

Erewash Local Plan Review Examination in Public

Participant 122 – Redrow Homes

Hearing Statement - Matter 3: The Spatial Strategy

December 2023

1.0 Introduction

- 1.1 This Hearing Statement sets out submissions made by Planning and Design Group (UK) Limited on behalf of Redrow Homes. It relates to Matter 3: The Spatial Strategy as set out in the Inspector's Matters, Issues and Questions document. The Statement forms the basis of our evidence, to be presented at the Examination in Public.
- 1.2 Only the questions relevant to Redrow Homes and the ongoing promotion of their land at Acorn Way, Derby, have been answered.

2.0 Matter 3: The Spatial Strategy

Issue – Whether the Core Strategy Review is justified, effective and consistent with national policy in relation to the Spatial Strategy.

Question 1 – Does the Core Strategy Review have a vision, strategic objectives and provide a clear and cohesive framework for the future growth and development of Erewash?

- 2.1 The vision of the Core Strategy Review is to be a mechanism for providing housing and employment land and bringing the development plan up to date, so that it aligns with national planning policy and guidance.
- 2.2 Future growth and development objectives are identified, and such opportunities established by new strategic policies 1-5.
- 2.3 The ‘framework’ could however be presented more clearly, in a defined document.

Question 2 – Will the spatial strategy contribute to achieving sustainable development, including a sustainable pattern of development, as set out in paragraph 11a of the National Planning Policy Framework and if so, how?

- 2.4 Fundamentally, planning needs to deliver sustainable development. The National Planning Policy Framework (NPPF) makes it clear that areas with existing infrastructure are best placed to deliver growth. The existing strategy of urban concentration can be supported on this basis.
- 2.5 Moving beyond this however, the NPPF also recognises the importance of small and medium sites coming forward, to ensure an adequate continuity of housing support and delivery.
- 2.6 Strategic housing policy reflects the NPPF presumption in favour of sustainable development.

Question 3 – What were the options for accommodating growth and how were they considered? Have all reasonable alternatives been considered?

- 2.7 Options for growth include development on brownfield land and development on land within existing settlement boundaries inset from the Green Belt. In accordance with national policy, priority should be given to these options. From the Council’s

Revised Options for Growth document, growth options in priority order are growth within urban areas (Long Eaton and Ilkeston) and rural settlements. From the Erewash Brough Council Strategic Housing Land Availability Assessment (SHLAA), however, it has been established that there is insufficient brownfield land, or land within existing settlement boundaries inset from the Green Belt, to meet housing needs in full.

- 2.8 Another option for accommodating growth is therefore Green Belt release. This was recognised by the Council within their Revised Options for Growth Document as a lower priority, once other options are exhausted.
- 2.9 All reasonable alternatives to the spatial strategy are set out in the evidence base to the Core Strategy Review.

Question 4 – What is the basis for the conclusions on each of the growth options and are these justified?

- 2.10 The growth options are informed by evidence which includes the SHLAA, Sustainability Appraisal, Strategic Growth Area Assessments and Housing Trajectory, thereby providing the basis and justification for the Review.
- 2.11 The conclusions are based on spatial form on the basis that allocated sites are related to existing settlements and infrastructure.
- 2.12 In the case of Acorn Way, the site is effectively an extension to Derby City, being a location that is readily accessible to existing services and facilities, public transport, employment and connected by existing infrastructure. The NPPF supports development that limits the amount of new significant infrastructure required for new development. The NPPF directs development to the most sustainable settlements. Derby City is a sustainable urban location, which can support growth as proposed at Acorn Way.

Question 7 – Has the potential for development in the urban area, the use of previously developed land and increased densities been optimised?

- 2.13 The potential for development in these areas has been optimised such that previously developed land and land that is within urban areas inset from the Green Belt is the subject of permissive policy that actively supports development in these areas.

2.14 The Green Belt boundary is tightly drawn such that additional release is required. The NPPF supports development that achieves appropriate densities, including development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services. For Acorn Way, access to substantial existing infrastructure is such that the quantum of development proposed on site is optimised accordingly. It is suitable and deliverable.

Question 8 – On a strategic Boroughwide level, does the scale of housing growth required and the limited opportunities within existing built-up areas provide the exceptional circumstances to justify altering the Green Belt?

2.15 Over the period of the existing Core Strategy, where active development is encouraged nationally through the presumption in favour of sustainable development, and current planning policy is permissive insofar as directing development to urban areas outside of Green Belt, the development plan has failed to keep pace with growth needs and is effectively why a new strategy is required.

2.16 As noted, there are limited opportunities within existing built-up areas to direct new development. Flood risk is a further constraint to development opportunities within existing built-up areas. A significant housing supply shortfall continues to be experienced and having considered growth options against a hierarchy, the need for Green Belt release is justified.

Question 10 – How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

2.17 Sites were assessed in the SHLAA and through the submission of evidence to each Regulation stage of the Core Strategy Review.

2.18 The allocation of Acorn Way was supported by a Green Belt Review, Promotion Document and representations to the Core Strategy Review process to evidence its suitability and deliverability as a site for housing.

Question 13 – In overall terms, is the Spatial Strategy appropriate and justified, particularly in terms of the range and mix of locations identified for growth? Is it effective and consistent with national policy.

2.19 The reality is that the spatial strategy without review, cannot respond effectively to continued growth needs. Erewash Borough is largely Green Belt, situated between

Derby and Nottingham. It's role in part is to support the growth of these City regions and maintain connections between them. To do so, growth is required. It has to be located somewhere, and the spatial strategy addresses this need appropriately.

- 2.20 The proposed spatial strategy is sensible and establishes opportunities for delivering growth without significant harm to the function of the Green Belt overall.
- 2.21 Indeed, the NPPF allows for redrawing of Green Belt boundaries through the updating of plans. This mechanism is in place to facilitate additional development where it is needed, in exceptional circumstances, as being experienced in Erewash Borough.
- 2.22 The release of Green Belt land at Acorn Way offers a suitable and realistic opportunity to accommodate development of a strategic yet proportionate level in a sustainable location. Its allocation is consistent with national policy. It supports and is supported by the spatial strategy.