

Erewash Core Strategy Review Examination Response to Matters, Issues & Questions (MIQs)

Main Matter 6: Housing Allocations

Issue:

Whether the proposed housing site allocations are justified, effective and consistent with national policy.

Relevant Policies: 1.1, 1.2, 1.3, 1.4, 1.5, 1.6

Please note: In responding to the questions below the Council should identify and address specific key concerns raised in the representations.

Questions

1. Strategic Policy 1.1 sets a threshold of 200 or more homes. How was this figure determined?

In the absence of guidance, a blend of technical work forming part of the local plan evidence base has influenced the size of site considered by the LPA as strategic through its plan review. Ahead of the review's formal commencement, Officers comprehensively appraised throughout 2019 a range of potential development locations, referred to as Strategic Growth Areas (SGA), around the Borough. SGAs ranged markedly in their sizes, with the smallest (SGA10: South of Little Eaton, a rejected site) assessed to have capacity for approximately 200 homes. No smaller site was assessed through the SGA appraisals. Progressing in parallel, but not directly linked to the LPA's SGA work, a Housing Market Area (HMA) study, the Greater Nottingham Growth Options Study (AECOM, July 2020) also provided direction on the matter of strategic sites. As part of its work, a call for sites across the five HMA councils in 2019 sought information from developers and landowners of sites able to accommodate a minimum of 250 homes. The threshold used was indicative but proved useful in generating engagement with the development industry, providing intelligence around where demand for strategic growth existed across the Greater Nottingham conurbation.

Further to technical work described above, a number of other factors helped the LPA to determine its view of what represented an appropriate scale for strategic development. These factors were:

- The characteristics and availability of land located within spatially preferable areas as indicated by the LPA's draft Sustainability Appraisal (SA).
- A starting range for strategic allocations that would stimulate interest from different parts of the development industry;

- The role smaller housing allocations can play in assisting accelerated housing delivery and strengthening the LPA's five-year housing land supply; and
- Introducing greater control on which sites should deliver or contribute towards key infrastructure, recognising that the vast majority of recent major housing development in Erewash has arisen from non-allocated land; and

The above factors saw the LPA establish a 200-home threshold for strategic development across the Borough, and this benchmark was applied throughout the local plan review.

2. In Strategic Policy 1.1 is the requirement to provide at least one off-street parking space per new dwelling served by an electric vehicle charging point justified?

Section 19A of the Planning and Compulsory Purchase Act 2004 requires development plan documents (taken as a whole) to include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Notwithstanding the sustainable location of the housing allocations, it is inevitable that any new homes on the periphery of a settlement will predominantly be accessed by private motor vehicles. Given the Government target for all new private cars to be carbon neutral in operation by 2035, new homes built without electric vehicle charging facilities are likely to be outdated before they are even built. The allocation of strategic scale housing sites allows these requirements to be planned into the development from the start, an opportunity that should not be missed at this stage of the planning process, which is in keeping with the requirements of Section 19A.

3. Should Strategic Policy 1.1 include any of the following requirements? What are the reasons for this?

- a. Sustainable surface water management and the drainage hierarchy**
- b. Overhead lines?**
- c. Public transport requirements?**
- d. Historic environment, heritage assets or their settings?**

a. Sustainable drainage is a requirement of Policy 1 of the extant 2014 Core Strategy. The Core Strategy Review will not replace that policy. There is therefore no requirement for additional policy wording on sustainable drainage in Strategic Policy 1.1.

b. Overhead lines are a site specific issue. It is therefore not appropriate to address issues of overhead lines at a cross-cutting strategic level in Strategic Policy 1.1.

c. Public transport requirements are a site specific issue. It is therefore not appropriate to address issues of public transport requirements at a cross-cutting strategic level in Strategic Policy 1.1.

d. The historic environment, heritage assets and their settings are a site specific issue. It is therefore not appropriate to address issues of historic environment, heritage assets and their settings at a cross-cutting strategic level in Strategic Policy 1.1.

4. Does the policy effectively protect ecological assets? Taking each of the following proposed site allocations individually in turn:

Ecological assets are a site specific issue. It is therefore not appropriate to address issues of ecological assets at a cross-cutting strategic level in Strategic Policy 1.1.

Ecological assets are protected by Policy 17 of the extant 2014 Core Strategy. The Core Strategy Review will not replace that policy. Ecological assets on all the allocation sites are therefore protected by this policy.

In respect to land at Stanton South, there are no designated ecological assets on or adjacent this site.

In respect to land at Acorn Way, Oaklands Brook is a designated local wildlife site within the site. Development of this allocation will have to take account of this by virtue of Policy 17 of the extant Core Strategy.

In respect to land north of Spondon, the Dunshill Shelterbelt is a designated local wildlife site which forms part of the eastern boundary, whilst Spondon Wood is a designated local wildlife site adjacent the site to northern site boundary. Criterion 1 of Policy 1.4 requires the new access arrangements to minimise disturbance to the Dunshill Shelterbelt, recognising that some disturbance is inevitable in order to create a safe access. Criterion 2 of Strategic Policy 1.4 requires a suitable interface to be provided to Spondon Wood, including a semi-natural buffer zone, to protect the biodiversity interest of the wood.

In respect to land south West of Kirk Hallam, Rifle Range Pond is a designated local wildlife site within the site, whilst Pioneer Meadows is a designated local nature reserve adjacent the site boundary. Criterion 5 of Strategic Policy 1.5 requires the provision of a green corridor through the allocation site, linking Pioneer Meadows to the wider countryside. Strategic Policy 5 designates this Green Infrastructure Corridor on the Proposals Map, which also incorporates Rifle Range Pond,.

In respect to land north of Cotmanhay, there are no designated ecological assets on or adjacent this site. Nevertheless, criterion 2 of Strategic Policy 1.6 requires a suitable interface to be provided to Cotmanhay Wood, including a semi-natural buffer zone to protect the biodiversity interest of the wood. Criterion 4 of Strategic Policy 1.6 requires biodiversity enhancements of Cotmanhay Wood to off-set the biodiversity impacts of the development.