

# Erewash Core Strategy Review

Examination Hearing Statement

Matter 3

Representations prepared by Fisher German LLP  
on behalf of Bloor Homes



**Project Title:**

Spondon Woodside

**Author:**

James Beverley MRTPI

**Contact Details:**

The Estates Office

Norman Court

Ashby de la Zouch

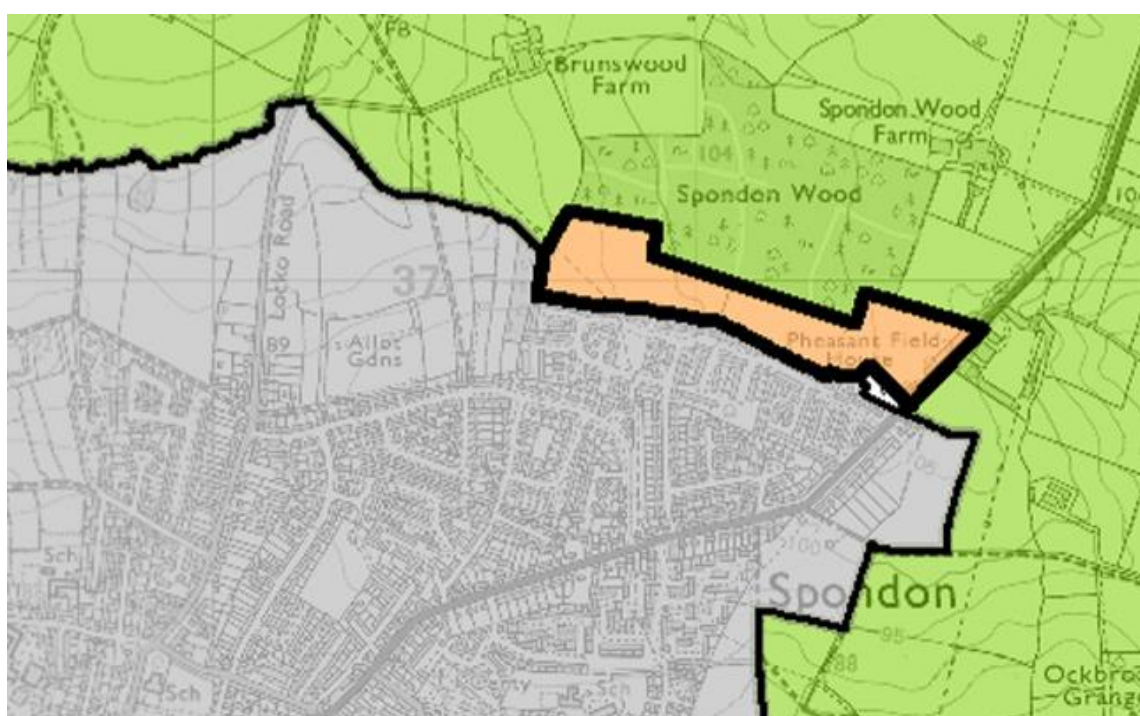
LE65 2UZ

[James.Beverley@fishergerman.co.uk](mailto:James.Beverley@fishergerman.co.uk)

07580323822

# 01 Introduction

- 1.1 These representations are prepared by Fisher German on behalf of Bloor Homes East Midlands in respect of their land interests at Woodside, Spondon. The site is identified for release from the Green Belt and allocation within the submitted Erewash Core Strategy Review; Strategic Policy 1.4 – North of Spondon. The site is a proposed allocation of “around 200 dwellings”, with site specific criteria and identified on the supporting policies map, extract below.



**Erewash Core Strategy Review Policies Map Extract**

- 1.2 In September 2023 a full planning application on the proposed allocation site for 263 dwellings, associated landscaping, open space, infrastructure and enabling earthworks (application reference - 0923/0024) was validated by Erewash Borough Council. This application is currently awaiting determination, but clearly given the full nature of the application, and the site being under the control of a major housebuilder, it offers the opportunity to expedite delivery of homes on the site and assist the Borough Council in being able to demonstrate a five-year housing land supply.
- 1.3 The site is sustainably located adjacent to the Derby City Urban Fringe. It is well connected to existing services and facilities and can take advantage of existing public transport connections.

## 02 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.**

**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 Yes, the Core Strategy Review, when read in association with the Core Strategy, provides a clear vision, strategic objectives and provides a clear and cohesive framework for the future growth and development of Erewash. The only difference being the Core Strategy Review provides an updated Plan period and updated development needs to be met within that period. The provision of these updated allocations and policies, read alongside the extant Erewash Core Strategy policies and allocations that are not to be superseded, provides a sufficiently clear framework for the future growth and development of Erewash.

**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?**

- 2.2 Yes, as set out in response to Matter 1, it is clear that the Plan, having been driven by a comprehensive SA process, provides an overall sustainable solution for meeting the Borough's development needs. As set out throughout these Matters statements, all sites allocated sit in the top 50% of all sites assessed through the SA. The SA, unlike other environmental measures and tests, aligns with the Frameworks broader spectrum of sustainability, and assuming the SA is considered acceptable, the Plan must be considered to represent a sustainable pattern of development and comply with Paragraph 11a of the NPPF. To comply with Paragraph 11a, a sustainable pattern of development should seek to meet the needs of an area; align growth and infrastructure; improve the environment and mitigate climate change. The Plan as submitted meets these requirements.

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

- 2.3 Due to the constrained nature of Erewash, there was no one spatial strategy which could reasonably accommodate all development needs. The SA process tested a range of growth

options, to inform a broad spatial hierarchy. This approach is considered appropriate as it is agreed that no single option is reasonably capable of forming a strategy for the Plan which both met its development needs in full, and demonstrated a requisite 5-year housing land supply. This approach, combined with site assessment work (both within, and external to, the SA) provided a framework for site selection to ensure the most sustainable sites were allocated.

- 2.4 The Council tested a range of potential housing sites through the preparation of the Plan (25 sites) which were considered to be reasonable for the purposes of SA testing. This work confirms that the proposed allocations all fall within the most sustainable 50% of sites assessed by the Council. Clearly, the Council is required to balance the SA with wider planning and strategic issues, such as Green Belt, but it does demonstrate that the SA has helped to ensure that only the most sustainable sites have been allocated, despite these constraints.
- 2.5 The SA also tested a range of policy options, pertinent to the policies proposed through the Plan, relating to options including transport and retail.

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

- 2.6 The conclusions for the growth options are provided within the SA results. We are satisfied that both the methodology and results are sufficiently robust to justify the approach advocated within the Plan.

**5. How was the settlement hierarchy in Strategic Policy 1 derived? Is the methodology used to determine the hierarchy appropriate and sufficiently robust?**

- 2.7 The settlement hierarchy was directly informed by the SA assessment of reasonable options, with the better scoring options featuring higher in the settlement hierarchy; which even when read in isolation of the wider evidence produces a logical hierarchy of options. We consider utilising the findings of the SA to inform this aspect of Plan is robust, as by definition it, as best as possible, ensures the most sustainable pattern of development can be achieved.

**6. How has the level of development anticipated in different settlement categories in Strategic Policy 1 been arrived at? Does the settlement hierarchy appropriately reflect the role and function of these settlements?**

- 2.8 Having set the settlement hierarchy the Council sought to identify the best housing sites to deliver that overall pattern of growth. However, due to the lack of available sites and the extent of Green Belt constraints across the Borough this has meant that the distribution of development is

potentially not as neatly aligned as it could have been in less constrained authorities.

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

2.9 Yes, the Plan is clear throughout that there has always been a drive to deliver as much of Erewash's growth on brownfield land as possible, or available land in the urban area. However, within Erewash, these are finite resources with many such sites already having been utilised. The consistent failure to provide sufficient housing land supply or delivery is evidence of this.

2.10 The Statement of Consultation (Page 25) sets out the approach adopted by Erewash in respect of meeting housing needs in the Plan and refers to "*Erewash's notably deficient current housing land supply*". The Statement of Consultation confirms that detailed work over several years was undertaken to "*firstly identify and then encourage development to take place on brownfield land opportunities across Erewash*". However, despite a clear drive to deliver as much development needs on brownfield land as possible, the reality is that there is simply not sufficient deliverable land using brownfield land only to meet identified needs. Moreover, simply promoting a higher density of development in itself would not reduce the requirement for allocations, as it will not expedite delivery, either in terms of initial site commencement or ongoing market absorption. It reduces the amount of marketable land, reducing choice and competition in the market and raising land price and monopolising control of land to a select few landowners who can then essentially control the market. This would serve in reducing the geographic scope of available sites in terms of housing market delivery, which will again reduce choice and competition but it will also reduce the available markets thus slowing market absorption and delivery, as per the conclusions of the Letwin Review and contrary to the aims of the NPPF which argues strongly for choice and competition in the market. Finally, it increases the risks of site non-delivery, i.e. if there are fewer sites, and retained allocated sites are inherently more riskier by definition, the risk of Plan failure increases dramatically, with no obvious route for recovery other than another new Plan.

**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?**

2.11 Yes, it is evident that there are exceptional circumstances to alter the Green Belt. Please refer to our Matter 4 statement.

**10. Overall, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Core Strategy Review?**

- 2.12 Yes, the Council has undertaken more than the statutory number of public consultations required, offering significant scope for parties to make their views known. Such consultations have demonstrably led to changes in the Plan, including the removal of the Lock Lane Sawley allocation.

**11. How did the Council consider the viability and deliverability of sites in deciding where to allocate development?**

- 2.13 The Council has clearly recognised the differing viability potentials of different site typologies. This is reflected in the development requirements differing between greenfield sites such as our client's interests at Woodside Spondon (Policy 1.4) and the brownfield sites such as South Stanton having differing requirements in terms of particularly affordable housing delivery, in acknowledgement of the differing viability challenges (and thus how that inputs into matters of deliverability) across differing sites.
- 2.14 In ensuring a deliverable Plan which can make a more positive contribution in terms of affordable housing delivery in particular, it was necessary for the Council to include a broader range of typeologies, including strategic greenfield delivery and greenfield community expansion. This provides further benefits as it adds choice and competition within the market.

**12. How did the Council consider the infrastructure requirements of the proposed development in the Strategy and how did this inform the site selection process?**

- 2.15 Please see our responses in Matter 9.

**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?**

- 2.16 Yes, as discussed above the Plan promotes a justified spatial strategy, which includes differing site typologies which will ultimately serve different housing markets, providing choice and competition in both land sales, but also market sales which will assist delivery through improved market absorption. Having regard to the highly constrained nature of Erewash, the eventual strategy is considered appropriate, delivering a significant quantum of growth, commensurate to overall assessed need, utilising brownfield land as far as possible, and the release of just 1% of Erewash's Green Belt.

2.17 Whilst there will be detractors of the chosen spatial strategy, as currently being evidenced through the Councils housing land supply position, Erewash is unable to meet its housing needs without Green Belt release; there is no reasonable evidence which supports an alternative argument on this position. Moreover, as demonstrated in the SA, the allocated sites are all within the top 50% as assessed within the SA. We are therefore confident the spatial strategy is appropriate and justified and will provide a robust portfolio of housing land to deliver Erewash's development needs.