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Erewash Core Strategy Review Examination

Matter 3 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 3 questions.

2. MATTER 3 – THE SPATIAL STRATEGY

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?

- 2.1 We support the broad principle identified in Policies 1 and 2 of focussing growth around the largest urban areas and towards the east of the borough, where the existing settlements form part of the Nottingham conurbation and there are good links to the strategic transport network. This broad approach supports a sustainable pattern of growth as advocated by paragraph 105 of the NPPF and the objectives set out in paragraph 104 of the NPPF, in terms of utilising existing infrastructure and encouraging sustainable modes of transport
- 2.2 However, we consider that the reliance on Stanton North in Policy 2 as the sole major allocation for new employment development would not support a sustainable pattern of development. The site is not well located in terms of the strategic road network, being some distance from Junction 25 of the M1 and not served by a direct major road. Whilst the possibility of a rail connection offers the potential for some element of rail freight, it is unclear to what extent this will actually be utilised by the employment uses on the site, or how many businesses could practically be served by this. Policy 1.2 also highlights how Stanton is not currently well served by public transport, thereby increasing the reliance on the car for workers.
- 2.3 This consideration of strategic connectivity is factored into the recommendations of the 2022 Nottinghamshire Core & Outer HMA Logistics Study (EBE2), which identifies an Area of Opportunity for strategic logistics development centred on Junction 25 of the M1, as a suitable and sustainable location for such development.
- 2.4 Therefore, in order to ensure a sustainable pattern of development in accordance with paragraph 11a of the NPPF, we consider that the provision of additional employment land close to Junction 25 of the M1 would deliver a more sustainable spatial strategy overall. This would provide a location for strategic logistics development that has good access to the strategic road network whilst also being well served by public transport, in close proximity to Long Eaton and Sandiacre, with good access to local labour.

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

- 2.5 The Council's response to the Inspector's Initial Questions (EBC01) sets out the assessment of options undertaken in relation to housing supply, resulting in the Options for Growth document

(EBH5). However, in relation to economic development, the Council's response to the Inspector's Initial Question 14 indicates that no options aside from Stanton North were considered. This was on the basis of no other large scale sites outside the Green Belt being promoted for employment purposes.

- 2.6 We have set out in our Matter 1 and Matter 8 Statements and in our previous representations how we consider this to be a flawed approach, given the scale of the need for strategic employment floorspace, the lack of a comprehensive strategy across the HMA to meet the full identified need, and the suitability of land adjacent to Junction 25 of the M1 to meet this need, thereby providing Exceptional Circumstances for release of Green Belt land.
- 2.7 In this context, the land adjacent to Junction 25 of the M1 was a reasonable alternative which in our view should have been assessed by the Council. Aside from the shortcomings of the SA in this regard, discussed in our Matter 1 Statement, this results in a significant soundness issue for the Plan, as it does not provide a positive strategy to meet objectively assessed needs or constitute an appropriate strategy that takes into account the reasonable alternatives. Accordingly, we consider that the Plan is not positively prepared or justified as required by paragraph 35 of the NPPF.
- 2.8 It is notable that the Regulation 19 version of the Plan was published before the publication of the Nottinghamshire Core & Outer HMA Logistics Study (EBE2), and therefore could not have taken account of the evidence regarding the scale of the need for strategic logistics development within the HMA. This should have subsequently caused the Council to review its strategy and at least assess reasonable alternatives in response to the evidence, however the reliance on Stanton North as the sole major employment allocation was seemingly fixed by this stage, and no alternative options were considered.
- 2.9 Further details are provided within our Matter 8 Statement on the need for additional strategic logistics development and the soundness issues caused by the failure of the Core Strategy Review to plan positively for this identified need.

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

- 2.10 The Council explains in its response to the Inspector's Initial Questions (EBC01) that it did not undertake a site selection exercise in relation to employment development. Given its desire to find a viable use for the Stanton North site, and its (in our view misplaced) judgement that the 55 ha (40 ha minimum) of employment land allocated will be sufficient to meet and exceed its employment needs to 2037, it did not consider any alternative options to be 'reasonable'. The Stanton North site has thus been presented as the only option available to the Council to meet its employment needs.

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- 2.11 However, as discussed in our previous representations and Matter 1 & 8 Statements, we consider that this was a flawed approach and did not give appropriate weight to the need for strategic logistics development. We consider that in light of the 2022 Nottinghamshire Core & Outer HMA Logistics Study (EBE02), which forms a key part of the Council's evidence base, and the emerging Greater Nottingham Strategic Plan, which only seeks to accommodate a portion of the total need identified for the HMA, the Council should have undertaken a broader site selection exercise to assess the options for allocating employment sites that had been promoted, but which were dismissed due to being located in the Green Belt.

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?

- 2.12 As the Council did not undertake a site selection exercise for employment allocations, there is no evidence that the infrastructure requirements of the proposed allocation (Stanton North) were considered in any detail, or that these matters informed the site selection process. The SA does include assessment criteria such as transport in relation to the 4 policy options considered, however given there was no site selection exercise for the proposed employment allocations, there was a lack of detailed consideration of specific infrastructure issues or how these compared to other growth options.
- 2.13 A comparative exercise considering reasonable alternatives such as the land southwest of Junction 25 of the M1 would have highlighted the relatively poor connection of Stanton North to the strategic road network and the lack of existing public transport, which should have been relevant factors when considering the overall spatial strategy and growth options for employment development.

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?

- 2.14 Whilst the Spatial Strategy broadly seeks to locate growth towards main urban areas, the employment strategy only includes one major allocation, which as discussed above does not meet identified needs. Therefore we do not consider that the Plan is positively prepared in this regard, and the Spatial Strategy is not justified, given it fails to take account of the Council's own evidence base which identifies a significantly greater need than 40 ha of employment land.
- 2.15 The Stanton North site is more suited to local employment needs, rather than a strategic logistics site, given its location some distance from the strategic road network. Meanwhile the Strategy's reliance on a single employment site (which requires extensive remediation) would involve significant risk in terms of delivery, with a lack of diversity to encourage swift delivery or to provide choice in the

market for occupiers. Therefore in overall terms we do not consider that the Spatial Strategy is effective.

- 2.16 Meanwhile the failure to meet identified employment needs means that the Spatial Strategy is not consistent with national policy, as it does not place sufficient weight on need to support economic growth, in particular considering both local business needs and wider opportunities for development, as required by paragraph 81 of the NPPF. Furthermore, the failure to plan for strategic logistics in suitable strategic locations means the Plan will not address the specific locational requirement of this particular sector. Paragraph 83 of the NPPF specifically refers to planning for storage and distribution operations at a variety of scales and in suitably accessible locations. The reliance on a single 40-55 ha site at Stanton North does will not achieve this, and therefore will not be consistent with national policy.