using a range of sources such as marketing material, Google Streetview, and websites which cover I&L activity. Each lease transaction was categorised into one of the employment uses: (E(g)(iii), B2, B8, or a mix of different uses. Premises which accommodated activities that had no I&L activity were discounted.

3.4.3 **Figure 3.9** shows that the majority of leasing activity (both by floorspace and lease transactions) was for B8 uses (72% of floorspace leased). There were a range of categories that combined B8 uses with other uses that also had a significant presence. This included B2/B8 (8%), B8/Office (2%), and B8/Retail (1%). This points to the blurring of lines between different uses, especially within the I&L sector between B2 and B8. Take-up related to B2 standalone uses was also significant (11%), albeit at a lower level compared to B8 uses.

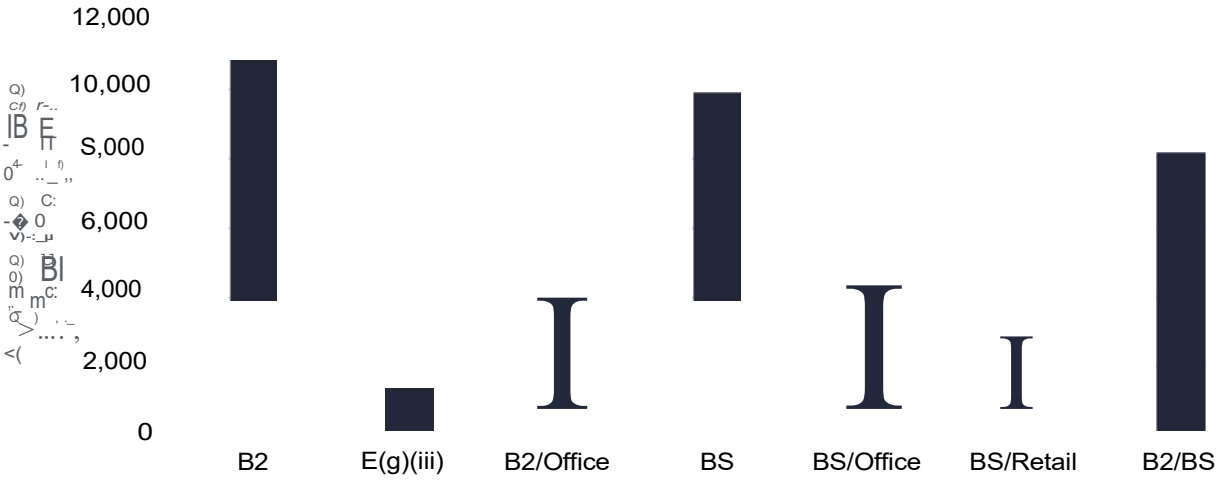
Figure 3.9 Take-up, Number of Lettings and % by Floorspace Transacted in DSD Since 2020



Source: Savi/ls analysis of Costar data (2026)

3.4.4 **Figure 3.10** presents the average size of lease transactions by use category. It shows that the largest leases are for standalone B2 or B8 uses or a combination of the two uses.

Figure 3.10 Average Deal Size by I&L Sector in DSD since 2020



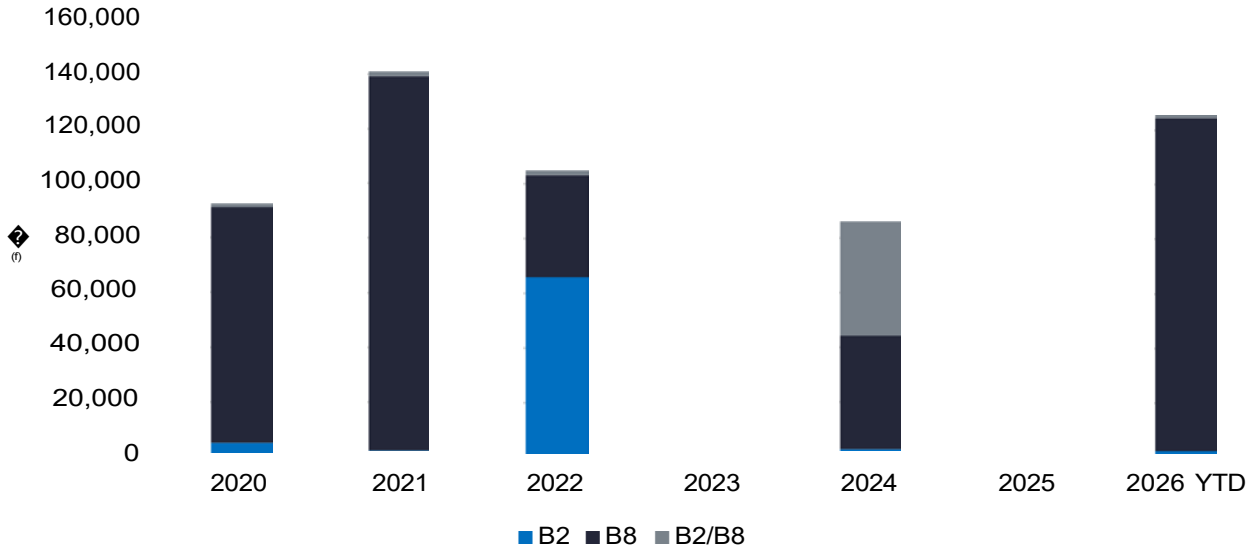
Source: Savi/ls analysis of Costar data

3.4.5 Data was also assessed in a time series. **Figure 3.11** shows the variable nature of leasing in the I&L market since 2020. (The analysis incorporates all the lease transactions in **Figure 3.6** and allocates them according to their primary I&L use. E(g)(iii) is allocated to B2.)

3.4.6 The analysis shows that B2 activity was particularly strong in 2022. This was primarily the result of a single large transaction by a food manufacturer. The nature of demand for B2 premises is an important component of I&L demand but it is intermittent whereas demand for B8 floorspace tends to be more stable.

3.4.7 So far in 2026 to date, DSD is exhibiting particularly strong demand, reaching about 125,000 sqm within the first half of the year. This is primarily being driven by demand for B8 premises.

Figure 3.11 Time Series of Take-up by I&L Sector in DSD Since 2020



Source: Savi/ls analysis of Costar data (2026)

3.5 Enquiries Analysis

Floorspace Enquires Are Dominated by a Search for B8 Premises

3.5.1 This section summarises live enquiries for I&L floorspace that incorporate Derby in the area of search. It updates analysis included in the previous report. (The list of live enquiries are presented in a table in **Appendix C.)**

3.5.2 Savills estimated each enquiry's floorspace quantum and categorised it as either B2 or B8. Instances where the enquiry was for a combination of B2/B8, we assumed that it was split 50/50. When the enquiry included a range of floorspace or acreage, we used the midpoint. For enquiries based in acres, we applied a 35% site coverage ratio to estimate the floorspace.

3.5.3 The results of the analysis are presented in **Table 3.2.** B2 requirements comprise about 21% of floorspace sought; B8 requirements comprise 79%. This is consistent with the breakdown in historic demand (net absorption) covered earlier in this section. The majority of the requirements were for premises above 9,300 sqm (100,000 sqft).

Table 3.2 I&L Floorspace Enquires by Sector		
Enquiry Type	**Enquires (sqm)**	**Enquires (% of total sqm)**
B2 Premises	201,903	21.1%
B8 Premises	755,224	78.9%
Total	**957,127**	**100.0%**

Source: Sav,JIs analysts of data from Saffoways (2026)

3.6 Case Studies Highlight Interdependencies Between B2 and BS Activities

3.6.1 This section presents two case studies that demonstrate the interrelationship and dependencies between B2 and B8 activities.

- **Indurent Park, Derby** has planning permission for B2 and B8 use and has now been completed. The majority of the units are now let and two units remain. Whilst demand has primarily been for B8 uses, a number of them are manufacturers that require B8 floorspace. Also, some of the occupiers who are using the space for manufacturing have a significant component for B8 activities.

  Manufacturers Rolls Royce and Sinoboom have taken B8 floorspace. Manufacturer Vaillant's B2 premises has a significant proportion of its floorspace dedicated to storage and warehousing activity.

- **Smart Pare, Derby** has planning permission for B2 and B8 uses, linked to food production. Both occupiers have both manufacturing and logistics elements to their operations. Deals to date include:

  - Greggs: frozen production and logistics facility on a 9.3 ha site due for completion in 2026.
  - Hello Fresh's European distribution centre opened in 2024 and is about c. 40,320 sq. m. It is known as 'The Windmill' because of its facilities for assembling food and onward distribution.

  Whilst the site is restricted to food production related activities, the park's flexibility enables occupiers to undertake both B2 and B8 operations. The ability to accommodate hybrid operations has been a key to its success.

3.7 Future Demand and Supply Balance

3.7.1 This section provides Savills future I&L demand estimates (across B2 and B8 sectors) based on the Savills Suppressed Demand method. The demand figures are then compared to future supply. A full explanation of our future demand and supply estimates are in **Appendices A** and **B.**

3.7.2 Savills demand estimates are presented for Derby, DSD and the Derby FEMA. We take a sub-regional approach to estimating future I&L demand. I&L occupiers typically have distribution networks linking their customers and suppliers of between 1 to 4 hours' travel time, sometimes longer. As a result, prospective I&L occupiers tend to look at a wider geographic area (or Property Market Area) rather than just a local authority when looking

for suitable properties.

3.7.3 We first consider the full market for I&L units, not just B8 and B2 premises. We estimate demand for all unit sizes and sectors covering light industrial, manufacturing and warehousing. However, we also estimate the need for B2 and B8 floorspace by apportioning down to these respective uses.

Comparing Supply and Demand

3.7.4 Based on the Savills Suppressed Demand Model, we estimate that over the 19-year period, consistent with the 2023 ELR, total I&L demand across Derby equates to 357 ha. This is substantially higher than the 85 ha assessed in the 2023 ELR for Derby. We estimate that the majority of the demand is for logistics (B8) uses, totalling 268 ha, whilst demand for industrial (B2) premises is about 89 ha.

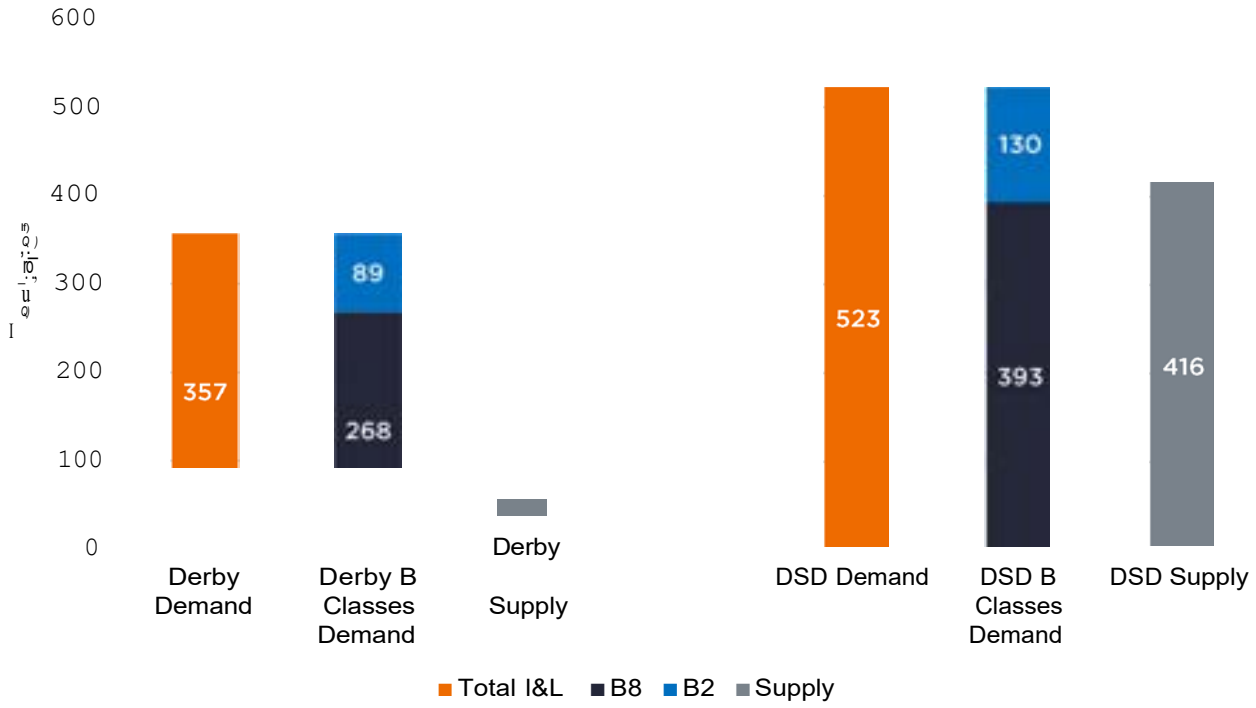
3.7.5 As detailed in **Appendix B,** Derby has just 51 ha of I&L land supply (comprising allocations, draft allocations and planning permissions), indicating a significant shortfall. When we assess the supply and demand balance in DSD, we can see there is also a substantial shortfall between demand and supply.

3.7.6 These estimates indicate continuing justification for removing the B8 limitation at the Subject Site :

- The Council's evidence base significantly underestimates demand for I&L floorspace within Derby.
- B8 demand makes up about 75% of estimated I&L demand within both Derby and DSD.
- There is limited land supply within Derby or the wider DSD to meet the estimated demand

3.7.7 Savills' estimates of future I&L land demand and supply over the 19-year Local Plan period are presented in **Figure 3.12** for both Derby and the combined DSD area.

Figure 3.12 Future Demand and Supply Estimations in Derby and the combined area of DSD 19-years (hectares)



Source: Savills (2026)

4 Conclusions

4.1.1 This report is a review of the policy basis for the restriction on B8 development at Infinity Park Derby. It has also assessed the evidence that underpins the restriction and analysed contemporary industrial and logistics market conditions. The analysis indicates that neither the policy framework nor the evidence base provide a clear quantitative justification for limiting B8 development to 50% of total floorspace at the Subject Site. The restriction is also inconsistent with market demand, occupier requirements and the way that modern industrial occupiers actually operate.

4.1.2 National policy makes clear that councils should not be 'overly prescriptive about the types of uses or unit sizes that would be acceptable on particular sites'. Savills detailed review of the Council's employment evidence found limited analysis distinguishing between demand for B2 and B8 uses and no evidence that demonstrates why a 50% cap is required. Where the Council's evidence does distinguish between manufacturing and logistics demand, the forecasts indicate negative demand for manufacturing floorspace and more favourable demand for logistics floorspace.

4.1.3 Savills experience and research also demonstrates that the distinction between B2 and B8 uses is becoming increasingly blurred in the I&L sector. Modern industrial occupiers increasingly integrate manufacturing, assembly, storage, fulfilment and distribution functions within their premises. Across a range of sectors, logistics facilities perform a critical role in supporting manufacturing activity through the storage of raw materials, inventory management, freight consolidation and the distribution of finished products. The policy approach of the Council treats B2 and B8 uses as separate, isolated functions that do not reflect how contemporary supply chains are structured.

4.1.4 The market assessment shows that demand for industrial and logistics floorspace remains strong across Derby and the wider market area, with availability rates indicating ongoing supply constraints. Occupiers continue to compete for a limited amount of available stock and the market is constrained by supply rather than a lack of demand.

4.1.5 The analysis of historic take-up provides further evidence about the relative strength of demand for B8 premises. Savills' detailed review of leasing activity in Derby and South Derbyshire found that approximately 72% of floorspace leased was occupied for B8 uses, compared with 11% for standalone B2 uses, with a further proportion comprising mixed B2/B8 activities. This demonstrates that logistics uses account for the majority of occupier demand and that a substantial number of occupiers require a combination of manufacturing and distribution activities rather than a single use class.

4.1.6 Analysis of occupier enquiries reaches a similar conclusion. Current requirements seeking premises within the Derby market indicate that approximately 79% of floorspace sought is for B8 use and approximately 21% is for B2 use. Whilst manufacturing demand remains an important component of the market, the evidence demonstrates that logistics demand represents the dominant source of occupier requirements. The volume and scale of active logistics enquiries also suggests that restricting the development of B8 floorspace risks

limiting Derby's ability to respond to current market requirements.

4.1.7 The assessment of future demand and supply indicates that Derby faces a substantial shortfall in industrial and logistics land over the Local Plan period. Savills forecasts estimate that about three quarters of future demand will be for B8 floorspace. On the supply side, the review identifies a limited supply of available and deliverable employment land in Derby, particularly for larger occupier requirements. The amount of land currently available with planning permission is modest, and a significant proportion of future supply is dependent upon the delivery of infrastructure, planning approval or are based on longer-term allocations.

4.1.8 The findings of this report do not suggest that manufacturing activity should be displaced or deprioritised at Infinity Park. Rather, the evidence indicates that manufacturing and logistics uses are complementary and that occupiers increasingly require flexibility to determine the appropriate balance between B2 and B8 activities based on their operational requirements. The available evidence does not demonstrate that maintaining a fixed 50% cap on B8 floorspace is necessary to support the policy objectives for the site, nor does it demonstrate that additional B8 development would undermine the wider economic role of Infinity Park.

4.1.9 Overall, the evidence reviewed in this report indicates that the restriction on B8 floorspace is not supported by a robust evidence base, is inconsistent with market demand, and does not reflect the integrated nature of I&L market practice. The evidence instead supports a more flexible approach that allows the balance between B2 and B8 development to respond to occupier requirements and market conditions. In this context, removing the B8 cap would provide greater flexibility for the market to respond to identified demand while continuing to support the employment and economic objectives of Infinity Park Derby.

5 Appendix A Future Logistics Demand Estimation

5.1 Savills Suppressed Demand Methodology

5.1.1 We present below Savills full methodology for estimating future I&L demand. Our methodology is considered to address the issues we raised against the various employment studies in **Section 2.** The demand estimates are presented for the Derby FEMA and a combined area of Derby and South Derbyshire (PMA), consistent with the Derby City Council and South Derbyshire District Council Employment Land Review 2023.

Compliance with National Policy and Guidance

5.1.2 Our methodology is compliant with the requirements of the Planning Practice Guidance ('PPG') as it:

- Analyses 'market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies'[4]. If a market is identified as being supply constrained (i.e. demand exceeds supply) such as the Derby FEMA and Derby, the Savills model supplements the historic demand profile accounting for suppressed demand (i.e. demand lost due to historic supply constraints).
- Applies 'economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector'[5]. The Savills method quantifies how much I&L floorspace growth is linked to current and future e-commerce growth which is the major growth driver for the sector, driving both demand for the supply-chain, and also the manufacturing of goods.

5.1.3 Based on the above, we consider our approach to estimating future logistics demand to be NPPF/NPPG compliant, and industry best practice. It has been endorsed by the British Property Federation ('BPF') in the *'Levelling Up - Logic of Logistics'* report, and was also shortlisted for an RTPI Award for Research Excellence 2022. The report has also been referenced as part of the Government's recently published 'Future of Freight Plan', and has been the focus of several discussions with senior officers at DLUHC and DfT. Our approach has also been recently considered in the Warehousing and Logistics in the South East Midlands Study. It is also being considered as one of the estimation methods as part of the West Midlands Strategic Employment Sites Study ('WMSESS').

5.1.4 Having regard to market signals and facilitating growth in the logistics sector are key priorities of the NPPF, namely:

- **Policy E1(1a)** which states that 'to support business investment and employment, development plans should, at the most appropriate level: Set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural

[4] In accordance with PPG, Paragraph: 031 Reference ID: 2a-031-20190722
[5] Ibid

areas, having regard to the Industrial Strategy and any relevant strategic and local strategies for economic development and regeneration. In doing so plans should take into account both local business needs and wider needs and opportunities for economic growth and investment including **relevant market signals,** priority places for investment in key sectors set out in the Industrial Strategy, and the location of Industrial Strategy Zones and AI Growth Zones.'

- **Policy EI(Ic(ii))** which states that development plans should 'Allocate sites to implement the economic vision and strategy and meet identified needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and **the specific locational requirements of different sectors. This includes, where a need exists or is anticipated, making provision for: Freight and logistics operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain (including 'last mile' deliveries), transport innovation and decarbonisation**
- **Policy E2(1a)** which states: 'To support business growth, substantial weight should be given to the economic benefits of proposals for commercial development which allow businesses to invest, expand and/or adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy, **support improvements in freight and logistics** and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones'
- **Policy E2(2a)** which states 'Where a development proposal is required to demonstrate whether an unmet need exists (including under policy S5) consideration should be given to whether: **Market signals indicate an undersupply of specific types of business land or premises, taking into account the anticipated catchment area for the type of development proposed, the changing needs of different sectors and the availability of suitable existing land and buildings'**
- **Policy E2(2b)** which states 'Where a development proposal is required to demonstrate whether an unmet need exists (including under policy S5) consideration should be given to whether: The **specific locational requirements** of the proposal are met by existing allocations in the development plan'
- **Policy E3** which states 'To support the effective and efficient movement of goods, development proposals for freight and logistics uses and associated infrastructure should: a) have good access to transport networks.... b) Be sited and designed to limit environmental impacts... c) Provide sufficient and secure parking for lorries or other vehicles to cater for the anticipated use'
- **Policy SPS(Ij(ii))** which states 'Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies

in this Framework: Development which would address an **evidenced unmet need...** and where the development would: **Comprise major development for freight and logistics purposes which accords with policy E3'**

(Savills emphasis in bold).

Taking a Sub-Regional Approach to Estimating Demand

5.1.5 We take a sub-regional approach to estimating future logistics demand. As discussed in **Section 3** above, logistics occupiers typically have distribution networks linking their customers and suppliers of between 1 to 4 hours' travel time, sometimes longer, depending on their size, i.e. up to 4 hours plus is more typical of very large companies with a national reach, while 1 to 2 hours' drive time is ideal for the majority of companies.

5.1.6 As a result of this, potential logistics occupiers will look at a wider geographic area rather than just a local authority when looking for suitable properties.

Step by Step Guidance

5.1.7 The detailed steps we follow in estimating future logistics demand are outlined below.

- **Step 1** - Calculate the Derby FEMA's historic and suppressed demand **only:** Firstly we consider future demand from the Derby FEMA including 'suppressed demand' or demand lost historically due to supply constraints;
- **Step 2** - Estimate additional demand associated with E-commerce growth: Secondly we consider increases in demand associated with future e-commerce growth which is the major growth driver for the sector;
- **Step 3** - We then apportion the Derby FEMA's total I&L demand to logistics (B8) uses;
- **Step 4** - We then translate the floorspace figures into a land requirement using an appropriate plot ratio;
- **Step 5** - We then apportion the Derby FEMA's logistics demand to the combined area of Derby and South Derbyshire and then Derby specifically.

Step 7 - Historic and Suppressed Demand

- Step 1 builds upon historic take-up (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up.
- We estimate the Derby FEMA's I&L demand (historic+ suppressed) to be 7,088,500 sqm of floorspace over a 19-year period.
- The steps are detailed below.

Step 7A: Estimating Demand over the Local Plan Period

5.1.8 We assume a 19-year period which is consistent with the time period used in the latest

employment evidence (ELR 2023).

Step 7B: Estimation of Historic Demand

5.1.9 This is based on the average annualised net absorption in the Derby FEMA at 195,100 sqm per annum for the overall I&L market between 2015 and 2025. Savills considers net absorption to be the leading measure of demand for floorspace as it indicates the quantum of net floorspace occupied over a period of time (i.e. move-ins minus move-outs) based on lease deals.

Step 7C: Estimation of Suppressed Demand

5.1.10 The rationale for accounting for suppressed demand is that when sufficient supply isn't available, demand cannot be accommodated. This top-up figure is added to the historic demand (net absorption) trend to account for years when the market was supply constrained.

5.1.11 Supply and demand are inextricably linked across all commercial property sectors. Put simply if demand exceeds supply, rents typically rise more quickly as occupiers compete for limited available stock. This can have a number of wider implications. For example, new companies aren't able to move into a market area, nor are existing companies able to find new space if their floorspace needs change, for instance, due to expansion. It may also happen that some existing local companies get priced out of the market as they can't afford the increasing rents. As a result, companies have to locate to areas that are not ideal in terms of serving their customer base, thereby increasing travel times and the costs of doing business, not to mention environmental impacts. The lack of supply may also mean companies are forced to occupy space that is not entirely suitable for their operational needs impacting productivity.

5.1.12 We describe a market where supply doesn't keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as the Derby FEMA, means that demand cannot be fully satisfied, typically resulting in strong rental growth.

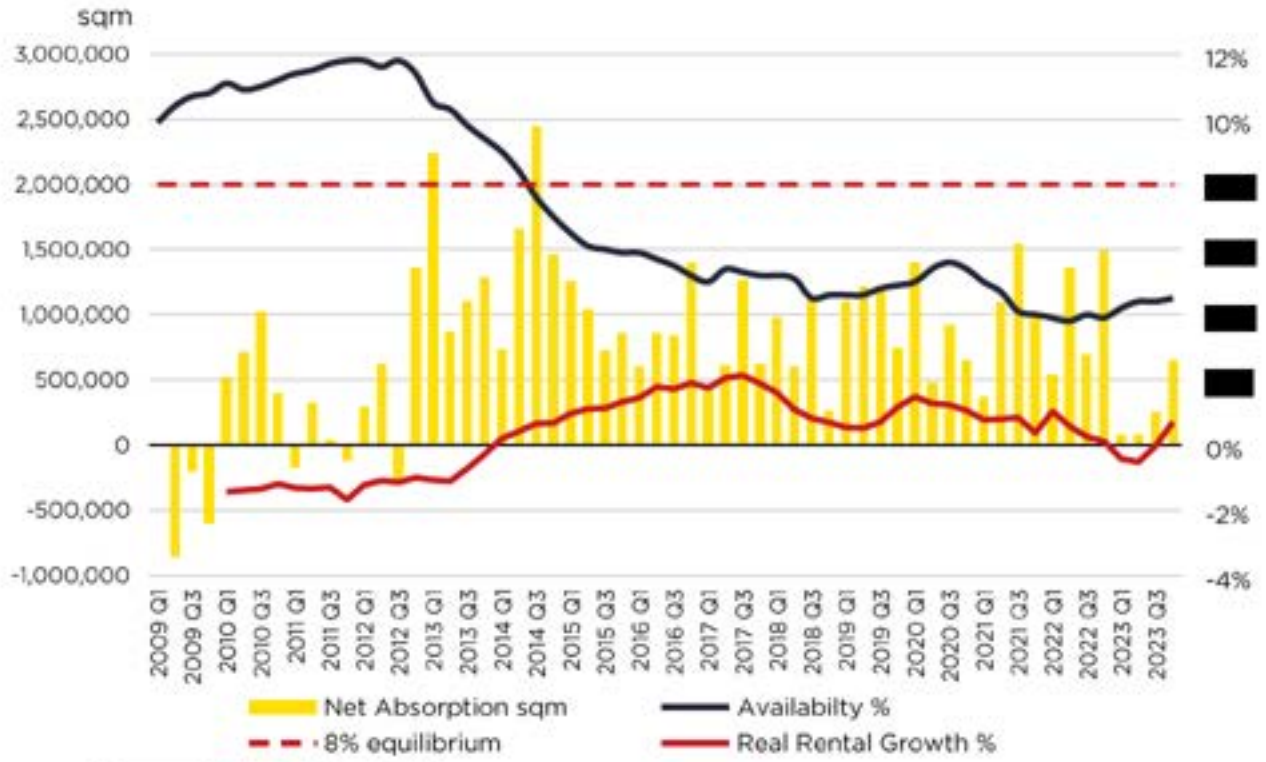
5.1.13 At the national level the market equilibrium level, where supply and demand are broadly in balance and rents are more stable, is around 8.0% availability. This benchmark rate is found in a number of prominent publications such as the GLA's Land for Industry and Transport Supplementary Planning Guidance ('SPG'), and the British Property Federation's *'Levelling Up - The Logic of Logistics'* report.

5.1.14 If one studies real rental growth (i.e. rental growth adjusted for inflation) over the past decade at the national level and observes its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8.0%. This relationship is clearly illustrated in **Figure 5.1** below. When availability was above 8.0% between 2009 and 2014, real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was available.

5.1.15 However, since 2014, as availability dipped below 8.0% and has stayed below this level ever since at the national level, real rents have grown strongly year-on-year. During this

period, net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This clearly shows the supressing nature tight availability (below 8.0%) has had on I&L demand nationally.

Figure 5.1 Historic Net Absorption (sq.m), Availability (%), and Real Rental Growth (%) in England



Source: CoStar, OBR, Savills

5.1.16 The 8.0% benchmark is also applicable to the Derby FEMA, given the I&L markets have broadly followed the same trajectory as the national market.

5.1.17 The individual steps for calculating the Derby FEMA's suppressed demand are as follows:

- **Step 1C(i):** For years where availability has been below the 8.0% equilibrium threshold, we calculate the quantum of floorspace necessary to achieve 8.0% availability (Column 'Av. To EQ (sqm)' in **Table 5.1**, calculation F);
- **Step 1C(ii):** We then take the average of the ratio between net absorption and available floorspace for every year over the last 11 years (2015-2025) (Calculation E averages 41% for the Derby FEMA based on Column 'Net Absorption/Availability');
- **Step 1C(iii):** We apply this average to the estimated floorspace required to reach 8.0% availability in each year where the market is below the 8.0% availability threshold to estimate each period's suppressed demand (Calculation F*E in Column 'Suppressed Net Absorption (sqm)');
- **Step 1C(iv):** We calculate average suppressed net absorption over the last 11 years (2014-2024). This gives the annualised suppressed demand figure to be used as a

top-up to the historic trend. The estimated average suppressed demand figure for the Derby FEMA is 178,000 sqm per annum between 2015 and 2025.

5.1.18 **Table 5.1** shows the relevant calculations for the Derby FEMA.

Table 5.1 Suppressed Demand Calculations within the Derby FEMA (sqm)

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Year	Inventory (sqm)	Availability (%)	Available Floorspace (sqm)	Net Absorption (sqm)	Net Absorption / Availability	Av. To EQ (sqm)	Suppressed Net Absorption (sqm)
2025	13,743,700	5.8%	797,100	56,400	7%	302,400	124,400
2024	13,707,000	5.6%	767,600	-77,800	-10%	329,000	00
2023	13,628,700	4.9%	667,800	118,400	18%	422,500	173,800
2022	13,280,700	3.9%	517,900	551,400	106%	544,500	224,000
2021	12,598,700	2.7%	340,200	233,400	69%	667,700	274,700
2020	12,437,100	3.5%	435,300	190,400	44%	559,700	230,300
2019	12,336,900	3.7%	456,500	399,600	88%	530,500	218,300
2018	11,852,800	3.6%	426,700	131,600	31%	521,500	214,600
2017	11,892,800	4.2%	499,500	93,600	19%	451,900	186,000
2016	11,821,600	5.0%	591,100	200,200	34%	354,600	145,900
2015	11,495,700	4.5%	517,300	248,900	48%	402,300	165,600
					E = average		Suppressed Demand = Average

Source: Costar, Savills, 2025

- **Step ID:** The final step requires adding the combined annualised historic and suppressed demand figures, and multiplying this by the number of years in the estimated period (19 years) as shown in **Table 5.2** below. This gives a total floorspace demand of 7,088,500 sqm for I&L in the Derby FEMA over the 19-year period.

Table 5.2 Derby FEMA Future Demand Estimates and Calculations (sqm)

	Derby FEMA (sqm)
(A)Annualised Historic Demand	195,100
(B) Annualised Suppressed Demand	178,000
(C) Total Annualised Demand (A+B)	373,100
(D) Total Demand over 19-Year Period (C*19)	7,088,500

Source: Costar, Savills 2025

Step 2 - Adding an E-commerce Uplift

- Savills demand estimate factors in future e-commerce growth which is the major growth driver for the sector, driving both demand for the supply-chain, and also the manufacturing of goods.
- After including an e-commerce uplift, we estimate the Derby FEMA's I&L demand to increase to **7,559,100 sqm** of floorspace over a 19-year period.
- The additional steps to add in an e-commerce uplift are detailed below.

Step 2A: Adjusting for Increases in Online Retail

5.1.19 As discussed in **Section 2,** there are a number of factors driving future growth in demand for I&L uses which are not captured by historic trend-based projections. Attempting to factor them all in is a challenging exercise prone to errors and overestimation due to the uncertainty around major events such as Brexit, and the risk of double counting the impacts of different growth factors. The strongest drivers are population growth and the move to online shopping, which the Covid-19 Pandemic has accelerated. We consider demand arising from population growth to be largely captured by increases in online sales which are a function of household spending and household growth. For this reason, in our work we focus on the move to online shopping as expressed as pounds spent at the UK level.

5.1.20 Focusing on total online spend in pound terms in considered more effective than the percentage of online sales. This is because the percentage of online sales will fail to pick up future growth drivers such as population growth and expected increases in consumption. In this regard, using the total online spend projections will enable these future e-commerce growth drivers to be included within our future I&L demand estimates. This enables a better representation of the increased demand for floorspace needed to process this online spending.

5.1.21 In order to estimate future increases in I&L demand linked to e-commerce growth, we first need to establish the share of demand that has historically been linked to e-commerce, and then determine how much higher this is likely going to be in the future. The sectors typically linked to e-commerce are Retail, Transport and Warehousing, and Wholesale. These sectors accounted for 47% of all floorspace leased in the Derby FEMA between 2015 and 2025 according to Costar data.

5.1.22 We have considered Statista's[6] online retail forecasts for the UK to 2030 as a proxy for future online spending growth. Statista is a leading provider of market and consumer data with over 2 million registered users. Statista's data only goes back to 2017 meaning only 3 years of data (i.e. 2017, 2018, and 2019) are available before the Covid-19 Pandemic began. We consider at least 5 years of data to be more robust for understanding historic trends. In order to extend Statista's historic series we have discounted their online spending figure for 2017 by the ONS online growth rates[7] in order to derive an estimate

[6] A prominent retail forecasting house
[7] ONS, Internet Retail Sales, All Retailing, 2024

for 2015 and 2016.

5.1.23 Next we compare the historic online spending figures (i.e. 2015-2019) with Statista's future online spend forecasts (i.e. 2023-2030). To ensure that we are comparing like for like, we convert both the historic and future forecast data into real prices in order to remove the effect of inflation. We do this by rebasing all data back to 2015 using GDP Deflators from OBR March 2024[8].

5.1.24 As shown in **Table 5.3** below, between 2015 and 2019 online retail sales averaged £75.6 billion per annum. We accept that 2020, 2021, and 2022 were exceptional years due to the COVID-19 Pandemic, and exclude them from our calculations. During the period between 2023 and 2030, online sales are predicted to average £101.4 billion per annum based on the Statista forecasts. This suggests a 34% uplift from the pre-pandemic (2015-2019) online spend average of £75.6 billion per annum based on the Statista data.

Table 5.3 UK Online Sales Forecasts (£ billion)

Year	Online Sales Real Prices (£b)	Annual Increase (£b)	
2015	48.8	-	2015-2019 Average Annual Online Sales Value in Real Prices: £75.6 billion
2016	73.8	25.0	
2017	85.0	11.2	
2018	82.2	-2.8	
2019	88.2	6.1	
Average 2015-19	**75.6**	**9.9**	
2020	103.9	15.7	Excluded from calculations as these were atypical years due to the Covid-19 pandemic
2021	106.4	2.5	
2022	97.5	-8.9	
2023	88.7	-8.8	2023-2030 Average Annual Online Sales Value in Real Prices: £101.4 billion (+34% uplifted compared to 2015-2019)
2024	93.9	5.2	
2025	99.7	5.7	
2026	101.3	1.7	
2027	103.7	2.4	
2028	105.9	2.2	
2029	108.0	2.1	
2030	109.7	1.8	
Average 2023-30	**101.4**	**1.5**	

Source: Statista, ONS, Savills, 2025

5.1.25 The increase in online spending in real terms indicates that the volume of shipped goods will increase. This in turn will increase the need for I&L floorspace to handle, store, and distribute the increased volume of goods.

5.1.26 Some of this increase will likely be dealt with more efficient operations in the future. Advancements in technology and fulfilments solutions will lead to increased productivity in the sector. According to Oxford Economics, the productivity per worker within the I&L

[8] OBR March 2024 Economic and Fiscal Outlook: Economic Supplementary Tables

sector, specifically the key e-commerce related sectors being Transport and Storage, Retail, and Wholesale, is predicted to grow by 19% between 2022 and 2042. We assume that these productivity gains will reduce the need for additional floorspace. To account for this productivity growth in the I&L sector, we adjust down the 34% online spend increase from **Table 5.3** above, by the 21% productivity increase. This yields a final online update of 27% as shown in **Table 5.4** below..

Table 7.4 Productivity Adjustment

Predicted Increase in Future Online Spend	Future Productivity Gains in the I&L Sector	Uplift Adjusted for Productivity Gains
	21%	34% * (1-21%) = 27%

Source: Statista, ONS, Oxford Economics, Savills, 2025

5.1.27 Applying this 27% uplift to the historic demand from e-commerce sectors equates to an uplift of 470,600 sqm for the Derby FEMA over the 19-year period **(Table 7.5).**

Table 5.5 Adjusting for Increases in Online Retail within the Derby FEMA

	Annual (sqm)	Over 19-Year Period (sqm)
E-commerce related (35% of historic)	91,700	1,743,100
E-commerce related after 27% uplift	116,500	2,213,700
E-commerce demand uplift	24,800	470,600

Source: Savills 2025; Figures may not sum due to rounding

Step 2B: Adding E-commerce Uplift to the Historic and Suppressed Demand Estimates

5.1.28 Adding the e-commerce uplift to the combined historic and suppressed demand estimates yields a total demand of 7,559,100 sqm for the Derby FEMA over the 19-year period, as summarised in **Table 5.6** below.

Table 5.6 Summary of Future Demand (Over 19-Year Period) within the Derby FEMA (sqm)

	Derby FEMA
(A) Historic demand (net absorption) over 19-years	3,707,100
(B) Suppressed demand over 19-years	3,381,400
(C) E-commerce uplift over 19-years	470,600
(D) Total demand over 19-year period (A+B+C)	7,559,100

Source: Sav,Jls 2026; Figures may not add up due to roundmg

Step 3 - Apportion Total Derby FEMA I&L Demand into B2 and B8 Demand

- We then apportion our total I&L demand estimate for the Derby FEMA to B2 and B8 uses specifically. To do this we use an apportionment rate that is reflective of the performance of the B8 and B2 market in relation to the total I&L market over the last 11 years (2015-2025).
- The steps are detailed below.

5.1.29 To estimate B8's share of total demand for I&L uses, we first consider the following three property market metrics:

- B8's share of the total I&L market's historic average net absorption per annum (2015-2025): 85%;
- B8's share of the total I&L market's average net deliveries per annum (2015-2025): 88%; and
- B8's share of the total I&L market's total inventory (2026 YTD): 62%.

5.1.30 The same approach is taken to estimate B2's share of total demand for I&L uses:

- B2's share of the total I&L market's historic average net absorption per annum (2015-2025): 14%;
- B2's share of the total I&L market's average net deliveries per annum (2015-2025): 11%; and
- B2's share of the total I&L market's total inventory (2026 YTD): 35%.

5.1.31 However, as a sense check, we have also reviewed leasing activity across the Derby FEMA over the 2015-2025 period. This analysis indicates that manufacturing occupiers accounted for 29% of all lease transactions, with logistics occupiers accounting for the remaining 71%. Averaging these leasing proportions with the apportionment rates derived from the inventory, delivery and absorption analysis results in a final apportionment rate of 75% for B8 uses and 25% for B2 uses. When these rates are applied to the total I&L demand over a 19-year period, the demand for B8 in the Derby FEMA equates to 5,669,316 sqm and 1,888,772 sqm for B2[9].

Step 4 - Translating Floorspace Demand (sqm) into Land Requirements (Ha)

- This step entails translating the above total logistics demand figures (sqm) into a land requirement (ha) using an appropriate plot ratio.
- Using a 35% plot ratio, we estimate the level of I&L demand over a 19-year period to be 2,160 ha in the Derby FEMA.
- The steps are detailed below.

5.1.32 The above floorspace figures need to be translated into a land requirement using an appropriate plot ratio.

5.1.33 As discussed in **Section 2,** the evidence base documents use a plot ratio ranging from 39% to 45%. Based on our experience, recent changes in the I&L sector means that occupiers are moving towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping. These modern occupier requirements imply a lower plot ratio. Savills considers a 35% ratio as appropriate.

[9] Figures may not add up to total FEMA demand due to rounding

5.1.34 The results of using a 35% plot ratio to translate our floorspace demand estimates are shown in **Table 5.7** below.

Table 5.7 Derby FEMA I&L Land Demand Estimates over a 19-Year Period (ha)

	Floorspace Demand Estimates (sqm)	Land Demand Estimates (Ha)
Derby FEMA B2	1,889,800	1,620
Derby FEMA B8	5,669,300	540
Derby FEMA I&L	7,559,100	2,160

Source: Savills 2026; Figures may not add up due to rounding

5.1.35 Within the Derby FEMA, we estimate the level of I&L demand over a 19-year period is **2,160 ha.**

Step 5 - Apportioning Total Derby FEMA I&L Demand to Derby and DSD

- We then apportion our total demand estimate for the Derby FEMA to Derby and the combined area of DSD Derbyshire specifically. To do this we use an apportionment rate that is reflective of Derby and DSD's I&L market performance over the last 11 years (2015-2025).
- The steps as to how we split the total demand are detailed below.

5.1.36 To estimate Derby and then the combined area of Derby and South Derbyshire's share of overall Derby FEMA demand for I&L, we first consider the following three property market metrics:

- The share of the Derby FEMA's historic average net absorption per annum (2015-2025): 16% and 22% respectively;
- The share of the Derby FEMA's average net deliveries per annum (2015-2025): 15% and 23% respectively; and
- The share of the Derby FEMA's total inventory (2026 YTD): 18% and 28% respectively

5.1.37 When we take the average of the above measures which results in an apportionment rate of 17% for Derby and 24% for the combined area of Derby and South Derbyshire. The results of this apportionment are shown in **Table 5.8.**

Table 5.8 I&L Demand Estimates over 19-Year Period in the Derby FEMA, Derby and the combined area of Derby and South Derbyshire (DSD)

	sqm	Ha
Derby FEMA	7,559,100	2,160
Derby	1,296,400	370

Derby and South Derbyshire	1,632,100	465

Source: Savi/ls, 2026; Figures may not add up due to rounding

5.1.38 Applying the B2 and B8 apportionment rates derived in Step 3 (25% and 75% respectively) to the I&L demand estimates for Derby and DSD. The results of this apportionment are presented in **Table 5.9** below.

Table 5.9 I&L Demand Estimates over a 19-Year Period in Derby's and DSD's B2 and B8 Use Classes

	sqm	Ha
Derby B2	312,700	89
Derby B8	938,100	268
DSD B2	458,000	131
DSD B8	1,374,000	393

Source: Sav1l!s, 2026; Figures may not add up due to roundmg

6 Appendix B Supply Review

Introduction and Key Conclusions

Aim:

- This section provides a quantitative and qualitative update of the current and future supply of I&L land within Derby and South Derbyshire (DSD).

Key Conclusions:

- In addition to the Subject Site, there is a total of **c. 416 ha** of land supply within the PMA, comprising land which benefits from a planning permission, an existing allocation or a proposed allocation with available land not benefiting from a planning permission. This is made up as follows:
  - Land with Planning Permission: c. 52 ha (a reduction of 8 ha predominantly due to take up at Smart Pare);
  - Allocated sites: c. 70 ha; and
  - Proposed Allocations with available land and without planning permission: 294 ha
- Of this total, within Derby, land supply includes **c. 51 ha** as follows:
  - Land with Planning Permission: c. 19 ha (Smart Pare)
  - Allocated sites: c. 28 ha
  - Draft allocations: 3 ha (for Rolls Royce on their site)
- Within Derby there is a particular shortage of land which is able to meet larger occupier requirements on a flexible basis within a high quality environment. This is limited to the Subject Site, Infinity Garden Village (element within Derby City) and SmartParc. Infinity Garden Village is not able to meet an immediate occupier requirement, being dependent upon delivery of the A50 link road. SmartParc is focused on the food sector and is therefore only able to meet demand from certain occupiers.
- The Subject Site therefore has a vital role to play in meeting immediate occupier demand across a range of uses and maximising investment and economic benefits to Derby. **Flexibility to meet a full range of occupier requirements is essential.**

6.1 Method

6.1.1 We have reviewed the supply of land within DSD. We have included sites with planning permission or an allocation for B2 or B8 development. Data collection was undertaken in Q2 2026 and represents a snapshot in time.

6.1.2 To objectively assess the level of supply, we have considered all sites of 2.5 ha and above.

Where a site below this threshold has planning permission for a unit of 100,000 sq. ft or more then this has been included for completeness. The vast majority of land supply is accounted for by sites which are larger than this size threshold and therefore we consider our assessment to be a comprehensive review of overall supply.

6.1.3 We consider three sources of supply:

- Land Supply being sites of 2.5 ha or more with planning permIssIon for B2 or B8 development which can accommodate a unit of 100,000 sq. ft plus;
- Pipeline supply of sites of 2.5 ha or more which benefit from an allocation for B2 or B8 development but do not yet have planning permission.
- Draft allocations comprising 2.5 ha or more, which could accommodate either B2 or B8 use (which do not already benefit from planning permission or an adopted allocation) which have been reviewed separately. These sites have no formal planning status and there is a high level of risk associated with their delivery.

6.1.4 Speculative developer promotions which fall outside these categories are not included.

6.1.5 **Please note that Infinity Park Derby (the Subject Site) is considered separately below.**

6.2 Infinity Park, Derby

6.2.1 Infinity Park was first granted planning permission for a business park in the early 1990s. The scheme comprised land in multiple ownerships (including Derby City Council and Rolls Royce) and at that point, access was constrained which significantly delayed delivery of the site. Key to unlocking the site was the delivery of the Tl2 road, which was completed in July 2016, having been funded via a combination of public sector funding streams, as well as private funding via the applicant. Prior to the road being delivered, development was not viable or deliverable at the Subject Site. Infinity Park was also designated as an Enterprise Zone in 2016 in order to encourage businesses to locate at the site.

6.2.2 Take up and activity at the Subject Site has been as follows:

- The iHub building, which now houses the Nuclear Skills Academy, opened in 2016 as a flexible workspace for start-ups and businesses. The facility extends to 4,181 sq. m (45,000 sq. ft). This facility is supported by Rolls Royce, the University of Derby and the National College for Nuclear. It is now used as teaching space by the University of Derby and is used in part as a training facility for Rolls Royce. It is therefore not in manufacturing use. The facility was delivered as a result of public sector funding from the Regional Growth Fund and European Regional Development Fund (ERDF), Derby City Council and the University of Derby.

  This does not indicate market demand for manufacturing use at the Subject Site.

- *The Nuclear Advanced Manufacturing Research Centre (NAMRC)* was completed in April 2023 and extends to 43,000 sq. m (462,848 sq. ft). The intention of the NAMRC was to bring together University of Sheffield's Nuclear AMRC and the University of

Derby's Institute for Innovation in Sustainable Manufacturing (IISE) to undertake R&D activities within the nuclear sector.

Construction was dependent upon significant public sector funding via the D2N2 Local Enterprise Partnership. The building stood vacant for three years post completion.

The building is now occupied by the University of Derby and is being repositioned as the Infinity Prototyping Centre. Additional works were carried out and the East Midlands Combined County Authority website indicates that it will offer flexible, collaborative workspaces tailored to organisations across the nuclear supply chain.

This public sector driven facility is not indicative of commercial market demand for advanced manufacturing uses at the Subject Site. Furthermore, it has not been taken up for its initial intended use.

- *Oregon Timber* agreed a deal on a Build to Suit basis for a bespoke unit of 17,242 sq. m (185,591 sq. ft) in October 2020. The unit is in B2 manufacturing use with Oregon being a specialist constructor of timber frame houses. Oregon is part of the Barratt Group, which also includes Wilson Bowden Developments (the applicant and developer of Infinity Park[70]). The locational decision of Oregon to come to the Subject Site was therefore driven by wider corporate objectives, as opposed to being a market-led commercial decision based on the merits of the Subject Site for this manufacturing use.

  This transaction is therefore also not indicative of commercial market demand for manufacturing use at the Subject Site.

- *Derby 507* is a speculatively constructed unit extending to 47,168 sq. m (508,003 sq. ft) which has been funded by Logicor. Practical Completion of the base build was achieved on the 19th February 2025. There has been strong market interest in this unit, the vast majority of which has been from occupiers seeking a B8 logistics facility. (The various proposals that have been submitted have all been to occupiers looking to use the premises for Class B8 use).

- *BOC* have agreed a deal on Unit G2 which was granted planning permission in April 2024 for a B8 gas storage depot. This unit extends to c. 690 sq. m (7,427 sq. ft).

6.2.3 Taking account of these uses, there is now **31.22 ha** remaining at Infinity Park. Forthcoming proposals for further development include:

- *Plot B1:* this plot is under offer to a B8 occupier and a full planning application has been submitted for a unit of 24,547 sq. m (264,222 sq. ft). This plot extends to **9.62 ha.**

- *Plot A2:* a reserved matters planning application has been submitted for a unit of 15,561 sq.m. Subject to demand (and planning) this could be occupied for either manufacturing or logistics use. Based on evidence to date, logistics use makes up the majority of demand and is the most likely use. This plot extends to **3.08 ha.**

[10] as part of the Joint venture Infinity Park Derby LLP

- *Plot* GI: a planning application has been submitted to relocate Star Micronics, a local business currently based at Rolls Royce, Raynesway. There is an urgent requirement to relocate as Rolls Royce are redeveloping their Raynesway site. This is a B2 use but does not represent underlying market demand because it is a relocation. This plot extends to **0.76 ha** and the proposed unit will extend to 2,234 sq. m (24,050 sq.ft). The building is to be used for manufacturing, office and storage.

6.2.4 Should these proposals be approved and delivered, there will be a total of **17.76 ha** of land remaining at the Subject Site.

6.2.5 There has therefore been limited market-driven manufacturing take-up at Infinity Park Derby, despite incentives via the Enterprise Zone and considerable public sector funding being deployed to unlock the delivery of the site. Savills are joint letting agents of Infinity Park and analysis of occupier enquiries confirms that **over 77% of enquiries received over the course of the last 2 years have been on the basis of B8 use.** This has translated into an agreed deal, subject to planning, on Plot BI, and significant interest in remaining plots on the basis of BS use.

6.3 Land Supply

6.3.1 We have analysed the supply of land with planning permission for B2 or BS use which can accommodate a unit of 100,000 sq. ft plus, within the PMA. We have included sites of 2.5 ha or more within our assessment, and the results are set out at **Table 6.1** below.

Table 6.1 Land Supply (with Planning Permission)

Ref	Name	Authority	Remaining Land 2025 (ha)	2026 Update (ha)	Comment
1	SmartParc SEGRO Derby	City of Derby	36.14	19.24	Remaining land. Permitted use limited to food production, distribution, training and education. Unit 6A, Unit 8 and Unit 9 have been let, Units on Plot 1 have been built out.
2	Woodville Regeneration Area	South Derbyshire	3.43*	6.42	PP for residential led scheme including 2,000 sq. m Eg, 4,000 sq. m B2 and 8,000 sq. m BB. Update in line with marketing particulars
3	Former Drakelow Power Station	South Derbyshire	2.50	2.50	Employment component of residential-led scheme.
4	Dove Valley Park	South Derbyshire	24.12	24.12 (13.59 ha purchased by Mit-Log)	Remaining plots with planning permission (P2-02, P2-03 and Plot 11).
	TOTAL		**66.19**	**52.31**	

**Assumed site area based on 35% plot density of consented 82/88 floorspace.*

6.3.2 Comparable land supply with planning permission has **reduced from c. 66 ha to c. 52 ha,** predominantly due to occupier take up at Smart Pare in Derby. (Both figures exclude the

Subject Site). Key occupiers at Smart Pare include Greggs and Hello Fresh who both operate state of the art facilities incorporating both production/meal assembly and logistics/order-picking functions.

6.3.3 Whilst we have included remaining land at Plot E5 Dove Valley Park (10.53 ha), this is shown as MEG Expansion Land on the masterplan and is therefore unlikely to be available to another occupier requirement. In reality the supply will be further reduced as Mit-Log have purchased Plot 11 (13.59 ha) at Dove Valley Park and we understand construction is due to start on two new units of 35,675 sq. m and 13,052 sq. m. Mit-Log are a Chinese I&L specialist aiming to address the growing warehousing needs of Chinese enterprises expanding into the European and UK markets. It is stated within the planning application and confirmed in the press that a deal has been agreed with an occupier in relation to the larger unit. As confirmed by Mit-Log: "Upon completion, the project will deliver institutionally acceptable, modern logistics facilities designed to support the operational needs of cross-border e-commerce and related supply chain occupiers in the UK."[11]

6.3.4 **The exclusion of Plot 11 reduces the supply with planning permission to 38.72ha.**

6.3.5 Whilst Woodville Regeneration Area and the Former Drakelow Power Station fall within our search parameters, both are very unlikely to deliver units of strategic scale, with indicative proposals showing small unit schemes (as would generally be expected given that these sites are employment components of residential-led developments. The timescales for delivery of the employment components of these schemes.

6.3.6 Proposals have been approved for the redevelopment of Sinfin Commercial Park to provide approximately 25,000 sq. m of floorspace to replace existing employment units across a 9.2 ha site. The largest unit permitted is 6,503 sq. m. This site has not been included within the supply calculation given that it a) only accommodates small and mid-box units and is therefore outside our parameters and not comparable with the Subject Site, but also b) it is not new employment land.

6.3.7 Sites with planning permission which provide opportunities for further larger units of 100,000 sq. ft plus remain limited to SmartParc and Plot E5 at Dove Valley Park (subject to this being available).

6.3.8 We have taken a comprehensive approach to assessing the land supply with planning permission which shows a reduction of c. 14ha since our previous assessment. However, the actual figure available to an occupier seeking a new building is much lower given the majority of land with planning permission at Dove Valley Park is either taken or reserved by occupiers. Overall, the supply of land with planning permission is very constrained, with very limited deliverable opportunities within short timeframes for strategic scale employment use, one of which being Smart Pare which is catering for a very specific market sector and therefore is not able to meet wider market demand.

6.4 Pipeline Supply

6.4.1 We have also assessed the 'pipeline' supply of sites that benefit from an allocation but

[11] https://www.log ist icsmatters.co. uk/news/exclusive-chi nese-log istics-specialist-secures-first-uk-site/

do not have planning permission. The assessment includes sites of 2.5ha or more, with an allocation for B2 or B8 use that can accommodate a unit of 100,000 sq. ft plus, consistent with the assessment of consented land supply above. In order to estimate floorspace capacity, we have assumed a density of 35% based on the gross developable site area.

6.4.2 These sites are subject to varying degrees of risk around delivery and timescales.

6.4.3 A schedule of allocated sites within the PMA is set out at **Table 6.2** below.

Table 6.2 Pipeline Supply (Allocations)

		Location			Comments
1	Wilmore Road, Sinfin	Derby City	2.60	2.60	**Eg/B2/B8** Saved' Policy from City of Derby Local Plan Review (2006).
2	Land South of Wilmore Road, Sinfin	Derby City	86.80	25.79	**Eg/B2/B8 subject to restriction on total B8** Majority has planning permission as Infinity Park Derby (Subject Site) and is excluded from this assessment. Total includes allocated land within Infinity Garden Village, plus small component of land to the north of Sinfin Moor Lane which is excluded from the Subject Site.
3	Land at Sinfin Moor	South Derbyshire	30.00	30.00	**Eg/B2/B8** Allocated land within Infinity Garden Village.
4	Hilton	South Derbyshire	7.00	2.30	**Eg/B2/B8** Of the total 7.00 ha adopted allocation, 5.30 ha is proposed to be re-allocated but 3.00 ha of this is owned by PM Harris who are progressing proposals to redevelop/intensify their use. Remaining plot is being promoted for residential use but is included here for completeness.
5	Dove Valley Business Park	South Derbyshire	19.27	6.26	**Eg/B2/B8** Plot 1. Further land with Planning permission included above at **Table 6.1**
6	Cadley Hill, Swadlincote	South Derbyshire	5.00	3.00	Correct area confirmed in emerging Local Plan.
	TOTAL				

6.4.4 The amount of allocated land without planning permission has remained consistent with

a total of **6 allocated sites** (without planning permission) extending to c. **71 ha** with a total capacity of **c. 247,275 sq. m (2.66 million sq. ft).** However, this headline figure masks the true supply picture **in** relation to allocated sites.

6.4.5 There is effectively only one allocated site of scale within the PMA being the employment component which is allocated and forms part of the South Derby Growth Zone and extends to c. 55 ha and straddles Derby City and South Derbyshire to the south of Sinfin Moor Lane.

6.4.6 This site will make a very important contribution to the employment land supply within the PMA when it comes forward, subject to delivery/ confirmation of funding in relation to the consented link road from the A50 which will provide access and unlock the scheme. Similarly to the Subject Site, which is part of the same allocation, that part of South Derby Growth Zone within Derby City is also impacted by the restrictions within the AC15 allocation which limit the amount of B8 development which can come forward.

6.4.7 Whilst this scheme is undoubtedly of key significance to Derby and the wider sub-region, it is not able to meet occupier requirements until the necessary road infrastructure is funded and delivered.

6.4.8 There is a further plot available at Dove Valley Park which does not yet benefit from planning permission. However, other allocated sites are subject to constraints:

- *Wilmore Road, Sinfin:* whilst site remains undeveloped, it is within the ownership of Rolls Royce and is therefore not available to meet general B2/B8 occupier demand.
- *Hilton:* this site is part of a wider mixed-use allocation and employment development to date has comprised small unit schemes focused on the local market. Land within the allocation is being promoted for residential development. It is very unlikely that any floorspace of strategic scale (100,000 sq. ft plus) will be delivered here.
- *Cadley Hill, Swadlincote:* whilst this site is adjacent to an established employment area, there is no direct access between the two. The residential nature of the surrounding area and access constraints (including limitations on surrounding roads) have so far prevented this site from coming forward for employment use.

6.4.9 **There is therefore only one allocated site at Dove Valley Park which is capable of delivery over the short term to meet a strategic scale occupier requirement.**

6.5 Draft Allocations

6.5.1 South Derbyshire's Local Plan Part 1 2022-2041 (Publication Version) consultation ran between 10th March 2025 and Friday 25th April 2025. The draft plan includes 12 proposed employment allocations which are set out in **Table 6.3** below.

Table 6.3 South Derbyshire Draft Allocations

	Name		[redacted]	Additional Land Supply (Ha)	Comment
1	Drift Road, Church Gresley	EIA	0.71	**N/A**	E(g)/B2/B8 - carried forward from 2016 plan. Undeveloped plot. Below size threshold.
2	Tetron Point, Stanton	EIB	**2.00**	**N/A**	E(g)/B2/B8 - carried forward from 2016 plan. Below size threshold, in use as open storage.
3	Swadlincote Lane, Church Gresley	EIC	3.00	Nil - included within Allocated site supply.	E(g)/B2/B8 - carried forward from 2016 plan.
4	Drakelow	EID	2.50	Nil - included within Land Supply with planning permission.	E(g)/B2/B8 - carried forward from 2016 plan.
s	Hilton	EIE	3.00	Nil - included within Allocated site supply.	E(g)/B2/B8 - carried forward from 2016 plan.
6	Dove Valley Business Park	EIF	**6.72**	Nil - included within Allocated site supply.	E(g)/B2/B8 - carried forward from 2016 plan.
7	Land to the North of Dove Valley Business Park	EIG	13.00	Nil - included within Land Supply with planning permission	B2, B8 - carried forward from 2016 plan.
8	Woodville Regeneration Area	E6	4.60	Nil - included within Land Supply with planning permission	E(g)/B2/B8 - carried forward from 2016 plan.
9	Infinity Garden Village, Sinfin Moor	STRAI	70.00	40.00	E(g)/B2/B8. Extension to IPD and part of the mixed use Infinity Garden Village development. Includes area of adopted E4 allocation which is being amalgamated into STRA1.
10	Land South of Mickleover	STRA2	10.00	10.00	E(g)/B2/B8. 5-l0ha of employment as part of a housing led, mixed use scheme.
11	Former Drakelow Power Station	STRA3	68.00	68.00	B2, B8. To include provision for small-medium size units. Proposals for solar farm on 33.30 ha.
12	East Midlands Intermodal Park Strategic Rail Freight Interchange/	**INF3**	173.00	173.00	National infrastructure project being promoted by Goodman with capacity for 5.2M sq. ft of floorspace which represents c. 30% site density.

Ref	Name	Draft Policy		Additional Land Supply (Ha)	Comment
	East Midlands Freeport				
		TOTAL:		291.00	

6.5.2 Whilst not included in the supply figures, it is noted that Brackley Property Developments submitted an outline planning application in 2019 for up to 100,000 sq. m B2/B8 with ancillary E(g) use on a site of 31.52 ha gross at Etwall in South Derbyshire (known as Axis 50). The application is yet to be determined. A similar application was refused on Appeal in 2010.

6.5.3 The Draft Local Plan for Derby Regulation 19 is currently out for consultation from 27th July 2026. In addition to 2 ha within the City Centre, the draft plan proposes three principle locations for employment growth, as well as 3.00 ha specifically for Rolls Royce at their Raynesway campus, as set out within **Table 6.4** below.

Table 6.4 Derby City Draft Allocations

Ref	Name	Draft Policy		Additional Land Supply (Ha)	Comment
	Land South of Willmore Road (Infinity Park)	E5	75.00	Nil (Subject Site and land to south already included within Land Supply)	Includes the Subject Site and land within the adopted allocation to the south of Infinity Park. Total remaining 57.01 ha.
2	Smart Pare, Spondon	E6	35.00	Nil (already included within Land Supply	Smart Pare - 19.72 ha remaining as at July 2026
3	Indurent Park, Derby	E7	17.00	Nil (fully built out)	Indurent Park Derby has been built out as at July 2026.
4	Rolls Royce, Raynesway	ES	3.00	3.00	This is only available to Rolls Royce.
		TOTAL	128.00		

6.5.4 With the exception ES which is solely for Rolls Royce, none of the proposed land supply is new land, being sites which are already allocated and/or benefit from a planning permission, and a significant proportion has been developed and is no longer available, having reduced further since the Council's assessment at April 2025:

- *Land South of Willmore Road (Infinity Park)* - this includes the Subject Site which is partially built out and where there is now 31.22 ha remaining, and other land outside the Infinity Park boundary but within the allocation. According to the draft local plan states there is 54 ha remaining here at April 2025.

- *Smart Pare, Spondon* - there is 19.72 ha remaining here with the remainder having been taken up by occupiers or developed out speculatively. The draft local plan states there was 35 ha remaining as at April 2025.
- *Indurent Park Derby* is now complete and there is no land remaining (the draft local plan states there was 2 ha remaining as at April 2025).

Supply Summary

6.5.5 **Table 6.5** sets out the total available land supply position, broken down by local authority area and excluding the Subject Site.

Table 6.5 Land Supply Summary (100,000 sq.ft/ 2.5 ha plus, I&L)

	Planning Permission		Allocated		Draft Allocations (no Planning Permission)		Total Land
Authority	Ha	Sq.m	Ha	Sq. m	Ha	Sq.m	Ha
Derby City	19.27	89,099	28.39	99,365	3.00		**50.66**
South Derbyshire	33.04	168,534	41.56	145,460	291.00	896,095	**365.60**
Total						**896,095**	**416.26**

6.5.6 Key points are summarised below:

- In addition to the Subject Site, there is a total of **c. 416 ha** of land supply within the PMA, comprising land which benefits from a planning permission, an existing allocation or a proposed allocation with available land not benefiting from a planning permission. This is made up as follows:
  a. *Land with Planning Permission:* **c. 52 ha;**
  b. *Allocated sites:* **c. 70 ha;** and
  c. *Proposed Allocations with available land and without planning permission:* **294 ha**
- The total includes c. 24ha of land with planning permission at Plot 11 and Plot E5 at Dove Valley Park which is not available to meet an occupier requirement currently so overstates the actual land supply position.
- Of this total, within Derby, land supply includes **c. 51 ha** as follows:
  a. *Land with Planning Permission:* **c. 19 ha** (Smart Pare)
  b. *Allocated sites:* **c. 28 ha**
  c. *Proposed allocation:* **3 ha**
- Within Derby there is a particular shortage of land which is able to meet larger occupier requirements on a flexible basis. This is limited to the Subject Site, Infinity Garden Village (element within Derby City) and SmartParc.

- Infinity Garden Village (to the south of Infinity Park) - c. 26 ha - is not able to meet an immediate occupier requirement, being dependent upon delivery of the A50 link road. There is no access to this site until the road is delivered and completed.
- SmartParc is focused on the food sector and is therefore only able to meet demand from certain occupiers. Occupiers here are undertaking both manufacturing and logistics uses within bespoke facilities, highlighting the need for flexibility around use classes in order to meet modern occupier requirements which are often hybrid in nature.
- The Subject Site therefore has a vital role to play in meeting immediate occupier demand across a range of uses and maximising investment and economic benefits to Derby. Flexibility to meet a full range of occupier requirements is essential.

Appendix C List of Enquiries Relevant to Infinity Park

Ref	Occupier/ Agent		Use Type	Enquiry Date
1	Savills (for client)	175,000 - 250,000 sq. ft	B8	May 2026
2	Infinity Tech	100,000+ sq. ft	B2	May 2026
3	JLL (for client)	120,000 - 150,000 sq. ft	B2/B8	May 2026
4	CBRE (for client)	15 - 25 acres	B2/B8	May 2026
5	COREP (for client)	80,000 - 120,000 sq. ft	B8	May 2026
6	JLL (for client)	160,000 - 170,000 sq. ft	B2	May 2026
7	C&W (for client)	175,000 - 225,000 sq. ft	B2/B8	May 2026
8	CBRE (for client)	250,000 - 350,000 sq. ft	B8	May 2026
9	Coca Cola	300,000 - 450,000 sq. ft	B8	May 2026
10	CBRE (for client)	5 - 25 acres	B8	May 2026
11	GV & CO (for client)	10 - 25 acres	B2/B8	May 2026
12	BNP Paribas (for client)	400,000 sq. ft	B2/B8	May 2026
13	Bestway	150,000 - 250,000 sq. ft	B8	May 2026
14	Am-Coe	20,000 - 40,000 sq. ft	B2	May 2026
15	Clarke Chapman	40,000 - 50,000 sq. ft	B2	May 2026
16	Amcor	100,000+ sq. ft	B2/B8	May 2026
17	Myton Horticulture	c. 400,000 sq. ft	B8	May 2026
18	J&E Group Ltd	100,000+ sq. ft	B8	May 2026
19	Lucas Leasing (for client)	0.5 acres+	B8	May 2026
20	CYSD UK Limited	108,000 sq. ft	B2	May 2026
21	EMCCA Inward Investment	100,000 sq. ft	B2	April 2026
22	EMCCA Inward Investment	TBC	B2	February 2026
23	HEB (for client)	75,000 sq. ft	B8	February 2026
24	Confidential	20,000 - 30,000 sq. ft	B2	February 2026
25	CBRE (for client)	120,000 - 180,000 sq. ft	B8	February 2026
26	Savills (for client)	70,000 - 100,000 sq. ft	B8	February 2026
27	GXO	300,000+ sq. ft	B8	February 2026
28	CBRE (for AMZ)	8 - 25 acres	B8	January 2026
29	Avison Young (for client)	3 - 5 acres	B8	January 2026
30	Birlea	150,000 - 175,000 sq. ft	B8	January 2026
31	Knight Frank (for client)	250,000 - 350,000 sq. ft	B8	January 2026
32	Avison Young (for client)	300,000+ sq. ft	B8	January 2026
33	Logix RE (for client)	27 - 42 acres	B8	December 2025
34	Newmark (for client)	85,000 - 200,000 sq. ft	B8	December 2025

	Occupier/ Agent		Use Type	Enquiry Date
35	Medstrom	55,000 - 70,000 sq. ft	B2/B8	December 2025
36	FHP (for client)	100,000 sq. ft	B8	November 2025
37	Russell Property Consultants (for client)	100,000 - 150,000 sq. ft	B2	November 2025
38	Made For Trade	100,000 sq. ft	B2/B8	November 2025
39	JLL (for client)	60,000 - 130,000 sq. ft	B2/B8	November 2025
40	JLL (for client)	100,000 sq. ft	E(g)(iii)/B8	November 2025
41	Games Workshop	100,000 sq. ft	B8	November 2025
42	Savills (for client)	300,000 - 600,000 sq. ft	B8	October 2025
43	Carter Jonas (for client)	100,000 sq. ft	B2/B8	October 2025
44	Waterstones	150,000 - 200,000 sq. ft	B8	October 2025
45	CEVA	150,000 - 200,000 sq. ft	B8	October 2025
46	CEVA	300,000+ sq. ft	B8	October 2025
47	CPP (for client)	100,000 - 150,000 sq. ft	B2/B8	September 2025
48	CPP (for client)	200,000 - 300,000 sq. ft	B2/B8	September 2025
49	C&W (for client)	250,000 - 350,000 sq. ft	B2/B8	January 2025
50	MRA Systems LLC	110,000 sq. ft	B2	November 2024
51	Savills (for client)	400,000 - 600,000 sq. ft	B8	September 2024
52	TDB (for client)	7 - 15 acres	B2/B8	February 2025

Source: Salloways, 2026. Active enquiries as of May 2026. Enquiries dated February 2026 or before are labelled as 'previously reported' or 'monitor'.

Appendix D Lease Transactions in DSD Since 2000

	Address (Costar)	•	••	Commentary	Tenant (if known)	Start Date
	William Nadin Way	57,414	B8	The tenant is a logistics distributor. Google Maps satellite confirms this is a large single storey distribution facility.	The Pallet Network	02/02/2020
2	Raynesway Park Drive	47,752	B8	The tenant is a logistics distributor. Costar images confirms this is a large logistics facility.	DHL	15/02/2026
3	Raynesway Park Drive	47,752	B8	This is assumed to be a prior lease at the same property above. The address, Costar images and floorspace leased are identical.	JD Sports	13/09/2021
4	Sinfin Moor	47,194	B8	The tenant is a logistics distributor. The tenant website confirms that Derby is a new facility. Costar images confirms this is a large logistics facility.	CEVA Logistics	28/05/2026
5	6000 Park Avenue	46,451	B2	The tenant carries out bottling operations for Lidl. Google Maps satellite and online news confirms this is a manufacturing facility.	MEG Derby	03/10/2022
6	9 Holme Lane	41,806	B2/B8	Costar property page indicates this is a food production and distribution facility. This is confirmed by the tenant website.	Greggs	01/10/2026
7	Raynesway Park Drive	34,467	B8	Costar property page indicates this is a logistics facility. This is confirmed by the tenant website.	Alloga	01/06/2021
8	2300 Dove Valley Park	31,865	B8	Costar property page indicates this is a logistics facility. This is confirmed by the tenant website.	GXO	01/01/2022
9	19 William Nadin Way	22,575	B8	Costar property page indicates this is a logistics facility. This is confirmed by the tenant website.	GXO	15/08/2024
10	DI45 Wyvern Way	13,657	B8	Costar property page indicates this is an industrial distribution facility. Industry news confirms that Rolls-Royce took a purpose-built warehouse space at the estate to support their submarine manufacturing operations, as well as the quantum leased.	Rolls-Royce Motor Cars	28/06/2024
11	William Nadin Way	13,192	B8	Costar brochure states this is a warehouse. Costar images confirms a warehouse typology.	IVC Brunel Healthcare	31/03/2026
12	Woodyard Lane	12,542	B8	Costar property page indicates this is a logistics facility. Costar images confirms a logistics typology.	Stobart	06/06/2021
13	Wyvern Way	12,170	B2	Costar property page indicates this is an industrial distribution facility. However, industry news confirms a primarily manufacturing facility.	Vaillant	21/12/2022

	Address (Costar)	•	••	Commentary	Tenant (if known)	Start Date
14	3A Dove Valley Park	10,498	B8	Costar brochure states this is a warehouse. Costar images confirms a warehouse typology.	Uniphar Pharma	26/06/2025
15	Wayzgoose Drive	9,755	B8	Costar and industry news indicate this is a industrial distribution facility with offices used by a medium size pottery manufacturer. The manufacturer has recently gone into administration.	Denby	01/06/2021
16	2000 Dove Valley Park	8,175	B8/Office	Costar and the tenant website indicate a mixed office and distribution headquarters for the Truma group. The tenant designs and distributes hi-tech accessories for outfitting caravans, motorhomes etc.	Truma	30/01/2021
17	Wyvern Way	7,246	B2/Office	At the same location as Rolls-Royce and Vaillant. Tenant website and industry news indicate a headquarters building plus some limited manufacturing capabilities.	Getinge	20/12/2022
18	50 Longbridge Lane	7,153	B8/Office	Costar images and the tenant website indicate a mixed storage, distribution and office facility for the aerospace and defence sector.	Incora	28/01/2021
19	6 Newmarket Drive	6,132	B8/Office	The tenant website indicates the facility hosts their central butchery and manufacturing facilities with secondary head office functions.	Fairfax Meadow	28/10/2021
20	Woodyard Lane	5,760	B8	Costar images and the tenant industry indicates a distribution facility.	Ascott Transport Ltd	15/04/2021
21	Wyvern Way	5,667	B8	Costar property page and brochure indicate a logistics facility.	Pureseoul	17/03/2026
22	Stores Road @ Mansfield Road	5,110	B8	Costar property page and brochure indicate a logistics facility.	Vertu Motors	19/02/2020
23	Wyvern Way	5,110	B8	Costar property page and brochure indicate a logistics facility.	Utopia Fulfilment	12/12/2024
24	Uttoxeter Road	4,274	B8	The tenant website indicates this is a flexible packaging facility.	Terinex Flexibles	
25	Walton Road	3,809	B8	The tenant website indicates this is a small audio visual equipment supplier and service provider.	JPSL	04/06/2021
26	3 Hearthcote Road	3,623	B8/Office	Costar property page and brochure indicate a mixed logistics and office facility. The tenant website indicates this is their UK headquarters and also hosts a training centre.	Fakro	20/03/2026
27	Coleman Street	3,437	B8/Retail	The tenant website confirms that the timber retail business operates primarily online but also includes a moderate level of in-person.	Harlow	01/01/2022

	Address (Costar)	•	••	Commentary	Tenant (if known)	Start Date
28	William Nadin Way	3,066	B8	Costar brochure states this is a warehouse. Costar images confirms a warehouse typology.	Brunel Healthcare Manufacturing	20/11/2020
29	Curtiss-Wright Ascot Drive	3,066	B8	The tenant website indicates this is a logistics facility.	Curtiss-Wright Corporation	
30	Raynesway	3,066	B8	Costar brochure states this is a warehouse.	Stellantis &You	27/01/2020
31	Wyvern Way	2,973	B8	Costar brochure states this is a warehouse.	Rodd & Gunn	02/12/2024
32	Nottingham Road	2,787	B8	Costar property page and brochure indicate a logistics facility.		02/03/2026
33	Millennium Way	2,601	B8	Industry news indicates this is a logistics facility.	Atlas Composite Technologies	19/07/2023
34	Wyvern Way	2,601	B8	Costar property page and brochure indicate a logistics facility.	Soniboom	31/03/2025
35	Cranmer Road	2,415	B8	Costar property page and brochure indicate a logistics facility.	Derby Express Couriers	06/09/2021
36	8 Woodland Road	2,415	B8	The tenant website confirms that the timber retail business operates primarily online but also includes a moderate level of in-person.	Global Timber Products Limited	13/11/2024
37	Infinity Park Way	2,230	B2/Office	Industry news and the developer's website indicates a mixed advanced manufacturing and office facility.	Star Micronics, Inc.	28/04/2026
38	Victoria Way	2,044	B2	Costar property page and the tenant website indicates the occupier tests, builds and supplies exhaust systems for racing cars. This facility is their main worldwide site.	Miltek Sport	21/12/2020
39	772 London Road	1,951	B8	Costar property page and the tenant website indicates a logistics facility.	Speedy Asset Services Ltd	02/02/2026
40	London Road	1,765	B2	The facility is known as the Kelvin test hall. The facility is a rail-related workshop connected to the main line. Online research indicates no single leaseholder is likely to have complete control over the facility. Instead, shared on-demand agreements are likely. Costar does not indicate current or past occupiers.		06/01/2020
41	Murdoch Road	1,765	BS/Retail	Costar property page and images indicate the tenant is a building supplier. The tenant website indicates customers are able to enter the site to speak with consultants and view stock.	MKM Building Supplies	12/09/2021
42	Meadow Road	1,765	B8	The tenant website indicates that this is a distribution facility for a light manufacturing business.	Neat Concepts	01/03/2024

	Address (Costar)	•	••	Commentary	Tenant (if known)	Start Date
43	Unit 15 Sandown Road	1,672	B8	Costar brochure indicates this is a logistics facility.		29/04/2023
44	Parcel Ter	1,672	B8	Costar property page and brochure indicate a logistics facility.	Surescreen Diagnostics Ltd	22/01/2021
45	8-11 Alfreton Road	1,672	B8	Costar property page and brochure indicate a logistics facility.		31/07/2024
46	Unit 8 Raynesway	1,672	B2/B8	Costar brochure, images and the tenant website indicate that both manufacturing and distribution occur on-site.	SGS Engineering (UK) Ltd	13/08/2021
47	Darley Abbey	1,579	B2/B8	Online research indicates the company went into administration and the site has now been leased to a building supplies manufacturer/distributor (Sycamore Avenue).	Greenbank Engineering Services Ltd	26/01/2022
48	Wayzgoose Drive	1,579	B2/B8	The property itself is quite large. Costar does not indicate which of the four tenants on the site signed the relevant lease and the floorspace leased does not match up with any of the areas listed. The brochure and property page describes the site as a workshop/warehouse complex under a pitched roof. This aligns with Google Maps satellite view and images.		01/12/2025
49	Sinfin Lane	1,486	B8	Costar property page and images indicate a logistics facility.		10/05/2021
50	Dunstall Park	1,486	B8	CoStar's brochure does not appear to refer to the right site, given the description on the property page. By referencing Costar images of the property with Google Maps street view, the facility is confirmed to be in distribution use.	Aseptic Medical Devices	24/08/2023
51	Dunstall Park	1,486	B8	CoStar's brochure does not appear to refer to the right site, given the description on the property page. By referencing Costar images of the property with Google Maps street view, the facility is confirmed to be in distribution use.	Hayley Group	13/07/2023
52	Riverside Court	1,486	E(g)(iii)	The tenant website indicates they are a calibration company. Their business model involves taking in equipment and calibrating. This is considered to fall under an E(g)(iii) since no major manufacturing is required. This is confirmed by the Costar brochure and images, which indicate a mixed E(g)(iii) and office space.	Comech Metrology Ltd	02/10/2025

	Address (Costar)	•	••	Commentary	Tenant (if known)	Start Date
53	City Road	1,394	B2	The tenant does not exist on online, including on companies house. Costar property page and images indicates an old brick workshop complex with offices and bays. This has been confirmed on Google street view, but the site looks relatively unused. The site is owned by Derby City Council.	Container Manufacturing Equipment Ltd	12/02/2024
54	Victory Road	1,394	BS	Google Maps satellite view indicates a warehouse. However, the tenant cannot be identified.	BK Event Ltd	13/03/2020
55	Unit 11 Dunstall Park Road	1,301	BS	Costar property page, Google Maps street view and the tenant website indicates a distribution facility.	Big Book Wholesale Ltd	28/02/2023
56	Optimum Road	1,301	BS	Costar property page, images and the tenant website indicates a self-storage facility	UK Storage	15/04/2021
57	Ashby Road	1,301	B2/B8	The tenant website indicates the business both manufactures and distributes pharmaceutical supplies. However, the facility does not look like a warehouse (lacking easy vehicle access) but also does not appear to be a major manufacturing facility. Conservatively, a hybrid facility is assumed.	Surepharm	29/09/2025
58	Tetron Point	1,301	BS/Office	The tenant website indicates this is the headquarters of a HVAC distributor firm.	Logicool	01/04/2022
59	Ascot Drive	1,301	BS/Retail	The tenant website indicates the facility is used for both distribution and retail operations.	Howdens	23/08/2024
60	Amberley Drive	1,208	E(g)(iii)	The Costar brochure states that the building is designated E(g)(iii). Costar images indicate a standard warehouse with ancillary office.	Exalto Bearings UK Ltd	31/03/2021
61	45 Bateman Street	1,208	E(g)(iii)	The Costar brochure accommodation schedule indicates the majority of the space is an office/workshop falling within E class use, with around 30% being BS.	Sound of Music Ltd	02/02/2024
62	Mansfield Road	1,208	B2	Costar property page and images indicate this is a car body shop.	Custom Paintwerx Ltd	12/03/2020
63	Walton Road	1,115	BS	Costar property page and images indicate a warehouse.	DeepTech Recycling Ltd	29/01/2024
64	Alfreton Road	1,115	B2/B8/Office	The site was previously used as a NHS wheelchair storage, repair and administrative facility. The current tenant is not known.		01/02/2026

	Address (Costar)	•	••	Commentary	Tenant (if known)	Start Date
65	Raynesway Park Drive	1,115	BS	The Costar brochure states that the building is designated in use classes BB and E(g). Costar images indicate the facility is for primarily BS use.	Remit Group Ltd	31/03/2023
66	Victoria Way	1,115	BS/Office	Costar property page, tenant website and Google Maps street view indicate that the facility is used by agents for and suppliers of stone machinery.		28/11/2023
67	Mansfield Road	1,115	BS/Office	Costar property brochure accommodation schedule and images indicate the facility is in mixed BS and office use.	Renewable Incentives	29/12/2021
68	Alfred Eley Clos	1,022	BS	The facility is used by an organisation that provides homecare services associated with NHS. The facility appears likely to function as the distributing hub for medicines.	Healthnet Homecare	25/11/2020
69	Ashlyn Road	1,022	BS	Costar property brochure states that the building is designated in use classes BB and E(g). Costar images indicate a typical warehouse with bay doors.		05/06/2022
70	Westside Park	1,022	B2/B8	Costar property brochure states that the building is designated in use classes B2 and BS. The business is rated as workshop premises. The tenant manufactures and supplies vinyl tiles.		19/03/2026
71	Nottingham Road	1,022	B2/Office	Costar images indicate half of the facility is in office use, while the other half is in mixed B2/B8 use. Online searching indicates the tenant was a famous doughnut factory. The parent company has recently entered administration.	Project D	15/09/2021
72	Tetron Point	1,022	BS/Office	Mirror unit adjacent to Logicool above.	CSL	21/10/2022
73	Raynesway Park Drive	1,022	BB	Costar property brochure states that the building is designated in use classes BB and E(g). Costar images indicate a typical warehouse with bay doors.		27/06/2024

Source: Costar, 2026; Savills, 2026.

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Appendix D Marketing Activity

August 2026

Developments
Forest Business Park
Bardon Hill
Leicestershire
LE67 1UB

55 Colmore Row
Birmingham
B3 2AA
savills.com

Dear

Latest Marketing Activity for the Advanced Manufacturing Sector at Infinity Park Derby

Further to previous updates regarding marketing activity undertaken in support of Infinity Park Derby, we have set out below a summary of the marketing initiatives completed to date, details of occupier engagement and the rationale behind the recipients selected for our most recent targeted marketing campaign for the manufacturing and advanced manufacturing sectors.

As outlined in our previous update, the marketing strategy for Infinity Park Derby has consistently focused on attracting occupiers from all sectors, including manufacturing and advanced manufacturing. This reflects both the strong characteristics of the site, including power availability and strategic location for such occupiers, and the benefits of the Investment Zone, which is intended to support innovation-led manufacturing, engineering, aerospace and related industries.

Throughout the marketing of Infinity Park Derby, there has been a dedicated manufacturing brochure prepared and continues to be used as part of our wider marketing campaign. Enquiries received through various channels have been responded to with information tailored specifically towards advanced manufacturing occupiers and businesses seeking opportunities for expansion or relocation within the region.

During the course of the campaign, discussions have taken place with a number of advanced manufacturing organisations. Recent examples include Infinity Technology Group Limited, MRA Systems and the Advanced Manufacturing Centre of Excellence (AM-COE). In relation to MRA and AM-COE, whilst both organisations expressed an interest in the opportunity at Infinity Park Derby, neither project is currently considered viable from a development perspective, with the respective parties not presently in a position to progress proposals at a scale sufficient to support a commercially deliverable scheme. With Infinity Technology Group Limited, I understand there are early exploratory discussions about taking additional space at Infinity Park Derby (having recently taken occupation of the former NAMRC facility on the Park).

Other discussions have also been held with prospective occupiers with a focus on advanced manufacturing, although these have subsequently not progressed further.

In addition to the above marketing activities, Savills worked alongside Marketing Derby and the wider Infinity Park Derby team to produce a dedicated Investment Zone promotional document specifically targeting advanced manufacturing occupiers. The document highlights the benefits available through the Investment Zone designation, including the wider strategic advantages of locating at Infinity Park Derby. This material has been made available via the Infinity Park Derby website, where interested parties can download the document after completing a registration form. This process enables enquiries and engagement levels to be tracked and followed up where appropriate. Whilst the campaign generated a number of website interactions and downloads, the volume of direct enquiries arising from this exercise has been limited.

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

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We have also sent the Investment Zone document to all parties that have historically engaged with Infinity Park Derby but again, there has been little follow up from those parties following this exercise.

Most recently, a specialist HTML email campaign (screen shot as Appendix 2) was developed and issued during w/c 3rd August. The campaign was designed to showcase the benefits of the Investment Zone and further promote Infinity Park Derby for advanced manufacturing and industrial occupiers. This activity forms part of the ongoing programme of targeted engagement aimed at generating occupier interest from key sectors.

Target Occupier Selection

The recipients for the latest marketing initiative have been selected using Savills' occupier database, which incorporates acquired occupier information from one of the market's leading providers of commercial property occupier and direct marketing data. This provides access to a comprehensive database of manufacturing and industrial occupiers across the United Kingdom, enabling campaigns to be directed towards businesses that are most likely to have current or future property requirements.

The campaign focused on advanced manufacturing and related sectors, including organisations operating in engineering, automotive, aerospace, defence, food production, pharmaceuticals and wider industrial manufacturing. Additional organisations from the defence sector were incorporated into the campaign due to the increasing levels of demand being experienced from defence-related occupiers across the UK industrial and logistics market.

A summary of the principal target sectors and example occupiers included within the campaign is provided below and a full list is at Appendix 1:

Target Sector	Example Occupiers Included
Advanced Manufacturing	Rolls-Royce, Renishaw, Yamazaki Mazak, JCB, Komatsu,
Aerospace & Aviation	Boeing, Meggitt, Magellan Aerospace, Pall Aerospace
Defence & Security	BAE Systems, Babcock International, Rheinmetall, AWE, Anduril
Automotive Manufacturing	Gestamp, Benteler Automotive, Pilkington Automotive
Engineering & Industrial Tech	Spirax Sarco, Rotork, Tracerco, Goodwin International
Pharmaceuticals & Life Sciences	Oxford BioMedica, Norgine, Teva UK, Sterling Pharma Solutions
Food & Beverage Manufacturing	Heinz, PepsiCo, Kepak, Tayto Group
Packaging & Materials Manufacturing	Ardagh Glass, Graphic Packaging, Greiner Packaging, Plastipak
Chemicals & Process Industries	Air Products, Syngenta, Innospec, SABIC
Existing Project Enquiries	Infinity Tech and AM-COE

The occupier database used for the HTML campaign comprised several hundred organisations operating within these sectors, ensuring that marketing activity was directed towards businesses whose operational requirements align closely with the opportunities available at Infinity Park Derby.

Campaign Analytics and Performance Reporting

Given that the HTML campaign was distributed during the w/c 3rd August, it is currently too early to draw definitive conclusions regarding engagement and conversion levels.

Typically, performance analytics associated with HTML campaigns require approximately three weeks to mature before meaningful analysis can be undertaken. This reporting period allows sufficient time for recipients to engage with the content, access linked materials and make any enquiries arising from the campaign.

Initial reporting will therefore focus on:

- Email open rates
- Click-through rates
- Downloads of marketing brochure
- Website engagement statistics
- Enquiry generation
- Follow-up activity arising from recipient engagement

Once this information becomes available, a more detailed assessment of campaign effectiveness can be undertaken and appropriate follow-up actions identified.

In summary, a considerable amount of targeted marketing has been undertaken to position Infinity Park Derby before key advanced manufacturing and industrial occupiers. This has included dedicated sector-specific brochures, website-based promotional materials, targeted occupier engagement, collaboration with Marketing Derby and most recently a specialist HTML campaign distributed to a carefully selected database of targeted occupiers. We will continue to monitor engagement levels, progress occupier discussions and refine the marketing strategy as opportunities emerge.

We trust the above provides a comprehensive overview of the marketing activity undertaken to date.

Should you require any further information, please do not hesitate to contact us.

Yours sincerely

For and on behalf of Savills UK Limited

Appendix 1: Occupier Distribution List

Occupier	Occupier	Occupier	Occupier	Occupier
A & P Group Ltd	A B P	A J W Aviation	A L C O A	A M G Chrome (UK) Ltd
Acorn Stairlifts	Aflex Hose	Aimia Foods	Air Products plc	AkzoNobel (UK) Ltd
Alexander Dennis Ltd	Allergy Therapeutics Ltd	Almac Group	Amazon Filters Ltd	Amphenol Invotec
Andor Technology Ltd	Aqualisa Products	Arconic	Ardagh Glass Ltd	Artifex Interior Systems
Aston Martin Lagonda	Atlas Tanks	Avon Engineered Rubber Ltd	Avon Motorsport	Axiom Manufacturing Services Ltd
B A E Systems	B D T/A Bard Limited	B E E Health Group Ltd	B F F Technical Fabrics	B P Pulse
Baker Perkins Ltd	Barony Universal Products Plc	Baxi Heating	Baxi Packaged Solutions Ltd	Beatson Clark Ltd
Benteler Automotive UK Ltd	Berry Global	Bespak	Bifold Fluid Power Ltd	Billington Structures Ltd
Birtley Group Limited	Bolton Plastic Components Ltd	Bosch Thermotechnology	Bostik	Brett Martin Ltd
Bridgnorth Aluminium Ltd	Brothers Drinks	Browns Manufacturing Ltd	Brush	Bulk Devices
C D S Global	C D T Sidoli Welshpool Ltd	C F Fertilisers UK Ltd	C N C Speedwell	C V G T/A KAB Seating Ltd
Cammell Laird	Carnaud Metal Box Engineering	Castings Plc	Catalent Pharma Solutions Ltd	Caw Ingredients Ltd
Cedo Ltd	Centrax Ltd	Chas A Blatchford & Sons Ltd	Cleveland Potash	Clyde & Forth Press
Coba Ltd	Coca-cola HBC Northern Ireland Ltd	Colorcon Ltd	Concentric Birmingham Ltd	Contract Candles & Diffusers Ltd
Cooper & Turner	CooperVision Ltd	Coordination Group Publications Ltd	Coppice Alupack Ltd	Cosma Casting UK
Crane Process Flow Technology Ltd	Cranswick Plc	Creagh Concrete	Creative Composites	Dale Power Solutions Plc
Devro	Dextra Group	Diodes Semiconductor GB Limited	Domino Printing Sciences Plc	Don & Low Ltd
Don-bur	Druck Ltd	Dundas Chemical Co	Dynex Semiconductor Ltd	E E T Fuels
E M A P Publishing	Eaton Corporation	Eaton Electric	Ebac Ltd	Edwards
Emergency One	Encirc	Encore Envelopes Ltd	Enermech	Enersys
English Provender Co	Epwin Group Plc	Esab Group UK Ltd	Essar Oil UK Ltd	Essentra plc
Essilor Ltd	Esterform Packaging Ltd	Etex Building Performance	Euromonitor International	F E I Foods Ltd
Fairline Yachts	Fenmarc Produce Ltd	Ferguson Marine	Festo Ltd	Finlay Terex
Finnebrogue	Fisher Scientific	Foster Refrigerator	Frederic Robinson Ltd	Friday Media Group
Froneri Ltd	Fuchs Lubricants Plc	Futamura Chemical UK Ltd	Gateway Publishing	Gemini Rail Services

Occupier	Occupier	Occupier	Occupier	Occupier
Genesis Oil & Gas Consultants Ltd	Gestamp UK Ltd	Getinge Group T/A ArjoHuntleigh	Glazerite	Glenair (UK) Ltd
Global Energy Group	Goodwin International	Graphic Packaging International Ltd	Greiner Packaging	Grupo Bimbo
Guala Closures Ltd	Hafele UK Ltd	Halewood International Ltd	Halo Foods	Heidelberg Materials UK Holdings Ltd
Heinz	Hensoldt	Herbert Parkinson	Hozelock	Hunter Plastics UK
Huntleigh Healthcare	Hurst Doors	Hydro Building Systems	I 2 R Packaging Solutions	I A C
I D S L	I M Serv	I P E C O Holdings	I V C Brunel	Ichiban UK
Icon Aerospace Technology Ltd	Ideal Boilers	Iggesund	Independent Glass Co Ltd	Innospec Ltd
Integrity Total Print Solutions	International Flavours & Fragrances	Intersurgical Ltd	Invibio	Invista Textiles UK Ltd
Ipeco Holdings Ltd	Ishida Europe	J & D Pierce Contracts Ltd	J C B Earth Movers	J P I Media
James Cropper Plc	James T Blakeman & Co Ltd	James Walker	Jigsaw Foods	Jim Lawrence Lighting & Home
John Smedley Ltd	Kanes Foods Ltd	Karcher UK Ltd	Kepak Convenience Foods	Kestrel B C E
Kingspan Group	Kinnerton	Klarius	Klockner Pentaplast Group	Knorr Bremse
Kohler Mira Ltd	Komatsu	Koura	Kronospan Ltd	Lawrence David Ltd
LexisNexis Risk Solutions Group	Leyland	Linatex Ltd	Linde Advanced Materials Technologies	Linden Foods
Liniar Ltd	Linney Group Ltd	Lothian Electric Machines Ltd	Lucchini Unipart Rail	M E N Media
M H Poskitt Ltd	M T L Advanced Ltd	Mademoiselle Desserts Taunton Ltd	Magellan Aerospace	Magna Exterior Systems
Makita Manufacturing Europe Ltd	Malvern Panalytical	Manrose	Masonite T/A Premdor Crosby Ltd	McAlpine
McCloskey International	McColgans	McCormick	McIntosh Donald	McLaren Automotive Ltd
Meiyume	Meritor	Metsa Wood	Mettler Toledo Safeline Ltd	Mission Foods
Mizkan Euro	Moeller Tech Ltd	Molson Coors Brewers Ltd	Morgan Sindall Group plc	N G F Europe
N M B Minebea UK Ltd	N S K	N W G Scientific Services	Newly Weds Foods Ltd	Nidec Industrial Automation
Nifco UK Ltd	Nipon Sheet Glass Co Ltd T/A Pilkington	Norbar Torque Tools Ltd	Norbrook Laboratories Ltd	Norgine
Norma UK Ltd	Northern & Shell Distribution Ltd	Nuaire	NuFarm Ltd	Numatic International Ltd
Nutricia	Olympus Keymed Ltd	Ontic	Owen Mumford Ltd	Oxford BioMedica Plc
Oxford Instruments Plc	P C I Pharma Services	P P G Archictectural Coatings	Pall Aerospace Ltd	Palram Europe Ltd
Peak Scientific Ltd	Pegler Yorkshire Group Ltd	Pendennis Ltd	PepsiCo UK & Ireland	Perkins

Occupier	Occupier	Occupier	Occupier	Occupier
Phoenix Natural Gas Ltd	Phonak	Pickstock Telford Ltd	Pilkington Automotive Ltd	Pirelli Tyres Ltd
Pladis Global	Plastipak UK Ltd	Plexus Corp (UK)	Polyframe	Polypipe Building Products
Pork Farms	Powell UK Ltd	Prax	Precision Polymer Engineering	Precision Proco Ltd
Prem Dor	Pritex	Pro Drive	Profine UK	Proto Labs Ltd
Prysmian Cables & Systems Ltd	Pullmaflex UK Ltd	Purolite An Ecolab Company	Qioptiq	Quercus
R P C Containers Ltd	Radwell International	Rayovac	Raytheon UK	Reflex Labels
Renishaw	Richard Alan Engineering	Richard Burbidge Ltd	Ricor	Rilmac Holdings Ltd
Rittal C S M Ltd	Robert Bosch Ltd	Robert McBride Ltd	Rockwell Automation Ltd	Rolls Royce Motor Cars Ltd
Rotork	Route 1 Print	Roxel UK	Rust-oleum	Ryobi Aluminium Casting UK Ltd
S K Chilled Foods	S M C	S P T S	Sabic	Safran Landing Systems
Sage Publications Ltd	Saladworks	Sandtex	Santa Fe Shutters	Saria Ltd
Scarab Sweepers Ltd	Scott Bader Company Ltd	Seda UK Ltd	Senior Aerospace B W T	Severfield plc
Sherwin-Williams UK Ltd	Siva Plastics	Sleepeezee	Solidel UK	Solenis
Solidor	Southco Manufacturing Ltd	Special Metals	Spirax Sarco	Sterling Pharma Solutions Ltd
Stiltz Ltd	Stoelzle Flaconnage Ltd	Stormking	Sulzer	Suntory Beverage & Food GB & I
Swann-Morton Ltd	Swansea Industrial Components Ltd	Syngenta Ltd	Synthomer Plc	T E Connectivity Ltd
T G W	T M D Friction Ltd	Tamlite Lighting	Tayto Group Ltd	Teledyne E 2 V
Teva UK Ltd	The Lianhetech Organics	Thermo Fisher Scientific	Thompson & Capper Ltd	Thompson Aero Seating Limited
Thorlux Lighting Plc	Thornton & Ross Ltd	Thumbs Up Bury Ltd	Timet	Titan Europe Plc
Tracerco	Trend Control Systems Ltd	Triton Showers	Truframe	U P M
Union Electric Steel	Unipart Powertrain Applications	Unipres (UK) Ltd	Usborne Publishing	Vaillant Group (The)
Vax Ltd	Vectura Ltd	Veka Plc	Vent-axia	Vision Labs
Vita Cellular Foams	Volvo Group Ltd	W E C Group Ltd	W H S Plastics Ltd	Walker Filtration
Washington Metalworks	Weartech	Weir Group plc	Welton Bibby & Baron	West Rock
Westrock T/A Multi Packaging Solutions Ltd	Whitecroft Lighting	Wienerberger Ltd	William Gibbons	Williams Refrigeration
Wirquin Ltd	Wockhardt UK Ltd	Xoserve Ltd	Yamazaki Mazak UK Ltd	Yuasa Europe

Occupier	Occupier	Occupier	Occupier	Occupier
Zertus Ltd	Zotefoams Ltd	Infinity Tech	Am-Coe	Rolls Royce
Babcock International	Total Energies	Exagon Group	Meggitt	Arx Robotics
Morson	BAE Systems	A W E	Rheinmetall	Flyby Technology
Boeing	Anduril	Fujitsu	Magellan Aero	

Appendix 2: Screenshot of Html



The future of advanced manufacturing starts here

Join one of the UK's most established design and engineering clusters at Infinity Park Derby.

Located alongside Rolls-Royce Civil Aerospace and surrounded by world-leading aerospace, defence, nuclear and engineering businesses, Infinity Park Derby offers bespoke design and build opportunities of up to 380,000 sq ft — now enhanced by East Midlands Investment Zone tax benefits.

Explore the Opportunities

savills



Unlock significant savings

Tax incentives at Infinity Park Derby include:

- **SDLT Relief**
- **Business Rates Relief**
- **Employer NIC Relief**
- **Enhanced Capital Allowances**
- **Assistance with local recruitment**

Discover the Benefits Now

A UK manufacturing powerhouse

- Adjacent to Rolls-Royce Civil Aerospace
- Within 15 minutes: Toyota • Alstom • JCB
- Home to Nuclear Skills Academy

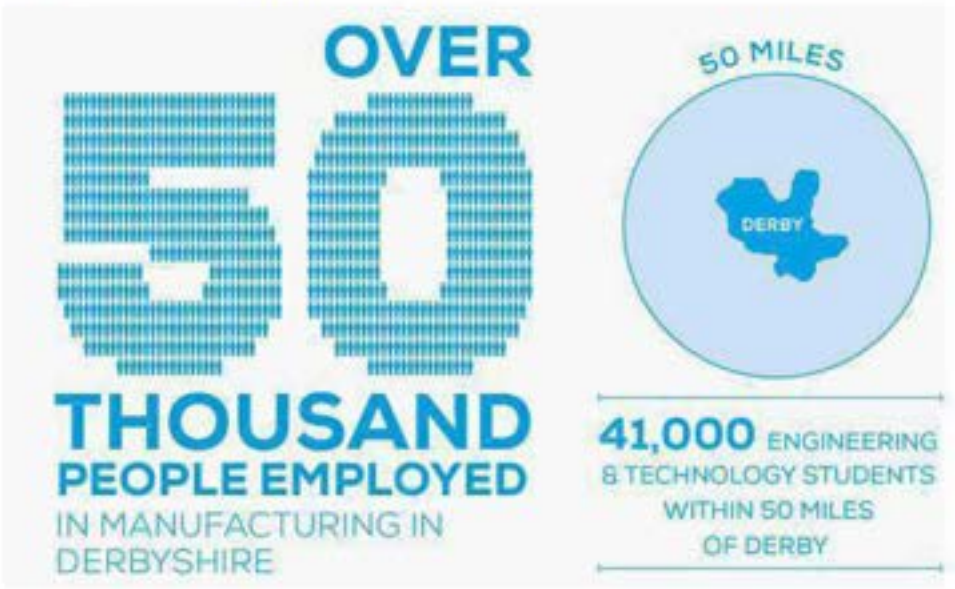


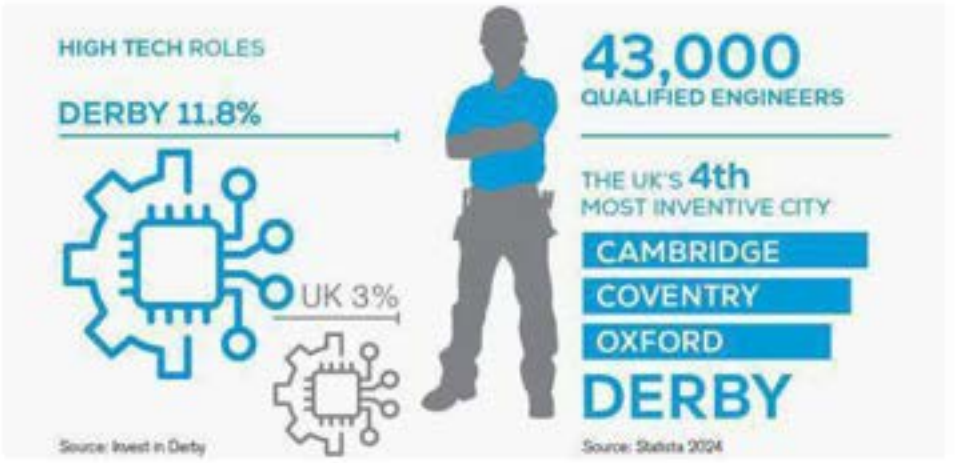






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Design & Builds up to 380,000 sq ft

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Infinity Park Derby

Logistics Needs Assessment

Prepared for Infinity Park Derby LLP

June 2025

Executive Summary

The Subject Site (Infinity Park Derby) is covered by Policy AC15 in the adopted Derby City Local Plan Core Strategy (2017). Policy AC15 applies to the planning permission covering the Subject Site, limiting the level of B8 development across the whole site to 50% of overall floorspace. This report seeks to demonstrate that the removal of this 88 restriction would not be incompatible with the goals of the policy and that allowing further development of B8 floorspace at the Subject Site would help to meet a significant supply shortfall given strong logistics demand in Derby.

Policy AC15 does not recognise the importance of logistics to the local economy

The BB limitation set out in Policy AC15 does not reflect the importance of the logistics sector to the local economy, including the high-quality and well-paid jobs it generates for local residents. It also fails to take into account that logistics is one of the only sectors of the economy that is seeing investment in areas outside of major cities such as London. The logistics sector is able to provide high quality jobs to local residents, even those without formal educational qualifications, which can help Derby reduce unemployment levels and deprivation.

88 development 'is generally in keeping with the vision for the area of the city'

The restriction on B8 development applies to the planning permission covering the Subject Site 'in order to ensure that development is in keeping with the vision for the area', namely the creation of an 'innovation and technology park' for companies in the manufacturing and manufacturing service sectors. This policy implies that B8 uses are not compatible with this vision. B8 uses are in fact in keeping with the vision of the area given that:

- Manufacturing and logistics are inextricably linked
- Modern I&L floorspace is inherently flexible and houses a number of functions under one roof, including manufacturing and research and development (R&D) activities
- The logistics sector plays an important supply-chain role in the economy
- High-tech innovations are reshaping the logistics sector

A Sector with High-Tech Innovations

Manufacturing and Logistics are Linked

Logistics Supports the Wider Economy

88 development at the Subject Site will 'not prejudice the development of other employment sites within the City where large scale 88 development would be more desirable'

The removal of the B8 restriction relating to the planning permission covering the Subject Site would not prejudice the development of other sites within the city, primarily because demand for B8 is so strong and has been underestimated in Derby's evidence base. Logistics floorspace in Derby has seen strong rental growth as supply has failed to keep up with strong demand. Further to this, Derby has a substantially high proportion of low-quality stock that would prevent new occupiers from investing in Derby.

Historic leasing trends, alongside live requirements indicate that the vast majority of demand is for BB uses and that B2 demand is not a consistent and reliable source of demand in Derby. As such, safeguarding prime logistics land for these unreliable sources is likely to negatively impact the deliverability of the Subject Site and limit much needed investment into Derby.

When we compare Savills future demand estimations to the future supply pipeline we can see that without removing the B8 restriction at the Subject Site. Derby is likely to continue to be supply constrained into the future, limiting the City's economic potential.

Furthermore, the Subject Site is a logistics location given its size and connectivity meaning that it would not prejudice development at other employment sites within the City.

Strong Logistics Rental Growth

Poor Quality Existing Logistics Inventory

Significant Supply Shortfall

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1 Introduction and the Subject Site

1.1 Report Purpose and Structure

1.1.1 The Subject Site (Infinity Park Derby) is covered by Policy AC15 in the adopted Derby City Local Plan Core Strategy (2017). Policy AC15 and the subsequent planning permission on the Site limits the level of B8 development across the whole site to 50% of overall floorspace.

1.1.2 This report seeks to demonstrate that the removal of this B8 restriction relating to the planning permission would not be incompatible with the goals of the policy and that allowing further development of B8 floorspace at the Subject Site would help to meet a significant supply shortfall given strong logistics demand in Derby.

1.1.3 In summary, this report demonstrates that:

- Policy AC15 does not recognise the importance of the logistics sector to the local economy;
- Further B8 development at the Subject Site would not be incompatible with the 'vision for the area'; and
- Further B8 development at the Subject Site would not 'prejudice the development of other employment sites within the City where large scale B8 development would be more desirable' given that logistics demand has been underestimated, there are severe land supply constraints in the City, and the Site is one of Derby's prime logistics locations

1.1.4 This report is structured as follows:

- **Section 2** reviews the latest relevant employment evidence across Derby and its associated Functional Economic Market Area (FEMA), specifically the approach to estimating future employment demand;
- **Section 3** outlines the importance of the logistics sector to the local economy of Derby;
- **Section 4** demonstrates why B8 development is compatible with the aspirations of Policy AC15, namely in keeping with the vision for the area;
- **Section 5** assesses market supply and demand signals within the logistics property markets of Derby and the Derby FEMA and brings together our future demand estimations and compares this to the future supply pipeline;
- **Appendix A** details Savills full methodology for estimating future Industrial and Logistics ('I&L')[1] demand;
- **Appendix B** presents Savills review of I&L supply in Derby City and South Derbyshire; and

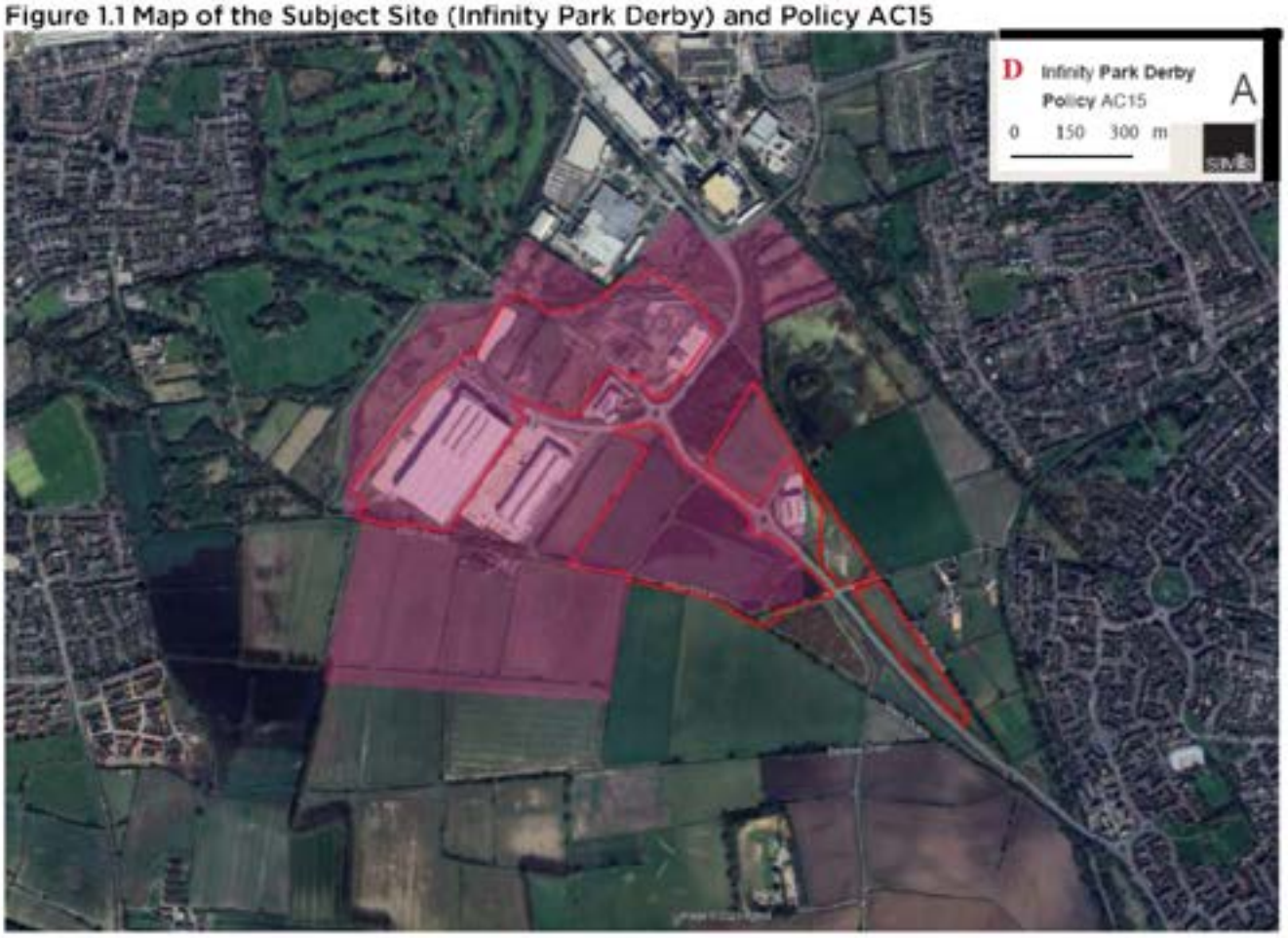
[1] When we refer to the I&L sector we mean Light Industrial (formerly Blc use class now part of Class E), General Industry (B2 use class), and Storage and Distribution (logistics) (B8 use class). Effectively the primary use classes that require warehouses and factories (including ancillary offices), and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

- **Appendix C** presents a list of I&L requirements collated by Salloway that would be applicable to the Subject Site.

1.2 The Subject Site

1.2.1 The Subject Site, Infinity Park Derby, falls within Policy AC15 of the Derby City Local Plan Part 1 Core Strategy 2017, which controls the development of land south of Wilmore Road, Sinfin (see **Figure 1.1**)

Figure 1.1 Map of the Subject Site (Infinity Park Derby) and Policy AC15



Source: Derby City Local Plan Part 7 Core Strategy 2077, Wilson Bowden

1.2.2 A major development control criteria of Policy AC15 is that it limits the level of B8 development across the whole site (i.e. the allocated area) to 50% of overall floorspace. The planning permission applicable to the Subject Site is also covered by this restriction. The stated reasons for this limit are:

- To ensure that the development 'is generally in keeping with the vision for the area of the city'
- To ensure the development 'does not prejudice the development of other employment sites within the City where large scale B8 development would be more desirable'.

2 Local Plan Employment Evidence Base Review

2.1 Introduction

2.1.1 This section provides a high-level review of the most recent employment evidence covering Derby and the Functional Economic Market Area (FEMA) it sits within (defined in the Derby HMA Employment Land Review 2008).

2.1.2 Our review seeks to understand the future demand methodologies used within the employment evidence and the various results they produce for employment floorspace and land. We follow this with our view of the methodological weaknesses of the key employment evidence which we believe has led to an underestimate of logistics need.

2.2 Adopted Local Plan Employment Evidence

Derby HMA Employment Land Review (2008)

2.2.1 The Derby Housing Market Area Employment Land Review (ELR) was prepared by BE Group in 2008. The report includes forecasts for employment land based on past trends in employment land take-up using monitoring data from Derbyshire County Council. Gross land take-up between 1992-2006 was projected forward on a linear basis for the 2006-26 period.

2.2.2 The ELR also reviewed econometric forecasts. BE Group reviewed forecasts in the East Midlands Land Provision Study (2006) prepared by Roger Tym and Partners for the East Midlands Regional Assembly. These forecasts are based on Experian economic forecasts for jobs calibrated to align with the level of housing provision proposed in the emerging regional plan.

2.2.3 Forecasts for floorspace and land requirements were then derived from this, using the standard approach of relating employment by sector to use classes; applying standard employment densities to this to derive floorspace forecasts; and using a 40% plot ratio to convert this to net requirements for additional land. BE Group then translated the forecasts over the period from 2003-16 to cover the 2006-26 period on a linear basis to provide estimates of employment land requirements over the plan period.

2.2.4 Once these forecasts have been translated from gross to net need, there is a requirement for around 54 hectares of land for offices and 31 hectares for industrial, but this is offset against a declining requirement for land for industrial of 94 hectares resulting in a net reduction in the level of land needed by 9 hectares over the 20-year period in the Derby HMA. The future demand estimates resulting from the economic forecasting models seem to be the preferred method from the BE Group.

Derby HMA Employment Land Review: Forecasts Update, March 2073

2.2.5 This report provided updated forecasts of requirements for employment land over the 2008-28 plan period for each of the three local authorities areas which together constitute the Derby Housing Market Area (HMA): Derby City, South Derbyshire and Amber Valley. The report updated demand forecasts set out in the Derby HMA

Employment Land Review (2008) prepared by BE Group.

2.2.6 This report has three main forecasting techniques:

- Labour demand forecasts
- Labour supply policy-ON forecasts
- Projections of past take-up

2.2.7 The report determined that the Labour Demand Scenario, based on the Experian forecasts, indicated a very limited requirement for additional employment land and that it was likely to be too pessimistic. The report also states that the past take-up methodology was likely to overestimate the level of additional employment demand. The Labour Supply Policy-On Scenario was determined to support employment growth in line with growth in labour supply.

Table 2.1 Summary of Forecasts ELR Forecast Update 2013

Land Requirement (ha)	Derby (2008-2028)
Labour Demand	26.6
Policy-ON Labour Supply	130.1
20-yr Completions	142.3
10-yr Completions	132.7

Source: GL Hearn

2.3 Emerging Plan Employment Evidence

Derby City Council and South Derbyshire District Council Employment Land Review 2023

2.3.1 This report provided an Employment Land Review (ELR) for the City of Derby (Derby) and the District of South Derbyshire. It was produced by BE Group to update the 2008 ELR for the Derby Housing Market Area (HMA), also produced by BE Group, but now excluding the other HMA local authority, Amber Valley, which is committed to a separate timescale for Local Plan review, to that of Derby City Council and South Derbyshire District Council.

2.3.2 This report has three main forecasting techniques:

- Historic Land Take-Up
- Employment Based Forecast
- Resident Workforce Forecast

2.3.3 The report ultimately chose the results from the 'Historic Land Take-Up' methodology as their estimates for future employment land requirements. The results of this methodology are shown below in **Table 2.2.**

Table 2.2 Summary of Results (ELR 2023)

Land Requirement (ha)	Derby
2022-2039	77.8
2022-2040	81.42
2022-2041	84.96

Source BE Group

2.4 Savills Employment Evidence Observations

2.4.1 Below we outline what we consider to be some of the key weaknesses of the demand methodologies used in the ELR (2008), ELR Update (2013), and 2023 ELR.

2.4.2 Our review of Derby's employment evidence indicates that insufficient regard is given to market signals directly as required by Paragraph 32 of the National Planning Policy Framework ('NPPF'):

'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and iustifying the policies concerned, and take into account relevant market signals'.

2.4.3 Derby's employment evidence instead relies on labour supply, labour demand and past development rates to forecast future land needs. These approaches have drawbacks, and we therefore consider the demand scenarios used to underestimate 'true' market demand in Derby. This is because the methods used by the employment evidence only tell you what has happened and projects this forward, rather than estimating the true need or potential of the market for employment uses.,

2.4.4 Due to recent changes in market trends and consumer behaviour as a result of COVID-19, Brexit and a more online focussed population, it would be erroneous to rely on past trends to define future uptake given that these structural changes are in their infancy. In this light, the ELR follows some PPG principles but neglects some factors that ultimately can lead to an underestimation of future demand.

2.4.5 Therefore there is a need for an alternative market-led view that puts at its heart the needs of the local and regional economy, and that can be compared with the Council's demand and need estimates. Savills have developed a tried and tested methodology which takes a market signals approach, which can supplement and refine the econometric approaches undertaken by the evidence base to help provide a more complete picture of future demand **(Appendix A).**

Labour Demand Methods Typically Underestimate Future Demand for J&L

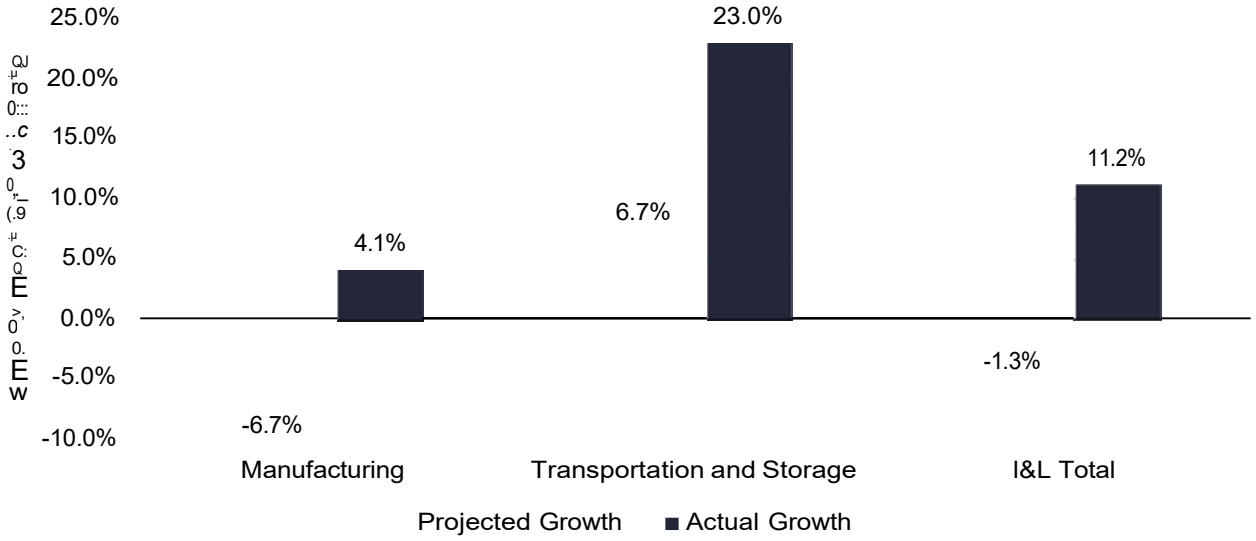
2.4.6 The labour demand method takes a statistical perspective to estimating future demand, and is not appropriate for the estimation of future I&L and therefore logistics land demand.

2.4.7 Typically, the use of statistical models underestimate the I&L sector's performance, and

therefore the future need for I&L demand. This is mainly because they reflect the continuing restructuring of the economy away from industry (particularly manufacturing) towards services, and do not take into account market signals or current drivers of I&L demand.

2.4.8 For example, if you compare historic employment projections from the 'Working Futures 2010-2020, Evidence Report' by the UK Commission for Employment and Skills against actual growth in employment in industries associated with I&L, it can be seen that the historic projections significantly underestimated what actually happened **(Figure 2.1).** This data shows that logistics (primarily the transportation and storage sector) has seen the biggest discrepancy between estimations and actual growth.

Figure 2.1 Estimated Employment Growth has Lagged Actual Employment Growth



Source: UKCES 2072, ONS Workforce by Industry (SIC, 2007) 2022, Savills

2.4.9 There is also a wider issue where the use of third party job projections from statistical houses such as Experian used by local authorities in their employment evidence bases, results in little transparency and therefore limited scrutiny of their results. For example, it is not possible to determine whether they have accounted for future growth drivers which are driving demand in the logistics sector.

Past Development Rates Method is Not a Measure of Future Demand

2.4.10 Using a past development rate method is also likely to underestimate logistics demand. 'Past development rates' are not an indicator of future demand, but rather is a supply measure. The leading demand measure of floorspace is 'net absorption', which indicates the quantum of net floorspace occupied over a period of time (i.e. move-ins minus move-outs) based on lease deals. Development completions on the other hand is a supply measure (rather than a demand measure), which calculates new floorspace delivered. While new floorspace can be delivered in existing sites through redevelopment and intensification, it mainly depends on new employment sites being made available (allocated) for development via the Planning System. If insufficient land has been

allocated for employment, build out rates will be suppressed.

2.4.11 Without available supply, development completions cannot happen, and therefore the past completions method has no relationship to actual market demand. In effect, by using past completions, the employment evidence is saying that the Council's ability, or willingness, to allocate employment land (new supply) historically is an accurate measure of 'true' market demand. The forward projection of historic supply trends only serves to further continue a supply constrained ('tight') market. If the same approach to housing need was adopted (i.e. just the projection forward of past housing completions plus a margin), the Local Plan would likely be found unsound.

2.4.12 The historical completions method does not consider market signals, and therefore does not take account of future growth drivers, that as discussed below and in **Section 3,** are driving demand in the sector.

Labour Supply Methods Typically Underestimate Future Demand for J&L

2.4.13 Labour supply methods essentially link future employment needs to housing and population growth. This is a flawed approach because housing growth at the local level has only a limited relationship to employment markets which typically have a wider geographical demand profile. In other words, this method is effectively saying that commercial demand is solely linked to the new residents, either through local population growth or new incoming residents, which is not the case. For instance, I&L demand is also linked to the growth in freight movements, business to business relationships, companies reshoring back to the UK to avoid supply chain shocks, increasing stockpiling requirements and the fact existing households too are increasingly spending more online.

'Suppressed Demand' is Not Accounted For

2.4.14 When supply, as signalled by floorspace availability, is low, demand is 'suppressed' as prospective tenants can't find space in a market. 8.0% is typically referred to as the equilibrium level at a national level when supply and demand are broadly in balance (as sourced in publications such as the GLA's Land for Industry and Transport SPG (2020), and the BPF's Levelling Up - The Logic of Logistics report). Below this level, available supply becomes tight and rents increase as strong occupier demand compete for limited available stock.

2.4.15 Neither labour demand or past development rates methodologies take account of demand that has been lost from Derby due to supply constraints, and therefore it presents a demand profile based on a supply-constrained historic trend (or 'suppressed demand'). Savills suppressed demand methodology, outlined in **Appendix A** below, is able to calculate how much demand has been lost due to historic supply constraints. This suppressed demand calculation can then be added to the historic demand trend as a 'top up' to provide a more accurate indication of future demand.

Plot Ratios Applied are Too High

2.4.16 Finally, the plot ratio assumptions used across the employment evidence reports of between 39% to 45% to convert floorspace requirements to land estimates is considered

to be too high.

2.4.17 From Savills experience, and based on recent developments across the country, a plot ratio of around 35% is considered more reflective of modern I&L, and therefore logistics, occupier requirements. This is evidenced via the case studies presented below in **Table 2.3,** which illustrate that changes in the logistics sector means that occupiers are moving towards larger building footprints and requiring lower site covering to allow for adequate yard space, cross-docking, sustainable urban drainage, strategic landscaping and a statutory need for Biodiversity net gain ('BNG'). These modern occupier requirements imply a lower plot ratio, typically in the region of 30% to 35%.

2.4.18 Based on this analysis we have used a 35% plot ratio to translate future floorspace need to land need as part of our demand modelling in **Appendix A.**

Table 2.3 Plot Ratio Case Studies

Local Authority	Site Name	Plot Ratio (%)
Bassetlaw	South of Haworth, Al Industrial & Logistics Park	30%
Blaby	Optimus Point Plot 80	**31%**
Bristol	Ocacio, St Modwen Park, Avonmouth	36%
Buckinghamshire	Symmetry Park Aston Clinton	**31%**
Central Bedfordshire	Symmetry Park Biggleswade	30%
Charnwood	Unit 2, Rowena Park - Rothley	33%
Derby	Indurent Park Derby	**31%**
Derby	IPD Oregon Plot Dl	30%
Doncaster	Nimbus Park	37%
Harborough	Magna Park South (Lutterworth) opt.l	29%
Mid Sussex	GAL at St Modwen Park Gatwick	34%
Newport	Amazon, St Modwen Park, Newport	26%
North Kesteven	St Modwen Park, Lincoln	32%
North Northamptonshire	West End, Raunds, Northamptonshire	29%
North Warwickshire	St Modwen Park, Tamworth	26%
North Warwickshire	Land North East of Sewage Works, Atherstone	36%
North Warwickshire	BIFT - Plot 7, Birch Coppice Business Park	34%
Oadby and Wigston	Wigston Industrial Estate	34%
Swindon	Symmetry Park Swindon	30%
Uttlesford	Land north of Taylor's Farm, Takeley Street	29%
Warrington	Mountpark Warrington Omega II	36%
Warrington	The Quadrant South	34%
		Average plot ratio= 32%

Source: Savi/ls 2025

Traditional Methods Fail to Take into Account Future Growth Drivers

2.4.19 The logistics sector continues to go through a period of unprecedented change, driven by a number of structural demand drivers which have accelerated since the Covid-19 pandemic. These include:

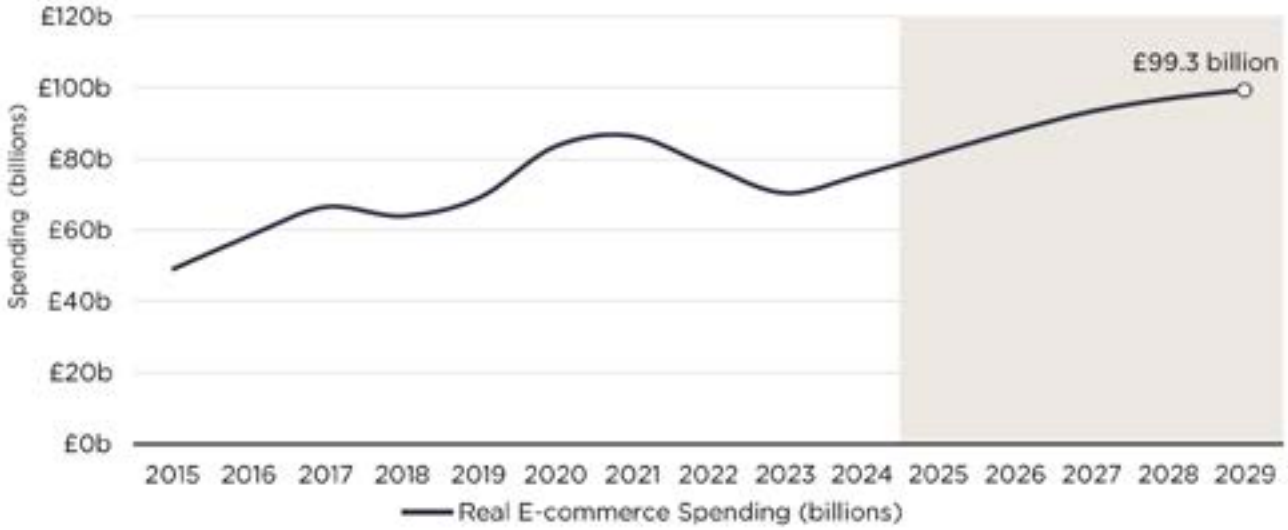
Growth in Online Retailing

2.4.20 Statistics collected by the ONS from November 2006 show that the share of internet sales has consistently increased over time, and now account for around 26% of all retail sales as of February 2025[2]. This compares to 19% in February 2019 prior to the start of the Covid Pandemic.

2.4.21 Most commentators agree that online retailing will continue to grow from a higher base than before the Covid-19 Pandemic due to behavioural changes such as increased home working, and continued demand for rapid parcel deliveries. For instance, the National Infrastructure Commission are predicting e-commerce to comprise up to 65% of total expenditure by 2050 for non-food items.

2.4.22 However, an arguably more relevant statistic than the percentage of online sales is the total amount spent online in pound terms. This is because the percentage of online sales doesn't pick up, for example, the fact that online spending in pound terms can increase even if the online percentage remains static. This is because the total pounds spent online will likely continue to increase into the future as we build more homes. This relationship is shown in **Figure 2.2** below based on Statista data. We have used real prices in order to remove the effect of inflation by rebasing all data back to 2015 using GDP Deflators from OBR March 2024. **Figure 2.2** shows that following a brief dip in total online spending from the Covid-19 lockdown induced peak in 2021, the growth trend is set to continue.

Figure 2.2 Value of Internet Sales (2015-2029)



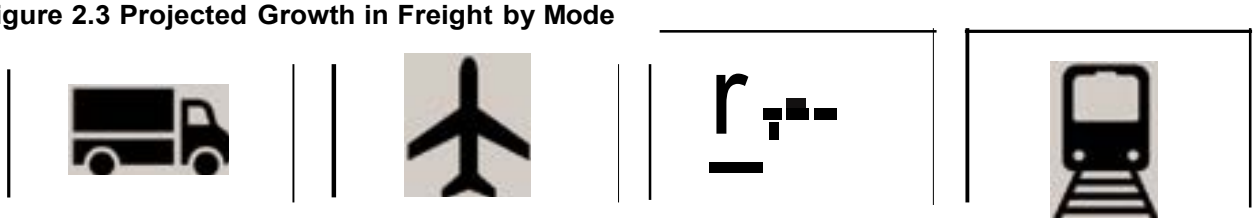
Source: Statista 2025, Savills 2025

[2] ONS (2025), Internet sales as a percentage of total retail sales (ratio) (%)
https://www.ons.gov.uk/businessindustryandtrade/retailindustry/timeseries/j4mc/drsi

Growth in Freight Modes

2.4.23 Freight volumes are another key growth driver of I&L and therefore logistics floorspace. Freight arriving and leaving the UK needs to be stored, packaged, and distributed via a network of freight handling infrastructure (i.e. ports, freight handling airports, rail freight interchanges, and motorways), and conveniently located logistics premises in order to reach end customers. Freight volumes are forecast to grow significantly across all freight modes **(Figure 2.3),** which will increase demand for logistics space in the UK.

Figure 2.3 Projected Growth in Freight by Mode



Source: DfT, MDS Transmodal, Boeing, Savills

2.5 Summary

2.5.1 Our review of the employment evidence documents indicates that limited regard is given to market signals as required by Paragraph 32 of the NPPF. We appreciate that the approaches used to calculate employment land need are traditional methodologies used in local authorities' employment evidence, and are themselves informed by the NPPG. However, as demonstrated in this section, they are likely to underestimate the true market need for logistics land. This is not a problem exclusive to Derby, but part of a wider overarching flaw with the Planning System in England, whereby a single, robust methodology for forecasting employment land requirements is not set out in the PPG.

2.5.2 In order to overcome the drawbacks of the current estimation methods set out in the PPG, Savills have developed their own methodology which takes a market signals approach **(Appendix A)** to provide a more complete picture of future logistics demand.

3 Importance of the Logistics Sector to **the** Local Economy

3.1 Introduction

3.1.1 The adopted Local Plan and Policy AC15, which in turn has impacted planning applications in Derby, including at the Subject Site was informed by employment evidence that is outdated. This employment evidence has therefore not taken into account current and future growth drivers and trends relevant to the logistics sector.

3.1.2 In particular, the B8 limitation in Policy AC15 and the planning permission covering the Subject Site does not reflect the importance of the logistics sector to the local economy, including the high-quality and well-paid jobs for local residents associated with it.

3.1.3 This section seeks to dispel many of the myths associated with the logistics sector and highlights the suitability of the Subject Site to accommodate logistics development. This analysis also highlights that the Subject Site is one of the most desirable locations for large-scale B8 development within Derby and therefore would not prejudice other development sites within the City.

3.1.4 Removing the B8 limitation at the Subject Site could result in the creation of high-quality and accessible jobs for local residents, allowing Derby to benefit from the strongest-performing commercial sector and address high levels of unemployment and deprivation.

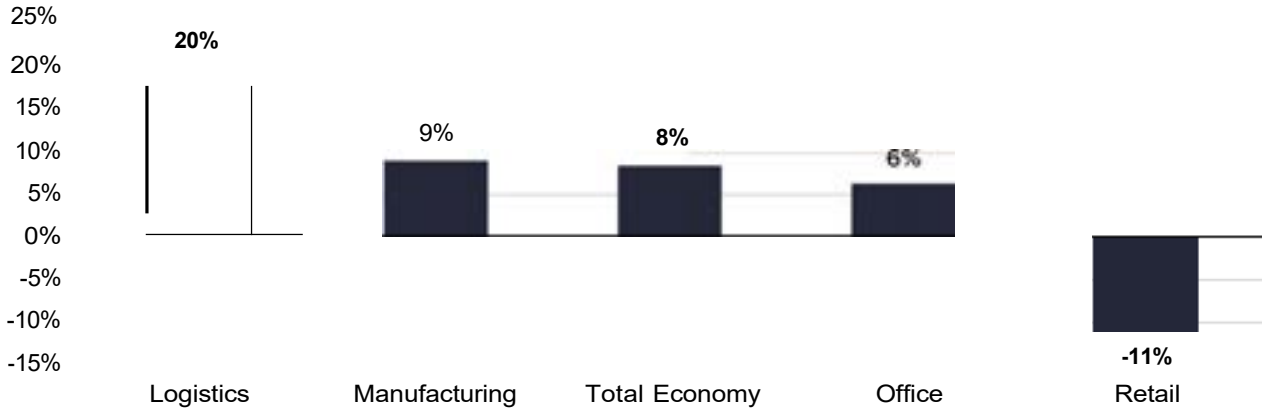
3.2 Logistics has become a key employment growth sector in Derby

3.2.1 Derby is a highly sought after logistics location in England. As a result, the logistics sector, underpinned by a number of structural growth drivers, has cemented itself as a key driver of the Derby economy.

3.2.2 This is especially evident when comparing the performance of other commercial uses such as office and retail, which are facing structural challenges. In Derby, the logistics sector[3] has experienced jobs growth of 20% between 2015 and 2023. This is in contrast to 9% growth in manufacturing, 6% growth in office-based sectors[4] and -11% in the retail sector[5] over the same time period[6] (see **Figure 3.1).**

[3] SIC Code H: Transportation and Storage
[4] SIC Codes K, M, N, 0
[5] SIC Code G
[6] ONS (2025) Business Register and Employment Survey

Figure 3.1 Employment Growth by Sector in Derby (2015-2023)



Source: ONS (2025) Business Register and Employment Survey

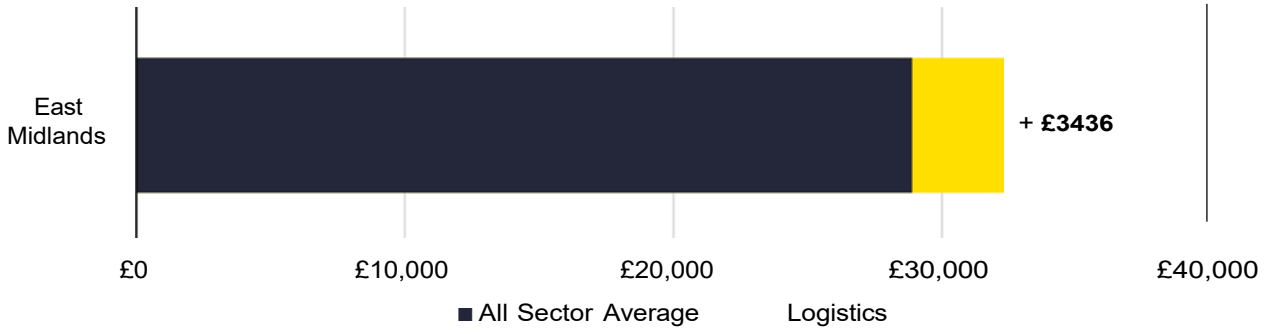
3.2.3 This demonstrates that the logistics sector is a growing segment of the local economy with significant employment growth opportunities.

3.3 The Logistics Sector Provides High-Quality and Diverse Jobs

3.3.1 The logistics sector is subject to a number of misconceptions about average pay levels and skills. Many stakeholders view the sector as a low-paid and low-skilled, however this is untrue.

3.3.2 In **Figure 3.2** below we compare the logistics sector's annual wages against the median pay in all sectors using the latest ONS data (2024) from the Annual Survey of Hours and Earnings (ASHE). It shows that logistics jobs in the East Midlands pay +£3,346 more than average per annum. Whilst these are regional level figures, similar levels of salary outperformance exist in Derby also.

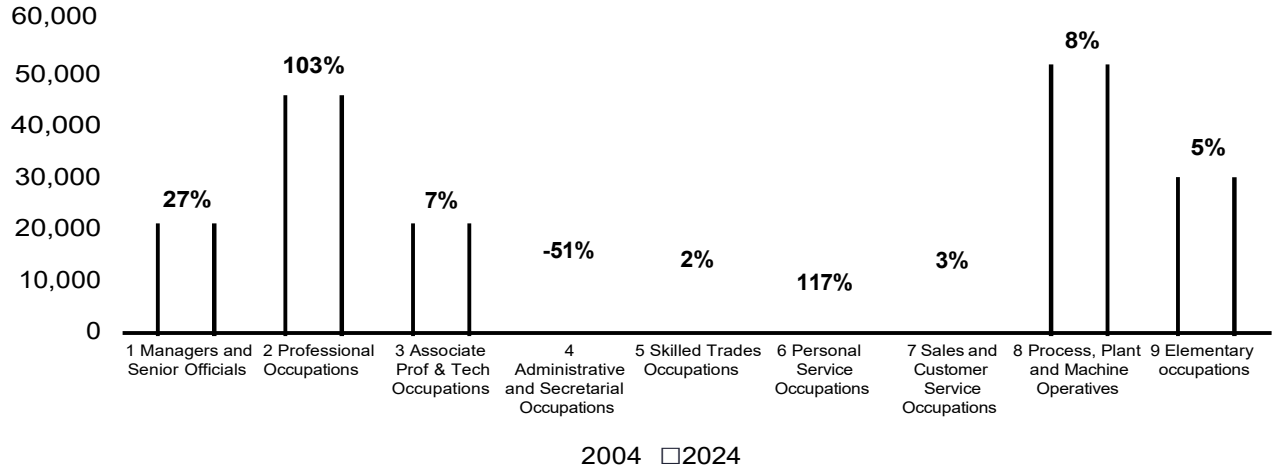
Figure 3.2 Annual Gross Earnings (2024) - Logistics Vs. All Sectors



Source: ONS ASHE 2024, Savi/ls 2025

3.3.3 Linked to the high pay levels in the logistics sector is the fact the jobs it provides are becoming increasingly diverse and higher skilled as shown in **Figure 3.3** below, as a result of the continued adoption of new technologies (as discussed in **Section 4).**

Figure 3.3 Occupational Distribution in the Logistics Sector in the East Midlands (2004 to 2024)



Source: ONS, APS, Savi/ls

3.3.4 Firstly, what we can see from **Figure 3.3** is that the share of higher-skilled roles (Occupational Groups 1 to 3) has increased by 50%, with the biggest increase being in Professional Occupations, where the number of roles has grown by 103%. These roles are typically associated with higher-skilled engineering and technological professions in response to increased automation and robotics in the sector and more advanced supply chain processes. Secondly, there has been an increase in predominantly office-based roles (Occupational Groups 1, 2, 3, 4, 6 and 7), with occupations in these categories going up by 23% over the last decade. Office-based roles are increasingly co-locating alongside logistics uses as it is convenient for these people to be closer to the operations they control and analyse. This analysis clearly dispels the myth that logistics is a low skilled, low paid employer.

High Quality, Accessible Employment Opportunities

3.3.5 Moreover, the logistics sector is also good at providing employment opportunities to those that may not otherwise be in work. Based on a recent independent survey undertaken by YouGov, Frontier Economics found that 20% of people currently in logistics were previously unemployed, and that one in four within this group were long-term unemployed[7].

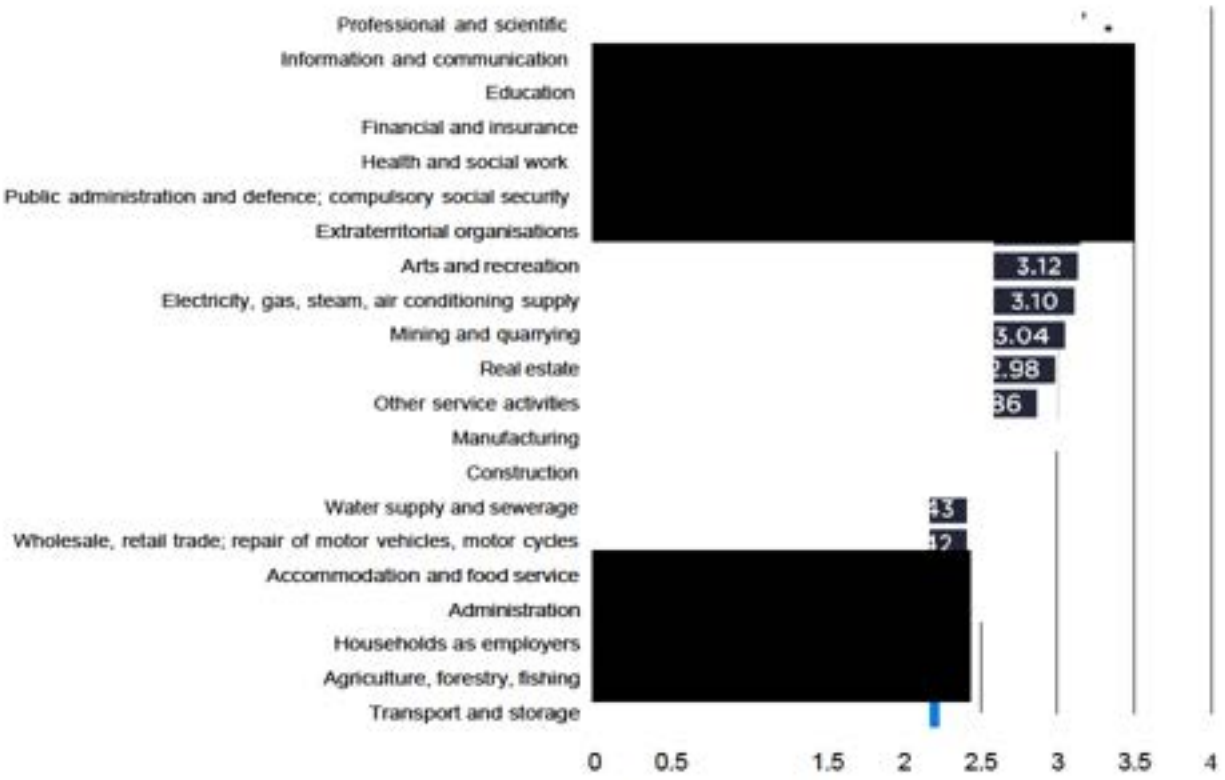
3.3.6 Further to this, it is important to note that many jobs within the logistics sector do not require formal qualifications in the same way as other sectors. **Figure 3.4** shows the average qualification quotient of workers by sub-sector, where a larger quotient represents more qualified workers on average. The largest sub-sector of the logistics sector (Transport and Storage) has on average the least qualified employees.

3.3.7 This indicates that the logistics sector is less reliant on formal qualifications which can be both costly and time consuming for employees to obtain. This should allow Infinity Park Derby to more easily positively contribute to the local economy of Derby by being able to employ unemployed or lower skilled persons more easily, many of which can be

[7] Frontier Economics (2022) The Impact of Logistics Sites in the UK. Available at https//logistics.org.uk/CMSPages/GetFile.aspx?guid=d3e3d23c-2dca-4b0a-8406-0dl26c7leb4d&lang=en-GB

upskilled on the job, which is a prominent feature of the logistics sector.

Figure 3.4 Average Qualification Quotient of Workers



Source: ONS Census 2027

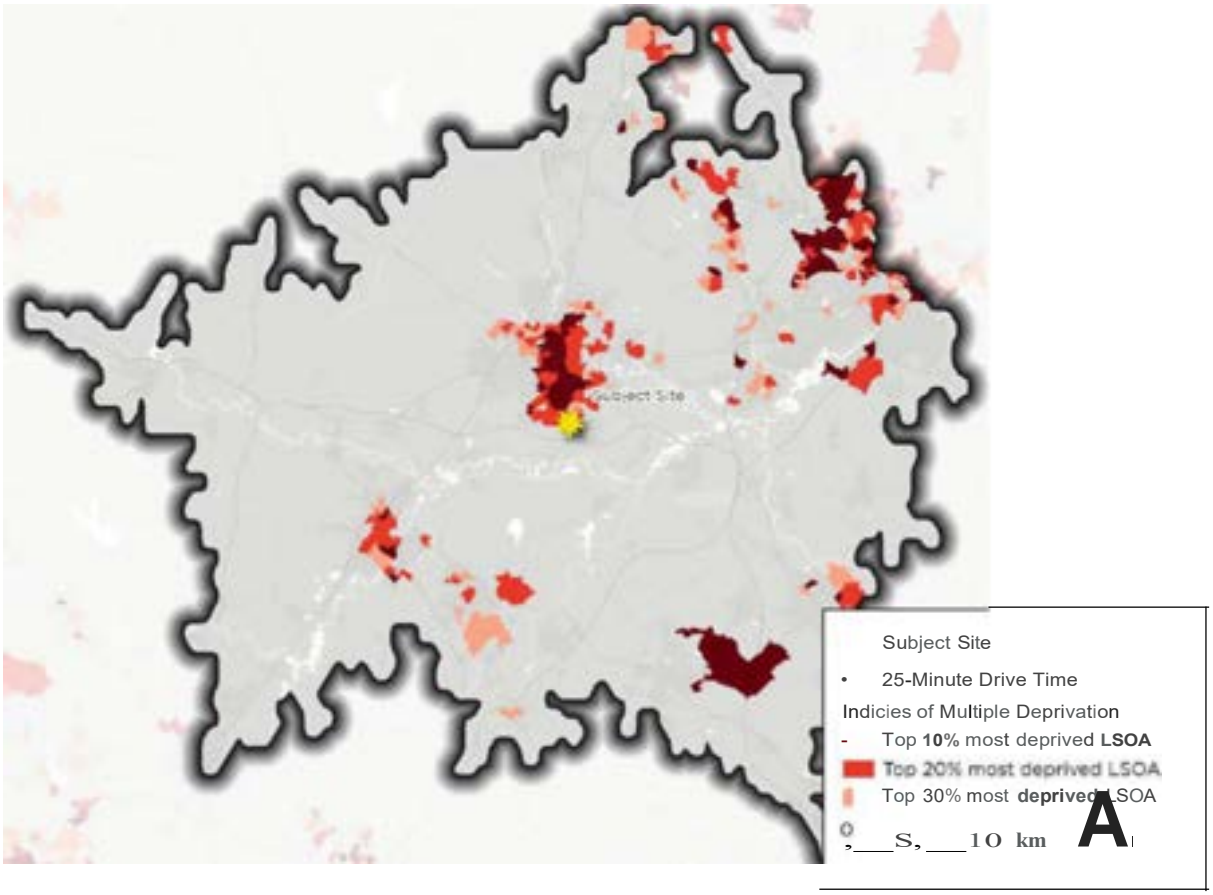
3.3.8 This is important given many areas of the country have claimant counts substantially higher than before the Covid pandemic. Derby has fared worse than the UK as a whole since the Covid pandemic, with the claimant count in Derby in February 2025 being 67% above January 2020 compared to a 45% increase nationally[8].

3.3.9 The fact that the logistics sector is a strong employer of people without high levels of academic qualifications allows it to provide accessible employment opportunities. This is particularly notable give the deprivation levels in proximity to the Subject Site. The map in **Figure 3.5** shows that within a 25 minute drive[9] of the Subject Site there are numerous neighbourhoods that score among the top 30% most deprived areas in England.

3.3.10 Typically many people in deprived areas are unable to find employment opportunities as a result of a lack of formal qualifications. Logistics development can therefore help to provide employment opportunities to these residents, tackling joblessness, deprivation and improve health outcomes for residents of Derby.

[8] ONS: Claimant count by sex and age (2025)
[9] The average drive time to work in Derby CONS Labour Force Survey)

Figure 3.5 Map of the top 30% most deprived LSOAs within a 25-minute drive of the Subject Site



Source: !MD 2079, Savi/ls 2025

3.4 The Subject Site Can Attract High Quality Employers to Derby

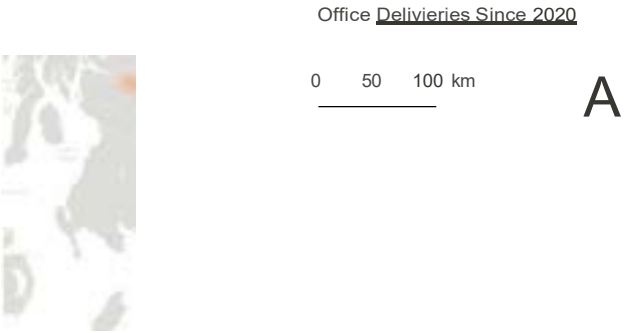
3.4.1 **Figure 3.6** illustrates the location of new logistics development across the country since 2020, illustrating a diverse economic footprint across the regions. This is in direct contrast to the office sector, where 74% of office development since 2020 has been in just 10 city centre locations, with the major contributor being London **(Figure 3.7).**

3.4.2 Over the last decade, we have seen demand from logistics developers to build out floorspace, and demand from logistics occupiers to take up space across the country. On the back of this, as mentioned above, logistics has been one of the only areas of employment growth in the economy in many areas, including Derby. The Subject Site, as an attractive location for B8 uses would therefore be able to attract high quality occupiers, bringing employment opportunities to Derby.

Figure 3.6 Location of logistics development since 2020



Figure 3.7 Location of office development since 2020



Source: Savi/ls analysis of Costar data (2025)

3.5 The Subject Site is a Prime Logistics Location

3.5.1 One of the stated goals of Policy AC15 is to ensure the development 'does not prejudice the development of other employment sites within the City where large scale B8 development would be more desirable'.

3.5.2 In this report we detail how there is sufficient demand (and a lack of supply) which means that logistics uses coming forward at the Subject Site will not prejudice the development of other sites in Derby **(Section 5).**

3.5.3 This subsection presents the Subject Site's unique advantages that make it one of, if not the most, desirable employment sites in Derby. Given this, further B8 development at the Subject Site would therefore not prejudice other employment sites within the city.

Flexible and Sizeable Allocation

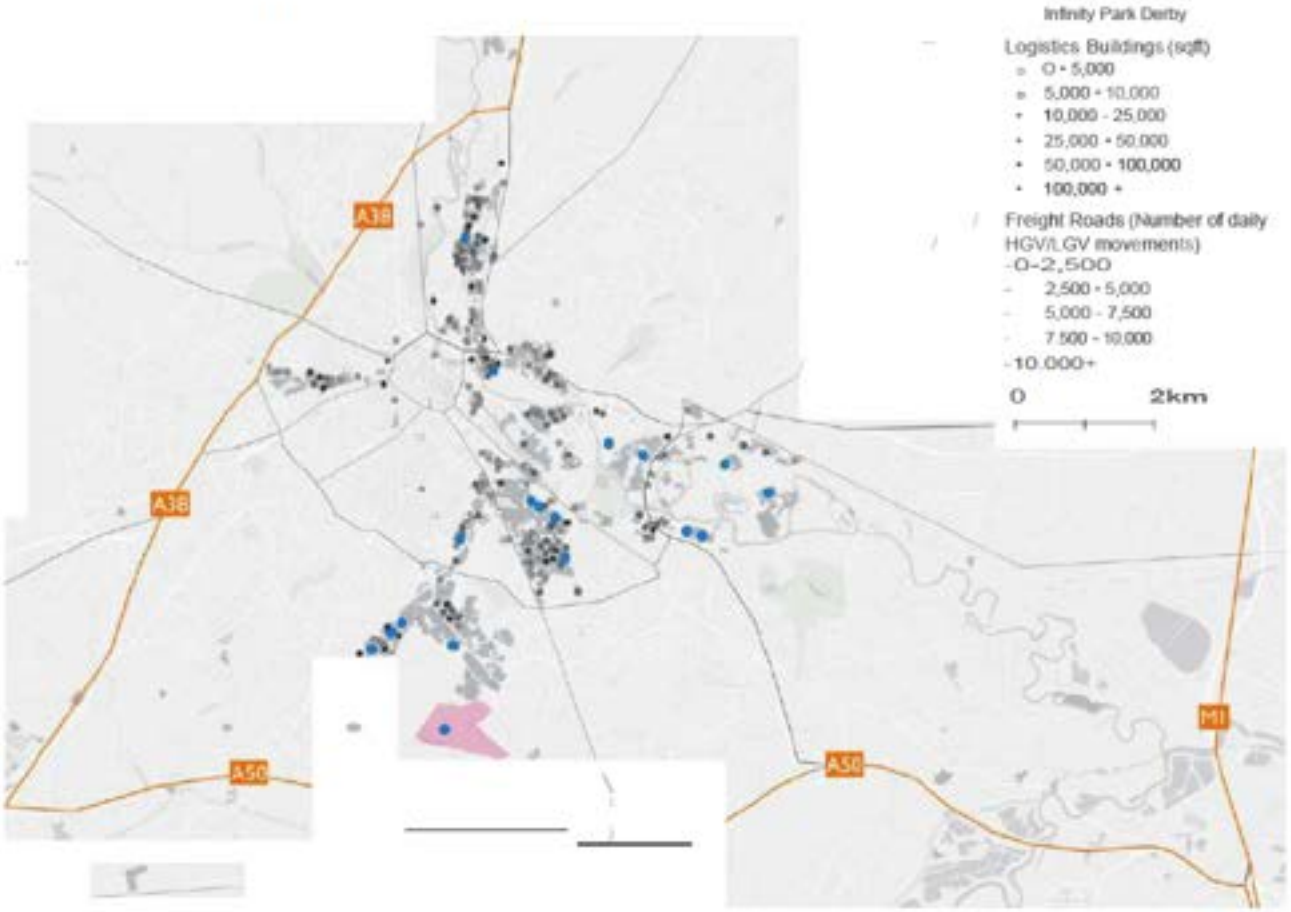
3.5.4 The Subject Site is one of the premier development locations in Derby, with 40 hectares remaining.

3.5.5 The Subject Site is large and has flexible plot sizes which can respond to the demands of occupiers. This is particularly important given that occupiers require generous yard sizes to accommodate vehicle movements, efficient loading and unloading, and associated parking for staff and visitors. Yard space is sometimes used for the outdoor storage of goods, containers, or equipment. As such, yard size and parking provision is a key consideration for occupiers when selecting a site. Flexible plot sizes would allow the site to be a desirable location for occupiers from a variety of sectors of the economy. Further to this, the plot sizes would be able to attract a diverse tenant pool, from multinational anchor tenants, to small and medium sized firms scaling up their operations.

A We/l-Connected Site in a Desirable Location

3.5.6 **Figure 3.8** below shows the location of logistics stock in Derby and the strategic freight road network. Primarily, this map shows that there is a distinct lack of large scale logistics units in Derby, which we will explore further in **Section 5.** This map also shows that the majority of logistics stock in Derby is located within or nearby the city centre. Being located within the city centre means that freight journeys from these units have to go through city traffic in order to access the major freight roads, such as the A50. Motorway access and free-flowing traffic are critical for efficient logistics operations. They enable timely deliveries, reduce transport costs, and improve supply chain reliability. Due to the diversity of logistics operations, these freight journeys vary by vehicle type, from vans to LGVs/HGVs depending on the occupier.

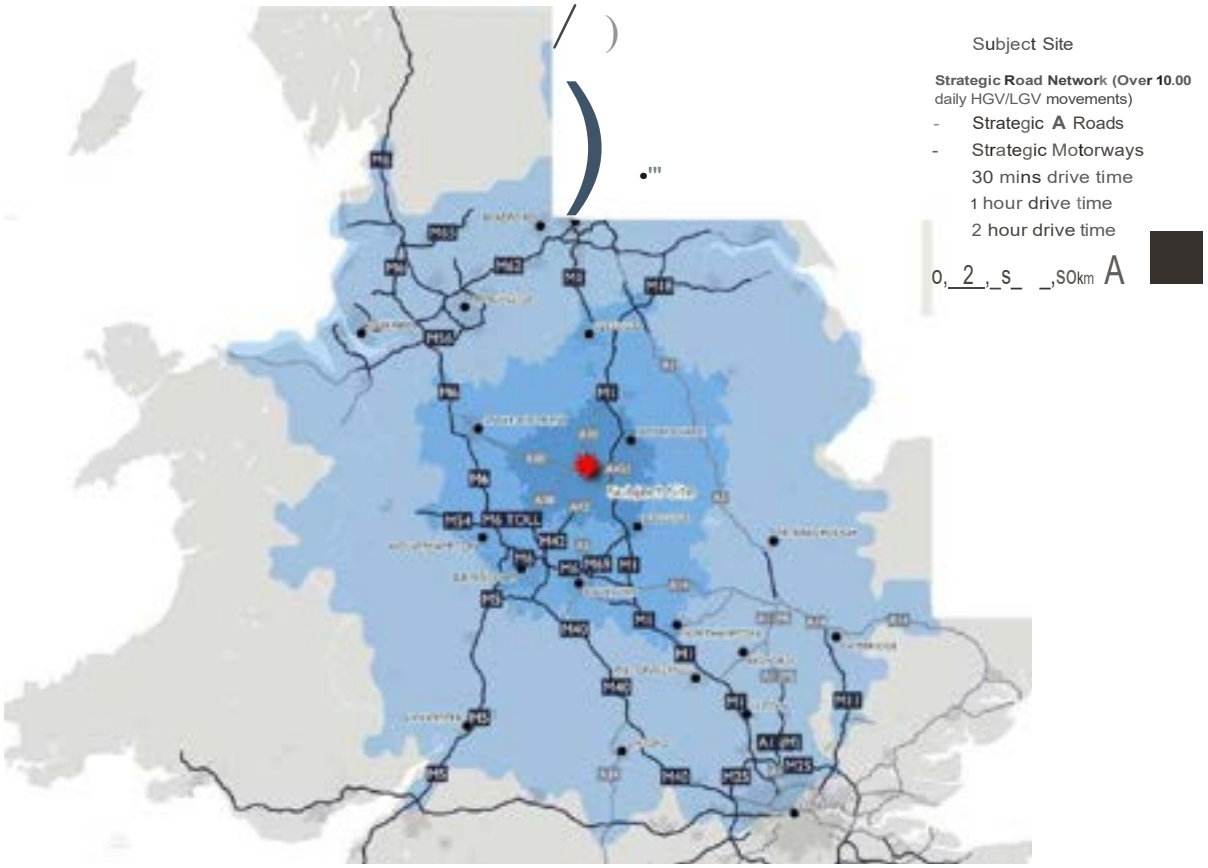
Figure 3.8 Location of Logisti\ Units In Derby



Source: Savills, Costar, DfT

3.5.7 The Subject Site is closer to the significant freight road, the A50, which sees over 10,000 daily HGV and LGV movements per day. As such, freight movements would be less impacted by residential areas, meaning the operations of potential occupiers would be less inhibited compared with other sites in Derby. In this light, the Subject Site represents a prime location for logistics development in Derby, contrary to the commentary in Policy AC15.

Figure 3.9 Nationally Significant Roads in Relation to the Subject Site



Source: Savi/ls, DfT

High Accessibility to Suppliers and End Customers

3.5.8 Most logistics occupiers have supply chains linking themselves with their suppliers and end customers of between 1 to 4 hours travel time. The shorter travel time is more typical of local and regional companies, while longer travel times are more typical of larger companies that do business throughout the country.

3.5.9 If we take the middle ground of 2 hours, which is appropriate for most companies, approximately 32.6 million people (approximately 55% of England and Wales's population), and approximately 1.3 million businesses (52% of the UK's total businesses) can be accessed from the Subject Site[70]. Such high numbers are because large conurbations including Liverpool, Manchester, Birmingham, Oxford, Cambridge, and the north of London, amongst others, are all accessible from the Subject Site within 2 hours.

High Accessibility to a Large Labour Pool

3.5.10 The availability of labour for UK companies has become increasingly challenging in recent years, especially with pay rises resulting from higher than desired inflation. As a result, labour availability has shot up the list of factors impacting logistics occupiers, with 25% of occupiers stating it as one of their biggest challenges in Savills European Logistics Census[11]. We consider a 25-minute drive time catchment to be appropriate for accessing

[10] Source: ONS Population Estimates (2022) and Business Counts (2024)
[11] https://pdf.euro.sav ills.co.uk/ uk/ com mercia1---other/ spotlig ht---european-log ist ics-census-2024.pdf

labour from the Subject Site. This is the average home-to-work travel time for Derby[12]. Within this catchment approximately 887,042 working-age people (aged 16-64) are reachable, representing a high level of workforce accessibility and a considerable labour pool for future businesses located at the Subject Site to draw from.

Ability to Link with Major Freight Handling Infrastructure

3.5.11 Savills has advised on numerous major freight handling projects across England in recent times. These include East Midlands Gateway, West Midlands Interchange ('WMI'), DIRFT, Humber Ports, Ellesmere Port, Southampton Airport, and Heathrow Airport, among others.

3.5.12 These projects have taught us that it's not only logistics premises located directly adjacent to freight handling infrastructure (i.e. airports, ports and rail freight interchanges) that benefit from this infrastructure. For instance, a study[13] of the operations of DIRFT I and II analysed the destination of outbound lorries leaving the rail terminal. It found that only 27% of all outbound lorries were destined to locations within the DIRFT estate. This means that the remaining 73% of lorries were moving goods further afield to destinations that were not within the immediate surroundings of the local estate. This analysis is useful as it clearly indicates that logistics developments not directly linked or within the estate of key freight handling infrastructure, but located relatively nearby, can benefit from its use as part of their wider supply chains.

3.5.13 We consider a 2-hour truck-time catchment as suitable in capturing the majority of logistics businesses that may use freight handling infrastructure as part of their supply chains. We also map a 1-hour truck time catchment given that, based on previous work, this is what operators of rail freight interchanges consider their primary catchment area for businesses using their facilities.

3.5.14 **Table 3.1** below lists the various freight handling infrastructure within a 1 hour and 2 hour truck time catchment of the Subject Site, while **Figure 3.10** below shows the geographic coverage of these catchments. The Subject Site is within 2 hours of several rail freight interchanges, freight airports, and ports. This means it is a prime location for occupiers who wish to decarbonise their supply chains via the use of rail and/or those occupiers who handle high value and rapid deliveries via air freight.

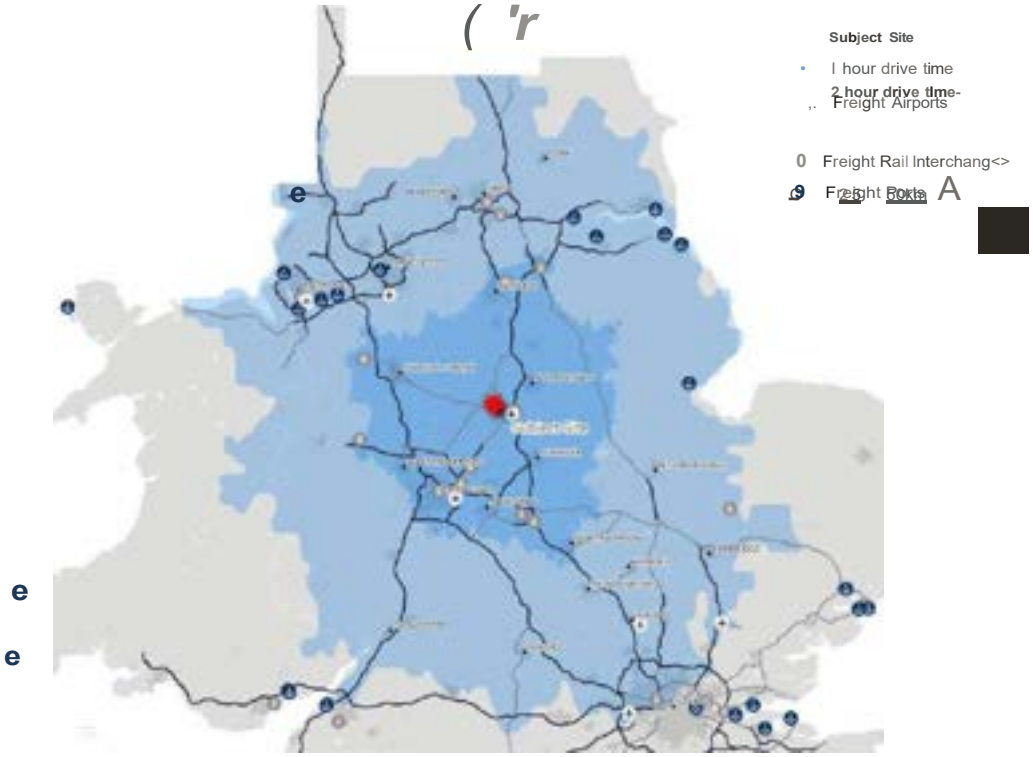
Table 3.1 Accessible Freight Handling Infrastructure from the Subject Site

Drive Time	Freight Ports	Freight Airports	Strategic Rail Freight Interchanges
1-hour	N/A	East Midlands, Birmingham	Rotherham, TIRFP, Rugby, Doncaster, Basford Hall, East Midlands Gateway, Birch Coppice, Lawley Street, Hams Hall, DIRFT
2-hour	River Trent, Ellesmere Port, Port Warrington, Boston, Liverpool, Immingham, Hull, Grimsby, Salford Quays, Goole, Runcorn Docks	Heathrow, Stansted, East Midlands, Manchester, Liverpool John Lennon, Birmingham, London Luton Airport	Ely, DIRFT, Hams Hall, Lawley Street, Birch Coppice, East Midlands Gateway, Trafford Park, Ditton, Garston, Doncaster, Wakefield Europort, Leeds Stourton, Port of Liverpool, Immingham, Basford Hall, Ditton, Rotherham, Rugby, TIRFP, Wembley (EFOC)

[12] ONS User Request Data - 2018: TRVTME Usual home to work travel time (minutes) by local authority
[13] Nathaniel Lichfield & Associates (2012), DIRFT III: Planning For The Future - The Expansion Of Daventry International Rail Freight Interchange - cited in Roxhill (2019), Document 6.8 - Market Analysis Report - Northampton Gateway Strategic Rail Freight Interchange

Source: DfT

Figure 3.10 Freight Infrastructure within a 45 Minute and 2 Hour Truck Time Catchment



Source: Savi/ls, DfT (2025)

4 B8 Development is Compatible with the Vision for the Area

4.1 Introduction

4.1.1 Policy AC15 applies a limitation on B8 development at the Subject Site 'in order to ensure that development is in keeping with the vision for the area', namely the creation of an 'innovation and technology park' for companies in the manufacturing and manufacturing service sectors. This policy implies that B8 uses are not compatible with this vision.

4.1.2 This section seeks to demonstrate that B8 uses are in fact keeping with the vision of the area given that:

- Manufacturing and logistics are inextricably linked
- Modern I&L floorspace is inherently flexible and house a number of functions under one roof, including manufacturing and research and development (R&D) activities
- The logistics sector plays an important supply-chain role in the economy
- High-tech innovations are reshaping the logistics sector

4.2 Manufacturing and logistics are inextricably linked

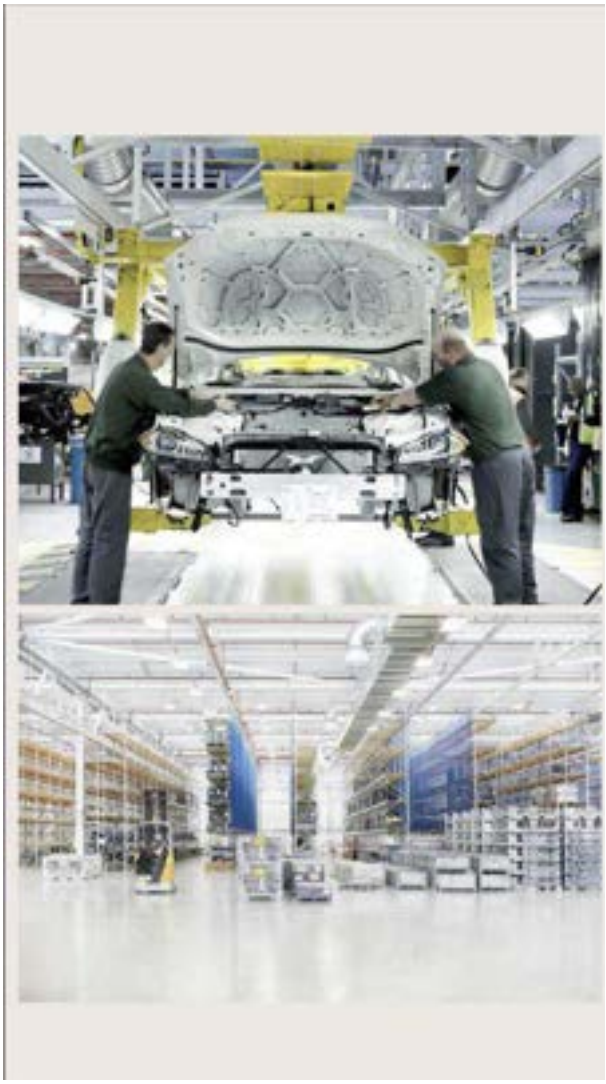
4.2.1 Policy AC15 and the planning permission at the Subject Site limits the amount of B8 development across the whole site to 50% of overall floorspace, in order to ensure the development supports the goal of providing *'high quality accommodation for companies in the manufacturing and manufacturing service sectors'.* This policy does not take into account that logistics and manufacturing are inextricably linked. We have seen the relationship between manufacturing and logistics develop over the last 50 years, as the UK's manufacturing sector has shifted away from traditional industries such as steel making, towards advanced manufacturing sectors such as aerospace and automotive (sectors which Policy AC15 is targeting).

4.2.2 Modern industrial outputs are highly dependent on efficient supply chains in order to prevent a breakdown in production lines. This has become increasingly important in the age of robotics, which create the most efficiency gains when running continuously, without breaks. Accordingly, manufacturing firms require efficient and consistent supply chains to continually feed these production lines. Modern and efficient logistics floorspace is therefore required in order to enable this production, whilst avoiding supply chain issues caused by external events such as conflict in the Middle East, or shipping delays. Accordingly, supply chain efficiency, through advanced logistics facilities has become a key area of growth for UK manufacturers attempting to compete internationally.

4.2.3 In **Table 4.1** Below we provide case studies on Jaguar Land Rover and Rolls Royce Motor Cars, to illustrate the interconnected nature of manufacturing and logistics activities at two of the UK's most successful firms.

Table 4.1 Case Studies of the link between logistics and manufacturing

Jaguar Land Rover (JLR) - the total supply chain



History

Jaguar and Land Rover (JLR) have been one of the preeminent automotive manufacturers in the UK over the last century. From their origins as two separate small scale manufacturers, they have grown into one of the largest global automotive firms in the world following their merger in 2013. They are a major player in the UK economy, employing approximately 30,000 people in the UK alone. JLR is at the forefront of innovation in the automotive industry, focusing on sustainability, advanced technologies, and cutting-edge design.

UK Footprint

JLR has a large footprint in the UK, and is one of the country's largest manufacturers.

Its manufacturing presence includes vehicle assembly plants at Castle Bromwich, Halewood, and Solihull amongst others. In addition to this, JLR has three research and development facilities at Gaydon, Whitley and at the University of Warwick in Coventry focussed on developing future technologies such as electric vehicles. JLR also has a dedicated engine manufacturing centre in Wolverhampton.

Notably, JLR demonstrates how manufacturing and logistics floorspace are required together. Not including the warehousing space within its manufacturing units, JLR has almost 4.5 million sqft of dedicated logistics space in separate units across its real estate portfolio. This logistics space is required to process and manage the 200,000 cubic metres of component parts that JLR's UK plants receive every week, which are delivered from more than 800 suppliers, travelling 1 million miles per week.

Lessons for planning

JLR are a prime example of a firm who have a physical presence in the UK at every stage of their supply chain, from research and development, to manufacturing, to logistics, to final point of sale and maintenance. Accordingly, they demonstrate the interconnectedness of supply chains, and how R&D, manufacturing and logistics space are all needed in unison in order to deliver advanced products.

Rolls-Royce Motor Cars - Goodwood



Context

Rolls-Royce, in a similar way to JLR, demonstrates how R&D, manufacturing and logistics space are all needed in unison in order to deliver advanced products. This is evident within Derby, where Rolls-Royce has a number of sites that contribute to a wide range of service lines including headquarters, training, and research and development alongside manufacturing.

Rolls-Royce Motor Cars - Goodwood

The Goodwood Rolls-Royce manufacturing facility is the only manufacturing plant for Rolls-Royce cars in the world. Originally built in 2003 the 590k sqft facility houses the manufacturing, design and engineering facilities for Rolls-Royce Motor Cars. This site directly provides 2,500 jobs for the local area, up from 350 in 2003.

Some components of the cars are manufactured in the BMW Group's wider supply chain, but all final assembly and finish is undertaken at Goodwood. This is particularly notable given the customizability of the final cars, which are often bespoke

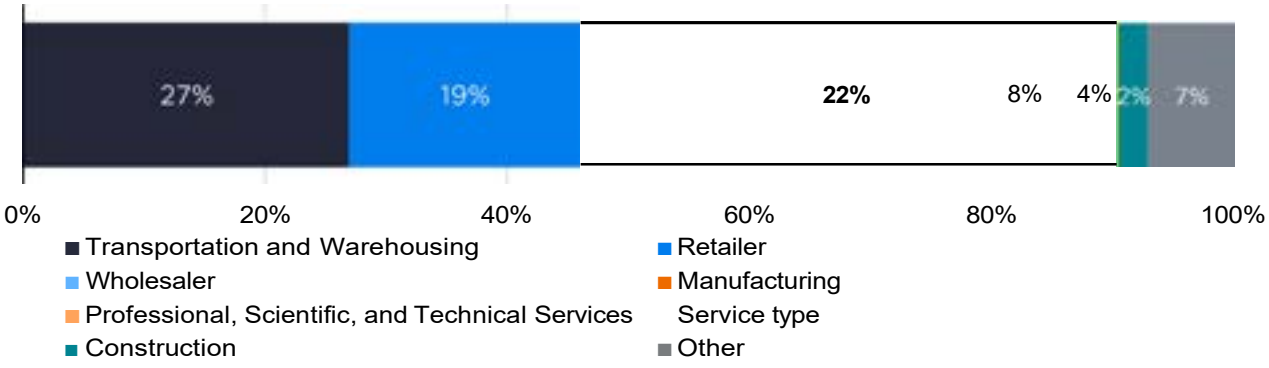
	to the end user. In this light, it required a large quantity of logistics floorspace to enable this bespoke manufacturing. In 2017 Rolls-Royce took up 323k sqft of logistics floorspace in Bognor Regis, in close proximity to the manufacturing facility. This Technology and Logistics Centre is situated just eight miles from RRMC's HQ and principal UK assembly plant at Goodwood. This facility, is used as a warehouse and distribution centre for inbound production parts, a car body store and finished car store with workshop for car preparation. The Technology and Logistics Centre occupied by RRMC again demonstrates how logistics buildings are essential to manufacturing in the UK, especially advanced manufacturing. Whilst this is an example of Rolls-Royce Motor Cars, which is headquartered at Goodwood, the concept of manufacturing and logistics uses being required in unison is also applicable to other Rolls-Royce divisions in Derby. Further to this, many advanced manufacturers such as Rolls-Royce employ third-party logistics (3PL) firms to run their supply chains efficiently. For example, Rolls-Royce have worked with CEVA logistics since 2017. CEVA has been responsible for designing, implementing, and managing inbound logistics for aerospace parts (civil and defence) into multiple Rolls-Royce sites in the UK (and globally).

4.3 Flexible Space to Meet Occupier Requirements

4.3.1 Fundamentally, the flexibility of I&L floorspace with allowance for logistics uses, enables diverse occupiers to fit out the internal spaces of buildings to suit their specific operational requirements. As such, flexible I&L premises can serve a wide range of industries and occupiers, from traditional manufacturers and logistics firms to innovative research and development companies as long as this flexibility is permitted.

4.3.2 Within the Derby FEMA[14] leasing of logistics floorspace has been from a diverse range of occupiers as shown in **Figure 4.1** below. Notably, only 57% of leasing has been from occupiers most associated with the traditional logistics sectors (Transportation and Storage, Retailers and Wholesalers). This means that 43% of leasing for logistics floorspace is from occupiers outside of the traditional logistics sectors, including manufacturers and research and development firms.

Figure 4.1 Logistics floorspace leased by sector in the Derby FEMA (2014-2024)



Source: Savills analysis of Costar data

[14] Containing the local authorities of Derby, South Derbyshire, Amber Valley, Broxtowe, Derbyshire Dales, East Staffordshire, Erewash, North West Leicestershire and Nottingham. Defined in the Derby City Council and South Derbyshire District Council Employment Land Review 2023

4.3.3 Whilst this reflects the case study of JLR, who are one of the largest manufacturers in the UK, there is also a recent example within Derby. In early 2025, Rolls-Royce took possession of a bespoke 148,000 sqft (approximately 13,750 sqm) warehouse facility at Indurent Park Derby. This state-of-the-art storage facility was taken up in order to support the company's significant manufacturing operations of Rolls-Royce Submarines and to directly support the expanded Raynesway manufacturing Site in Derby. Further to this, Infinity Park Derby is facilitating the expansion of Rolls-Royce advanced manufacturing by accommodating the local relocation of tenants which will allow Rolls-Royce to redevelop their campus for investment into the new submarine manufacturing plant. These tenants have a role in Rolls-Royce's supply chains.

4.3.4 This, alongside the leasing data, demonstrates that occupiers from other sectors in the economy, including the targeted manufacturing sector, have demand for logistics floorspace. In this light, placing limitations on B8 development at the Subject Site will ultimately prevent high-quality occupiers from a diverse range of economic sectors from taking up space within Derby.

4.3.5 Primarily this may hamper the business operations of these occupiers, but will also restrict high quality employment opportunities for Derby residents (as explored in **Section 3).** Further to this, enabling sectors adjacent to the manufacturing sector can help support economic resilience, job creation, and growth, all while reducing risks associated with single sector dependencies.

4.4 The logistics sector plays an important supply-chain role in the economy

4.4.1 Not only is the logistics sector a key facilitator of other sectors of the economy, but it also generates significant economic benefits in its own right. The sector employs at least 1.9 million people in the UK[15], and produces £85 billion of Gross Value Added (GVA) annually[16]. In relation to employment density, while it is true that logistics uses generate fewer on-site jobs per sqm of floorspace compared to other uses, on-site jobs are only part of a commercial use's true economic contribution.

4.4.2 For instance, the sector's role in facilitating other sectors means it supports significant indirect employment. As discussed, logistics premises are a critical link in all supply chains alongside the key freight modes that allow goods to enter, leave and move around the country (i.e. ports, airports, rail freight interchanges and motorways), underpinning nearly all economic activity. Like warehouses, these freight handling facilities generate employment to drive the planes, trains and boats as well as jobs involved in their maintenance and repair. Jobs are also created at ports, airports and rail freight interchanges as part of their operation, as well as at retail services where goods are sold. The analysis of ONS Type 1 FTE Multipliers for the Warehousing sector suggests that for every 10 new warehousing jobs created, another 7 to 12 jobs are created offsite across the wider supply chain. **Figure 4.2** provides a simplified graphical representation of the logistics sector's role within supply chains, illustrating its employment contribution (either directly or indirectly) at every stage.

[15] ONS (2025), Workforce Jobs by Region and Industry - Jobs in H: Transportation and Storage for December 2024 - UK
[16] Oxford Economics (2025) GVA by Sector for Transportation and Storage - UK

Figure 4.2 Logistics sector's role within supply chains

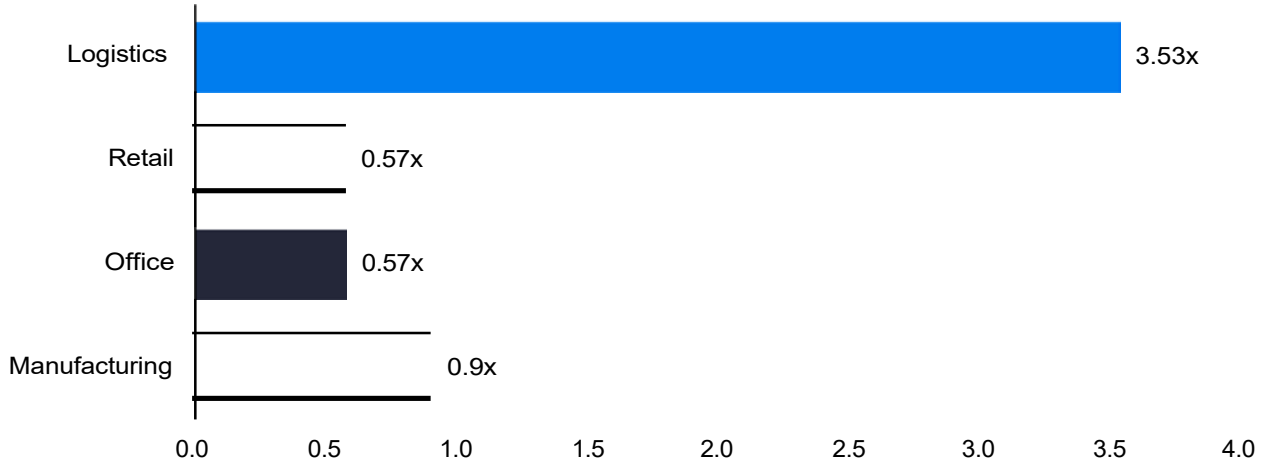


Source: Savills

4.4.3 Another vital component of the logistics sector's 'economy story' is 'Indirect GVA'. Indirect GVA captures the impact that the logistics sector has on other segments of the economy. For example, the services that a sector procures in support of its business activities trigger a GVA contribution by its suppliers, suppliers of suppliers, and so forth, up the entire value chain. In simple terms, the logistics sector stores and distributes material and products used or sold by other companies as part of their operations.

4.4.4 These inputs and outputs generate economic value that logistics has played a vital role in helping to realise. When we quantify the ratio between the direct and indirect GVA generated by industrial sectors in the UK we can see the value of the logistics sector. The indirect GVA generated by the logistics sector in the UK is 3.5 times higher than its direct GVA contribution. This is much higher than the indirect GVA generated by manufacturing (0.9), office (0.57), and retail (0.57) sectors **(Figure 4.3).** This further illustrates the importance of logistics in facilitating other sectors of the economy.

Figure 4.3 Indirect GVA Generation Compared to Direct GVA Generation



Source: Savills, ONS, Input Output Analytical Tables 2027

4.5 High-Tech Innovations are Reshaping Logistics

4.5.1 As discussed above, Policy AC15 seeks to develop an 'innovation and technology park', accommodating BI, B2 and B8 uses. While the focus of the policy is on companies in the manufacturing and manufacturing services sectors, it fails to account for the fact that the logistics sector has seen a rapid uptick in the adoption of advanced technologies and processes over the last decade.

4.5.2 In adopting these technologies, the nature of jobs supported by the sector have become increasingly diverse, higher skilled, and higher paid (as discussed in **Section 3).** The following illustrates some of the technologies being adopted within the logistics sector, further dispelling the myth some have that the sector is a low-value, or 'dirty' industry:

- **Automation and Robotics in Warehousing** - Automation in warehouses, such as the use of robots for picking, packing, and sorting, as well as advanced racking systems, are being used to reduce human error and increase speed. Increasingly the adoption of automated guided vehicles (AGVs) and autonomous mobile robots (AMRs) are also being used to transport goods within facilities. It important to note this increased automation is not resulting in job losses given the growth of logistics jobs nationally. The increase automation is adding to the sectors' efficiency and productivity and leading to higher skilled jobs in place of more elementary roles.
- **Data Analytics and Internet of Things (IoT)** - Data analytics, Artificial Intelligence and the IoT are becoming increasingly important for logistics occupiers to track, monitor and optimally plan for shipments and to manage inventory. For example, AI has the ability to analyse historical and real-time data to predict demand, helping companies optimize inventory and manage stock accordingly. These technologies have grown in importance, with the mainstream adoption of next-day deliveries requiring quicker and more efficient supply chains.
- **Energy efficient vehicles** - Transportation represents one of the largest costs to logistics operators, and also one of the greatest environmental impacts. As such, it is

an area that has seen substantial investment into R&D. The majority of logistics companies are trialling new transportation technologies such as electric trucks, biofuels, autonomous vehicles and more recently last-mile delivery drones.

- **Sustainability Practices** - Eco-friendly measures, like green warehousing and green packaging are increasingly valued by logistics businesses. Sustainable practices reduce operational costs over time, which also contributes to productivity gains. For example, packaging within the logistics industry is an area which has seen drastic evolution in recent years as companies seek to reduce their environmental impact and costs. Between 2015 and 2022, Amazon reduced the weight of packaging used by over 36%.

4.5.3 **Table 4.2** below provides some real world examples of logistics firms using these technologies in practice.

Table 4.2 Case studies of technologies being used in the logistics sector

Ocacio - Logistics Robotics and the 'Hive'



Picture: Ocacio, Segro Park Purfleet

Ocacio, originally a local online grocery retailer in the UK, has transformed into a major player in logistics technology, particularly in terms of its use of robotics.

In Ocado's warehouses, thousands of robots operate on a 3D grid system called 'The Hive' which enables them to pick and place items quickly. The robotic fleet operates in unison, using 'swarm intelligence' principles to work together in close proximity. This coordination is crucial for efficiency and helps maximize space utilization in their warehouses and fulfilment centres.

Each robot moves independently, with their pioneering robotic arms making smart real-time decisions, packing grocery items into bags without any prior knowledge of what the products are or what's coming next. These systems can automate the entire packing process, loading up to 350 totes per house onto van frames for dispatch with no human interaction.

Royal Mail/Wiliot - Internet of Things (IoT)



Picture: Williot and Royal Mail

Royal Mail is to become the first delivery company to use Wiliot's digital tagging technology. This technology removes the requirement to manually scan each container and allows for real-time feedback on location and status to a cloud and AI-based platform. This technology will also allow for the tracking of environmental factors such as temperature and humidity, which are important when transporting complex items.

Evri - e-cargo bikes



Evri have recently established a 'final-mile electrification taskforce' to transform last-mile deliveries into a zero emission operation. This includes a £19 million investment to fast-track the rollout of electric cargo bikes. This is part of Evri's wider plans to become a net-zero company by 2035, alongside increasing investment into electric vehicles.

Picture: Evri e-cargo bike

5 Demand for B8 Uses Has Been Underestimated

5.1 Introduction

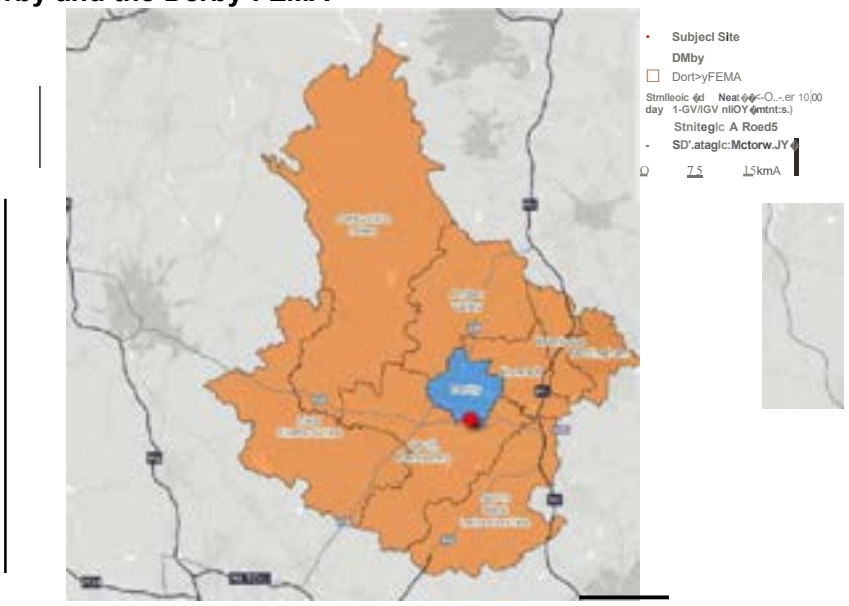
5.1.1 A further justification for the limitation on B8 uses at the Subject Site is to ensure development 'does not prejudice the development of other employment sites within the City where large scale B8 development would be more desirable'. As discussed in **Section 2,** the adopted Local Plan is underpinned by outdated employment evidence which has likely underestimated future need for logistics floorspace and land within Derby, given that it does not account for current and future growth drivers including e-commerce growth and increased freight flows.

5.1.2 This section considers supply and demand signals in the logistics markets of Derby and the Property Market Area (PMA) that it sits within. The aim of this analysis is to objectively assess the relevant market strength for logistics floorspace within Derby, and compare this against other geographies for context. The analysis within this section points to the immediate need for new B8 development within Derby given strong demand and the lack of pipeline supply. Accordingly, further B8 development at the Subject Site would not prejudice other employment sites within the City in line with Policy AC15.

5.2 Property Market Area

5.2.1 Logistics occupiers place almost no weight on local authority boundaries when searching for potential sites, as such, completing analysis just within the boundaries of Derby would be insufficient. As such, within this section we focus the analysis within the boundaries of Derby, but also consider the wider sub-regional Derby Functional Economic Market Area (FEMA) which comprises Derby, South Derbyshire, Amber Valley, Broxtowe, Derbyshire Dales, East Staffordshire, Erewash, North West Leicestershire and Nottingham[17] (shown in **Figure 5.1)**

Figure 5.1 The Derby and the Derby FEMA



Source: Derby City Council and South Derbyshire District Council Employment Land Review 2023

[17] Defined in the Derby City Council and South Derbyshire District Council Employment Land Review 2023

5.3 Derby has seen limited demonstrated demand for B2 uses

5.3.1 Despite the noted existing strengths in the manufacturing sector within Derby, being the UK leader in advanced manufacturing employment[18], the local manufacturing sector still faces the same challenges as the national market. High input costs including electricity, raw materials and labour all make the UK a challenging market for manufacturing in a global context. This is particularly true for the near term future in a world with increasing uncertainty from tariffs, conflict in the Middle East and Ukraine and inflation woes. Accordingly, protecting land solely for an employment use class with an uncertain future is unlikely to provide the much needed employment opportunities within Derby.

5.3.2 The lack of demand from manufacturers has been evident at the Subject Site. The Subject Site, which currently has the option to provide manufacturing floorspace, and the developer, who would be willing to develop this space if demanded, is struggling to find occupiers willing to take up the space.

5.3.3 In **Appendix B** we detail the occupiers at the Subject Site, and how they do not represent repeatable sources of demand in the future and therefore cannot be used as case studies of sources of future demand in order to justify the B8 limitation. To keep the B8 restriction is likely to limit the success of the Subject Site, prevent new investment opportunities and the resulting employment opportunities for Derby residents.

5.3.4 Within the Derby FEMA, 88% of net absorption (a measure of demand[19]) in the last decade of I&L floorspace has been for logistics uses[20]. Effectively the policy is protecting prime logistics development land for other employment classes, which have demonstrated substantially less demand than B8 over the last decade. To safeguard land against B8 uses will limit the economic potential of the Subject Site, Derby and the wider economy.

Limited Success of Tax Incentive Policies

5.3.5 Central or local governments can often try to encourage the growth of a specific sector through restrictive policies such as AC15, or through incentives such as enterprise zones with tax incentives. The extent to which these policies are effective is disputed. In this report we detail the limitations of restrictive policies such as AC15 and how they can limit the economic potential of sites. Furthermore, tax incentive policies often have limited success in markets such as the UK.

5.3.6 Below we detail case studies of enterprise zones with specific use class restrictions that have failed to spur demand for those specific use classes despite tax incentives, infrastructure improvements and anchor tenants either through legacy industry, or through government grants. This is important for the Subject Site given it has similar characteristics with the infrastructure improvements, proximity to Rolls-Royce, and government funded tenants such as the AMRC and iHub.

[18] Derby City Local Plan, Part 1 - Core Strategy
[19] Move ins minus move outs
[20] Source: Costar

Lancashire Enterprise Zones

Established in 2012, Lancashire's Enterprise Zones (EZs) comprise four sites: Samlesbury, Warton, Blackpool Airport, and Hillhouse. Collectively known as the Lancashire Advanced Manufacturing and Energy Cluster (LAMEC), these zones aimed to attract knowledge-intensive businesses by offering incentives such as business rate discounts and simplified planning processes. Despite being set up over a decade ago, the success of these zones has been limited. Below we detail two of the enterprise zones and their relative success over the last decade.

Samlesbury Enterprise Zone





Context

The aim of the Samlesbury Enterprise Zone was to establish a globally significant hub for advanced manufacturing, engineering, cyber innovation, and hi-tech research. Strategically located near BAE Systems, the zone was designed to drive transformational growth in sectors such as aerospace, sci-tech, and cyber. Its objectives included creating high-value jobs on-site, fostering new business startups and spin-outs, and strengthening local supply chains through inward investment. The Samlesbury site has seen significant infrastructure improvements, including the construction of a new spine road and a primary substation to meet power requirements. The site had a Local Development Order (LDO) that would allow for fast and simple planning permissions, however this was restricted for Advanced Engineering and Manufacturing (AEM), Science Technology and Cyber uses. The original LDO for the Samlesbury Enterprise Zone, adopted in 2014, expired in early 2024. In response, a new LDO (version 3) and an updated Masterplan were adopted in Autumn 2024.

Outcome

As of 2025, development has been limited on site, with the following notable schemes delivered on site:

- Advanced Manufacturing Research Centre (AMRC) North West: A £25 million facility providing innovation support to Lancashire's advanced manufacturing businesses that was built using grant funding from the LEP Growth Deal.
- BAE Systems' Academy for Skills and Knowledge (ASK): A training hub producing over 170 apprentices and graduates annually, supporting the local talent pipeline.
- Innovation Hub: A proposed £13.2 million facility aimed at fostering collaboration in sectors like digital, cyber, advanced manufacturing, energy, and aerospace.

n Enterprise Zone



Context

The Warton Enterprise Zone spans 72 hectares adjacent to BAE Systems' principal aerospace manufacturing hub at Warton Aerodrome. It also benefited from an LDO, first implemented through to November 2024 and extended in February 2025 for another ten years, this LDO enables accelerated planning approval for advanced engineering and manufacturing developments. The 2025 extension of the LDO was accompanied with the opening of Edith Rigby Way in order to improve accessibility to the site.

Outcome

As of 2025, development has been limited on site, with the following notable schemes delivered on site:

- Altitude Facility: In mid-2025, the Altitude innovation facility officially began hosting tenants, incubator programmes, and research initiatives. It is positioning itself as a hub for future aviation and space-tech by bringing together BAE Systems, the University of Lancashire, entrepreneurs, and government agencies.

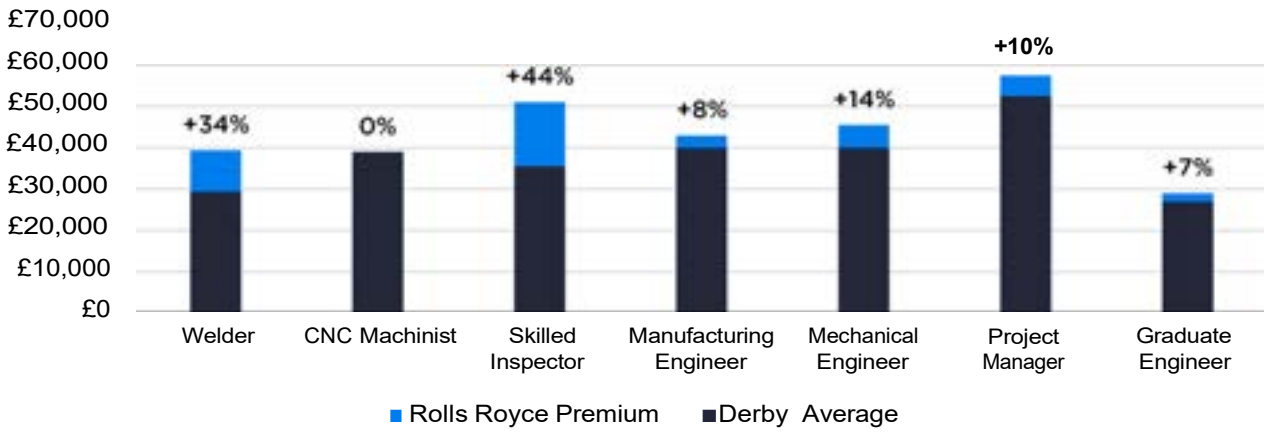
Conclusion

Both the Samlesbury and Warton Enterprise Zones have failed to spur demand for their targeted sectors to a level that can be considered successful. This is despite the infrastructure improvements and on-site organisations such as the Altitude Facility and the AMRC. This should be an important case study for Infinity Park Derby to demonstrate that restrictions for specific use classes are not guaranteed to facilitate demand in these sectors. Infinity Park Derby has also seen infrastructure improvements and state funded tenants in the form of iHub and the Nuclear AMRC and has yet to see demonstrated demand from repeatable manufacturing tenants as we detail in **Appendix B.**

A 'Crowding Out' Effect From Ro/ls-Royce

5.3.7 Rolls-Royce is a major operator and employer within Derby, employing over 15,000 people across its business units in Derby. It is also a major contributor to the local economy through economic output, business rates and wages. These wages are on average higher than the Derby average for wages (see **Figure 5.2)** as a result of the economic success of the company. The higher wages Rolls-Royce can offer can help to explain the lack of demand for other B2 uses in Derby and therefore at the Subject Site. Other manufacturing occupiers, and especially small and medium sized firms will find it hard to compete with Rolls-Royce either on wages, or for the best talent. In this light they may look to other areas of the country for floorspace in order to find skilled labour for more affordable wages. This is often described as a 'crowding out' effect where smaller or less established firms can't compete with the incumbent larger firm, in this case, Rolls-Royce. The crowding out effect would give weight to the idea that even with support from government, manufacturers outside of Rolls-Royce may be unlikely to take up space in Derby even despite its demonstrated skills and location.

Figure 5.2 Wage Premium of Rolls-Royce Employees and Derby Employees



Source: Rolls-Royce, Indeed, Glassdoor, Tota/Jobs 2025

5.4 Derby has a Proportionally Small Logistics Market

5.4.1 If we compare the existing logistics inventory in Derby, the FEMA and the East Midlands we can see that Derby has significantly less logistics[21] space relative to the size of its working age population. This comparison is illustrated in **Figure 5.3,** Derby has 5.8 sqm of logistics floorspace per working age resident (16-64 years), compared to 9.4 sqm in the FEMA and 9.0 sqm in the East Midlands.

[27] Defined in Costar as: Distribution, Light Distribution, Refrigeration/ Cold Storage, Telecom/Data Hosting (Industrial), Telecom/Data Hosting (Light Industrial), Truck Terminal, Warehouse, Showroom (Light Industrial), Showroom (Industrial)

5.4.2 A similar trend is evident when you compare logistics inventory to the total population of these areas. Given the strength of the logistics market (discussed in **Section 3**), this relative lack of supply is restricting Derby's participation in the sector's growth, and thus inhibiting its economic potential.

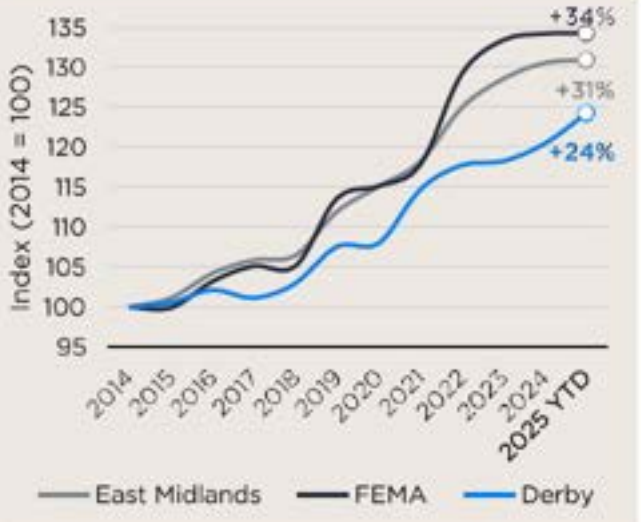
5.4.3 Despite the strength of the sector, Derby has seen a slower rate of logistics development in the last decade (see **Figure 5.4**), a trend which is at odds with the wider regional performance and the strategic advantages of Derby as a logistics location (illustrated in **Section 3**). The overall logistics floorspace in the FEMA and the East Midlands grew by 34% and 31% respectively between 2014 and 2025 YTD, however Derby has seen its inventory grow at a much slower rate (24%). As we explore below, the lack of development of new logistics floorspace, alongside strong demand has contributed towards very strong rental growth.

Figure 5.3 Logistics inventory per person and per working age person



Source: CoStar, ONS Population Estimates 2025

Figure 5.4 Indexed logistics inventory growth (2012-2025 YTD)



Source: CoStar 2025

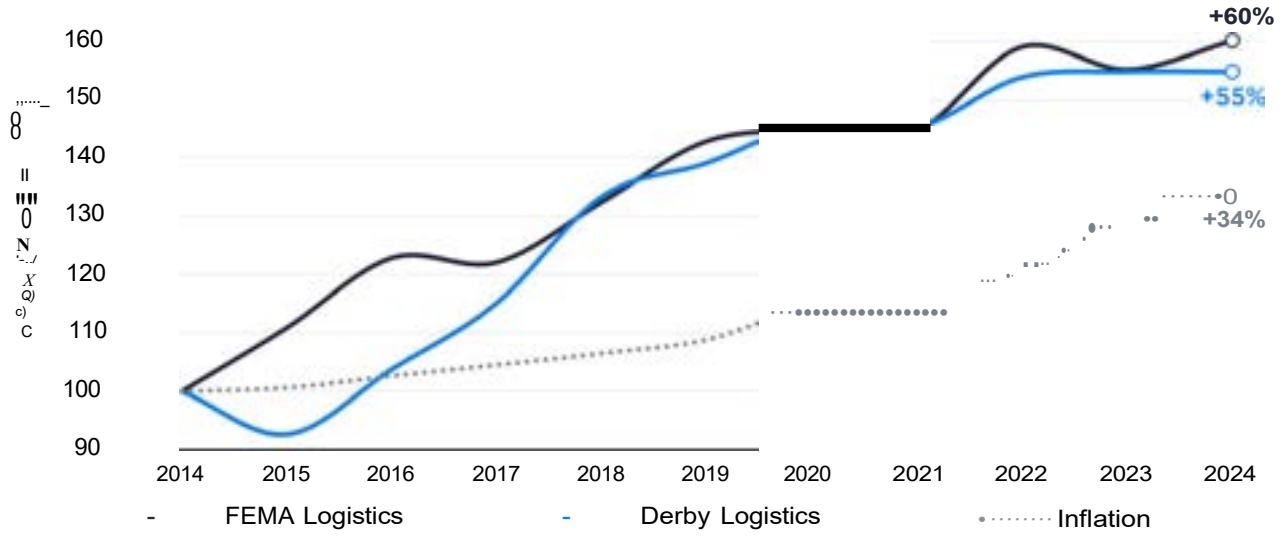
Logistics Rental Growth has Outstripped Inflation

5.4.4 A key market indicator for understanding the relationship between supply and demand is rental growth. When demand outstrips supply, rental growth is typically higher as occupiers compete for limited available stock. This in turn drives up rents. Conversely, when there is sufficient supply to accommodate demand, rental growth is lower, typically tracking inflation more closely.

5.4.5 Across Derby and the FEMA, logistics rents have broadly tracked each other, growing by 55% and 60% respectively between 2014 and 2024 (**Figure 5.5**). This is almost twice the rate of inflation over the same period at 34%. This rampant rental growth is particularly challenging for occupiers, given macroeconomic challenges such as inflation have had an outsized impact on logistics operations. Electricity and fuel prices have been some of the leading drivers of inflation over the last 3 years alongside rental growth and these components comprise a large share of the cost base for logistics businesses. The rampant

rental growth as a result of a lack of supply corroborates the notion that both Derby and the FEMA's logistics markets are in need of new supply in order to meet the demand in the market. New supply is required in order to help quell these spiralling rents and help businesses operate in Derby and continue to provide employment opportunities.

Figure 5.5 Logistics Rental Growth against Inflation in Derby and the FEMA (2014-2024)



Source: Costar

Lack of good quality logistics floorspace

5.4.6 **Figure 5.6** compares the quality of logistics inventory by EPC rating within Derby and the FEMA. Primarily it shows that Derby, partly as a result of slower development of new stock, has a lower proportion of logistics floorspace that is of good quality when compared with the FEMA.

5.4.7 Alongside this, Derby has a high quantity of floorspace with EPC ratings below a C. This further demonstrates the supply-constrained nature of the Derby logistics market. In many areas an influx of new prime floorspace that can command higher rents has pushed up average rental values, however Derby has seen high rental growth for poor quality stock meaning occupiers are paying higher rents for the same poor quality floorspace.

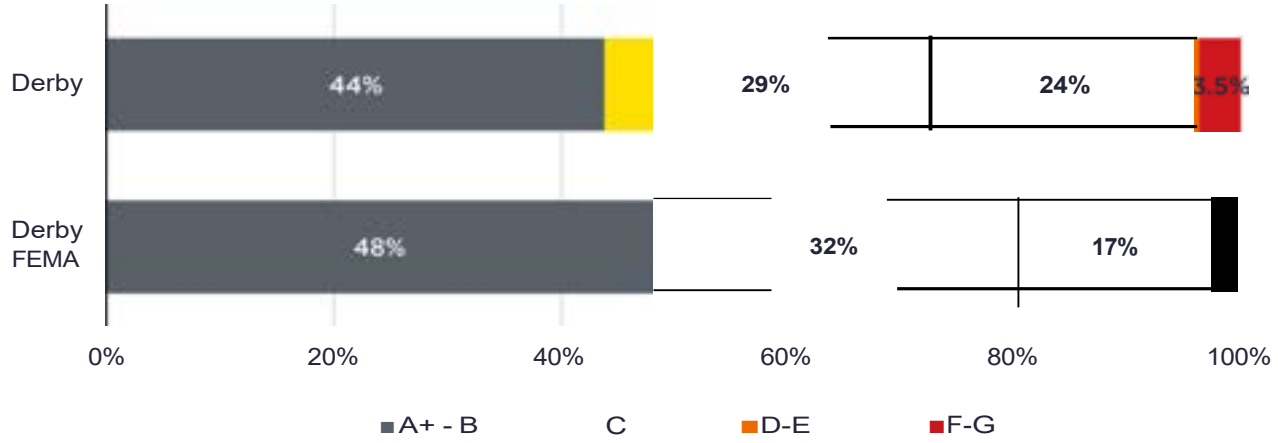
5.4.8 Further to this, if government's current proposed Minimum Energy Efficiency Standards (MEES) reforms are also adopted, then:

- From pt April 2027, a commercial property cannot be let unless achieving at least an EPC rating of C.
- From 2030, a commercial property cannot be let unless achieving at least an EPC rating of B.

5.4.9 Based on the above requirements, and without any upgrades to existing inventory in Derby, from April 2027 27% of inventory will be unable to be let. From 2030, over 56% of existing inventory will be unable to be let.

5.4.10 This data indicates that the supply of lettable logistics floorspace in Derby is likely to decline as not all floorspace would be expected to realistically be retrofitted to a level that will meet future occupier requirements. Without development of new logistics floorspace the supply position would worsen further and therefore limit investment from potential occupiers who want to move into Derby or expand existing operations.

Figure 5.6 Proportion of Logistics Inventory by EPC Rating in Derby and the Derby FEMA



Source: Costar 2025

5.4.11 EPC ratings alone do not provide a total picture as to the quality of buildings. Modern logistics occupiers require high quality premises in prime locations with features such as adequate clear heights, yard sizes and amenities such as high-quality ancillary office space. These features are often not possible to add to legacy logistics stock. Therefore, in order to meet the demands of high quality occupiers, development of new logistics floorspace within Derby is required.

An immediate need for B8 floorspace

5.4.12 In **Appendix C,** we detail a list of I&L requirements that are geographically relevant to the Subject Site. Notably, since 2020, B8 requirements have comprised 85% of the requirements in Derby by floorspace. This aligns with the split in the historic demand (88%) as described above. 77% of B2/B8 or B8 requirements were for units above 9,300 sqm (100,000 sqft).

5.4.13 With the exception of Derby 507 at Infinity Park, there is only one Grade A unit available within Derby in excess of 9,300 sqm, at SEGRO's SmartParc development and we understand that this is under offer and has food production restrictions **(Appendix B).** In this light, other than Derby 507, there are no Grade A logistics buildings available for occupiers, which is at odds with the list of requirements in **Appendix C** and would therefore limit potential investment into Derby and subsequent employment generation opportunities.

5.4.14 If we extend this search out to buildings with planning permission, only SmartParc SEGRO in Derby has planning permission (113,321 sqft, 10,527 sqm). However we understand that the permitted use is limited to food production, distribution, training and education and

therefore not available for logistics operations. This means that any potential occupier seeking logistics floorspace within Derby, over 100,000 sqft (9,300 sqm), would not be able to find any Grade A space to meet an immediate business requirement (i.e. existing, under construction or with planning permission), outside of Derby 507 at the Subject Site.

5.4.15 Furthermore, neighbouring South Derbyshire has no Grade A units above 9,300 sqm currently available or with planning permission to meet demand. The Subject Site's potential to offer a much-needed, attractive logistics offering is more prevalent when you factor in the limited land availability within Derby. The Subject Site has the potential to provide a unique offering of strategic logistics (typically over 9,300 sqm) which is commonplace for many logistics operations who gain efficiencies from scale.

5.4.16 Within the list in **Appendix C,** logistics requirements are on average over 2 times larger by floorspace when compared to manufacturing requirements. This unique offering is evident in the Derby 507 unit at the Subject Site, as this unit could not be accommodated on any other site in Derby, other than SmartParc which will only consider food-use occupiers. This availability at IPD was crucial - without it, Derby would have missed out on this major investment. As such, removing the B8 restriction would allow for further investment into Derby, potentially from high quality multinational companies. The restriction would also not prejudice the development of other employment sites within Derby, given the current lack of supply.

5.5 Future Demand and Supply Balance

5.5.1 This section provides Savills future demand estimates for logistics uses and compares this to the future supply pipeline. This will demonstrate how more logistics floorspace is required over the total local plan period, and into the future. A full explanation of our future demand and supply estimations are in **Appendix A and B.**

5.5.2 Our demand methodology is considered to address the issues we raised against the various employment studies in **Section 2.** The demand estimates are presented for the Derby FEMA and a combined area of Derby and South Derbyshire and then Derby specifically. We have analysed the supply and demand balance in the combined area of Derby and South Derbyshire given that both local authorities commissioned the 2023 ELR together and the Subject Site is in close proximity to South Derbyshire. We take a sub-regional approach to estimating future logistics demand. As discussed in **Section 3** above, logistics occupiers typically have distribution networks linking their customers and suppliers of between 1 to 4 hours' travel time, sometimes longer. As a result of this, potential logistics occupiers will look at a wider geographic area (or Property Market Area) rather than just a local authority when looking for suitable properties. It is for this reason that we use the Derby FEMA area as defined above.

5.5.3 We first consider the full market for I&L units, not just logistics floorspace. We estimate demand for all unit sizes and relevant planning use classes covering light industrial, manufacturing and warehousing. This is considered a more robust approach as it relies on a larger pool of data, and the fact light industrial, manufacturing, and warehouse occupiers desire similar types of premises with similar locational characteristics. It also

highlights the fact that, as discussed in **Section 3,** flexibility is one of the major attractions of I&L floorspace, and that occupiers from a variety of sectors use both 'industrial' and 'logistics' floorspace. As such, we believe that I&L space should be planned for flexibly. However, to demonstrate the need for logistics space in particular we ultimately apportion our total I&L demand figure to logistics floorspace.

Comparing Supply and Demand

5.5.4 We estimate that over the 19-year period, consistent with the 2023 ELR, total I&L demand across Derby equates to 465 ha (using a 35% plot ratio). This is substantially higher than the 85 ha assessed in the 2023 ELR for the Derby area. The majority of the demand is for logistics uses (370 ha). As detailed in **Appendix B,** Derby has just 65 ha of I&L land supply (covering allocations, draft allocations and planning permissions), indicating a significant shortfall.

5.5.5 Due to the land constrained nature of Derby and it being an urbanised area, it is understandable to assume that neighbouring local authorities should help to meet this demand. In this light, we have also estimated future supply and demand at the combined area of Derby and South Derbyshire. This area is applicable given that both local authorities commissioned the 2023 ELR together and the Subject Site is in close proximity to South Derbyshire. When we view the supply and demand balance in the combined area of Derby and South Derbyshire, we can see there is still a substantial shortfall between demand and supply.

5.5.6 These estimates indicate a robust justification for removing the B8 limitation at the Subject Site given that:

- The evidence base has significantly underestimated demand for I&L floorspace within Derby
- B8 demand makes up the majority of estimated I&L demand within Derby
- There is limited land supply within both Derby and neighbouring South Derbyshire to meet this demand
- Given the underestimation of demand and the lack of supply, further B8 development at the Subject Site would not prejudice the development of other employment sites within the City

Figure 5.7 Future Demand and Supply Estimations in Derby and the combined area of Derby and South Derbyshire over 19-years (hectares)



Source: Savills

6 Conclusion

6.1.1 This report has demonstrated that the removal of the B8 restriction relating to the planning permission covering the Subject Site would not be incompatible with the goals of Policy AC15 and that allowing further development of B8 floorspace at the Subject Site would help to meet a significant supply shortfall given strong logistics demand in Derby.

6.1.2 Derby's employment evidence informing the adopted Local Plan Policy AC15 (and therefore the planning permission at the Subject Site) is outdated and has therefore not taken into account current and future growth drivers and trends relevant to the logistics sector.

6.1.3 In particular, the B8 limitation in the planning permission does not reflect the importance of the logistics sector to the local economy, including the high-quality and well-paid jobs for local residents associated with it.

6.1.4 Removing the B8 limitation at the Subject Site could result in the creation of high-quality and accessible jobs for local residents, allowing Derby to benefit from the strongest-performing commercial sector and address high levels of unemployment and deprivation.

6.1.5 Further B8 development at the Subject Site would be compatible in 'keeping with the vision for the area' namely the creation of an 'innovation and technology park' for companies in the manufacturing and manufacturing service sectors. This is because:

- Manufacturing and logistics are inextricably linked
- Modern I&L floorspace is inherently flexible and house a number of functions under one roof, including manufacturing and research and development (R&D) activities
- The logistics sector plays an important supply-chain role in the economy
- High-tech innovations are reshaping the logistics sector

6.1.6 Further B8 development will also not 'prejudice the development of other employment sites within the City where large scale B8 development would be more desirable' given that:

- The evidence base has significantly underestimated demand for I&L floorspace within Derby
- B8 demand makes up the majority of estimated I&L demand within Derby
- There is limited land supply within both Derby and neighbouring South Derbyshire to meet this demand
- The Subject Site is a prime location for logistics development in Derby given its size and connectivity.

6.1.7 Therefore, there is a strong justification for the removal of the B8 limitation at the Subject Site in order to enable investment in Derby that can provide high quality accessible employment opportunities to local residents.

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Appendix A Future Logistics Demand Estimation

Savills Suppressed Demand Methodology

7.1.1 We present below Savills full methodology for estimating future I&L demand. Our methodology is considered to address the issues we raised against the various employment studies in **Section 2.** The demand estimates are presented for the Derby FEMA and a combined area of Derby and South Derbyshire (PMA), consistent with the Derby City Council and South Derbyshire District Council Employment Land Review 2023.

Compliance with National Policy and Guidance

7.1.2 Our methodology is compliant with the requirements of the Planning Practice Guidance ('PPG') as it:

- Analyses 'market signals, including trends in take up and the availability of logistics land and floorspace across the relevant market geographies'[22]. If a market is identified as being supply constrained (i.e. demand exceeds supply) such as the Derby FEMA and Derby, the Savills model supplements the historic demand profile accounting for suppressed demand (i.e. demand lost due to historic supply constraints).

- Applies 'economic forecasts to identify potential changes in demand and anticipated growth in sectors likely to occupy logistics facilities, or which require support from the sector'[23]. The Savills method quantifies how much I&L floorspace growth is linked to current and future e-commerce growth which is the major growth driver for the sector, driving both demand for the supply-chain, and also the manufacturing of goods.

7.1.3 Based on the above, we consider our approach to estimating future logistics demand to be NPPF/NPPG compliant, and industry best practice. It has been endorsed by the British Property Federation ('BPF') in the *'Levelling Up - Logic of Logistics'* report, and was also shortlisted for an RTPI Award for Research Excellence 2022. The report has also been referenced as part of the Government's recently published 'Future of Freight Plan', and has been the focus of several discussions with senior officers at DLUHC and DfT. Our approach has also been recently considered in the Warehousing and Logistics in the South East Midlands Study. It is also being considered as one of the estimation methods as part of the West Midlands Strategic Employment Sites Study ('WMSESS').

7.1.4 Having regard to market signals and facilitating growth in the logistics sector are key priorities of the NPPF, namely:

- **Paragraph 32** which states: 'The preparation and review of all policies should be underpinned by **relevant and up-to-date evidence.** This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and **take into account relevant market signals'.**

- **Paragraph 85** which states: 'Planning policies and decisions should help to create the

[22] In accordance with PPG, Paragraph: 031 Reference ID: 2a-031-20190722
[23] Ibid

conditions in which businesses can invest, expand, and adapt...The approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential'.

- **Paragraph 87** which states: 'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for **storage and distribution operations at a variety of scales and in suitably accessible locations'.**

(Savills emphasis in bold).

Taking a Sub-Regional Approach to Estimating Demand

7.1.5 We take a sub-regional approach to estimating future logistics demand. As discussed in **Section 3** above, logistics occupiers typically have distribution networks linking their customers and suppliers of between 1 to 4 hours' travel time, sometimes longer, depending on their size, i.e. up to 4 hours plus is more typical of very large companies with a national reach, while 1 to 2 hours' drive time is ideal for the majority of companies.

7.1.6 As a result of this, potential logistics occupiers will look at a wider geographic area rather than just a local authority when looking for suitable properties.

Step by Step Guidance

7.1.7 The detailed steps we follow in estimating future logistics demand are outlined below.

- Step 1 - Calculate the Derby FEMA's historic and suppressed demand **only:** Firstly we consider future demand from the Derby FEMA including 'suppressed demand' or demand lost historically due to supply constraints;
- Step 2 - Estimate additional demand associated with E-commerce growth: Secondly we consider increases in demand associated with future e-commerce growth which is the major growth driver for the sector;
- Step 3 - We then apportion the Derby FEMA's total I&L demand to logistics (B8) uses;
- Step 4 - We then translate the floorspace figures into a land requirement using an appropriate plot ratio;
- Step 5 - We then apportion the Derby FEMA's logistics demand to the combined area of Derby and South Derbyshire and then Derby specifically.

Step 7 - Historic and Suppressed Demand

- Step 1 builds upon historic take-up (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up.
- We estimate the Derby FEMA's I&L demand (historic+ suppressed) to be 7,696,000 sqm of floorspace over a 19-year period.
- The steps are detailed below.

Step 7A: Estimating Demand over the Local Plan Period

7.1.8 We assume a 19-year period which is consistent with the time period used in the latest employment evidence (ELR 2023).

Step 7B: Estimation of Historic Demand

7.1.9 This is based on the average annualised net absorption in the Derby FEMA at 208,700 sqm per annum for the overall I&L market between 2014 and 2024. Savills considers net absorption to be the leading measure of demand for floorspace as it indicates the quantum of net floorspace occupied over a period of time (i.e. move-ins minus move-outs) based on lease deals.

Step 7C: Estimation of Suppressed Demand

7.1.10 The rationale for accounting for suppressed demand is that when sufficient supply isn't available, demand cannot be accommodated. This top-up figure is added to the historic demand (net absorption) trend to account for years when the market was supply constrained.

7.1.11 Supply and demand are inextricably linked across all commercial property sectors. Put simply if demand exceeds supply, rents typically rise more quickly as occupiers compete for limited available stock. This can have a number of wider implications. For example, new companies aren't able to move into a market area, nor are existing companies able to find new space if their floorspace needs change, for instance, due to expansion. It may also happen that some existing local companies get priced out of the market as they can't afford the increasing rents. As a result, companies have to locate to areas that are not ideal in terms of serving their customer base, thereby increasing travel times and the costs of doing business, not to mention environmental impacts. The lack of supply may also mean companies are forced to occupy space that is not entirely suitable for their operational needs impacting productivity.

7.1.12 We describe a market where supply doesn't keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as the Derby FEMA, means that demand cannot be fully satisfied, typically resulting in strong rental growth.

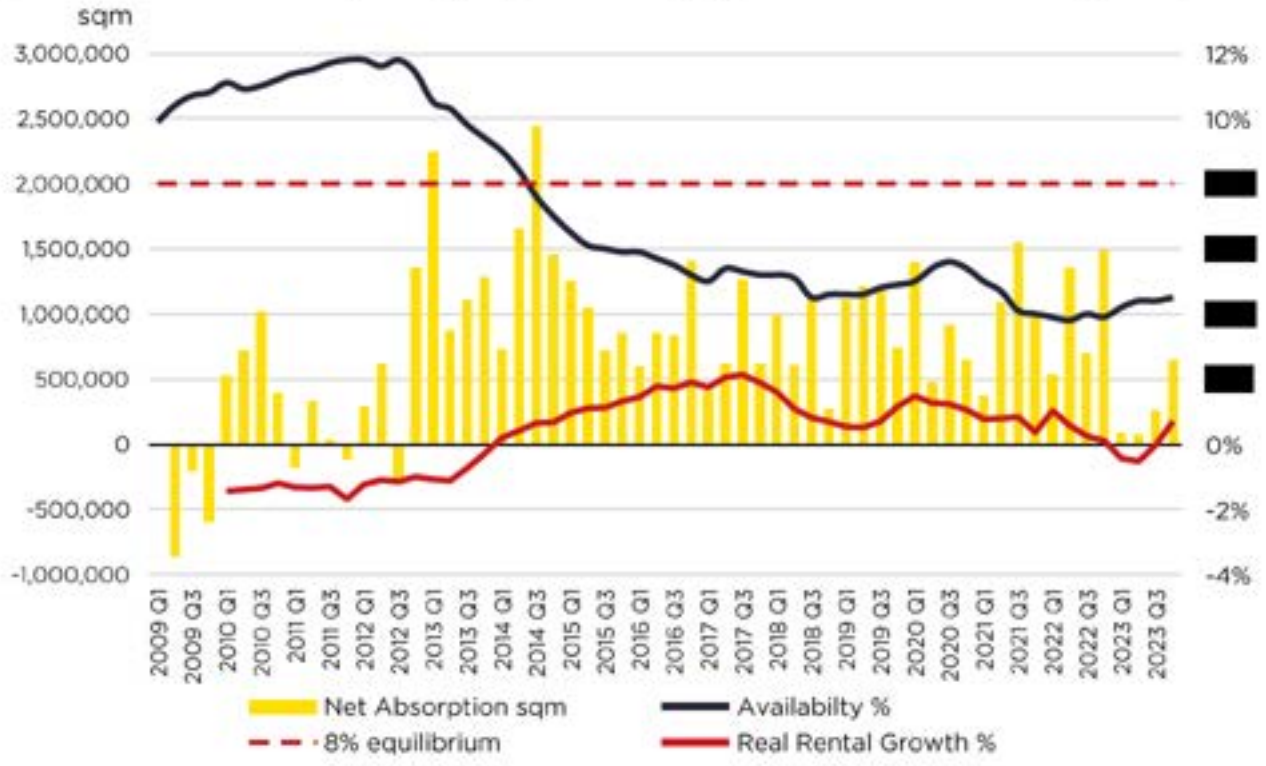
7.1.13 At the national level the market equilibrium level, where supply and demand are broadly in balance and rents are more stable, is around 8.0% availability. This benchmark rate is

found in a number of prominent publications such as the GLA's Land for Industry and Transport Supplementary Planning Guidance ('SPG'), and the British Property Federation's '*Levelling Up – The Logic of Logistics*' report.

7.1.14 If one studies real rental growth (i.e. rental growth adjusted for inflation) over the past decade at the national level and observes its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8.0%. This relationship is clearly illustrated in **Figure 7.1** below. When availability was above 8.0% between 2009 and 2014, real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was available.

7.1.15 However, since 2014, as availability dipped below 8.0% and has stayed below this level ever since at the national level, real rents have grown strongly year-on-year. During this period, net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This clearly shows the supressing nature tight availability (below 8.0%) has had on I&L demand nationally.

Figure 7.1 Historic Net Absorption (sq.m), Availability (%), and Real Rental Growth (%) in England



Source: CoStar, OBR, Savills

7.1.16 The 8.0% benchmark is also applicable to the Derby FEMA, given the I&L markets have broadly followed the same trajectory as the national market.

7.1.17 The individual steps for calculating the Derby FEMA's suppressed demand are as follows:

- **Step 1C(i)**: For years where availability has been below the 8.0% equilibrium threshold,

we calculate the quantum of floorspace necessary to achieve 8.0% availability (Column 'Av. To EQ (sqm)' in **Table 7.1**, calculation F);

- **Step IC(ii):** We then take the average of the ratio between net absorption and available floorspace for every year over the last 11 years (2014-2024) (Calculation E averages 45% for the Derby FEMA based on Column 'Net Absorption/Availability');
- **Step IC(iii):** We apply this average to the estimated floorspace required to reach 8.0% availability in each year where the market is below the 8.0% availability threshold to estimate each period's suppressed demand (Calculation F*E in Column 'Suppressed Net Absorption (sqm)');
- **Step IC(iv):** We calculate average suppressed net absorption over the last 11 years (2014-2024). This gives the annualised suppressed demand figure to be used as a top-up to the historic trend. The estimated average suppressed demand figure for the Derby FEMA is 196,400 sqm per annum between 2014 and 2024.

7.1.18 **Table 7.1** shows the relevant calculations for the Derby FEMA.

Table 7.1 Suppressed Demand Calculations within the Derby FEMA (sqm)

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Year	Inventory (sqm)	Availability (%)	Available Floorspace (sqm)	Net Absorption (sqm)	Net Absorption / Availability	Av. To EQ (sqm)	Suppressed Net Absorption (sqm)
2024	13,453,300	5.5%	739,900	-72,300	-10%	336,300	0
2023	13,367,600	4.8%	641,600	106,200	17%	427,800	186,000
2022	13,045,100	4.0%	521,800	563,600	108%	521,800	226,900
2021	12,331,100	2.8%	345,300	270,000	78%	641,200	278,800
2020	12,172,400	3.5%	426,000	166,500	39%	547,800	238,200
2019	12,073,300	3.7%	446,700	422,200	95%	519,200	225,700
2018	11,552,700	3.5%	404,300	127,200	31%	519,900	226,000
2017	11,593,900	4.1%	475,300	126,100	27%	452,200	196,600
2016	11,480,600	4.8%	551,100	180,100	33%	367,400	159,700
2015	11,157,600	4.4%	490,900	93,800	19%	401,700	174,600
2014	11,097,000	4.6%	510,500	312,000	61%	377,300	164,000
					E= average		Suppressed Demand= Average

Source: Costar, Savills, 2025

- **Step ID:** The final step requires adding the combined annualised historic and suppressed demand figures, and multiplying this by the number of years in the estimated period (19 years) as shown in **Table 7.2** below. This gives a total floorspace demand of 7,696,000 sqm for I&L in the Derby FEMA over the 19-year period.

Table 7.2 Derby FEMA Future Demand Estimates and Calculations (sqm)

	Derby FEMA (sqm)
(A) Annualised Historic Demand	208,700
(B) Annualised Suppressed Demand	196,400
(C) Total Annualised Demand (A+B)	405,100
(D) Total Demand over 19-Year Period (C*19)	7,696,000

Source: Costar, Savi/ls 2025

Step 2 - Adding an E-commerce Uplift

- Savills demand estimate factors in future e-commerce growth which is the major growth driver for the sector, driving both demand for the supply-chain, and also the manufacturing of goods.
- After including an e-commerce uplift, we estimate the Derby FEMA's I&L demand to increase to **8,439,000 sqm** of floorspace over a 19-year period.
- The additional steps to add in an e-commerce uplift are detailed below.

Step 2A: Adjusting for Increases in Online Retail

7.1.19 As discussed in **Section 3,** there are a number of factors driving future growth in demand for I&L uses which are not captured by historic trend-based projections. Attempting to factor them all in is a challenging exercise prone to errors and overestimation due to the uncertainty around major events such as Brexit, and the risk of double counting the impacts of different growth factors. The strongest drivers are population growth and the move to online shopping, which the Covid-19 Pandemic has accelerated. We consider demand arising from population growth to be largely captured by increases in online sales which are a function of household spending and household growth. For this reason, in our work we focus on the move to online shopping as expressed as pounds spent at the UK level.

7.1.20 Focusing on total online spend in pound terms in considered more effective than the percentage of online sales. This is because the percentage of online sales will fail to pick up future growth drivers such as population growth and expected increases in consumption. In this regard, using the total online spend projections will enable these future e-commerce growth drivers to be included within our future I&L demand estimates. This enables a better representation of the increased demand for floorspace needed to process this online spending.

7.1.21 In order to estimate future increases in I&L demand linked to e-commerce growth, we first need to establish the share of demand that has historically been linked to e-commerce, and then determine how much higher this is likely going to be in the future. The sectors typically linked to e-commerce are Retail, Transport and Warehousing, and Wholesale. These sectors accounted for 57% of all floorspace leased in the Derby FEMA between 2014 and 2024 according to Costar data.

7.1.22 We have considered Statista's[24] online retail forecasts for the UK to 2029 as a proxy for future online spending growth. Statista is a leading provider of market and consumer data with over 2 million registered users. Statista's data only goes back to 2017 meaning only 3 years of data (i.e. 2017, 2018, and 2019) are available before the Covid-19 Pandemic began. We consider at least 5 years of data to be more robust for understanding historic trends. In order to extend Statista's historic series we have discounted their online spending figure for 2017 by the ONS online growth rates[25] in order to derive an estimate for 2015 and 2016.

7.1.23 Next we compare the historic online spending figures (i.e. 2015-2019) with Statista's future online spend forecasts (i.e. 2023-2029). To ensure that we are comparing like for like, we convert both the historic and future forecast data into real prices in order to remove the effect of inflation. We do this by rebasing all data back to 2015 using GDP Deflators from OBR March 2024[26].

7.1.24 As shown in **Table 7.3** below, between 2015 and 2019 online retail sales averaged £68.0 billion per annum. We accept that 2020, 2021, and 2022 were exceptional years due to the Covid-19 Pandemic, and exclude them from our calculations. During the period between 2023 and 2029, online sales are predicted to average £94.6 billion per annum based on the Statista forecasts. This suggests a 39% uplift from the pre-pandemic (2015-2019) online spend average of £68.0 billion per annum based on the Statista data.

Table 7.3 UK Online Sales Forecasts (£ billion)

Year	Online Sales Real Prices (£b)	Annual Increase (£b)	
2015	53.8	-	
2016	64.0	10.1	2015-2019 Average Annual Online Sales Value in Real Prices:
2017	72.8	8.9	
2018	73.9	1.1	£68.0 billion
2019	75.3	1.4	
Average 2015-19	**68.0**	**5.4**	
2020	88.9	13.6	Excluded from calculations as these were atypical years due to the Covid-19 pandemic
2021	98.2	9.3	
2022	82.0	-16.2	
2023	75.6	-6.4	
2024	81.7	6.1	2023-2029 Average Annual Online Sales Value in Real Prices:
2025	89.7	8.0	
2026	96.7	7.0	£94.6 billion
2027	102.7	6.0	(+39% uplifted compared to 2015-2019)
2028	106.7	4.0	
2029	109.1	2.5	
Average 2023-29	**94.6**	**3.9**	

[24] A prominent retail forecasting house
[25] ONS, Internet Retail Sales, All Retailing, 2024
[26] OBR March 2024 Economic and Fiscal Outlook: Economic Supplementary Tables

Source: Statista, ONS, Savills, 2025

7.1.25 The increase in online spending in real terms indicates that the volume of shipped goods will increase. This in turn will increase the need for I&L floorspace to handle, store, and distribute the increased volume of goods.

7.1.26 Some of this increase will likely be dealt with more efficient operations in the future. Advancements in technology and fulfilments solutions will lead to increased productivity in the sector. According to Oxford Economics, the productivity per worker within the I&L sector, specifically the key e-commerce related sectors being Transport and Storage, Retail, and Wholesale, is predicted to grow by 18% between 2021 and 2040. We assume that these productivity gains will reduce the need for additional floorspace. To account for this productivity growth in the I&L sector, we adjust down the 39% online spend increase from **Table 7.3** above, by the 18% productivity increase. This yields a final online update of 32% as shown in **Table 7.4** below.

Table 7.4 Productivity Adjustment

Predicted Increase in Future Online Spend	Future Productivity Gains in the I&L Sector	Uplift Adjusted for Productivity Gains
39%	18%	39% * (1-18%) = 32%

Source: Statista, ONS, Oxford Economics, Savills, 2025

7.1.27 Applying this 32% uplift to the historic demand from e-commerce sectors equates to an uplift of 743,000 sqm for the Derby FEMA over the 19-year period **(Table 7.5).**

Table 7.5 Adjusting for Increases in Online Retail within the Derby FEMA

	Annual (sqm)	Over 19-Year Period (sqm)
E-commerce related (57% of historic)	118,500	2,251,500
E-commerce related after 32% uplift	157,600	2,994,400
E-commerce demand uplift	39,100	743,000

Source: Savills 2025; Figures may not sum due to rounding

Step 2B: Adding E-commerce Uplift to the Historic and Suppressed Demand Estimates

7.1.28 Adding the e-commerce uplift to the combined historic and suppressed demand estimates yields a total demand of 8,439,000 sqm for the Derby FEMA over the 19-year period, as summarised in **Table 7.6** below.

Table 7.6 Summary of Future Demand (Over 19-Year Period) within the Derby FEMA (sqm)

	Derby FEMA
(A) Historic demand (net absorption) over 19-years	3,964,900
(B) Suppressed demand over 19-years	3,731,100
(C) E-commerce uplift over 19-years	743,000
(D) Total demand over 19-year period (A+B+C)	8,439,000

Source: Savills 2025; Figures may not add up due to rounding

Step 3 - Apportion Total I&L Demand into Logistics Demand

- We then apportion our total I&L demand estimate for the Derby FEMA to logistics uses specifically. To do this we use an apportionment rate that is reflective of the performance of the logistics market in relation to the total I&L market over the last 11 years (2014-2024).

7.1.29 To estimate logistics' share of total demand for I&L uses, we first consider the following three property market metrics:

- Logistics' share of the total I&L market's historic average net absorption per annum (2014-2024): 88%;
- Logistics' share of the total I&L market's average net deliveries per annum (2014-2024): 90%; and
- Logistics' share of the total I&L market's total inventory (2025 YTD): 62%.

7.1.30 We have taken the average of the above measures which results in an apportionment rate of 80% for logistics. When this rate is applied to the total I&L demand over a 19-year period, the demand for logistics in the Derby FEMA equates to 6,710,400 sqm.

Step 4 - Translating Floorspace Demand (sqm) into Land Requirements (Ha)

- This step entails translating the above total logistics demand figures (sqm) into a land requirement (ha) using an appropriate plot ratio.
- Using a 35% plot ratio, we estimate the level of I&L demand over a 19-year period to be 2,406 ha in the Derby FEMA.
- The steps are detailed below.

7.1.31 The above floorspace figures need to be translated into a land requirement using an appropriate plot ratio.

7.1.32 As discussed in **Section 4,** the evidence base documents use a plot ratio ranging from 39% to 45%. Based on our experience, recent changes in the I&L sector means that occupiers are moving towards larger building footprints and requiring lower site coverage to allow for adequate yard space, cross-docking, sustainable urban drainage, and strategic landscaping. These modern occupier requirements imply a lower plot ratio. Savills considers a 35% ratio as appropriate.

7.1.33 The results of using a 35% plot ratio to translate our floorspace demand estimates are shown in **Table 7.7** below.

Table 7.7 Derby FEMA I&L Land Demand Estimates over a 19-Year Period (ha)

	Floorspace Demand Estimates (sqm)	Land Demand Estimates (Ha)
Derby FEMA	6,710,400	2,406

Source: Savills 2025; Figures may not add up due to rounding

7.1.34 Within the Derby FEMA, we estimate the level of I&L demand over a 19-year period is **2,406 ha.**

Step 5 - Apportioning Total Derby FEMA logistics Demand to Derby and South Derbyshire

- We then apportion our total demand estimate for the Derby FEMA to Derby and the combined area of Derby and South Derbyshire specifically. To do this we use an apportionment rate that is reflective of Derby and South Derbyshire's I&L market performance over the last 11 years (2014-2024).
- The steps as to how we split the total demand are detailed below.

7.1.35 To estimate Derby and then the combined area of Derby and South Derbyshire's share of overall Derby FEMA demand for logistics, we first consider the following three property market metrics:

- The share of the Derby FEMA's historic average net absorption per annum (2014-2024): 24% and 22% respectively;
- The share of the Derby FEMA's average net deliveries per annum (2014-2024): 15% and 22% respectively; and
- The share of the Derby FEMA's total inventory (2025 YTD): 18% and 28% respectively

7.1.36 When we take the average of the above measures which results in an apportionment rate of 19% for Derby and 24% for the combined area of Derby and South Derbyshire. The results of this apportionment are shown in **Table 7.8.**

Table 7.8 Logistics Demand Estimates over 19-Year Period in the Derby FEMA, Derby and the combined area of Derby and South Derbyshire

	sqm	Ha
Derby FEMA	6,710,400	2,406
Derby	1,296,400	370
Derby and South Derbyshire	1,632,100	465

Source: Savills, 2025

Appendix B Supply Review

Introduction and Key Conclusions

Aim:

- This section provides a quantitative and qualitative review of the current and future supply of I&L land within Property Market Area (PMA), being the local authority areas of Derby City and South Derbyshire.

Key Conclusions:

- In addition to Derby 507 at the Subject Site, there is a total of 53,816 sq. m of Grade A floorspace available within the PMA within four existing buildings or those under construction (3 of which are at Dove Valley Park and 1 at Smart Pare).
- In addition to the Subject Site, there is a total of **c. 428 ha** of land supply within the PMA, comprising land which benefits from a planning permission, an existing allocation or a proposed allocation with available land not benefiting from a planning permission. This is made up as follows:
- Land with Planning Permission: **c. 66 ha;**
- *Allocated sites:* **c. 71 ha;** and
- Proposed Allocations with available land and without planning permission: **291 ha**
- Of this total, within Derby, land supply includes **c. 64.5 ha** as follows:
- Land with Planning Permission: **c. 36 ha** (Smart Pare)
- Allocated sites: **c. 28 ha**

- Within Derby there is a particular shortage of land which is able to meet larger occupier requirements on a flexible basis within a high quality environment. This is limited to the Subject Site, Infinity Garden Village (element within Derby City) and SmartParc. Infinity Garden Village is not able to meet an immediate occupier requirement, being dependent upon delivery of the A50 link road. SmartParc is focused on the food sector and is therefore only able to meet demand from certain occupiers.
- The Subject Site therefore has a vital role to play in meeting immediate occupier demand across a range of uses and maximising investment and economic benefits to Derby. **Flexibility to meet a full range of occupier requirements is essential.**

8.1 Approach

8.1.1 We have reviewed the supply of land within Derby City and South Derbyshire local authority areas. We have included sites with planning permission or an allocation for B2

or B8 development. Data collection was undertaken in April 2025 and represents a snapshot in time.

8.1.2 In order to objectively assess the level of supply, we have considered all sites of 2.5 ha and above. Where a site below this threshold has planning permission for a unit of 100,000 sq. ft or more then this has been included for completeness. The vast majority of land supply is accounted for by sites which are larger than this size threshold and therefore we consider our assessment to be a comprehensive review of overall supply.

8.1.3 We consider four sources of supply:

- Grade A Buildings of 100,000 sq. ft or more which can accommodate an immediate occupier requirement for B2 or B8 use within the PMA.
- Land Supply being sites of 2.5 ha or more with planning permission for B2 or B8 development which can accommodate a unit of 100,000 sq. ft plus;
- Pipeline supply of sites of 2.5 ha or more which benefit from an allocation for B2 or B8 development but do not yet have planning permission.
- Draft allocations comprising 2.5 ha or more, which could accommodate either B2 or B8 use (which do not already benefit from planning permission or an adopted allocation) have been reviewed separately. These sites have no formal planning status and there is a high level of risk associated with their delivery.

8.1.4 Speculative developer promotions which fall outside these categories are not included within the supply.

8.1.5 **Please note that Infinity Park Derby (the Subject Site) is considered separately below.**

8.2 Infinity Park, Derby

8.2.1 Infinity Park was first granted planning permission for a business park in the early 1990s. The scheme comprised land in multiple ownerships (including Derby City Council and Rolls Royce) and at that point, access was constrained which significantly delayed delivery of the site. Key to unlocking the site was the delivery of the TI2 road, which was completed in July 2016, having been funded via a combination of public sector funding streams, as well as private funding via the applicant. Prior to the road being delivered, development was not viable or deliverable at the Subject Site. Infinity Park was also designated as an Enterprise Zone in 2016 in order to encourage businesses to locate at the site.

8.2.2 Take up and activity at the Subject Site has been as follows:

- The iHub building, which now houses the Nuclear Skills Academy, opened in 2016 as a flexible workspace for start-ups and businesses. The facility extends to 4,181 sq. m (45,000 sq. ft). This facility is supported by Rolls Royce, the University of Derby and the National College for Nuclear. It is now used as teaching space by the University of Derby and is used in part as a training facility for Rolls Royce. It is therefore not in manufacturing use. The facility was delivered as a result of public sector funding from

the Regional Growth Fund and European Regional Development Fund (ERDF), Derby City Council and the University of Derby.

This does not indicate market demand for manufacturing use at the Subject Site.

- *The Nuclear Advanced Manufacturing Research Centre (AMRC)* was completed in April 2023 and extends to 43,000 sq. m (462,848 sq. ft). The intention of the AMRC was to bring together University of Sheffield's Nuclear AMRC and the University of Derby's Institute for Innovation in Sustainable Manufacturing (IISE) to undertake specialist Research & Development into the nuclear sector. The facility relied on significant public sector funding via the D2N2 Local Enterprise Partnership. The building currently remains vacant, having not been occupied for its intended use. We understand that there are proposals for an alternative (non-employment) use of the building.

  This public sector driven, R&D facility is therefore also not indicative of commercial market demand for advanced manufacturing uses at the Subject Site. Furthermore, it has not been taken up for its permitted and intended use to date.

- *Oregon Timber* agreed a deal on a Build to Suit basis for a bespoke unit of 17,242 sq. m (185,591 sq. ft) in October 2020. The unit is in B2 manufacturing use with Oregon being a specialist constructor of timber frame houses. Oregon is part of the Barratt Group, which also includes Wilson Bowden Developments (the applicant and developer of Infinity Park[27]). The locational decision of Oregon to come to the Subject Site was therefore driven by wider corporate objectives, as opposed to being a market-led commercial decision based on the merits of the Subject Site for this manufacturing use.

  This transaction is therefore also not indicative of commercial market demand for manufacturing use at the Subject Site.

- *Derby 507* is a speculatively constructed unit extending to 47,168 sq. m (508,003 sq. ft) which has been funded by Logicor. Practical Completion of the base build was achieved on the 19th February 2025. There has been strong market interest in this unit, the vast majority of which has been from occupiers seeking a B8 logistics facility. (The various proposals that have been submitted have all been to occupiers looking to use the premises for Class B8 use).

- *BOC* have agreed a deal on Unit G2 which was granted planning permission in April 2024 for a B8 gas storage depot. This unit extends to c. 690 sq. m (7,427 sq. ft).

8.2.3 Taking account of these uses, there is now **31.22 ha** remaining at Infinity Park. Forthcoming proposals for further development include:

- *Plot B1:* indicative of the strength of demand from the sector, this plot is under offer to a B8 occupier and a full planning application has been submitted for a unit of 24,547 sq. m (264,222 sq. ft) in order to meet their requirements. This plot extends to **9.62 ha.**

- *Plot A2:* a reserved matters planning application has been submitted for a unit of 15,561 sq. m on this plot. Subject to demand (and planning) this could be occupied for either

[27] as part of the Joint venture Infinity Park Derby LLP

manufacturing or logistics use. Based on evidence to date, logistics use makes up the majority of demand and is therefore the most likely use. This plot extends to **3.08 ha.**

- *Plot* GI: a planning application has been submitted to relocate Star Micronics, a local business currently based at Rolls Royce, Raynesway. There is an urgent requirement to relocate as Rolls Royce are redeveloping their Raynesway site. This again is another rare B2 use that does not truly represent market demand for B2 as it is a relocation. This plot extends to **0.76 ha** and the proposed unit will extend to 2,234 sq. m (24,050 sq. ft). The building is to be used for manufacturing, office and storage use.

8.2.4 Should these proposals be approved and delivered, there will be a total of **17.76 ha** of land remaining at the Subject Site.

8.2.5 There has therefore been very limited market driven manufacturing take-up at Infinity Park, despite incentives via the Enterprise Zone and considerable public sector funding being deployed to unlock the delivery of the site. Savills are joint letting agents of Infinity Park and analysis of occupier enquiries confirms that **over 77% of enquiries received over the course of the last 2 years have been on the basis of BS use.** This has translated into an agreed deal, subject to planning, on Plot BI, and significant interest in remaining plots on the basis of B8 use.

8.3 Grade A Building Supply

8.3.1 We have assessed the supply of Grade A buildings within the PMA of 100,000 sq. ft plus and this is summarised at **Table 8.1** below.

Table 8.1 Grade A Buildings

Ref.	Name	Authority	Size (sq. ft)	Size (sq. m)	Comment
	Unit 1 SmartParc SEGRO, 1 Holme Lane	City of Derby	118,071	10,969	Built 2024 - available now. Targeted at food production. Understood to be U/O.
2	DVP 113, Dove Valley Park	South Derbyshire	113,137	10,503	Speculative unit - available now. U/O to Uniphar deal due to complete imminently.
3	DVP 196, Dove Valley Park	South Derbyshire	195,679	18,179	Speculative unit - available now.
4	DVP 152, Dove Valley Park	South Derbyshire	152,466	14,165	Speculative unit - available now.
	TOTAL		579,353	53,816	

8.3.2 There are a total of four buildings available which total 53,816 sq. m (579,353 sq. ft). The units are of a relatively small scale, all being sub-200,000 sq. ft. With the exception of Derby 507 at Infinity Park which is reviewed separately, there is only one Grade A unit available within Derby in excess of 100,000 sq. ft, at SEGRO's SmartParc development and we understand that this is under offer. The other three available buildings are located at Dove Valley Park on the A50 to the south west of Derby. We understand that unit DVP113 is under offer and is due to complete imminently which will further reduce the

supply of Grade A buildings in the PMA.

8.4 Land Supply

8.4.1 We have analysed the supply of land with planning permission for B2 or B8 use which can accommodate a unit of 100,000 sq. ft plus, within the PMA. We have included sites of 2.5 ha or more within our assessment, and the results are set out at **Table 8.2** below.

Table 8.2 Land Supply (with Planning Permission)

Ref.	Name	Authority	Remaining Land (ha)	B2/B8 Capacity (sq. m)	Comment
	SmartParc SEGRO Derby	City of Derby	36.14	113,321	Remaining land. Permitted use limited to food production, distribution, training and education.
2	Woodville Regeneration Area	South Derbyshire	3.43*	12,000	PP for residential led scheme including 2,000 sq. m Eg, 4,000 sq. m B2 and 8,000 sq. m B8.
3	Former Drakelow Power Station	South Derbyshire	2.5	8,750**	Employment component of residential-led scheme.
4	Dove Valley Park	South Derbyshire	24.12	93,433	Remaining plots with planning permission (P2-02, P2-03 and Plot 11)
	TOTAL		**66.19**	227,504	

*Assumed site area based on 35% plot density of consented B2/B8 floorspace.

**Assumed floorspace based on land allocated for employment uses within masterplan.

8.4.2 There is a total of c. **66.19 ha** of land across **4 sites** within the PMA (excluding the Subject Site). These sites have a total capacity of c. 227,504 sq. m (approximately 2.45 million sq. ft).

8.4.3 However, the opportunities for larger units of 100,000 sq. ft plus are in reality limited to SmartParc and Dove Valley Park.

8.4.4 Whilst Woodville Regeneration Area and the Former Drakelow Power Station fall within our search parameters both are very unlikely to deliver units of strategic scale, with indicative proposals showing small unit schemes (as would generally be expected given that these sites are employment components of residential-led developments. The timescales for delivery of the employment components of these schemes.

8.4.5 Overall, the supply of land with planning permission is very constrained, with limited deliverable opportunities within short timeframes for strategic scale employment use, one of which being Smart Pare which is catering for a very specific market sector and therefore is not able to meet wider market demand.

8.5 Pipeline Supply

8.5.1 We have also assessed the 'pipeline' supply of sites that benefit from an allocation but do not have planning permission. The assessment includes sites of 2.5ha or more, with an allocation for B2 or B8 use that can accommodate a unit of 100,000 sq. ft plus, consistent with the assessment of consented land supply above. In order to estimate floorspace capacity, we have assumed a density of 35% based on the gross developable site area.

8.5.2 These sites are subject to varying degrees of risk around delivery and timescales.

8.5.3 A schedule of allocated sites within the PMA is set out at **Table 8.3** below.

Table 8.3 Pipeline Supply (Allocations)

	Name	Location	Ha	Sq.m	Comments
1	Wilmore Road, Sinfin	Derby City	2.60	9,100	Saved' Policy from City of Derby Local Plan Review (2006).
2	Land South of Wilmore Road, Sinfin	Derby City	25.79	90,265	Allocated land within Infinity Garden Village, plus small component of land to the north of Sinfin Moor Lane which is excluded from the Subject Site.
3	Land at Sinfin Moor	South Derbyshire	30.00	105,000	Allocated land within Infinity Garden Village.
4	Hilton	South Derbyshire	3.00	10,500	Remaining land within wider allocation, adjacent to Hilton Business Park
5	Dove Valley Business Park	South Derbyshire	6.26	21,910	Plot 1.
6	Cadley Hill, Swadlincote	South Derbyshire	9.00	10,500	Correct area confirmed in emerging Local Plan.
	TOTAL				

8.5.4 There is a total of **6 allocated sites** (without planning permission) extending to c. **71 ha** with a total capacity of **c. 247,275 sq. m (2.66 million sq. ft).** However, this headline figure masks the true supply picture in relation to allocated sites.

8.5.5 There is effectively only one allocated site of scale within the PMA being the employment component which is allocated and forms part of the South Derby Growth Zone and extends to c. 55 ha and straddles Derby City and South Derbyshire to the south of Sinfin Moor Lane.

8.5.6 This site will make a very important contribution to the employment land supply within the PMA when it comes forward, subject to delivery/ confirmation of funding in relation to the consented link road from the A50 which will provide access and unlock the scheme. Similarly to the Subject Site, which is part of the same allocation, that part of South Derby Growth Zone within Derby City is also impacted by the restrictions within the AC15 allocation which limit the amount of B8 development which can come forward.

8.5.7 Whilst this scheme is undoubtedly of key significance to Derby and the wider sub-region, it is not able to meet occupier requirements until the necessary road infrastructure is funded and delivered.

8.5.8 There is a further plot available at Dove Valley Park which does not yet benefit from planning permission. However, other allocated sites are subject to constraints:

- *Wilmore Road, Sinfin:* whilst site remains undeveloped, it is within the ownership of Rolls Royce and is therefore not available to meet general B2/B8 occupier demand.
- *Hilton:* this site is part of a wider mixed-use allocation and employment development to date has comprised small unit schemes focused on the local market. Land within the allocation is being promoted for residential development. It is very unlikely that any floorspace of strategic scale (100,000 sq. ft plus) will be delivered here.
- *Cadley Hill, Swadlincote:* whilst this site is adjacent to an established employment area, there is no direct access between the two. The residential nature of the surrounding area and access constraints (including limitations on surrounding roads) have so far prevented this site from coming forward for employment use.

8.5.9 There is therefore only one allocated site at Dove Valley Park which is capable of delivery over the short term to meet a strategic scale occupier requirement.

8.6 Draft Allocations

8.6.1 South Derbyshire District Council is currently consulting on its Local Plan Part 1 Review Publication Version. The draft plan includes 12 proposed employment allocations which are set out in **Table 8.4** below.

Table 8.4 South Derbyshire Draft Allocations

	Name			Additional Land Supply (Ha)	
1	Drift Road, Church Gresley	EIA	0.71	N/A	E(g)/B2/B8 - carried forward from 2016 plan. Undeveloped plot. Below size threshold.
2	Tetron Point, Stanton	EIB	2.00	N/A	E(g)/B2/B8 - carried forward from 2016 plan. Below size threshold, in use as open storage.
3	Swadlincote Lane, Church Gresley	EIC	3.00	Nil - included within Allocated site supply.	E(g)/B2/B8 - carried forward from 2016 plan.
4	Drakelow	EID	2.50	Nil - included within Land Supply with planning permission.	E(g)/B2/B8 - carried forward from 2016 plan.

5	Hilton	EIE	3.00	Nil - included within Allocated site supply.		E(g)/B2/B8 - carried forward from 2016 plan.
6	Dove Valley Business Park	EIF	6.72	Nil - included within Allocated site supply.		E(g)/B2/B8 - carried forward from 2016 plan.
7	Land to the North of Dove Valley Business Park	EIG	13.00	Nil - included within Land Supply with planning permission		B2, B8 - carried forward from 2016 plan.
8	Woodville Regeneration Area	E6	4.60	Nil - included within Land Supply with planning permission		E(g)/B2/B8 - carried forward from 2016 plan.
9	Infinity Garden Village, Sinfin Moor	STRAI	70.00	40.00	140,000	E(g)/B2/B8. Extension to IPD and part of the mixed use Infinity Garden Village development. Includes area of adopted E4 allocation which is being amalgamated into STRAI.
10	Land South of Mickleover	STRA2	10.00	10.00	35,000	E(g)/B2/B8. 5-10ha of employment as part of a housing led, mixed use scheme.
11	Former Drakelow Power Station	STRA3	68.00	68.00	238,000	B2, B8. To include provision for small-medium size units. Proposals for solar farm on 33.30 ha.
12	East Midlands Intermodal Park Strategic Rail Freight Interchange/ East Midlands Freeport	INF3	173.00	173.00	483,095	National infrastructure project being promoted by Goodman with capacity for 5.2M sq. ft of floorspace which represents c. 30% site density.
		TOTAL:	356.53	291.00	896,095	

8.6.2 Whilst not included in the supply figures, it is noted that Brackley Property Developments submitted an outline planning application in 2019 for up to 100,000 sq. m B2/B8 with ancillary E(g) use on a site of 31.52 ha gross at Etwall in South Derbyshire (known as Axis 50). The application is yet to be determined. A similar application was refused on Appeal in 2010.

Supply Summary

8.6.3 **Table 8.5** sets out the total available land supply position, broken down by local authority area and excluding the Subject Site.

Table 8.5 Land Supply Summary (100,000 sq.ft/ 2.5 ha pl

Local Authority	Planning Permission Ha	Planning Permission Sq. m	Alloc	ed Sq. m	Draft Allocations without Planning Permission		111- Ha
Derby City	36.14	113,321	28.39	99,365			64.53
South Derbyshire	30.05	114,183	42.26	147,910	291.00	896,095	363.31
Total	66.19	227,504		247,275	291.00	896,095	427.84

8.6.4 Key points are summarised below:

- In addition to Derby 507 at the Subject Site (which is excluded), there is a total of 53,816 sq. m of Grade A floorspace available within the PMA within four existing buildings or those under construction (3 of which are at Dove Valley Park and 1 at Smart Pare).
- In addition to the Subject Site, there is a total of **c. 428 ha** of land supply within the PMA, comprising land which benefits from a planning permission, an existing allocation or a proposed allocation with available land not benefiting from a planning permission. This is made up as follows:
  a. *Land with Planning Permission:* **c. 66 ha;**
  b. *Allocated sites:* **c. 71 ha;** and
  c. *Proposed Allocations with available land and without planning permission:* **291 ha**
- Of this total, within Derby, land supply includes **c. 64.5 ha** as follows:
  a. *Land with Planning Permission:* **c. 36 ha** (Smart Pare)
  b. *Allocated sites:* **c. 28 ha**
- Within Derby there is a particular shortage of land which is able to meet larger occupier requirements on a flexible basis. This is limited to the Subject Site, Infinity Garden Village (element within Derby City) and SmartParc. Infinity Garden Village is not able to meet an immediate occupier requirement, being dependent upon delivery of the A50 link road. SmartParc is focused on the food sector and is therefore only able to meet demand from certain occupiers.
- The Subject Site therefore has a vital role to play in meeting immediate occupier demand across a range of uses and maximising investment and economic benefits to Derby. Flexibility to meet a full range of occupier requirements is essential.

Appendix C List of Enquiries - Salloway

Number	Company	Size	Use Type	Date
1	C&W	40-100,000	B8	Jan-25
2	JLL	50-100,000	B8	Jan-25
3	CBRE	150-450,000	B8	Jan-25
4	CBRE	150-250,000	B8	Jan-25
5	AY	150-350,000	B8	Dec-24
6	ACRE	100-150,000	B2/B8	Dec-24
7	CBRE	175-300,000	B8	Nov-24
8	CBRE	50-60,000	B8	Nov-24
9	CBRE	200-300,000	B8	Nov-24
10	MRA Systems LLC	110,000	B2	Nov-24
11	Sarvafoam	50,000	B2	Oct-24
12	JLL	100-200,000	B8	Oct-24
13	BNP Paribas	100-130,000	B8	Oct-24
14	BNP Paribas	500-700,000	B2/B8	Sep-24
15	AY	40-80,000	B2/B8	Sep-24
16	AY	400-600,000	B8	Sep-24
17	Savills	300-500,000	B8	Sep-24
18	C&W	80-120,000	B8	Sep-24
19	Savills	450-600,000	B2/B8	Aug-24
20	CBRE	550-800,000	B8	Aug-24
21	JLL	100-150,000	B8	Jul-24
22	BNP Paribas	90-140,000	B8	Jul-24
23	CBRE	250-500,000	B8	Jun-24
24	AY	175-250,000	B8	May-24
25	Knight Frank	300-450,000	B8	Apr-24
26	Catlin Young	20-30acres	B2/B8	Mar-24
27	Knight Frank	50,000	B8	Mar-24
28	Savills	15-40acres	B2/B8	Feb-24
29	Top Hat	300-500,000	B2/B8	Feb-24
30	Colliers	50,000	B8	Jan-24
31	Moran Logistics	100-200,000	B8	Jan-24
32	Louch Shacklock	300-350,000	B8	Jan-24
33	Kempton Carr	60-70,000	B2/B8	Jan-24
34	3PLRE	100-200,000	B8	Jan-24
35	Bellway Homes	200,000	B2	Jan-24
36	Alpha DMS	400-600,000	B8	Dec-23
37	B8 Real Estate	150-300,000	B2/B8	Dec-23
38	Louch Shacklock	350-400,000	B8	Dec-23
39	CBRE	80-280,000	B2/B8	Dec-23
40	C&W	300-400,000	B8	Nov-23
41	EAC Consulting	300-500,000	B2/B8	Nov-23
42	C&W	100-300,000	B8	Nov-23
43	CBRE	125-225,000	B2/B8	Nov-23
44	CBRE	800-1,200,000	B8	Nov-23
45	BNP Paribas	15-25acres	B2	Oct-23
46	Knight Frank	100,000	B2	Oct-23
47	JLL	20-60acres	B2/B8	Oct-23
48	BNP Paribas	300-500,000	B2/B8	Sep-23
49	Haslams	100-150,000	B8	Sep-23
50	3PLRE	50-100,000	B8	Sep-23
51	Klipa	500-1,000,000	B8	Sep-23
52	DBT	200,000	B2/B8	Sep-23
53	CBRE	50-100,000	B2/B8	Aug-23
54	JLL	50-150,000	B8	Aug-23
55	JLL	250-280,000	B2/B8	Aug-23
56	Savills	60-100,000	B8	Aug-23
57	3PLRE	300-500,000	B8	Aug-23
58	Colliers	300-800,000	B8	Jul-23
59	LSH	80-150,000	B8	Jul-23

60	CBRE	30-60,000	B2	Jul-23
61	Fisher German	120-150,000	B2	Jul-23
62	BNP Paribas	600-lm	B2/B8	Jul-23
63	LSH	200-500,000	B8	Jul-23
64	Colliers	400-600,000	B8	Jul-23
65	Knight Frank	60-90,000	B8	Jun-23
66	Colliers	600-1,000,000	B8	Jun-23
67	C&W	50-75,000	B8	Jun-23
68	CBRE	500,000	B8	Jun-23
69	JLL	200-350,000	B2/B8	Jun-23
70	Salloway	50-70,000	B2/B8	Jun-23
71	Elliam CPS	80-100,000	B2	May-23
72	Savills	300-450,000	B8	May-23
73	CBRE	50-100,000	B8	May-23
74	Knight Frank	80-150,000	B8	Apr-23
75	CPP	50-75,000	B2/B8	Apr-23
76	Checkley's	350-500,000	B8	Apr-23
77	CBRE	15-25acres	B8	Apr-23
78	JLL	60-80,000	B8	Mar-23
79	C&W	75-100,000	B2	Mar-23
80	Edisons	120-160,000	B8	Mar-23
81	Sarten	50-100,000	B2	Feb-23
82	Prop-Search	100-150,000	B8	Feb-23
83	Knight Frank	70-110,000	B8	Feb-23
84	G&H Associates	50-100,000	B2	Feb-23
85	Harris Lamb	350-450,000	B8	Feb-23
86	Rolls Royce	55,000	B2	Jan-23
87	JLL	250-400,000	B8	Jan-23
88	Knight Frank	120-170,000	B8	Jan-23
89	JLL	300-400,000	B8	Jan-23
90	CBRE	150-350,000	B8	Dec-22
91	Graham & Sibbald	250-350,000	B2	Nov-22
92	CBRE	80-120,000	B2/B8	Nov-22
93	BNP Paribas	200-300,000	B2/B8	Nov-22
94	Gerald Eve	100-200,000	B2/B8	Nov-22
95	JLL	300-600,000	B8	Nov-22
96	Knight Frank	100,000	B2/B8	Nov-22
97	I Holland	50,000	B2	Oct-22
98	Colliers	12-30acres	B2/B8	Oct-22
99	Wright Silverwood	30acres	B2	Oct-22
100	Doherty Baines	150-200,000	B8	Sep-22
101	MI Agency	50-100,000	B2/B8	Sep-22
102	Fox Lloyd Jones	60-80,000	B8	Aug-22
103	CBRE	450-1,200,000	B8	Aug-22
104	MK2 Real Estate	450-500,000	B8	Aug-22
105	DHL	100-200,000	B8	Aug-22
106	Louch Shacklock	80-120,000	B2/B8	Aug-22
107	JLL	90-120,00	B2	Aug-22
108	AY	25acres+	B2	Aug-22
109	AY	100-150,000	B8	Aug-22
110	UPS	100-300,000	B8	Jul-22
111	Prosteans	150-200,000	B2/B8	Jul-22
112	Gerald Eve	100-150,000	B8	Jul-22
113	ACRE	400-600,000	B8	Jul-22
114	CBRE 10-25	acres	B8	Jul-22
115	CBRE	150-200,000	B2	Jul-22
116	Savills	400-800,000	B2/B8	Jul-22
117	CBRE	750-1,000,000	B8	Jul-22
118	LSH	1,000,000	B8	Jul-22
119	Graham Sibbald	200,000	B8	Jul-22
120	Braiser Freeth	45-100,000	B8	Jul-22
121	CBRE	350-500,000	B8	Jul-22
122	Gerald Eve	180-200,000	B8	Jul-22

123	DHL	300-500,000	B8	May-22
124	JLL	500,000	B8	May-22
125	Chadwick McRae	55,000	B2/B8	May-22
126	Colliers	150-250,000	B8	May-22
127	Darby Keye Property	200-300,000	B8	May-22
128	JLL	100-400,000	B2/B8	Apr-22
129	MI Agency	75-125,000	B2/B8	Apr-22
130	JLL	250-350,000	B8	Apr-22
131	Daher	310-330,000	B2	Apr-22
132	CBRE	60,000	B2	Mar-22
133	Savills	85-200,000	B8	Mar-22
134	Savills	600-750,000	B8	Mar-22
135	JLL	500-750000	B8	Mar-22
136	JLL	200-300,00	B8	Mar-22
137	Gent Visick	100-150,000	B8	Mar-22
138	SBM CRE	70,000	B8	Feb-22
139	JLL	250-1,000,000	B8	Feb-22
140	Moran Logistics	50-200,000	B8	Jan-22
141	CBRE	400-600,000	B8	Jan-22
142	JLL	400,000	B8	Jan-22
143	Savills	100-300,000	B2/B8	Jan-22
144	LSH	150-200,000	B8	Jan-22
145	CBRE	200,000	B8	Dec-21
146	Harris Lamb	600-900,000	B8	Dec-21
147	3PLRE	200-500,000	B8	Dec-21
148	Knigh Frank	80-100,000	B8	Dec-21
149	Knigh Frank	80-120,000	B8	Dec-21
150	CBRE	70-180,000	B8	Nov-21
151	CBRE	400-600,000	B8	Oct-21
152	FHP	150-350,000	B8	Oct-21
153	LSH	400-750,000	B8	Oct-21
154	Carter Jonas	100-150,000	B8	Oct-21
155	CBRE	150-300,000	B8	Oct-21
156	CBRE	600-1,000,000	B8	Sep-21
157	JCB	380,000	B2/B8	Sep-21
158	CBRE	60,000	B2	Sep-21
159	Banks Long & Co	500,000	B2/B8	Sep-21
160	Knight Frank	150-225,000	B8	Sep-21
161	DS Smith	400,000	B2/B8	Aug-21
162	Wincanton	500,000	B8	Aug-21
163	CBRE	100-150,000	B8	Aug-21
164	AY	200-350,000	B8	Aug-21
165	Vail Williams	80-200,000	B2/B8	Aug-21
166	SBH	25-55,000	B8	Jul-21
167	Savills	500,000	B2/B8	Jul-21
168	Savills	500-800,000	B8	Jul-21
169	Burley Brown	50-150,000	B8	Jul-21
170	JLL	200-400,000	B8	Jul-21
171	JLL	70-110,000	B8	Jun-21
172	Brown & Lee	130-170,000	B8	Jun-21
173	Gerald Eve	150-250,000	B8	Jun-21
174	CBRE	100-250,000	B8	Jun-21
175	Savills	500-800,000	B8	Jun-21
176	Gervas Consulting	60,000	B8	Jun-21
177	JLL	600-900,000	B8	Jun-21
178	Carter Jonas	100-150,000	B2	Jun-21
179	Knight Frank	60-100,000	B8	Jun-21
180	Drake Commercial	80-120,000	B8	Jun-21
181	LSH	300-450,000	B8	Apr-21
182	CBRE	500,000	B2	Apr-21
183	JLL	350-500,000	B2	Apr-21
184	MD	260,000	B2/B8	Mar-21
185	BGH	100-200,000	B2/B8	Feb-21

186	Vail Williams	180-200,000	BS	Feb-21
187	JLL	50,000	BS	Feb-21
188	Colliers	75-120,000	BS	Feb-21
189	LSH	150-225,000	BS	Feb-21
190	CBRE	40-200,000	BS	Jan-21
191	LSH	50-80,000	BS	Jan-21
192	CBRE	300-1,000,000	BS	Jan-21
193	Flude Commercial	80-100,000	BS	Jan-21
194	BS Real Estate	800-1,000,000	BS	Jan-21
195	Carter Jonas	100,000	B2	Dec-20
196	CBRE	150,000	BS	Dec-20
197	Louch Shacklock	100-200,000	BS	Dec-20
198	LSH	70-120,000	BS	Dec-20
199	Carter Jonas	100-150,000	BS	Nov-20
200	BNP Paribas	200-400,000	BS	Nov-20
201	Montagu Evans	30-100,000	BS	Nov-20
202	CBRE	75-100,000	BS	Oct-20
203	Smiddy & Co	60-80,000	BS	Sep-20
204	JLL	500-800,000	B2	Sep-20
205	JLL	250-350,000	BS	Aug-20
206	Alder King	75-150,000	BS	Aug-20
207	JLL	450-650,000	BS	Jul-20
208	Colliers	100,000	B2/B8	Jul-20
209	Davies Harrison	150,000	B2/B8	Jun-20
210	BNP Paribas	50-150,000	BS	May-20
211	JLL	60,000	BS	May-20
212	Baker Roase	100-180,000	B2	Apr-20
213	CBRE	60-80,000	BS	Apr-20
214	LSH	500-750,000	BS	Apr-20
215	C&W	100-200,000	BS	Mar-20
216	3PLRE	50-100,000	BS	Mar-20
217	CBRE	30-120,000	BS	Mar-20
218	Clayton Equipment Ltd	50,000	B2	Feb-20
219	Matthews and Goodman	500,000	BS	Feb-20
220	JLL	50-150,000	BS	Jan-20

Local Plan for Derby Regulation 19 Consultation

P&DG on behalf of JGP Properties Ltd

Land South of Lime Lane, Oakwood

September 2026 13.020

Quality Control & Revisions Record

Project No.	13.020
Client	JGP Properties Ltd
Title	Local Plan for Derby Regulation 19 Consultation
Location	Land South of Lime Lane, Oakwood
File Ref.	13.020 Reg 19

Issue	Date	Prepared By	Reviewed By	Approved By
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Appendices

Appendix 1- Location Plan

Appendix 2- Illustrative Land Use Plan

Appendix 3 – Aerial Overview Sketch

Appendix 4- Annotated Aerial Photo and Sketches

Appendix 5 -Summary of Main Benefits

1. Introduction & Context

These representations have been prepared by Planning and Design Group (UK) Limited (P&DG) on behalf of JGP Properties (JGP) in response to the Regulation 19 consultation on the Local Plan for Derby.

Via P&DG, JGP has been actively engaged throughout the preparation of the emerging Local Plan and has persistently raised concerns regarding the soundness of the emerging housing strategy and the evidence upon which it is based. These concerns remain at Regulation 19 stage and have not, in JGP's view, been adequately addressed.

JGP controls Land South of Lime Lane, Oakwood (SHLAA Ref: DER/0209), which is shown outlined in red on the location plan included in **Appendix 1**. It consists of two fields and is herein called 'the Site.' The fields are referred to as the 'eastern field' and the 'western field'. The Site's total area is 8.2ha, with the eastern field being the smaller of the two at 2.94ha.

It is adjacent to Chaddesden Wood, which a Local Nature Reserve (LNR) and Ancient Woodland.

The Site was previously the subject of a planning application for **150 dwellings**, which was refused in July 2025 (ref: 24/01023/OUT). The reasons for refusal related to impacts on the role and function of the Green Wedge, along with impacts on Chaddesden Wood Ancient Woodland and veteran trees.

JGP subsequently promoted the '*Eastern Field at Land South of Lime Lane, Oakwood*' for a reduced-scale residential development of up to **49 dwellings**, with the western field retained to deliver a comprehensive package of habitat creation, plus associated recreational public open space on what is currently private land i.e. that promoted at the Reg.18 Stage in March this year and via a concurrent Call for Sites submission.

The measures detailed for the western field included **woodland creation/expansion**, the creation of species-rich grassland and semi-natural wetland habitats, together with new opportunities for public recreation in accordance with the adopted Local Nature Recovery Strategy and Green Infrastructure aims for the Green Wedge. However, the approach was devised primarily to mitigate any potential adverse effects of the development on Chaddesden Wood alongside a commitment to funding long-term measures to assist with

the better management of the woodland to address its ongoing deterioration. The wood is classed as being in an '*unfavourable managed state'*.

Ultimately, proposals present a significant opportunity to meet not only Derby's identified housing needs within its own boundary, including unmet affordable housing needs, but also to secure a scheme of ecological mitigations and improvements and alternative recreational space that would benefit Chaddesden Wood in the long term. Despite this, the Council has not taken the Site forward as a residential allocation targeting dwellings on the eastern field only within the Regulation 19 Local Plan. This has included no approaches being made to P&DG to discuss the concurrent Reg. 18 and Call for Sites submissions.

There is, however, limited evidence to support the exclusion of the Site with housing on the eastern field only alongside the stated benefits on the 5.26ha western field. In particularly, the Council does not appear to have sufficiently considered the overall potential for mitigation measures to address any potential impacts of development and indeed provide certain betterments, particularly in relation to Chaddesden Wood, including the potential for new natural and semi natural POS to reduce its recreational pressures.

It is noteworthy that only through the Reg.19 consultation has P&DG become aware of the responses of the Woodland Trust and Derbyshire Wildlife Trust (DWT) to JGP's Reg.18 submission i.e. dwellings on the eastern field only. Following a request to the Council in August, P&DG received copies of the Woodland Trust's letter dated 6th May 2026 and the DWTs email on 2nd September 2026.

These responses raised a number of concerns in terms of the impact of the Reg.18 scheme on the Ancient Woodland, including some questioning JGP's suggested mitigations and enhancements. Unfortunately, the Council did not seek additional information from P&DG in response to these concerns before completing the Regulation 19 Sustainability Appraisal which refers to them, nor before issuing the Regulation 19 draft Local Plan. In light of this, certain raised concerns will be commented upon herein.

However, Derbyshire Wildlife Trust's comments broadly align with JGP's proposals terms of the western field and are particularly welcomed:

> *'Ideally the Green Wedge provides an opportunity not only to protect the woodland but also provide additional green space to take pressure of the woodland and if circumstances allowed the creation of complementary habitats and expansion of the woodland. If this were to happen the future of the woodland and improvements to its condition would be more secure.'*

The first part of these representations provides an assessment of the soundness of the plan and resulting requested modifications, including the allocation of the Site. Such are split into summary and detailed sections. This is followed by a Site Assessment covering the Site's suitability, development potential and deliverability for a now revised scheme of up to **60-65 dwellings** on the eastern field, alongside substantial habitat creation including woodland creation/expansion, and habitat creation and associated recreational POS on the western field. This updates information submitted previously for a 49 dwelling scheme.

There is some inherent overlap in the information provided in the separate Soundness Assessment and Site Assessment as the relevant issues overlap.

2. Soundness Assessment – Housing Delivery Evidence Base and Strategy

(a) Introduction and Summary

JGP's overall soundness concerns, which remain unresolved at Regulation 19 stage, can be summarised as follows:

(i) Housing Capacity: It is recognised that the City Council has a housing land capacity issue, which requires a proactive approach to meet as much as possible of its local housing need within its own boundaries. There is, however, a lack of clarity regarding how the 12,500 capacity figure has been derived and evidenced, which forms the basis of the '*a minimum of 12,500 dwellings'* requirement figure in the Reg.19 Draft Local Plan (**draft Policy H1** – Housing Delivery and supporting text in **Paragraph 184**). There is also inconsistency between the available evidence base and the Plan period, with the plan period now running to 2043 whilst the main evidence runs to 2039. This draws into question whether there is proportionate evidence to justify a housing capacity figure of 12,500.

(ii) Unmet Need: As a consequence of the above, there is a lack of clarity and proportionate evidence to appropriately justify the amount and full extent of unmet housing need to be exported to neighbouring authorities in the wider Housing Market Area. The lack of clarity has a potential impact on the overarching spatial strategy and has wider consequences for directing unmet housing growth towards more rural authorities. This includes Amber Valley, which since the adoption of its plan earlier this year, immediately has its own much increased local housing need figure to plan for in a restricted context including Green Belt land.

(iii) Exclusion of Eastern Field, Lime Lane, Oakwood: There is a lack of proportionate evidence to justify the exclusion of eastern field, Lime Lane, Oakwood as a residential allocation alongside habitat creation, woodland expansion and recreational public open space on the western field. The Council's site assessment process (as detailed in Appendix G of the Reg.19 Sustainability Appraisal) acknowledges that with the western field remaining undeveloped *'functional Green Wedge to remain'*. However, the Site is treated differently to other Green Wedge sites put forwarded as allocations, with adverse effects on the Ancient Woodland cited as the main issue. It is not clear whether the Council's assessment of the Site has adequately considered the extent to which potential Ancient Woodland impacts can be addressed through appropriate mitigation, and indeed enhanced through certain offered proposals. The Reg.19 SA also incorrectly refers to the Site as *'containing'* Ancient Woodland rather just being adjacent to it.

(iv) City Centre focused Housing Allocations: The Reg.19 draft Local Plan lists the housing supply in terms of consented schemes, allocations and windfalls (**Table 2, Page 50**). Supporting text in **Paragraph 187** states that housing will be focused primarily focused in the City Centre. This clearly meets national aims of developing previously developed land and locating dwellings in highly sustainable locations. However, the city centre focus raises concerns regarding the mix of housing types that could be achieved across the Plan Period. Whilst some city centre units will be dwellings, many more would be apartments. Such would not fully meet demand for family homes with gardens, and the proposed M4(2) and M4(3)a targets of **draft Policy H2** are unlikely to be delivered at high rise apartment lead developments. Similarly, the proposed affordable housing and city centre living policies (draft Policies H4 and CC4) propose just 5% affordable housing at city centre sites, which will clearly limit provision with a city centre focused housing strategy. These various issues support the allocation of additional land beyond the city centre in sustainable locations where family dwellings, and affordable and accessible dwellings, can be more readily secured.

In summary, the overriding issue is that there is acknowledged housing land capacity issue within the City of Derby and, therefore, the Council must seek to maximise available sustainable residential opportunities to meet as much of its local housing need (**19,060 dwellings**) as possible within the administrative boundary over the 20-year plan period. This must include proper consideration of how identified constraints could be mitigated to enable otherwise suitable development opportunities to come forward, with such suitably evidenced.

On the basis of the above, JGP considers that the Plan, in its current form, has not been positively prepared, is not justified or effective and, as a consequence, is not consistent with

the National Planning Policy Framework that the plan is being prepared under i.e. the 2024 NPPF 2024.

The unresolved soundness concerns regarding issues (i), (ii) and (iii) above are considered in detail below.

(b) Detailed Assessment

(i) Housing Capacity

As highlighted above, JGP has raised concerns throughout the preparation of the emerging Local Plan regarding the derivation and evidential basis of the Council's Housing Land Capacity figure. Those concerns do not appear to have been adequately addressed at Regulation 19 stage.

The Council relies upon a Housing Land Capacity figure of **12,500 dwellings** to establish the amount of its local housing need that can be accommodated within Derby and, consequently, the extent of unmet need that must be accommodated elsewhere within the wider Housing Market Area (HMA). It is, therefore, important that the Council can demonstrate that this figure represents a robust assessment of the realistic and deliverable capacity of the City and that all reasonable opportunities to maximise housing supply and delivery within Derby have been appropriately assessed.

It terms of this capacity matter, JGP's concerns relate principally to:

- How have the 2021 high-level desktop housing capacity assessment and related reviews up to 2024 (which state a rounded capacity to 12,500) been reviewed and refined by later work to provide the capacity figure of 12,500 upon which the 2026 Reg.19 draft Local Plan is based?
- In relation to the above, concerns regarding the lack of an updated Housing Land Capacity Position Paper, or equivalent reconciliation, as part of the latest evidence base to clarify how the later assessments/evidence have informed, confirmed or amended the May and July 2024 position;
- Whether the capacity assessment has been appropriately reconsidered following the extension of the Plan period from 2039 to 2043;
- The treatment of potential Green Wedge capacity, including whether previously identified constraints and opportunities have been appropriately reconsidered; and
- The treatment of the Land South of Lime Lane site, as an example of the approach taken to potential development constraints and mitigation.

These matters are addressed in turn below.

Housing Land Capacity Position

As identified within JGP's previous representations, the Council's housing capacity position is summarised in the Derby Housing Land Capacity Position Paper dated October 2024.

The Position Paper explains that the 2021 capacity assessment originated in an '*officer-led desktop review of potential residential land capacity with the administrative area of the city'.* It further explains that this was undertaken to provide an early indication of realistic housing land capacity within Derby in the next plan period (2021 to 2039 at that time) and, consequently, the potential scale of unmet need.

Importantly, the Position Paper notes that this desktop capacity exercise was progressed in preference to producing a new Strategic Housing Land Availability Assessment (SHLAA). The Council acknowledged that whilst a SHLAA is the usual method for assessing land supply, it was considered that the circumstances required an earlier indication of potential capacity to assist HMA partners with their plan-making.

This officer-led exercise identified a potential capacity range of 11,900 to 13,600 dwellings, with the Position Paper clarifying that capacity was expressed as a range to reflect '*the significant uncertainties associated with assessing potential capacity at such an early stage in plan making'*. The paper states that lower figure in the range was considered to be a realistic baseline, but '*nonetheless ambitious'*, whilst the achievement of the higher figure would require a '… *more ambitious approach in the city centre, additional releases from Green Wedges and potential release of Green Belt land'.*

The Position Paper contends that the original officer-led exercise adopted a '*no stone left unturned'* approach. However, it nonetheless remained a high-level desktop exercise based on professional judgement and assumptions regarding matters including future policy direction and potential changes to Green Belt and Green Wedge boundaries. At that stage, infrastructure and mitigation requirements were also not been fully factored into the assessment.

Of particular relevance, the Position Paper expressly states that the desktop study: *'… does not provide a detailed assessment of the specific sites and locations that have been considered through the capacity work as further assessment is required to fully assess the merits of locations, including through Sustainability Appraisal.'*

It also states that the capacity exercise was undertaken: *without having undertaken the full, detailed assessment of sites that would normally be required to justify a housing requirement figure.'*

The Position Paper explains that in response to a request from other HMA partner authorities, the desktop capacity exercise was subjected to an independent review by AECOM in 2022. Whilst AECOM found the officer-led desktop review to be '*broadly robust*' in identifying the main sources of future housing supply based on the information then available, it recommended that the Council should ensure that its land supply was kept under review.

The Position Paper states that such periodic reviews were undertaken between 2023 and 2024 with housing capacity found to be:

12,041 dwellings in March 2023 (with the Plan Period amended from 18 years to 17 years)
12,361 dwellings in June 2023 (rounded to circa 12,500 in July 2023 to aid HMA working)
12,247 dwellings in May 2024.

The **May 2024** figure of **12,247 dwellings** was reported as the '*current figure in **July 2024***', and again rounded to **12,500 dwellings**, with the Position Paper stating:

*'Whilst acknowledging that calculation of urban capacity is a **fluid process**, there is a broad acceptance from HMA partners that their respective plans should progress on the basis that DCC's capacity is **capped at 12,500** as agreed by JAB.'*

The provisional nature of the capacity exercise up to July 2024 is reflected in Appendix 3 of the Position Paper, which describes the capacity figure as:' *purely working assumptions that require further refinement around policy direction technical feasibility, viability and on-site requirements, as plan making progresses.'*

In recognition of the need for further testing and refinement as the Local Plan evidence progressed, the Position Paper confirmed in October 2024 that an updated SHLAA would be published 'shortly' to identify the range of sites under consideration and provide a broad assessment of their respective merits.

A Sustainability Appraisal was also expressly identified as part of the further assessment work required to establish the merits of locations.

Additionally, the latest Statement of Common Ground between the Derby HMA authorities, published in February 2026, identifies that the Council was further developing its evidence

base in relation to various matters including allocations and windfalls, urban capacity and trajectory, Green Belt/Green Wedge, plan-wide viability and the Sustainability Appraisal.

However, it is not sufficiently clear from the Regulation 19 evidence how the SHLAA (published in late 2024), later work in 2026 and the Reg.19 Sustainability Appraisal have informed the Housing Land Capacity position as reported in May and July 2024 (i.e. 12,247 rounded to 12,500). In particularly, it is not apparent how sites considered through the 2023-2024 SHLAA relate to those assumed within the earlier capacity exercise; whether additional opportunities or different site capacities have been identified; or whether more detailed assessment of suitability, availability, achievability and mitigation has altered the assumptions previously made.

If the later evidence base (including the SHLAA) confirms that the reasonable identified opportunities were already captured within the original assessment up to May and July 2024 and that 12,500 dwellings remains an appropriate capacity figure, this should be capable of being transparently demonstrated. Equally, if the subsequent work has identified additional opportunities/capacity, those findings should be reflected in the overall capacity position.

JGP would, therefore, have expected the Regulation 19 evidence base to contain an updated Housing Land Capacity Position Paper, or equivalent reconciliation, clarifying how the later assessments/evidence has informed, confirmed or amended the May/July 2024 position.

At present it is entirely unclear how the assessed the capacity figure in May 2024 (12,247 rounded to 12,500 in July 2024) and the published capacity figure in 2026 (12,500) have remained practically the same, despite the SHLAA and other later work.

Extension of the Plan period to 2043 as a Capacity Issue

It is noted that the original capacity work was undertaken in the context of a Plan period ending in 2039. The Position Paper records that the June 2023 assessment of 12,361 dwellings related to a 17-year Plan period, before that figure was rounded to circa 12,500 for HMA working. Appendix 3 similarly calculates components of supply, including the windfall allowance, by reference to a period ending in **2039**.

However, the Plan period has subsequently been extended to **2043**.

The latest Statement of Common Ground confirms that housing need has been rolled forward to reflect those additional years but that no additional supply has been attributed to them on the basis that there is '*no updated evidence of additional capacity'* beyond the

12,500 dwellings. This has been used for the '*minimum requirement figure*' of 12,500 dwellings in Paragraph 184 of the Reg.19 draft Local Plan.

JGP does not suggest that extending the Plan period by four years must automatically result in additional capacity being found and reported, but the Council itself describes urban capacity as a '*fluid process*' which should be kept up to date as plan-making progresses. It should, therefore, be clearly demonstrated that the implications of the additional four years have been considered in assessing the City's stated capacity and, if no further realistic opportunities for housing delivery over that period can be identified (excluding anticipated windfalls), the evidence should explain why.

Green Wedge as a Capacity Consideration

Green Wedge formed a component of the original capacity exercise. Indeed, as noted above, the upper end of the 11,900–13,600 dwelling range of the desktop study expressly assumed, amongst other matters, that such would require '*additional releases from Green Wedges*'.

The May 2024 capacity update subsequently removed several Green Wedge opportunities because of concerns regarding the '*technical feasibility*' of bringing those sites forward. Appendix 3 of the Position Paper 2024 nevertheless records 615 dwellings from Green Wedge releases as forming part of the 5,100 dwellings of potential new capacity included within the July 2024 assessment.

It is not clear from the Position Paper which individual Green Wedge opportunities were removed, the detailed basis upon which their technical feasibility was assessed, or the extent to which those conclusions have subsequently been reconsidered through the more detailed evidence prepared to support the Reg. 19 draft Local Plan.

Where Green Wedge opportunities continue to be excluded, their potential should be assessed on the basis of the detailed evidence now available, including whether identified constraints are capable of satisfactory mitigation. Conversely, where subsequent site-specific assessment identifies areas of Green Wedge land capable of appropriately accommodating residential development, that should be reflected in the City's overall housing capacity.

The relevant consideration is, therefore, not simply whether a site is affected by a constraint such as an adjacent Ancient Woodland, but the implications of that constraint for development and whether it can reasonably be addressed and/or mitigated.

Land South of Lime Lane, Oakwood provides a particular example of the above Green Wedge capacity issue.

As addressed separately JGP considers that the Site represents a suitable, available and deliverable opportunity for residential development on the eastern field only, and there is insufficient proportionate evidence to justify the exclusion of residential development here, when considered as part of a comprehensive scheme capable of incorporating appropriate mitigations and enhancements, including on the retained western field.

The relevance of the eastern field to the Housing Land Capacity assessment is, therefore, whether the Council's approach has appropriately considered the ability for identified constraints to be addressed through the location, form and design of development along with any mitigation measures that could be incorporated (including on the western field) before excluding otherwise reasonable Green Wedge opportunities from the City's capacity. This is considered in more detail in Section 3 below.

Conclusion regarding Capacity Land Capacity

The Housing Land Capacity figure is fundamental to determining how much of Derby's housing need the Council considers can be accommodated within the Council's administrative area and how much must be met elsewhere within the HMA.

JGP considers that the Regulation 19 evidence base does not currently provide a sufficiently clear reconciliation between the high-level and provisional capacity position established by July 2024 (12,500) and the later more detailed Local Plan evidence, which still finds the capacity to be 12,500.

In particularly, further clarity is required as to the treatment of Green Wedge opportunities and constraints; whether all reasonable opportunities for residential development have been appropriately assessed; and how the extension of the Plan period to 2043 has been reflected in the capacity assessment.

JGP, therefore, considers that the Council should demonstrate, through an updated Housing Land Capacity Position Paper or equivalent evidence, how the subsequent detailed evidence has informed the 12,500 dwelling capacity figure and that all reasonable opportunities to accommodate additional housing within Derby have been appropriately explored before concluding the extent of housing need that must be accommodated by neighbouring authorities.

(ii) Unmet Need

The concerns identified above in respect of Derby's housing capacity have direct implications for the amount of unmet housing need arising from the City and, consequently, the extent to which that need is expected to be accommodated elsewhere within the wider Housing Market Area (HMA).

JGP considers that significant uncertainty remains regarding the scale of Derby's unmet housing need to be distributed to neighbouring authorities and, critically, the genuine capacity of those authorities to accommodate that need.

This issue was considered through the recent examination of the Amber Valley Local Plan. At Paragraph 64 of their report, the Inspectors concluded that *'… the three authorities recognise that unmet need from the city will need to be met within the adjoining authorities but have failed to agree an appropriate apportionment during the preparation of the Plan'*.

Whilst the adopted Amber Valley Local Plan makes provision for 1,320 dwellings towards Derby's unmet need, the Inspectors expressly regarded this as a *'pragmatic first step in the longer-term process of addressing housing need across the HMA'*. Importantly, the figure was not derived from an agreed apportionment of Derby's unmet need but originated from the proposed allocation at Brun Lane, Mackworth, which was subsequently removed from the Plan.

JGP acknowledges the complexities arising from changes to national planning policy, the different plan-making timetables across the HMA and pending LGR. Nevertheless, establishing the full extent of Derby's unmet housing need, and how and where that need can sustainably be accommodated, is currently a fundamental strategic matter which must be supported by proportionate evidence.

The position in Amber Valley is particularly acute, as its recently adopted Local Plan is based on a housing requirement of 434 dpa, compared with a current Local Housing Need figure of approximately 670 dpa. The adopted requirement, therefore, represents only around 65% of current LHN, which is well below the 80% threshold. The Council is hence required to undertake an immediate review of its Local Plan.

The new LHN figure of circa 670 dwellings clearly represents a material change in circumstances and places significant additional pressure on Amber Valley to meet its own housing need. Any contribution towards Derby's unmet need would represent an additional requirement over and above the substantially increased level of housing for which Amber Valley must now plan. Against this context, there can be no reasonable assumption that

Amber Valley will have capacity to still accommodate a significant proportion of Derby's unmet need, particularly given the environmental and policy constraints affecting the Borough, including Green Belt land and the Derwent Valley Mills World Heritage Site. This materially alters the context in which Amber Valley's realistic capacity to accommodate unmet need from Derby must now be assessed.

South Derbyshire District Council's emerging plan, which proposes to take around 4000 of Derby's unmet need, is being prepared under the legacy plan making system and has not been submitted for examination to date. Hence, its soundness has not been established and nor have the proposed allocation sites been examined.

The above cases reinforce the need for robust evidence regarding Derby's own capacity and the realistic capacity of authorities across the HMA to accommodate Derby's unmet need.

Consequently, JGP considers that there remains insufficient clarity and proportionate evidence to justify the amount and full extent of Derby's unmet housing need that is proposed to be exported to neighbouring authorities across the HMA. This has direct implications for the justification of the overarching spatial strategy and the need for scrutiny of the stated capacity position. The sustainability consequences of directing housing growth away from Derby, as the principal and most sustainable urban area, towards more rural and constrained authorities such as Amber Valley, should also be fully considered and justified.

Without greater certainty regarding the scale, distribution and realistic capacity to accommodate Derby's unmet housing need, JGP considers that the spatial strategy has not been demonstrated to be justified or positively prepared and is, therefore, unsound in these respects.

(iii) The Exclusion of Land South of Lime Lane, Oakwood (with dwellings on eastern field only)

As noted above, following the refusal of planning application (ref: 24/01023/OUT) for **150 dwellings** in July 2025, JGP promoted the eastern field as a standalone residential development for **49 dwellings**, with the western field being retained to deliver a comprehensive package of biodiversity, habitat and woodland creation, plus new natural and semi natural public open space and woodland management improvements. This aimed to address the reasons for refusal regarding impacts on adjacent Ancient Woodland and the functionality of the Green Wedge, including the former suggesting that housing of <u>both</u> fields would isolate and fragment the woodland from open countryside to the north (and associated semi-natural habitats).

Notwithstanding the potential mitigations and enhancements which were set out in the Regulation 18 representations, the Council has not taken the 2.94ha eastern field forward as a residential allocation within the Reg.19 draft Local Plan, with such tied to the measures detailed for the western field. However, as introduced above, JGP considers that there is limited evidence or justification to support the exclusion of the Site.

It is clear from the Sustainability Appraisal, which forms a key part of the evidence base, that the Council has undertaken an assessment of the proposed reduced scheme for dwellings on the eastern field only, with such reported in the conclusions as provided in Appendices E and G.

Overall, the site is assessed as performing relatively well against the majority of the identified Sustainability Appraisal objectives, largely receiving 'minor positive', 'neutral' or 'minor negative' scores. This is to be expected of residential development sites, where minor negative effects can be taken into account and balanced against other priorities, including the delivery of housing.

However, the site is assessed as having a 'Significant Negative' score in relation to SA8: Biodiversity and Natural Capital with the SA stating:

> *'The site is adjacent to the Chaddesden Wood LNR and a SSSI.* ***The site also contains ancient woodland****. There is potential for negative effects upon biodiversity as a result of construction activity at the site. However, development at the site is required to contribute to enhancing biodiversity resources within the site as biodiversity enhancement should meet minimum standards of 10% for all developments, as set out in Policy EN10.'* [Our emphasis added]

Potential Ancient Woodland Impacts including Mitigations and Enhancements

The main Sustainability Appraisal gives the headline reason for excluding the Site as an allocation as '*Ancient Woodland impacts*' (Page 49).

The Site Assessment Overview of the Sustainability Appraisal (Appendix G) confirms that the retention of the western field would allow a '***functional Green Wedge to remain'***. However, alongside this it is stated that:

> *'There are still significant concerns about the impact of residential development in this location on the ancient woodland, including increased footfall through the area which would adversely impact the woodland. Derbyshire Wildlife Trust and the Woodland Trust continue to raise concerns about development in this location, even if reduced to 50 dwellings, as it would adversely affect the ancient woodland. Given these constraints the site was not identified for allocation due to deliverability concerns.'* [Our emphasis added]

Firstly, contrary to that stated in SA8 , it is important to note that whilst the Site is adjacent to Chaddesden Wood, it does not contain Ancient Woodland itself. This is demonstrated on the extract below from Natural England's open data mapping of Ancient Woodland. The SA is, therefore, factually incorrect in this regard.



Figure 1 - Natural England Open Data Publication - Ancient Woodland (England)

This factual error raises concerns as to the basis upon which the 'Significant Negative' assessment of SA8 has been reached. If the assessment proceeds on the incorrect basis that development would take place on land containing Ancient Woodland, rather than adjacent to it, there is a risk that the significance of the likely effect has been misunderstood and overstated.

More generally, it is not clear that in considering the 49 dwelling scheme (rounded to 50 in the SA) the Sustainability Appraisal has fully accounted for:

- The materially different nature of the reduced housing proposal relative to the original promotion for housing on both fields (i.e. the 2024 SHLAA ref DER/0209);
- The likely lesser ecological impact of a smaller scheme alongside an increased potential for appropriate mitigation measures;
- The ecological and recreational opportunities presented by the retention of the western field as Green Wedge in terms of mitigations and enhancements in relation to the Ancient Woodland.
- Derbyshire Wildlife Trust's positive comments regarding the provision of green space to take the pressure off the woodland and provide complementary habitat, and how if such were to happened it would make an improvement to the wood's condition more secure (quoted in full in the introduction).
-

The submitted Reg.18 scheme proposed enhanced wildlife corridors between the wood and the open countryside north of Lime Lane, including bolstering existing linear north south corridors. This was coupled with woodland expansion, new species rich grassland and semi natural wetland habitat/SuDS on the western field.

As quoted above, the Sustainability Appraisal refers to the Woodland Trust and Derbyshire Wildlife Trust having continuing concerns to even a 50 dwelling scheme (i.e. on the eastern field). However, it is not clear from the Sustainability Appraisal what those precise concerns are or their significance; and whether residual concerns take proper account of the mitigations set out in the Reg.18 scheme. Additionally, the certain positive comments of DWT are not reported. Copies of the mentioned responses are not included as appendices to the SA nor publicly available elsewhere.

Importantly, as noted above, the continued existence of concerns does not in itself demonstrate that the Site is unsuitable for allocation; rather, there should be a clear understanding of the nature and significance of any residual effects and whether these are capable of being mitigated. This is a particularly important issue in the context of the tests of soundness.

Indeed, in the context of the acknowledged constraints on housing land capacity within the city, the exclusion of a site otherwise capable of contributing sustainably towards Derby's housing should be supported by clear and proportionate evidence. In this respect, how the issues raised by the Woodland Trust and DWT (including positive aspects) have been considered by the Council should be clearly set out in the published evidence base.

In the above context it appears remiss of the Council not to have forwarded the responses by the Woodland Trust and DWT to P&DG upon receipt to allow raised comments to be suitably considered and responded to. Instead, P&DG received copies on them on 2nd September 2026 after requesting such after noting references to them in Appendix G of the Reg.19 SA.

Notwithstanding the above, since the Reg. 18 promotion, further assessment and technical work has been undertaken on JGP's behalf, including a detailed assessment of the development capacity of the eastern field. This has demonstrated that the eastern field can accommodate approximately 60-65 dwellings using a density of 35dph, whilst maintaining the fundamental principles of the reduced development strategy alongside the above proposals for the western field.

Importantly, this increased number of dwellings does not represent an expansion of built form into the wider landholding but instead reflects a more detailed understanding of the capacity of the eastern field itself and what mitigations are needed on the western field (including to address potential increased footfall in the woodland from 60-65 new dwellings).

JGP is, therefore, now promoting the eastern field for an allocation of up to **60-65 dwellings** including a **30m woodland buffer** with substantial habitat creation, woodland expansion

and associated new recreational public open space on the western field. The latter would include new paths through new woodland and grassed areas, a community woodland and a community orchard, as shown on the illustrative land use plan in Appendix 2. This illustrates **circa 3ha of new woodland** at the Site, including a regenerative area along the woodland edge.

Contrary to concerns raised by the Woodland Trust, areas of natural and semi natural open space including woodland can function well as a mix of wildlife habitat, wildlife corridors and public recreation space, which DWT appears to accept. The Council's Allestree Park rewilding project provides an example of such. Indeed, it is the existence of wildlife within the Chaddesden Wood LNR that justifies the provision of improved wildlife corridors across the Site to the open countryside north of Lime Lane.

Fundamentally, the scheme now being promoted by JGP is not simply residential development. It instead comprises residential development on the eastern field together with the retention and positive management of the western field as an integral part of the mitigation and enhancement strategy. Alongside this, funds would be provided towards targeted improved management measures in Chaddesden Wood, focusing on ecology and hydrology through a Woodland Management Sum. The woodland and broader environmental effects of the proposal should be considered by the Council on this basis.

Overall, it is considered that this amended proposal represents a significant opportunity to not only meet Derby's identified housing needs (including affordable housing needs), but also to secure a comprehensive scheme of habitat creation, **significant woodland creation/expansion** and natural and semi natural public open space, plus improved woodland management measures. Such would benefit Chaddesden Wood by helping to address its ongoing deterioration, including reducing recreational pressures on it as an LNR. This appears to align with DWTs comments.

It is understood that, without positive intervention and improved long-term ecological and recreational management, the condition of Chaddesden Wood will continue to deteriorate.

Importantly, the proposed measures will not only mitigate potential increased recreational pressure from the proposed development itself (60-65 dwellings) but also significantly assist in reducing the effects of the **existing** well documented recreational pressure on the woodland.

The POS would be created as a standalone alternative recreational offer to the woodland LNR with hedging/fencing to secure the wood's northern boundary. New grassland areas and paths would provide immediate opportunities for public leisure activities including walking. In the longer term the new woodland areas with various paths would represent an increase of **up to 30%** of new public woodland relative to the Chaddesden Wood (circa 10ha). This is a significant amount relative to the potential percentage increase in footfall from 60-65 new dwellings. Together the new areas for public recreation across the western

field (covering a total area of circa 5ha) would greatly assist in lessening the recreational pressure on the woodland, particularly in the longer term.

The precise measures would be subject to further detailed design, ecological, arboricultural and landscape work and discussion with relevant stakeholders. However, the extent of undeveloped land across the Site (including a 30m woodland buffer on the eastern field) provides clear scope for measures to protect Chaddesden Wood from development pressure and reduce the existing recreational pressure, whilst simultaneously delivering ecological and recreational betterment.

A 30m buffer between the new dwellings and the Ancient Woodland with no gardens backing on to the woodland to mitigate against adverse effects e.g. noise and light pollution and/or invasive species. There is no technical justification for a wider buffer, as discussed in the Site Assessment section below.

There is also the potential to redirect some surface water at the Site towards the woodland edge.

Overall, the western field provides clear scope for mitigation and far more enhancement than would ordinarily be available through a standalone residential parcel. Indeed, the proposal has the ability to go materially beyond simply achieving statutory minimum biodiversity requirements and instead deliver measures specifically responding to the sensitivities and management requirements of Chaddesden Wood, including its Local Nature Reserve status and the pressures this brings.

This would be cross funded by the development on the eastern field.

In respect of the above, JGP stresses that where an existing ecological asset is already subject to pressures and deterioration, the assessment of mitigations and enhancements should not simply consider the proximity of residential development, but also whether development can provide a **mechanism** to secure measures that protect, enhance and assist with the long-term management of that asset.

JGP continues to welcome the opportunity to engage constructively with the Council, Derbyshire Wildlife Trust, Woodland Trust and other relevant stakeholders to better understand any residual concerns and explore how these could be addressed through the design of the development and a comprehensive woodland, habitat and ecological management scheme for the western field. Attempts to engage with Friends of Chaddesden Wood earlier this year resulted in one in-person meeting with P&DG but a second meeting was sadly not agreed to by FoCW.

In JGP's view, the above matters are directly relevant to, and should hence be properly reflected in, the conclusions reached in relation to SA8. Similarly, the Site should not be excluded on the basis of *'Ancient Woodland impacts'* and ongoing concerns raised by the Woodland Trust and DWT without such being properly justified and evidenced taking account of potential mitigations and enhancements.

Green Wedge Considerations

JGP recognises the important strategic role that the Green Wedge policy plays in shaping the city's character, identity and environmental quality. It is acknowledged that the Green Wedge forms an important component of Derby's spatial strategy by maintaining areas of open land between the city's neighbourhoods, defining the City's urban structure and providing green links/areas through settlements to the countryside beyond.

However, the aims and purposes of the Green Wedge must be carefully balanced against the need to meet the identified housing needs of the city. Indeed, Green Wedge policy does not have the same force as Green Belt policy. As stressed in the above capacity section, this is particularly important given that Derby is unable to meet its housing needs within its own administrative boundary. The Local Plan must, therefore, demonstrate that all reasonable opportunities to accommodate additional housing within the city have been properly considered.

In this context, the Green Wedge should not operate as an outright constraint to development. The plan-making process provides an opportunity to consider whether individual sites can accommodate development whilst retaining the underlying functions of the Green Wedge. This is particularly relevant to Land South of Lime Lane, Oakwood.

The Council's Green Wedge Review assessed SHLAA ref: DER/0209 on the basis of residential development across the entire site south of Lime Lane (both fields). It concluded that development would cause high harm as it would *'span the full width of the GW'* and alter its character from a 'wedge' to a 'green gap' surrounded by development.

As explained herein, JGP is now promoting the whole site as a comprehensive allocation, but with residential development confined to the eastern field with the western field retained and enhanced as described above. An annotated aerial view (Appendix 4) depicts the retained mouth of the Green Wedge as just over 350m wide taking account of the neighbouring POS to the west and the NE corner of the eastern field.

Therefore, the principal concern identified in the Green Wedge Review would simply not arise i.e. built form would not span the full width of the Green Wedge. This is recognised by the Council's own evidence. To reiterate, Appendix G of the Reg.19 Sustainability Appraisal recognises that the retention of the western field would allow '***functional Green Wedge to remain'.***

JGP supports this finding.

JGP also notes that the revised scheme would additionally meet Green Wedge aims regarding recreational provision, habitat creation and tree planting.

Comparison with Other Green Wedge Sites

The Council's Reg.19 SA's conclusion that housing restricted to the eastern field will allow a functional Green Wedge to remain is consistent with its assessment of other sites within the Green Wedge that have subsequently been allocated for residential development.

Most notably, land East of Moorway Lane, Littleover (**draft Policy HA3**) has been allocated for approximately 335 dwellings within the Littleover/Sunnyhill Green Wedge. The Council's assessment of that site recognises that this development can be accommodated whilst retaining the wider function of the Green Wedge. The width of retained Green Wedge land is not dissimilar to the extent of Green Wedge that would be retained at the Lime Lane Site with residential development restricted to the western field.

Overall, the Green Wedge conclusions reached for the East of Moorway Lane can be equally applied to this Lime Lane proposal. The Lime Lane site has the Ancient Woodland consideration, but as outlined herein, any potential development impacts in this respect can be mitigated alongside certain betterment.

Accordingly, JGP considers that the Council has not adequately justified the omission of Land South of Lime Lane (with housing on the eastern field only) from the Reg.19 draft Local Plan. In particularly, the omission of the eastern field for housing is not consistent with the Council's own Sustainability Appraisal regarding Green Wedge functionality and its approach to the assessment and allocation of other sites within the Green Wedge.

(c) The Council's Site Assessment Methodology

The above issues draw into question the soundness of the Council's site assessment and identified methodology when considering whether sites are suitable or, as the case may be, could be made suitable for residential development.

It would be appropriate and proportionate for any robust and well-justified site assessment process to take into account the ability for identified constraints to be mitigated, including through reconsideration of assumptions around density, development extent and overall development potential. As stressed above, a constraint does not necessarily render a site unsuitable where there is a reasonable prospect that it can be satisfactorily addressed through the design, scale and form of development and appropriate mitigation. This distinction is particularly relevant in this instance.

JGP has responded directly to the previously identified concerns (including the refusal of the 150 scheme) by substantially reducing the extent of development from the earlier proposal, including retaining all of the western field for ecological and recreational purposes. Further detailed assessment has subsequently demonstrated that approximately 60-65 dwellings can be appropriately accommodated within the eastern field without altering that fundamental strategy.

JGP acknowledges that the Council has reconsidered the Site in light of the Reg.18 submission and that Derbyshire Wildlife Trust and Woodland Trust continue to raise concerns. However, as noted above, the evidence does not make it sufficiently clear what the nature or significance of those residual concerns are ; how the opportunities presented by the western field have been taken into account; nor why appropriate mitigation could not overcome the identified constraint.

This is directly relevant to whether the Local Plan is justified. Where a reasonable alternative has been materially amended specifically to respond to previously identified constraints, there should be a clear and evidenced basis for concluding why those changes and associated mitigation are nevertheless insufficient to make the site suitable for allocation.

The factual error within the Sustainability Appraisal regarding the presence of Ancient Woodland on the Site, together with the lack of clarity regarding the residual ecological concerns and the treatment of the mitigation and enhancement opportunities associated with the western field, means that JGP does not consider that the evidence presently provides a sufficiently robust basis for the exclusion of the site.

There are also implications for whether the Plan has been positively prepared. As outlined, Derby has acknowledged the significant constraints affecting its ability to accommodate housing needs within its administrative boundary. Against that background, it is particularly important that potentially deliverable residential sites are not discounted where identified constraints are capable of being appropriately addressed.

The eastern field provides the opportunity to deliver approximately 60-65 dwellings at 35 dph, including affordable and accessible housing, whilst retaining the substantial majority of the wider landholding for ecological and recreational purposes and providing an opportunity to secure positive intervention in relation to Chaddesden Wood.

Accordingly, JGP consider that the exclusion of the Site as an allocation (with dwellings on the eastern field only) has not been adequately justified by the evidence currently presented and hence raises concerns as to whether the Reg.19 Local Plan satisfies the tests of soundness in this particular respect.

(d) Modifications Sought

To address the above soundness concerns, JGP request that the Regulation 19 Local Plan is modified to allocate the Land South of Lime Lane, for up to 60-65 dwellings on the eastern field alongside linked habitat creation, woodland creation/expansion, public open space and SuDS on the western field.

As set out above, when properly assessed on the basis of the reduced development proposal and having regard to the ability to appropriately mitigate identified impacts, JGP consider that the Site represents a suitable and sustainable opportunity for residential development. In the context of the significant constraints on housing land capacity within Derby, it is important that suitable opportunities to contribute towards meeting the city's identified housing needs are fully utilised.

Suitable green field sites will also secure a suitable housing mix and the delivery of affordable housing at a rate (25% AH) that will insist in the overall delivery of AH across the plan area, which will be limited in relation to city centre sites (5% AH).

The Council should also correct the factual assertion that the promoted site contains Ancient Woodland and reconsider the conclusions reached in relation to SA8 having regard to the capacity of the eastern field and the mitigation and enhancement opportunities afforded by the retention of the western field.

Greater public clarity should also be provided as to the nature of the residual concerns raised by Derbyshire Wildlife Trust and Woodland Trust and the extent to which those concerns could be addressed through appropriate mitigation.

JGP would welcome the opportunity to engage constructively with the Council and relevant stakeholders regarding the form and scope of measures necessary to appropriately mitigate potential impacts upon Chaddesden Wood and the measures that could form part of a comprehensive woodland, habitat and ecological scheme for the western field.

On a proper and proportionate assessment, JGP considers that the eastern field is suitable for a housing allocation. Its allocation would make a valuable contribution towards addressing Derby's constrained housing land capacity and identified housing needs (including affordable homes), whilst providing a mechanism through which substantial and long-term woodland, habitat and ecological benefits could be secured, including new public recreation opportunities. The latter would assist in deflecting footfall from the existing woodland which suffers the effects of recreational pressure as an LNR, particularly in the long term. Such would also meet various LNRS and Green Wedge Review aims

3. Site Assessment – Land South of Lime Lane, Oakwood

(a) Introduction

The following section of this submission demonstrates that the Site, with residential development restricted to the eastern field, is suitable and available for residential development; and also deliverable; and hence capable of contributing positively to the Council's identified market and affordable housing needs. The Site should, therefore, be allocated for residential development as part of the new Local Plan, with the western field being defined as being for associated ecological and recreational mitigation and enhancement measures.

The following plans/drawings are provided in Appendices 2, 3 and 4:

- Illustrated Land Use Plan (ILUP)
- Aerial Overview Sketch (view from the north)
- Annotated Aerial Photo and sketches (including woodland buffer cross section)

(b) The Site & Context

The overall Site is 8.2ha and comprises agricultural land located to the south of Lime Lane, and between existing residential development of Oakwood to the east and west. Lime Lane acts as a defensible edge to this part of Oakwood with open countryside beyond to the north.

The Site's southern boundary abuts Chaddesden Wood, which is an Ancient Woodland. The Ancient Woodland does not extend onto the Site. There are two veteran trees towards the front of the western field.

The Site forms the northern extent of the North Oakwood Green Wedge between Chaddesden Wood and Lime Lane. The eastern field, which is hereby promoted as the residential part of an allocation, is 2.94 hectares. The Illustrative Land Use Plan (ILUP) shows the associated illustrative proposals for the whole site including the 5.26ha western field.

Chaddesden Wood is a Local Nature Reserve (LNR) that is well used by the public, and managed by Friends of Chaddesden Wood (FoCW) alongside the owners, the City Council. It is the subject of a Woodland Management Plan, with the latest document being the 2023 Review. This assesses the woodland as being in an 'Unfavourable Managed State'

The eastern field is separated from the neighbouring western field by a gappy hedgerow with trees which runs north south between Chaddesden Wood and Lime Lane. Further north-south hedging and trees are situated between the eastern field and the existing residential estate to the east, with such forming a partial tree belt.

As noted above, the Site has previously been brought to the Council's attention as part of a planning application for up to 150 dwellings across both the eastern and western fields within JGP's ownership, which was refused in July 2025 (24/01023/OUT). These combined fields also formed the basis of a previous promotion (DER/0209 SHLAA 2024), whilst the March 2026 Reg.18 scheme promoted housing on the eastern field only (alongside details of the associated ecological and recreational proposals for the western field).

The outline application was refused in relation to the functions of the Green Wedge and the suggested harm to the Ancient Woodland and veteran trees. The latter included a concern that the extent of the proposed residential development (i.e. across both fields) would lead to the isolation and fragmentation of the woodland from the countryside to the north, with a detrimental impact on the movement of wildlife between the two implied.

Since the refusal of the application the Council published a new Green Wedge Review dated September 2025, which forms part of the evidence base for the emerging Local Plan. As discussed above, the GWR 2025 includes consideration of the development of both fields for housing (together) but not just the eastern field alone.

In response to the reasons for refusal and the GWR 2025, JGP seeks to promote just the eastern field for residential development alongside the retention of the larger western field as Green Wedge with habitat creation including woodland creation/expansion and public recreation opportunities. The proposals for the western field alongside the supplementation of north south hedgerows would be in accordance with stated Green Infrastructure recommendations within the Green Wedge Review 2025 and items in the Local Nature Recovery Strategy (LNRS) to which it refers:

Explore opportunities for new woodland creation to enhance habitat connectivity (Priority WT-3 and Measure 022).
Opportunities to target species-rich grassland creation to enhance connectivity within the grassland network on land to the north of Chaddesden Wood (Priority GL-3 & Measure 043).
Contribute to the future wetland resource through the creation of new semi-natural wetlands and other complementary habitats (Priority WL-3 & Measure 083).

(c) Site Suitability

The Site sits south of Lime Lane and north of Chaddesden Wood between existing residential estates to the east and west. It forms part of the Oakwood settlement with open countryside north of Lime Lane. Residential development on the eastern field would represent a logical and physically coherent development within Oakwood, with this field being particularly well related to residential estate to the east. Lime Lane provides a strong defensible boundary between the Site and the open rural landscape to the north, which is Green Belt.

As an established large suburb, Oakwood is well served by services and facilities including a district shopping centre, health related facilities, schools, public houses, Oakwood Leisure Centre and formal public open space. Any lack of medical and educational capacity would be a matter for a Section 106 Agreement to secure appropriate contributions towards new capacity/infrastructure.

A pair of bus stops on the nearby main road (A608 'Hilltop') to the west, are served by a regular bus service (H1) to Derby and nearby villages. Beyond the A608 is 'The Great Northern Greenway', which is part of the National Cycle network connecting through to Derby.

In assessing the application for 150 dwellings the Council agreed that the land south of Lime Lane is a sustainable location for new dwellings in terms of access to services and facilities by non-car modes subject to various mitigations. These included the provision of a new dedicated footway/cycleway along Lime Lane connecting the site with the A608 bus stops to the west and the long-established path to the east of the Site. The latter is a well-used path that runs north south, connecting Lime Lane with housing development to the east. It connects with the Council owned path that runs to the east of Chaddesden Wood.

Any residential development of the eastern field only, would still provide a frontage cycleway/footway, a toucan across the A608 and pedestrian/cycle links to the existing estates to the east and west. Such paths are shown illustratively on the accompanying ILUP including a section of an east west Lime Lane cycleway/footway sitting rear of the hedge and veteran tree that fronts the road, avoiding the RPA of the latter.

Overall, there is clear scope for future residents to have a genuine choice of transport modes through harnessing opportunities to promote walking and cycling and access of public transport. A toucan across the main road would provide a safe crossing facility to the northbound bus stop and 'The Greenway'.

The Site is not the subject of any landscape designations, nor is it within a Conservation Area or the setting of any designated or non-designated heritage assets. It is in Flood Zone 1 and has no surface water drainage issues.

The refused application for up to 150 dwellings across the two fields was supported by a suite of technical information and was not refused on any technical grounds (e.g. highway

safety, network capacity, flood risk, noise) subject to various planning conditions and Section 106 requirements, as set out in the officer's report.

The above included the LLFA being satisfied that suitably designed on-site SuDs would prevent flood risk being increased elsewhere including downstream in Breadsall Village. Similarly, the Highway Authority raised no highway safety or network capacity objections subject to various measures including securing the proposed access visibility splays and a Traffic Regulation Order to reduce the speed on the adjoining section of Lime Lane. The accompanying ILUP shows the vehicular access and visibility splays as per the proposed access for the previous scheme that was not objected to by the Highway Authority or the LPA.

Technically, there is no reason why a scheme for residential development on just the eastern field would not be similarly acceptable subject to agreed mitigations.

Notwithstanding the above, and as already noted, the Site is located within the North Oakwood Green Wedge and adjacent to the Ancient Woodland.

Whilst the woodland may include veteran trees recent survey work concludes that there are none on or near the woodland's northern edge that would impact on any development proposals at the Site. The impact of the proposed development on the Green Wedge, Ancient Woodland and the 2 frontage veteran trees can be mitigated as part of any future development with dwellings on the eastern field only, as detailed herein.

Overall, it is considered that the Site is suitable for housing development on the eastern field when assessed in the round taking account of its sustainable location; contained nature as a single field south of a defensible northern edge and where appropriate frontage planting can be secured; its physical relationship with existing housing and associated connectively (existing and proposed); relevant Green Wedge functions being suitably retained with certain Green Wedge aims/functions enhanced by the proposals for the western field; measures to fully protect and indeed enhance the Ancient Woodland; and significant tree planting that would more than offset loss of 3 Category A TPOd trees to facilitate the previously supported Lime Lane access.

i. Green Wedge Functions

As noted above, the Council accepts that with the retention of the western field will allow the *'functional Green Wedge to remain'* (Reg.18 Sustainability Appraisal, Appendix G). JGP agrees with this finding.

Policy CP18 of the adopted Local Plan identifies Green Wedge functions as:

> '… *areas of land that define and enhance the City's urban structure, maintain the identity of the different residential neighbourhoods, provide an uninterrupted link to the countryside, form part of the wider green infrastructure network and play an important role in climate change adaptation'.*

This wording is largely repeated in the proposed Green Wedge Policy (**draft Policy EN6**) whilst the Green Wedge Review (GWR) 2025 assessed the Green Wedge against the following 3 primary functions and 8 secondary functions regarding health, well-being and community. The former are:

- Urban Structure and Neighbourhood Definition
- Promoting Residential Amenity
- Connection to the Countryside [visual and physical connections]

In terms of the primary functions, the GWR 2025 concludes that the Green Wedge (in terms of the North Oakwood Green Wedge as whole) *'…plays a vital role in breaking up dense residential areas and providing visual and physical separation'.*

The GWR 2025 acknowledges that the Green Wedge does not perform the role of:

- Maintaining the identity of different residential areas or preventing the coalescence of Oakwood and Breadsall Village.
- Preventing urban sprawl into the open countryside (i.e. beyond Lime Lane).
- Flood water storage.

Whilst developing the eastern field for housing would remove part of the northern extent of Green Wedge this would be a limited parcel as outlined above, leaving the western field 'intact'.

As illustrated on the enclosed Annotated Aerial View (see Appendix 4), a circa 240m – 350m wide area would remain as undeveloped and open Green Wedge, consisting of the whole of the western field, existing neighbouring Public Open Space at the Persimmon estate to the west and the far NE corner of the eastern field. This would start at the woodland and widen to around 350m where it meets with Lime Lane. As noted in the proceeding Soundness Assessment, this retained width would be similar to that assessed as acceptable for proposed Moorway Lane allocation (**draft Policy HA3**).

This wide retained area of Green Wedge between Chaddesden Wood and Lime Lane would allow the following functions to continue:

- The undeveloped western field acting to break up the new residential area and the existing Permission development, providing ongoing visual and physical separation.
- The retained wedge across the western field defining the urban structure and neighbourhoods of this part of Oakwood.
- Penetration of open land into the urban area with such providing visual and physical connections to the open countryside north of Lime Lane.
- A significant area of green space of woodland and grassland providing an ongoing rural setting for the majority of the woodland as viewed from the north.
- Views from the expanded woodland of the countryside to the north, providing an open character and visual connection with the rural landscape.
- The promotion of residential amenity through views towards green space and/or access to new POS.

This accords with the Council's positive conclusion regarding continued Green Wedge functionality with the western field retained (as provided in Appendix G of the Reg.18 SA).

In terms of openness and views, the woodland planting would impact on the current uninterrupted nature of the western field but it would remain 'green', open and undeveloped in terms of built form.

Whilst certain existing views would be altered to accommodate much needed housing , the Illustrative Land Use Plan (Appendix 2) provides an illustration how viewpoints towards the countryside could be incorporated into the woodland planting, such as a north facing view with the existing loan tree as a meaningful focal point. The expanse of the view is also highlighted on the Aerial Overview Sketch (Appendix 3).

In assessing the proposal, it must be acknowledged that both the eastern and western fields are currently private land, being ploughed fields lacking in established vegetation other than the boundary hedges and trees. There are no PROW across the fields. The following Green Wedge functions and Green Infrastructure recommendations in the GRW 2025 are, therefore, not currently supported on the land within JGP's control:

- Access to the countryside/public recreation/open space provision;
- Improved wildlife habitat/wildlife corridors between the wood and the countryside; and

Such functions/aims would, however, be introduced or enhanced as part of the illustrated proposals by way of:

- Woodland planting/expansion onto the western field as shown indicatively on the enclosed Illustrative Land Use Plan and annotated aerial view, in accordance with an LNRS aim for the site (as repeated in the GWR 2025). This would be additional to a 30m woodland buffer on the eastern field to separate new housing from the Ancient Woodland;
- The creation of further natural and semi natural habitat on the western field including species rich grassland and potential semi-wetland habitat, in accordance with an LNRS aim for the site (as repeated in the GWR 2025);
- The overall enhancement of habitat corridors between the woodland and the countryside, including supplementing various gaps in existing north-south hedges to enhance local landscape character and provide enhanced habitat connectivity (LNRS and GWR 2025);
- New public recreation opportunities on the western field including paths through parts of the new natural and semi natural habitat, including up to 3ha of new woodland;
- The creation of a community woodland and orchard.
- Significant new green infrastructure and public open space around and within the developed eastern field, in the form of policy compliant Green Amenity Space including a LEAP.

The general greening/habitat creation at the western ploughed field would also enhance the foreground north views between the expanded woodland and the countryside north and Lime Lane and offer new a vegetative outlook from the dwellings at the Persimmon site that face the western field (The latter being suggested as secondary function in the GWR 2025).

Overall, the proposals for The Site and the adjoining western field would allow the relevant Green Wedge functions, and Green Infrastructure recommendations of the GWR 2025, to be achieved or significantly enhanced, alongside modest residential development.

ii. Ancient Woodland and Veteran Trees

JGP recognises the importance of safeguarding the Ancient Woodland and frontage Veteran Trees to prevent loss or deterioration of irreplaceable habitat. Indeed, the proposals go well beyond a safeguarding response to an overall safeguarding and enhancement response.

Firstly, by moving away from any plans to develop the western field for housing and instead provide habitat enhancements here, the Council's previous concerns regarding the 'isolation and fragmentation' of the woodland from the countryside is overcome. Indeed, connecting habitat would be substantially increased. As noted above, wildlife habitat and recreational use cannot successfully coexist, with such being apparent at many local and National sites.

Secondly, a woodland buffer of 30m is shown on the enclosed Illustrative Land Use Plan and a sketch cross section with Appendix 4.

A 30m buffer exceeds what the relevant guidance seeks as a minimum (15m) and JGP's appointed ecologist and arborist, who have visited the site and undertaken various survey work, conclude that there is no technical justification for a buffer that exceeds 15m subject to no land level changes within such. This includes there being no veteran trees close to the woodland edge that would require a wider buffer. However, a 30m buffer is offered nonetheless to help appease concerns and give a larger area for a new woodland planting alongside a regenerative woodland edge.

The Woodland Trust suggested that a 50m buffer was required in relation to the for refused 150 dwelling scheme, partly with reference to its assertion that such a scheme would fully enclose the woodland with residential development. Any such effect is negated, however, with the proposed 60-65 dwelling scheme whereby the western field will remain completely devoid of housing and other built form. However, in its response to the Reg.18 submission, the Woodland Trust questions the rationale behind and the adequacy of a 30m buffer with reference to noise, light and invasive species. JGP accepts the advice of its appointed consultants that a 30m buffer with no gardens backing onto it would allow the suitable mitigation of any such operational impacts. A detailed CEMP would protect the woodland from adverse effects at the construction stage.

Scrub planting, hedging and fencing would prevent direct access to the woodland along its full northern edge, save the existing entry point from adjoining POS land to the west which leads to a designated woodland path. This is not to say that new residents would not use

the wood at all, but it would prevent access into the woodland from the Site other than by the designated routes. Such demarcation and scrub along the northern boundary would also serve the aim of the POS on the western field being a distinctly separate recreational offer to the LNR.

Thirdly, and perhaps most significantly, the indicative proposals for the western field show new woodland planting to allow the Ancient Woodland's expansion northwards, not only within the proposed eastern buffer but also onto a large part of the western field. The ILUP illustrates around 3ha of new woodland with woodland paths and an east to west path.

As noted in the Soundness Assessment of these representations, the Chaddesden Park LNR is 10ha, such that 3ha of new woodland would provide up to a 30% increase in woodland coverage.

Such woodland planting/expansion onto land north of Chaddesden Wood is identified in FoCWs Woodland Management Plan as a key measure to improve the health of the Ancient Woodland, which has been assessed by FoCW as being in an 'Unfavourable Managed State'. This potential woodland expansion is hence an important benefit for the Council to take into account when assessing JGP's residential promotion of the eastern field alongside the illustrated proposals for the western field.

As a suburban LNR Chaddesden Wood is well used by the public leading to various recreational pressure and certain associated negative effects (e.g. degradation of paths). However, the GWR 2025 encourages public access to the woodland for welfare reasons. The proposed 60-65 dwellings have the potential to increase footfall in the woodland for recreational reasons, and hence increase the existing recreational pressure by a certain amount in percentage terms. The percentage increase in such footfall would, however, be significantly lower than the percentage increase in proposed new woodland (up to 30%) plus adjoining new grassland POS on the 5ha western field.

The proposed significant woodland expansion and new public recreational opportunities at the western field would certainly help relieve the overall footfall pressure on the Ancient Woodland, including existing users/locals. The grassland and paths would provide immediate opportunities whilst the woodland would provide longer term recreational alternatives to the existing LNR. These proposals tend to align with DWTs recent comments as reported above.

Additionally, JGPs appointed specialists note that there are measures in the current Woodland Management Plan that are not fully funded and/or implemented at present, including the enforcement of dogs on leads. The residential development at the eastern field would contribute towards targeted ecological and recreational management measures, potentially including measures relating to the wood's hydrology. JGPs appointed ecologist notes various potential ecological improvements such as more ground level planting of the wood's central area. This would also assist deter recreational access beyond the designated paths.

It is appreciated that the wood's hydrology is primarily a function of its own land levels, which fall away from the application site. This is reported as being accepted by the Council's Drainage Engineer in the Committee Report for the 150-dwelling scheme. However, there may be scope to secure the disruption of the ditch that runs down the centre of the wood to reduce the speed that rainwater leaves the wood, which is mentioned in the Woodland Management Plan as an aim.

Additionally, retaining land levels within 30m of the woodland edge and the proposed drainage scheme would ensure that any current limited flows of surface water towards the Ancient Woodland, including within the east-west ditch along the boundary, would not be reduced. Methods to increase surface water flows from the Site to the woodland edge ditch would be secured if technical advice concludes such would be desirable for the woodland edge trees and feasible.

There would be no development, including no paths, within the root protection areas of any trees, including the 2 veteran trees at the front of the western field (one in the central hedge). These could be fenced off with ornate fencing as seen in various Derby Parks under the Council's control to prevent public access to safeguard both the public and the tree. This responds positively and proportionately to an issue raised by Woodland Trust to JGP's Reg.18 submission.

All of the above measures could be secured through various mechanisms. It is, therefore, concluded that the overall package would ensure no loss or deterioration of the woodland or veteran trees and instead secure various enhancements. The provision of plentiful alternative natural and semi natural POS to the existing woodland LNR, including new areas of woodland and recreational paths linking to the Greenway, would be a significant benefit to the wood in terms of reducing long term recreational pressure.

Woodland expansion aims of current Woodland Management Plan, the GWR 2025 and the adopted LNRS would be met on what is currently private land to the benefit of the LNR as set out above. This, together with the other habitat creation, offers a real opportunity for betterment associated with the limited release of Green Wedge land for housing on the eastern field.

iii. Site Suitability Conclusion

In conclusion, the Site is considered suitable for residential development subject to this being new dwellings being restricted to the eastern field and coordinated with plans for the western field, including various planning conditions and Section 106 requirements.

Any site-specific considerations, including the Ancient Woodland, access, flood risk and drainage, ecology, or landscape matters, are capable of being appropriately addressed through the planning application process and the implementation of suitable mitigation measures.

d. Development Potential

Indicative capacity assessments suggest that the site could accommodate approximately 60-65 dwellings, based on a density of 35 dwellings per hectare, as sought by **draft Policy H2** of the Reg.18 draft Local Plan. This is based on an assumed net developable area on the eastern field of around 1.72-1.82 ha taking account of the required woodland buffer, frontage infrastructure including visibility splays and a cycleway/footway, eastern and western buffers relating to existing hedges, trees and a ditch, and required on site Green Amenity Space, including a LEAP.

The proposed development would deliver a mix of market and affordable housing units. The precise number, mix, and layout of homes would be determined through detailed design work and in accordance with relevant planning policy requirements. Based on **draft Policy H4,** a policy compliant scheme (25%) would provide up to 16 affordable homes, which would be a significant benefit given the Council's difficulties in fulfilling the ever-increasing demand for such properties.

In accordance with the above site suitability assessment, policy compliant and good quality public open space and landscaping would be achieved, including new pedestrian and cycle paths and informal and formal space for childrens play. Significant habitat enhancement and creation across the Site would result provide in excess of 10% BNG alongside Ancient Woodland and veteran trees not being harmed.

As noted above a new cycleway and pavement serving Lime Lane, partly rear of existing boundary vegetation, would provide a new sustainable and safe link for new and existing residents to existing bus stops on the A608, and pedestrian and cycle connections to the wider countryside.

Although the site lies within the Green Wedge, as described above, it will leave the western field undeveloped, being around 350m wide at its mouth including the neighbouring POS.

The dwellings would be of an appropriate density and style and have a landscaped character to respond positively to the site's rural edge location i.e. opposite the open countryside to the north. This would include new frontage hedging and trees to each side of the new access to blend the frontage with nearby roadside hedging and trees east and west that would be retained.

The dwellings would integrate with the nearby residential areas to the east and west through some physical intervisibility and by new footpath and cycleway links. This would include a formal connection onto the long-established path to the east of the Site where it meets with Lime Lane. A new path would also be provided in the south-eastern corner of the eastern field where there is an established gap of compacted ground in the eastern tree belt. This would likely operate as a desire line to and from the eastern path. New and existing communities would all have access on foot or bike to the new POS, the community woodland and orchard and the LEAP, assisting in developing social connections and community cohesion.

Houses either side of tree belts is part of the prevailing character of Oakwood, which the scheme would follow in terms of the trees along part of the eastern boundary.

Overall, the proposal would make effective use of land to meet the identified and future housing needs of the City, while suitably safeguarding and enhancing the surrounding environment, the Ancient Woodland, Green Wedge functions, GI recommendations of the GWR 2025 and key aims of the LNRS.

The development of the Site presents an opportunity to create a high-quality, sustainable, and well-designed place that contributes positively to the area's character and provides benefits for both existing and future residents, wildlife and the adjoining Ancient Woodland.

e. Site Availability

The landowner is supportive of development and is actively seeking to promote the site through the plan-making process. Although not currently owned by developers, there is long-standing interest in this site. A residential allocation for around 60-65 dwellings is likely to be an attractive proposition for additional housebuilders. Alongside supportive landowners, there are no known legal, covenant, or title issues that would inhibit delivery on this site.

Furthermore, no significant infrastructure would be required before the development could come forward (e.g. a link road) and there are no abnormal costs or issues that would undermine the viability or delivery of the scheme (e.g. land contamination).

The above assessment illustrates that development can be anticipated on this site within 1-5 years of allocation. This would, therefore, be a meaningful contribution to the council's housing needs.

f. Conclusion

The Site is a suitable, available, achievable and deliverable residential opportunity that could and should make a contribution to addressing the Council's identified market and affordable housing needs. There are no planning and technical constraints that would preclude the residential development of the site, which could not be appropriately mitigated, or indeed enhanced. The Site should, therefore, be allocated for residential development as part of the emerging Local Plan, with residential development of up to 60-65 units restricted to the eastern field.

P&DG and JPG continue to welcome the opportunity to discuss the merits of the Site as such a residential allocation with the Council as part of the ongoing plan making process.

Appendix 1 Location Plan

N

Breadsall
Cutting

Brookside Rd

91m

105m

110m

Hilltop

Balancing
Pond

Lime La

113m

Lime

Hare Edge Dr

Limedale Ave

Bleaklow Cl

Priory Gdns

Foxglove Dr

Diamond Dr

Cornflower Dr

Chaddesden Wood

Porters La

Silverburn Dr

0m 50m 100m 150m 200m

Drawn By: SP	Title: Site Location Plan	Drawing No: 13.020/2	P&DG Planning and Design Group
Approved By: DH		P and DG accept no responsibility for any unauthorised amendments to drawings and does not permit unauthorised copying of drawings in order that subsequent reproduction of drawings are internally controlled. Copyright P and DG.	
Revision Detail / Date	Scale: A3 @ 1:2500	This drawing should not be scaled for construction purposes	
	Date: 12.05.26		

Appendix 2 – Illustrative Land Use Plan

N

LIME LANE

LIME LANE

Pedestrian / cycle link can be implemented as per existing legal agreement between Persimmon and the landowner.

CHEDDESDEN WOOD

Key

- Proposed allocation site boundary
- Proposed woodland creation / expansion
- Reinforced and enhanced hedgerow planting including trees (north south corridors)
- Existing Trees
- Proposed 30m woodland buffer including tree planting
- Potential new hedgerow
- Potential SuDS basin
- Potential swales
- Proposed habitat creation including species rich grassland, semi-natural wetlands and amenity grassland providing public recreational opportunities
- Vehicle access
- Development blocks and access roads
- Proposed LEAP
- Potential pedestrians only paths
- Proposed 3m cycle / pedestrian paths
- New post and rail fence and hedge

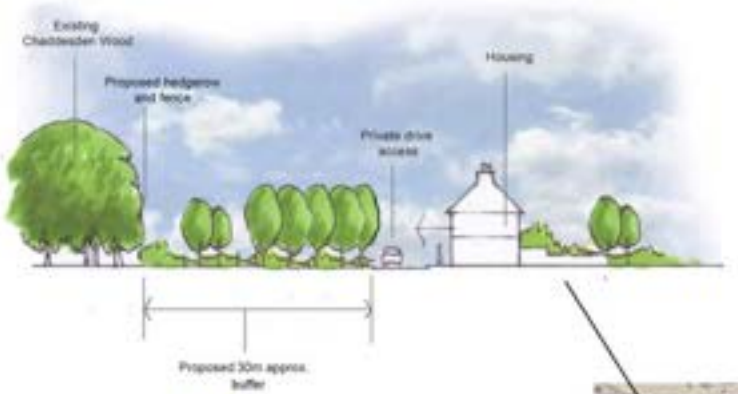
Drawn By: SP	Title: Lime Lane Illustrative Land Use Plan	Drawing No: 13.020/2	P&DG Planning and Design Group
Approved By:		P and DG accept no responsibility for any unauthorised amendments to drawings and does not permit unauthorised copying of drawings in order that subsequent reproduction of drawings are internally controlled. Copyright P and DG.	
Revision Detail / Date:	Scale: A3 @ 1:1500	This drawing should not be scaled for construction purposes	
	Date: 07.09.26		

Appendix 3 – Aerial Overview Sketch

(View from the North)

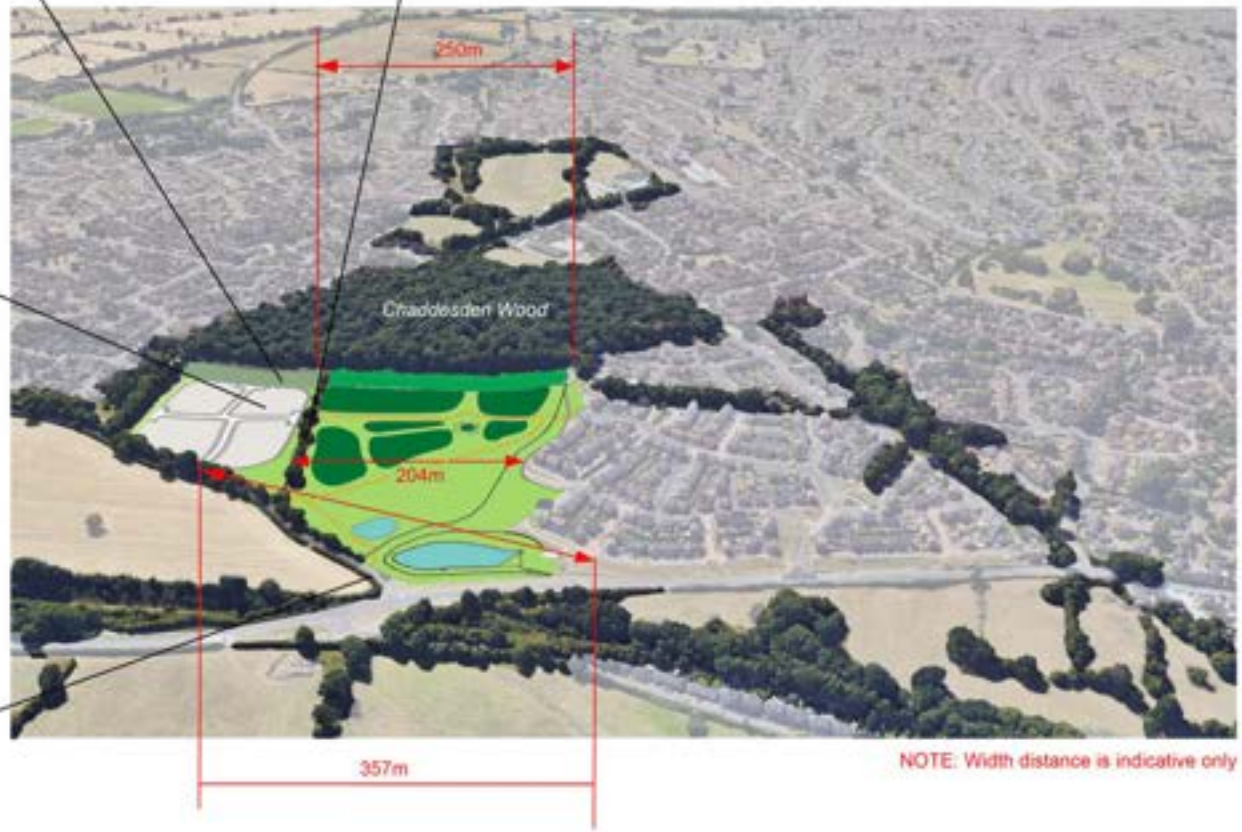

Proposed development
Persimmon Development
Chaddesden Wood
Oakwood
Oakwood
Lime Lane
A
B
C
A608
Breadsall Top
North

Appendix 4 – Annotated Aerial Photo and Sketches











NOTE: Width distance is indicative only

Appendix 5 – Summary of Main Benefits

The supply of up to 65 dwellings of a type and mix to be agreed with the Councill, to assist in meeting the City's housing needs, including affordable housing.

A development that relates well to existing urban existing urban form with residential development on the eastern field being a logical and physically coherent development within Oakwood, being particularly well related to residential estate to the east.

The new built form being contained on the northern side of Lime Lane, separated from the Green Belt to the north by the road itself and new roadside planting, including hedgerow and trees.

Dwellings at an appropriate density and style and having a landscaped character to respond positively to the site's rural edge location i.e. opposite the open countryside to the north.

Dwellings integrating well with the nearby residential areas to the east and west through physical intervisibility and by way of existing and new paths.

The provision of plentiful green infrastructure and public open space, including play space within the developed site (the eastern field).

The retention and greening of the western field (alongside existing neighbouring POS) in a manner that would provide physical and visual links between the woodland and the open countryside to the north.

The retention and enhancement of the western field (sitting alongside the neighbouring existing POS) in a way that would retain and enhance the functions of the Green Wedge (as defined in the GWR 2025), including a break between residential areas, a defined urban edge and new public recreation opportunities on what is currently a private field (which amongst other things would help reduce recreational pressures on the existing woodland).

Significant habitat creation on the western field including woodland expansion, species rich grassland and semi wetland natural habitat to meet stated aims within the LNRS and the related Green Infrastructure recommendations of the Green Wedge Review 2025.

Enhancement of the Ancient Woodland through woodland expansion which would also respond directly to an aim of the Woodland Management Plan in relation to aid its future health and wildlife connections.

Funds towards the targeted improvements to the woodland's management including ecological, and potentially hydrology related measures.

Supplementation and enhancement of existing hedgerows between the woodland and Lime Lane, as sought by the LNRC and GI Recommendation of the GWR 2025.

Habitat creation meeting or indeed exceeding 10% BNG for habitat, hedgerow and watercourse units.

Off-site flood risk would be reduced, through an appropriate SUDS scheme.

The provision of new cycle and pedestrian paths for use by existing and new residents, including a new footway/cycleway along Lime Lane (partly rear of existing hedge) linking to bus stops on the B608 and the Great Northern Greenway (part of the National Cycle Route).

The provision of a Toucan crossing over the B608 serving the northern bus stop and the route to the Greenway (part of the National Cycle Network).



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