

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

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.

Relevant Policies: 1, 2

Questions

- 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?**

Yes, the adopted Core Strategy and Core Strategy Review, when taken as a whole, provide a clear and cohesive framework for the future growth and development of the borough. The vision and strategic objectives set out in the adopted Core Strategy are relevant to the Core Strategy Review Document, which further supports them through its Spatial Portrait and policies.

- 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?**

Paragraph 11a states the following:

Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

Practice guidance states that this should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally. It clarifies that there is no need for a plan to directly replicate the wording in paragraph 11 in a policy.

As will be set out below, the Core Strategy Review achieves a sustainable pattern of development by identifying a spatial hierarchy, which is informed by a robust Sustainability Appraisal (SA).

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

Sustainability Appraisal 1 (SA1) assessed eight broad options for growth which encompasses all reasonable approaches to spatial distribution.

These were:

- a. Growth within Long Eaton Urban Area (the conurbation)
- b. Growth within Ilkeston Urban Area (the town)
- c. Growth within the Rural Area (the villages)
- d. New Settlements not in the Green Belt
- e. Extension of the conurbations (including Derby City) into the Green Belt
- f. Extension of the town into the Green Belt
- g. Extension of the villages into the Green Belt
- h. New Settlements in the Green Belt

Each were subject to the same assessment criteria originally developed in the SA Scoping Report and detailed conclusions can be found in Section 4 of SA 1 – Strategic Growth Options (Evidence Base Library Core Documents ref CD9). It focused on assessing each option on its own merits, without prejudice from other options.

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

The SA Framework forms the basis of the conclusions regarding the 8 growth options which are set out in SA 1. This is available to view as a standalone document within the examination evidence base library (CD9).

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

The SA 1 conclusions informed the settlement hierarchy and reflects which options performed best under testing. The hierarchy was predicated on the need to locate strategic growth in sustainable locations that benefitted from existing infrastructure and patterns of built-up development. This is considered to be a highly robust and transparent method of formulating a settlement hierarchy.

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?

As explained elsewhere, the identification of potential sites has been guided by a sustainable spatial hierarchy which gives favour to locations adjoining the larger urban areas. The conurbations provide the most comprehensive infrastructure, followed by the town and then smaller settlements. The SA clearly shows the constraints (and opportunities) of growth around the Borough and has helped the Council to take decisions about suitable locations for new growth and the suitable level of development at each one.

The levels of development within the two urban areas reflects their maximum deliverable urban capacity having regard to the 2022 SHLAA (EBH4) as is the case with regard to brownfield land not in the Green Belt. The level of development assigned to urban extensions into the Green Belt is derived from the SGA assessments and information provided by site promoters. (SGA Assessments can be found in the evidence base at EBH1).

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

Yes. As set out above this reflects a detailed site by site assessment of urban capacity brownfield land, having regard to findings set out in the 2022 SHLAA. As a result of successive local plans over past decades being focussed on urban intensification, there are now limited strategic development opportunities outside of the Green Belt.

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?

Yes. The Council has exhausted all deliverable options outside of the Green Belt to meet its housing requirement as evidenced in the 2022 SHLAA. The Council recognises the urgency in identifying sites that enable it to plan positively and significantly boost local housing delivery and meet objectively assessed needs. Given the out-of-date status of the current Local Plan and poor levels of housing delivery, further delay would only serve to increase risks to the Green Belt from planning decisions that invoke the presumption in favour of sustainable development. Such an outcome could result in speculative, unplanned development that is less sustainable and in conflict with the council's evidence based spatial hierarchy.

9. What factors were taken into account regarding the suitability of each of the rural villages/ settlements to accommodate growth? What is the basis for the conclusions in each case and are these justified?

The Council, through the development of the spatial strategy, guided by the SA, has helped distribute strategic housing sites to appropriate locations within Erewash where advanced forms of infrastructure are more readily available to cope with the additions of larger scales of new development. As well as environmental and landscape-based reasons, it is not felt that the promotion of strategically sized housing allocations away from the Borough's towns represents a sustainable growth strategy. This is due to the distance from key services/facilities, and difficulties in making effective connections to the localised road network with challenges for sustainable travel via public transport. The Erewash 2022 SHLAA identifies a range of non-strategic housing sites throughout the rural parts of the Borough that can contribute towards the need for new housing and help sustain vitality in Erewash's rural settlements.

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

The Borough Council has extensively assessed growth options around the borough right from the outset of the Core Strategy Review. The locations of identified housing sites were informed by the establishment of a spatial growth hierarchy that sought to direct growth to more sustainable locations where advanced forms and networks of infrastructure are present. Both the spatial strategy and the choices of individual growth sites were comprehensively tested across the Core Strategy Review process, but particularly by the Sustainability Appraisal.

SA 3 - Housing Allocations Options (ref CD4) appraised 25 potential housing allocations – sites that had been made known to the Council by promoters either prior to commencement or during the Core Strategy Review process. All potential housing allocations spanned the entire spectrum of strategic growth options appraised within SA1 - Strategic Growth Options. The assessment tables for each housing allocation option are contained within appendices B1-B6 of the Submission Version Sustainability Appraisal (ref CD7 E-K). The following order of top ten sites emerged from the work and it was found that in general sites scoring -10 and upwards were comfortably within the most sustainable half of site options appraised.

The sites that form allocations in the submitted version of the Core Strategy Review are considered the most appropriate locations to accommodate the Borough's development needs whilst being achieved in sustainable locations and when combined with sites identified in the 2022 SHLAA, provides for sufficient land to meet Erewash's longer-term housing needs.

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

The 2022 SHLAA, Housing Trajectory (EBH3a), a revised Trajectory (EBH3b/EBC11) and updated Five-Year Housing Land Supply statement (EBH3) to support the Submission Version document provide further information and clarity about the

availability deliverability of housing land in Erewash and demonstrate the existence of a 5-year land supply. The plan's housing requirement will also adequately provide for affordable housing needs across the Borough, whilst site promoters of the four housing allocations on Green Belt have provided the Council with sufficient evidence to demonstrate each can deliver a timely and early boost to the supply of new housing and address the persistent under-delivery of new homes in Erewash. Furthermore, Land North of Spondon is now subject to a live planning application.

The council undertook a viability appraisal in autumn 2023 which included input from all four promoters of Green Belt sites. The methodology comprised high level testing, large site analysis and the assessment of small site/ affordable housing thresholds. The report, which found the plan to be viable can be located in the Examinations library. (EBCO4) An addendum to assess the site promoter's revised quantum of housing at Land SW of Kirk Hallam can be found at EBC04a.

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?

From the outset, the SGA assessments (EBH1) informed the site selection process by providing an analysis of infrastructure requirements, including roads, public transport, school provision, green and blue infrastructure, utilities and community facilities. Specifically with regard to roads, this included an assessment of vehicular access arrangements and a high-level junction capacity analysis. This work looked to identify appropriate access points to sites and impacts from development on nearby junctions and was part of the overall assessment of the suitability of different sites as potential housing allocations.

This work was updated, where required, in response to any changes to potential site allocations or their circumstances which emerged through the various stages of public consultation undertaken. The Infrastructure Delivery Plan (EBC06) sets out the specific infrastructure requirements related to each site.

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?

Yes, the spatial strategy is supported by a robust evidence base which clearly details the process of assessing the options for growth. The settlement hierarchy is justified by the conclusions of the SA process with a resulting broad range and mix, that promotes development at six of the eight spatial options considered by SA 1. The answers provided in Qs 1-12 above set out how the spatial strategy supports the requirement under NPPF para 11a for plans to promote a demonstrably sustainable pattern of development.