

Erewash Core Strategy Review

Amendment Public Consultation

Bloor Homes Ltd (May 2025)

Professional memberships and accreditations



Fisher German LLP is a limited liability partnership.
Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office,
Ivanhoe Office Park, Ivanhoe Park Way, Ashby-de-la-Zouch, Leicestershire, England, LE65 2AB. A list of
members' is available for inspection at Head Office.

1. Introduction

- 1.1. These representations are prepared by Fisher German on behalf of Bloor Homes Ltd in respect of their land interests on the Derby City urban fringe within Erewash. These representations should be read alongside the following appendices:
 - Appendix 1 – Land west of Dale Road, Spondon Call for Sites Form
 - Appendix 2 – Land west of Dale Road, Spondon Concept Masterplan
 - Appendix 3 – Land East of Morley Road Call for Sites Form
 - Appendix 4 – Land East of Morley Road Concept Masterplan
 - Appendix 5 – Land north - east of Acorn Way Call for Sites Form
 - Appendix 6 – Land north - east of Acorn Way Concept Masterplan
- 1.2. As part of Erewash's Call for Sites earlier this year, 3 parcels of land were submitted to Erewash for consideration as part of the Inspector's requirement for additional housing land to be found to enable the Core Strategy Review to be found sound. This included 2 proposed expansions to the Derby suburb of Oakwood (CSR-0042 – Land East of Morley Road and CSR0043 – Land north - east of Acorn Way).
- 1.3. A further submission was made to provide an extension to the North of Spondon Draft Allocation (SR 0041 – Land West of Dale Road).
- 1.4. North of Spondon 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", subject to site specific criteria and is identified on the supporting policies map.
- 1.5. 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. A resolution to grant planning permission was made on the 12 February 2025 with the planning obligation completed and decision notice subsequently issued on the 4 March 2025, under the 'Golden Rules' principles of the 2024 NPPF, but having regard for the requirements of the draft Erewash Core Strategy Review also. The SoS was asked to call the application in, but declined. Bloor Homes are now working on the various dischargeable conditions and other applications needed to enable development to commence.
- 1.6. In respect of the Dale Road expansion, Bloor Homes will give consideration to using its Fitchett Homes product for this extension. Fitchett Homes a separate brand of Bloor Homes which would enable multi-outlet delivery, as to not impede the delivery of the North of Spondon allocation and increase 5-year delivery. This extension could be delivered relatively simply through the approved Bloor Homes scheme to the south, as demonstrated on the appended concept masterplan. The other sites are intended to be delivered by Bloor Homes.
- 1.7. All land parcels are under the control of Bloor Homes, who are well equipped and prepared to deliver additional housing in a strong market area with latent demand due to a lack of residential development (particularly in Spondon and Oakwood) due to application of Green Belt policy (and Green Wedge within Derby City), but also housing needs emanating out of Erewash and Derby City.

2. Representations

- 1.9. The Council propose an additional 7 residential allocations, amounting to just under 1,000 additional dwellings. This has been provided as a direct response of the comments of the Core Strategy Review Inspector who concluded that the submitted strategy was likely to yield to a shortfall of 820 dwellings, with at least 218 dwellings being required to count towards the immediate 5 year housing land supply. The Inspector continued *"given the marginal supply in relation to requirements it would be sensible to identify sufficient capacity to provide a reasonable amount of flexibility in addition to this"*. Should it however be established that there is a further shortfall of housing land supply, either in totality or over a 5-year period, all of the sites submitted by Bloor Homes (referred to above) are well positioned to address the additional need, particularly given they are under control of a major housebuilder who can expedite delivery (as demonstrated through the achievement of planning permission on North of Spondon (CSR Policy 1.4), at a time when none of the other CSR allocations even have planning applications submitted).
- 1.10. Our representation focuses on land west of Dale Road, Spondon and the omission of the site within the consultation document. Whilst the two Bloor sites at Oakwood are well placed to meet housing need, and considered to be suitable for development, these representations focus on the land west of Dale Road, Spondon. This is because Bloor Homes do not agree with the conclusions of the Green Belt assessment which discounted the site, despite its high scoring in the Sustainability Appraisal.

Land west of Dale Road, Spondon

- 1.11. The land west of Dale Road, Spondon (SR-0041) is a natural and easily deliverable expansion of the North of Spondon CSR allocation (CSR 1.4). This parcel is enclosed by Spondon Wood to the west, Dale Road to the east, the committed development of North of Spondon to the south and existing field boundaries, mature vegetation and a farmstead to the north. Through relatively minor and standard amendments, an access road can be located to access the field parcel immediately west of Dale Road from the committed development at North of Spondon.
- 1.12. Crucially, the site is acknowledged in the SA assessment to be the 3rd most sustainable of the additional sites assessed and is only not proposed for allocation due to the Council's incorrect assessment of its impact on the Green Belt.
- 1.13. We concur with the Council's SA scoring, which concludes that the site is highly sustainable, and certainly comparable to much of the housing on the North of Spondon allocation, which now benefits from a full planning permission. It should be noted that this decision was not called in by the SoS and the CSR Inspector raised no significant concerns in respect of its allocation. The additional land would benefit from various measures agreed as part of the North of Spondon scheme, including improved connectivity to bus stops on Dale Road, bus stop improvements and other new linkages enabling easy movement to and from the existing built up area. The SA has not raised any obvious site constraints. The site is demonstrably sustainable.
- 1.14. Turning to the Green Belt assessment, it is recognised that this must be read in accordance with the applicable PPG, i.e. not the 2025 revision relating to Green Belt, which was introduced in accordance with the 2024 NPPF, is not applicable to this examination. As such, the assessment of land must consider all relevant purposes of the Green Belt and not limit itself to those specifically related to Grey Belt.
- 1.15. Our assessment of the site in Green Belt terms is provided below.

To check the unrestricted sprawl of large built-up areas

- 1.16. The technical assessment of the Green Belt (2012) outlines how the Direction C Area of Green Belt helps to define the eastern edge of the City and constrains sprawl, but this relates to a significant area of land, and thus the conclusions whilst relative are not directly applicable to smaller, enclosed parcels such as that submitted West of Dale Road. This proposal would not extend Derby City further east and only slightly further north at a very local level than that already committed (with Oakwood to the west extending much further north than Spondon).

- 1.17. The site is well contained by woodland to the west and a thick border of mature vegetation and Dale Road to the east. Further planting of vegetation on the northern boundary of the site would enclose the site further and prevent further urban sprawl northwards. The southern boundary borders the draft residential allocation (with a consented application) and thus the site will be adjacent to built form.
- 1.18. The Erewash Green Belt Review (2025) concludes *"Overall, Green Belt designation inside Erewash which adjoins the Derby urban area is assessed to contribute a more limited role in checking urban sprawl. For the most part, defensible boundaries are present at locations within abutting Green Belt designation that could, if required, play a role in effectively containing further growth of the urban area, removing any consideration that development at the locations described above could be considered as unrestricted or sprawl"*.
- 1.19. The Council's Site Selection Topic Paper (2025) concluded that the site *"performs less well against the Green Belt Review due to impact on urban sprawl"*. Fisher German conclude with the Green Belt Review, that the site plays a limited role in checking the urban sprawl of Derby, due to the presence of defensible boundaries. Spondon Wood to the west, Dale Road to the east and existing mature vegetation and retained farmstead to the north. Due to existing mature vegetation, particularly along Dale Road, there would be limited perception of development behind, thus an extension of Derby on the Dale Road axis would not be noticeable beyond that which has already been approved. The site is not widely visible from public vantage points, and will be largely limited to from within the North of Spondon allocation itself.
- 1.20. We therefore do not accept that the site contributes to urban sprawl, which was the primary reason for the site not being proposed for allocation. As such, this site should have been considered more positively. A finer grained review of the Green Belt in this location should have been undertaken by the Council.

To prevent neighbouring towns merging into one another

- 1.21. The technical assessment of the Green Belt (2012) states that the Green Belt in the Direction C Area of Derby's Green Belt prevents the coalescence of the cities of Derby and Nottingham. The site is located adjacent to the Land north of Spondon (draft strategic policy 1.4) on the edge of the built form of Spondon and so when considering its context, the site performs a very minor role in preventing the coalescence of these conurbations. As already mentioned, the mature border of vegetation on the eastern boundary and Dale Road act as a defensible boundary to further development eastwards towards Ockbrook. The Council's Green Belt Assessment 2025 does not demonstrate any further issue against this category, and clearly demonstrates that this site would not materially result in the merging of towns (or any other settlement).
- 1.22. Consequently, we consider that the site only performs a 'minor' role against this purpose.

To assist in safeguarding the countryside from encroachment

- 1.23. Whilst we accept the development of this site would lead to some form of encroachment (as is the case with almost all edge of settlement Green Belt release), we do not consider that the site plays an 'important' role with regards to this purpose of the Green Belt. The boundaries of the site are defined by approved built form, woodland or mature vegetation and trees. The site's northern boundary whilst well defined by existing field boundaries, mature vegetation and farmstead, could be strengthened further through site design and landscaping. This means that the proposal will be very well contained and will not result significant encroachment.
- 1.24. As a consequence, we consider that the site should be considered as performing a 'minor' role of this Green Belt purpose.

To preserve the setting and special character of historic towns

- 1.25. There would be no harm through the development of the site against this purpose of the Green Belt.

To assist with urban regeneration, by encouraging the recycling of derelict and other urban land

- 1.26. The development of this site would have a minor impact on this purpose. As already established through work of the Council and EiP, there are no viable brownfield alternatives in Erewash. The site therefore performs no role against this purpose.
- 1.27. It is noted that the Derby urban fringe allocations have not been assessed comparably to other sites in the district, assessed as strips rather than parcels. As such, this site lacks a specific parcel assessment which, it is contended, would have resulted in a different conclusion. Whilst we appreciate that the principle of village related growth was broadly agreed in the examination, urban fringe growth should have been considered on a consistent basis.
- 1.28. Considering the above, it is apparent that the site's Green Belt contribution has been overestimated and in reality there would be limited actual or perceived harm to the openness or purposes of the Green Belt, including urban sprawl. The site is acknowledged to be one of the most sustainable available to the Council, thus should be allocated. This additional supply created by the allocation of the site would benefit the Council's land supply, at best increasing the buffer and at worst mitigating any further losses to supply due to continued inertia on the other retained CSR allocations. Bloor Homes have invested heavily into expediting early delivery in Erewash and remain committed to doing so should the opportunity arise.
- 1.29. This extension could be delivered on the same terms as the other Derby City urban fringe allocation, could provide much needed additional financial contributions to the provision of affordable housing in areas with the highest quantum of need (as has been secured through the North of Spondon allocation). Its allocation would cause negligible harm, whilst providing a myriad of benefits.
- 1.30. This site can be delivered without undue delay to the delivery of the approved housing at North of Spondon. As set out in the introduction, the intention of Bloor Homes would be to deliver this site through its Fitchett Homes outlet, thus to enable the site to be opened up to multi-outlet delivery which would increase the yield of this site. This will increase delivery within the first 5-year period.
- 1.31. The approach adopted is not sound, as the assessment of the land west of Dale Road is not justified, nor is the failure to allocate such eminently suitable site effective or consistent with national policy (NPPF Paragraph 35). This site can be allocated without undue harm to the delivery of the remainder of the allocation and will provide additional buffer to safeguard the Plan moving forward in accordance with the recommendations of the Inspector. The Inspector confirmed in the post hearing note that additional flexibility was required in order for the Plan to be found sound, this additional allocation would provide a further buffer which will help demonstrate delivery, both in the first 5-years and over the Plan period.
- 1.32. Should there be any requirement for additional housing, either due to supply being challenged elsewhere or due to a need to provide a more robust buffer, this site is available and an application would be submitted in the short term. Even designating the site as safeguarded land would be considered a positive and commensurate action.