



Ref: MLP-25-J031

Date: 16/05/2025

Erewash Borough Council  
Town Hall  
Wharnccliffe Road  
Ilkeston  
Derbyshire  
DE7 5RP

Dear Sirs

**RE: EREWASH CORE STRATEGY REVIEW AMENDMENT – CONSULTATION**

It is understood that Erewash Borough Council is currently undertaking a public consultation on the Core Strategy Review document as part of the ongoing independent examination. The consultation runs until Monday 19 May 2025.

Mair Land & Planning Consultants Ltd has been instructed by its client to engage with the consultation in respect of a potential development opportunity, relating to land west of Hopwell Road, Draycott (referred to as 'the site' hereafter). The site is available and deliverable.

The basis of our submission is to support housing growth within the Borough and propose an additional site for allocation within the Core Strategy Review document. We consider that this is necessary to ensure the Council delivers suitable sites in sustainable locations to meet its current and future housing needs, particularly in light of the revised standard methodology for calculating housing need as set out in December 2024. It is understood that the Local Housing Need under the previous standard method for Erewash Borough stood at 376 dwellings per year, and the Local Housing Need under the new standard method is 523 dwellings per year.

It is noted in the Inspector's Post Hearings Letter (4 September 2024) and subsequent letter of 5 November 2024 that there is a requirement for the Council to undertake a systematic evaluation of the Erewash Green Belt and identify sufficient, additional housing sites to achieve a 5 year housing land supply position at the point of adoption and to meet the housing requirement of the whole plan period.

The site to which our submission relates is identified in the plan below, outlined in red.



The site is located to the north of Draycott and is currently located in the Green Belt. It comprises 13.3 ha (33 acres) and is located to the west of Hopwell Road. The site benefits from direct access from the public highway, with suitable visibility splays achievable at several points along Hopwell Road.

The site boundaries are made up of existing hedgerows and field boundaries. The site is bound by Brookside Boarding Kennels & Cattery to the north, Hopwell Road to the east, the railway line to the south and agricultural land to the west.

The settlement of Draycott benefits from a good level of local service provision, including a primary school and nursery, coffee shops, takeaways, newsagents and small grocery shops. The majority of local services within Draycott are within walking distance of the site, and would be accessible via existing pedestrian footpaths.

Whilst the site is located within the Green Belt, it is proposed that the removal of the site from the Green Belt would enable the delivery of circa 200-250 new homes, including affordable dwellings, and land for community benefit (possibly to include land for car parking for the existing cemetery opposite the site) and ecological enhancement. The site benefits from an existing access off Hopwell Road and it is proposed that a safe and suitable access could be delivered to support a residential development scheme.

The proposed removal of the site from the Green Belt has been assessed against the provisions of paragraph 145 of the National Planning Policy Framework, which identifies the five purposes for including land within the Green Belt, as follows:

- a) to check the unrestricted sprawl of large built up areas;
- b) to prevent neighbouring towns merging into one another;

- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In assessing the site against the five above purposes, we comment as follows:

- ***‘to check the unrestricted sprawl of large built up areas’*** – The site lies immediately to the north of the village of Draycott and benefits from strong defensible boundaries to the north and east.
- ***‘to prevent neighbouring towns merging into one another’*** – Development of the site would not result in the merging of Draycott with another settlement. The nearest settlement is Borrowash and there is a significant area of separation between the two settlements.
- ***‘to assist in safeguarding the countryside from encroachment’*** – Whilst the site sits to the north of the existing railway and within the countryside, the built up area of the settlement is visible from the site, particularly as you approach Draycott from the north on Hopwell Road. There are also existing businesses to the north of the site, including the Brookside Boarding Kennels & Cattery, the Canal Cottage Coffee, along with residential properties.
- ***To preserve the setting and special character of historic towns’*** – The site is not located within a conservation area and development will not impact upon the setting of listed buildings or other sites benefitting from heritage status.
- ***To assist in urban regeneration, by encouraging the recycling of derelict and other urban land’*** – It is acknowledged that the site is greenfield and therefore development would not assist in urban regeneration. However, the Council has accepted that there is insufficient brownfield sites within the Borough to meet its identified housing need. Therefore, the release of the site would not conflict with this purpose.

In respect of releasing land from the Green Belt for development, the NPPF continues, as follows:

*155. ‘The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*

*156. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions (‘Golden Rules’) should be made:*

- a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- b. necessary improvements to local or national infrastructure; and*
- c. the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.*

*157. Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.*

*158. A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.'*

Regarding the sites designation as 'Green Belt', and with reference to Paragraph 155 of the NPPF, development of new homes within the Green Belt should not be regarded as inappropriate if four conditions can be met, as follows:

- The site is Grey Belt
- There is a demonstrable unmet need for new homes
- The site is sustainably located, and
- The new 'Golden Rules' are met.

The Glossary to the NPPF defines Grey Belt as including land in the Green Belt that does not contribute to the purposes of either checking the unrestricted sprawl of built up areas, preventing neighbouring towns merging into one another, or preserving the setting and special character of historic towns.

It is proposed that development of the site would not amount to 'unrestricted sprawl'.

A recent Planning Committee report suggested that sprawl can be defined as '*poorly contained development*'. The northern boundary of the site comprises the restored canal and footpath, along with the existing Brookside Boarding Kennels & Cattery, which would prevent further development to the north. The site is bound by Hopwell Road to the east and the railway line to the south, which prevents further sprawl in these directions. It is considered that the site is well contained with strong defensible boundaries. Development of the site would not lead to neighbouring towns merging into one another or impact upon the setting and special character of historic towns. It is therefore considered that the site is capable of being described as Grey Belt.

Regarding housing need, it is accepted by the Council that it has consistently failed to deliver its objectively assessed housing need and a recent Planning Committee report confirms '*it has consequently failed to meet the housing delivery test in every year since its introduction. The Borough also does not have a five year land supply. An unmet need for housing has therefore been demonstrated.*'

It is proposed that the site is located within a sustainable location, suitable to support future housing growth. The site is accessible by a choice of modes of transport with good pedestrian links to existing services and public transport links in Draycott.

The 'Golden Rules' defined in Paragraph 156 of the NPPF as the provision of defined contributions to affordable housing, necessary improvements to infrastructure, and suitable improvements to accessible green space. It is considered that development of the site could meet these tests, by way

of delivering affordable housing land, land for community benefit and open space, as part of a development proposal.

It is considered that the four conditions set out in Paragraph 155 of the NPPF are met.

In response to the current consultation, we support the Council's approach in releasing land from the Green Belt to accommodate future growth and meet its identified housing need. However, we propose that the Core Strategy Review should allocate further sites, including Reserve Sites, in order to provide a robust and flexible strategy relating to the delivery of new homes.

It has been demonstrated that the site is suitable and deliverable. It therefore should be considered as a proposed allocation.

I would be grateful if we could be informed of future consultation stages.

Kind regards



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