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Erewash Core Strategy Review Examination

Matter 1 Statement

Iceni Projects Limited on behalf of
GLP

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ON BEHALF OF GLP

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Icen Projects on behalf of GLP, the promoters of land to the southwest of Junction 25 of the M1.
- 1.2 Representations were submitted at the Regulation 19 stage by GLP, classified under representation numbers 136 & 273.
- 1.3 This Statement builds upon those previous representations in response to the Inspector's Matter 1 questions.

2. MATTER 1 – PROCEDURAL/ LEGAL REQUIREMENTS

Sustainability Appraisal

5. How has the Sustainability Appraisal (SA) informed the preparation of the Core Strategy Review at each stage? How has the SA been reported? Has the methodology for the SA been appropriate?

- 2.1 We do not consider that the methodology for the SA has been appropriate in relation to employment policy. In our view it does not give sufficient weight to the identified need for strategic logistics floorspace, resulting in an unduly positive assessment of the preferred approach, and does not consider all reasonable alternatives.
- 2.2 Section 1.3 of the SA sets out the key stages undertaken as the Core Strategy Review progressed, which largely focussed on housing provision. Employment matters were considered in terms of broad 'Policy Options' at the SA2 stage (2021). Table 4 provides further detail on the 4 policy options assessed in SA2, which included scenarios involving the allocation of additional land at Stanton Regeneration Site, West Hallam Storage Depot, or east of Breaston.
- 2.3 The Council's response to the Inspector's Initial Questions (Question 14) explains that the Council did not undertake a methodical site selection exercise to identify employment sites, but instead based its strategy on the need to find an alternative use for a long-term housing allocation that had not been delivered. In light of there being no other non-Green Belt sites being promoted, the Council thus proceeded to identify Stanton North as the single major allocation. This process described by the Council in its response to Question 14 of the Inspector's Initial Questions appears to be at odds with the assessment exercise described within the SA, which suggests an assessment of different options was undertaken in addition to Stanton North.
- 2.4 Notwithstanding this apparent contradiction, we consider that the identification of the 4 scenarios described did not appropriately take into account all reasonable alternatives as required by the Planning Practice Guidance¹. The description in Section 1.3 of the SA does not provide justification for the selection of the scenarios that were assessed. The Council will have been aware of additional options for major/ strategic employment allocations, such as the land southwest of Junction 25 of the M1, which were not assessed in the SA. The Council's reliance on up to 55 ha of new employment land at Stanton North is based on this site being the only non-Green Belt option, which in the

¹ Paragraph 18, reference ID 11-018-20140306

Council's view is sufficient to meet its identified needs. However, we have explained in our representations, and detail further in our Matter 8 Statement, that there is a significantly greater need for Strategic logistics (B8) floorspace, which is not being met within the HMA and which Erewash should make adequate provision to help accommodate. The SA should have therefore assessed the policy options in this context, taking account of its evidence base including the 2022 Nottinghamshire Core & Outer HMA Logistics Study (EBE2), and considered additional options including potentially suitable Green Belt sites as reasonable alternatives.

2.5 We note that the Strategic Distribution and Logistics Background Paper (September 2023)² produced by the Greater Nottingham Planning Partnership (which includes Erewash Council) in support of the emerging Greater Nottingham Strategic Plan identified a number of reasonable alternative sites within the Green Belt in order to meet the wider strategic logistics need within the HMA. The land southwest of Junction 25 of the M1 was identified as one such reasonable alternative. Given Erewash's role within the Greater Nottingham HMA and the significant need for strategic logistics floorspace across the region, we consider that Erewash's SA should have considered appropriate Green Belt options as reasonable alternatives.

2.6 Meanwhile as highlighted in our previous representations at the Regulation 19 stage, we consider that the 'major positive' assessment of Stanton North's potential to provide land and buildings required by businesses (as summarised in Objective 3, Question 1 in Appendix A1 of the SA) is overly positive. The failure to adequately consider the full scale of the need for strategic logistics space and Erewash's role in helping to meet this leads to an unduly narrow assessment as to whether identified needs will be met at Stanton North. Furthermore, as highlighted in our previous representations and our Matter 8 Statement, Stanton North is unlikely to function as a strategic logistics site and consequently will not make a significant contribution to providing land and buildings required by businesses in this respect. We note that the SA's assessment of Option 2 specifically refers to Stanton "helping to meet local demand" (our emphasis) rather than consideration of broader strategic needs. The assessment in the SA thus does not give sufficient consideration to the need for strategic logistics, and results in a flawed assessment of the limited scenarios that were identified.

6. What options were considered through the SA for the following:

a. The overall scale of housing and other growth

b. The broad distribution of development across the Borough

c. Potential allocation sites

d. Policy approaches

² [Strategic Distribution and Logistics Background Paper \(September 2023\)](#)

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- 2.7 The SA process in relation to employment matters appears to have been based on local employment needs, as identified in the 2021 Nottingham Core HMA and Nottingham Outer HMA Employment Land Needs Study (EBE1). The implication in the assessment of options in the SA is that the Stanton North site is sufficient to meet identified needs (resulting in a 'major positive' score), although the SA Report does not explicitly define what these are. The SA process does not appear to have considered alternative options for different levels of employment growth.
- 2.8 As set out above, we consider that the SA should have considered a scenario for a higher level of employment growth, which makes a contribution towards the need for strategic logistics space within the Nottinghamshire HMA as identified in the 2022 Nottinghamshire Core & Outer HMA Logistics Study (EBE2).
- 2.9 In light of this, as discussed in response to Question 5, we consider that additional reasonable alternatives should have been assessed, in terms of policy approaches and potential allocation sites, rather than the 4 limited policy options summarised in SA2.