



**Erewash Borough Council:  
Core Strategy Review Amendment Consultation**

**P&DG on behalf of Redrow Homes Limited**

**May 2025**

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## 1.0 Introduction

- 1.1 These written representations have been prepared by Planning and Design Group (UK) Limited ('P&DG') on behalf of Redrow Homes Limited ('Redrow') in response to Erewash Borough Council's Core Strategy Review amendment consultation.
- 1.2 Redrow have been actively involved through the preparation and examination of the Core Strategy Review and these representations are made within the context of seeking to work positively with the Council and the Planning Inspectorate to ensure that the review is found sound, effective and deliverable.
- 1.3 The purpose of these representations is to set out our support for the efforts made by the Council to proactively seek to address the concerns previously raised by the Planning Inspectors. It is within the social, economic and environmental interests of the Borough as a whole that a positive strategy that will genuinely deliver much needed housing development, investment and economic growth is achieved.
- 1.4 Redrow are in control of **Land at Acorn Way, Derby** that has been a longstanding proposed housing allocation within the Erewash Core Strategy Review. The allocation has been amended to address specific queries in the Inspectors post-examination letter to the Council, which are considered below in detail.
- 1.5 Overall, it is considered that the proposed amendments to the allocation of Land at Acorn Way, Derby are appropriate. Moreover, that the additional evidence prepared by the Council, and the subsequent amendments to the Core Strategy Review is sufficient to ensure that the plan is positively prepared, justified, effective and consistent with national policy, as required by the NPPF. As such, the review is sound and can now proceed to adoption by the Council.

## 2.0 The Importance of a Genuinely Plan-led System

- 2.1 The National Planning Policy Framework ('NPPF') is clear that its purpose is to provide a framework within which locally prepared plans can provide for sufficient housing and other development in a sustainable manner. Critically, that **preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective** (Paragraph 1) and that the planning system should be **genuinely plan-led** (Paragraph 15) (our emphasis added).
- 2.2 The importance of plan-making is also reflected in the Minister of State for Housing and Planning, Matthew Pennycook's, letter to the Planning Inspectorate on 30<sup>th</sup> July 2024. The letter states: *'The Government knows how essential it is that local authorities have an up-to-date local plan in place as a basis for making sustainable decisions about the future of our cities, towns and countryside.'*
- 2.3 Whilst recognising the importance of plan-making and the length of time that Local Plan examinations are currently taking, Matthew Pennycook encourages Planning Inspectors to take a **pragmatic approach** where it is likely that the plan is capable of being found sound with limited additional work to address soundness issues (our emphasis added).
- 2.4 The letter from Matthew Pennycook is also specifically referred to in the Inspectors letter to the Council of 5<sup>th</sup> November, which set out a number of key matters that Council must address in order for the Core Strategy Review to be found sound. It is, therefore, our understanding that Inspectors consider that a pragmatic approach is appropriate in this instance and that the plan is capable of being found sound subject to the additional work being undertaken by the Authority.
- 2.5 The key issues that were raised in the Inspectors letter to the Council included:
1. *Undertaking a systematic evaluation of the Erewash Green Belt.*
  2. *Assessing the impact of all existing and potential new site allocations on the Green Belt within the Borough.*
  3. *Identifying sufficient, additional housing sites to achieve a 5-year housing land supply at the point of adoption and meeting the housing requirement of the whole plan period.*
  4. *Identifying the infrastructure implications of additional site allocations.*

5. *Undertaking additional sustainability appraisal work, including appraising all potential new housing sites.*
6. *Producing an updated housing trajectory with sufficient evidence to enable proper testing of all the different elements that are expected to make up the housing land supply.*
7. *Additional previously identified work including work related to the settlement hierarchy and growth strategy, additional transport evidence to support an existing housing allocation and additional evidence to support Strategic Policy 5.*
8. *How and when there will be engagement with different stakeholders, interested parties and Members.*

2.6 In response to the above, the Borough Council have undertaken a substantial body of work, including undertaking a Green Belt Review (published in January 2025), identifying additional housing sites and assessing them against the Green Belt (as set out in the published Site Selection Paper.

2.7 Additionally, updates have been made to the technical evidence underpinning the Local Plan Review, including amendments to the Transport Assessment, Heritage Impact Assessment and Sustainability Appraisal.

### **Importance of a Local Plan for Erewash**

2.8 The importance of new Local Plan is perhaps even more pertinent in a Borough such as Erewash, where there are high levels of economic and social deprivation, and where the majority of land availability for development lies beyond existing settlement boundaries, and therefore, within the Green Belt.

2.9 The adoption of a new Local Plan is critical in providing certainty to developers, such as Redrow, to deliver the housing that the Borough readily needs. In doing so, this will in turn lead to the securing additional affordable housing, economic growth and improvements to the social infrastructure in the area including health, education and community infrastructure through S106 contributions. Additionally, it will bring environmental benefits through the delivery of 10% biodiversity net gain and other green infrastructure enhancements.

- 2.10 Indeed, the consequences of non-adoption would be significant, undermining confidence in the plan-led system and delaying the realisation of important social, economic and environmental objectives.
- 2.11 Additionally, there will remain very little certainty for developers to bring residential sites forward, which risks the further worsening of levels of social and economic deprivation within the Borough, and a lack of investment into the area to help alleviate these issues. It would also risk wasting further considerable time and public resources already invested in preparing the Local Plan Review and responding to the Inspectors concerns.

### **Conclusion**

- 2.12 In light of the comprehensive evidence now submitted and the scale of work undertaken, It is our view that given the proposed amendments address the fundamental soundness issues raised by the Inspector. As such, the plan is entirely sound and capable of being adopted.
- 2.13 Should any remaining concerns be identified, it would be entirely appropriate and consistent with national guidance that these are addressed through an early review process rather than derailing the current Local Plan Review.
- 2.14 Ultimately, as the NPPF affirms, the fundamental purpose of the planning system is to contribute to the achievement of sustainable development. This includes meeting housing needs, supporting economic growth, and improving social and environmental outcomes. In that context, the adoption of the Erewash Core Strategy Review—with its proposed amendments—must be viewed as an absolute priority.

### 3.0 Land at Acorn Way, Derby

- 3.1 Land at Acorn Way, Derby is a long-standing proposed residential allocation within the Erewash Core Strategy Review, which is reflective of its suitability as a sustainable location for residential development. The allocation of the site is fully supported by Redrow who are committed to seeing the successful delivery of the site once the plan review has been formally adopted.
- 3.2 The site is well established as an available, suitable, deliverable and economically viable residential development opportunity. Moreover, there are no insurmountable technical constraints that would preclude its development that cannot be appropriately mitigated and subject to the adoption of the plan the site would come forward imminently.
- 3.3 Notwithstanding this, the Inspectors post-examination letter to the Council identified two specific concerns with the allocation, as follows:
- An absence of evidence to support the highways improvements required to support the housing allocation identified in Strategic Policy 1.3 Land at Acorn Way.
  - Lack of evidence to support the locational requirements of the policy with regards education provision in Strategic Policy 1.3 Land at Acorn Way and Strategic Policy 1.4 North of Spondon.
- 3.4 As a result of additional technical evidence, the Core Strategy Review Amendment proposes a number of amendments to Strategic Policy 1.3 Acorn Way to address these comments. This includes a slight reduction of the development capacity from 600 to 550 homes, and a reduction in the development area from 26 to 24 hectares. It also includes a number of amendments to the policy criteria including the following:
- 3) Financial contributions to improve bus services on Danebridge Crescent and pedestrian access from the site to those services, including safe pedestrian and cycle crossings of Morley Road.*
- 4) Financial contributions to provide a functional cycle route from Morley Byway 29 to Lees Brook Academy.*

- 3.5 Additionally, an area of safeguarded land has been identified to the south of the allocation, and surrounding Hill Top Farm:

*As a consequence of this development, an area of 8.5ha hectares of land extending southwards and a further 3.1ha at Hill Top Farm has been identified as safeguarded land and will help assist with meeting longer term housing needs.*

- 3.6 Redrow support the suggested amendments to the proposed allocations at Land at Acorn Way, Derby, which are considered to be relatively minor amendments necessary to make the allocation positively prepared and justified.
- 3.7 Redrow's comments with regard to the Inspectors comments and the merits of the residential allocation are considered as follows:

#### *Spatial Strategy*

- 3.8 The site is located immediately adjacent to the established residential edge associated with the north western edge of Derby. This area falls within the Nottingham Conurbation (which incorporates the Long Eaton Urban Area, and the Derby Conurbation, which abuts the Erewash boundary) which is recognised as the most sustainable area in the Borough and at the top of the Council's settlement hierarchy.
- 3.9 The site is unequivocally an appropriate location to accommodate a proportion of housing growth over the plan period, which is entirely in accordance with the Council's spatial strategy that has been robustly justified and evidence, as part of the Core Strategy Review process.

#### *Capacity & Delivery Parameters*

- 3.10 The Core Strategy Review amendments include a slight reduction in the capacity of Land at Acorn Way, Derby from 600 homes to 550 homes, which is supported by Redrow and is considered to be an appropriately realistic response to the site and the identified development capacity.
- 3.11 Additionally, the capacity ensures efficient use of land in accordance with the NPPF whilst also ensuring the delivery of a high-quality residential development alongside the provision of necessary landscape and environmental infrastructure (including BNG provision).



- 3.12 The amendment to the site capacity is considered to be robust and justified and, therefore, soundly based.

*Housing Trajectory / Deliverability*

- 3.13 The Borough Council have published an updated Housing Trajectory as part of the amended Erewash Core Strategy Review consultation. This estimates that the 550 dwellings at Land at Acorn Way, Derby will come forward in 2027/28, providing 50 dwellings that year, and 100 dwellings per annum in subsequent years until 2032/33.
- 3.14 Given the size of the allocation, it is considered that this presents a realistic timescale for the delivery of the site with respect to the expected annual delivery rates. Additionally, there are no landowner or marketability constraints that would preclude the residential development of the site. Likewise, there are no significant infrastructure required to deliver the site.
- 3.15 As such, subject to the plan being adopted in a timely manner, it is reasonable to conclude that the site would come forward within the timeframes proposed by the Borough Council.

*Highways Evidence*

- 3.16 A Transport Assessment (TA) has been undertaken in support of the proposed allocation of Land at Acorn Way, Derby to seek to address the Inspectors specific highways related queries and to help demonstrate the soundness of the allocation. The Transport Assessment has been shared with both Erewash Borough Council and Derby City Council, and the scope of the assessment was also agreed with both authorities.
- 3.17 The TA has been undertaken on the basis of a 600 dwellings and concludes that the highway impacts resulting from the proposals can be appropriately mitigated and that the residual cumulative impact on the highway network would not be severe. Additionally, the TA confirms proposed mitigation at the Acorn Way/Raynesway roundabout junction would be sufficient to accommodate the full allocation.
- 3.18 The overall conclusion outlined in the TA is as follows:

- The site is considered to be well located for residential development, with the surrounding area having good levels of pedestrian, cycling and public transport infrastructure, providing access to local amenities.
- A review of the latest five-year personal injury collision data for the surrounding area does not indicate any existing highway safety issues that would warrant mitigation as part of the development proposals.
- Vehicular access to the site will be formed on Morley Road. All accesses take the form of simple priority junctions and have been designed in accordance with relevant highway standards.
- A package of off-site sustainable transport enhancements have been identified as part of the proposed development to encourage and facilitate travel by non-car modes. This is further supported by the Travel Plan prepared in conjunction with this report.
- Highway capacity assessments have been undertaken at key off-site junctions. The modelling shows that the majority of the junctions in the study area are expected to operate within capacity in the future with the proposed development.
- A potential scheme of works has been identified to mitigate the impact of the proposed development at the Acorn Way/ Raynesway roundabout junction (J6). These primarily involve widening works to the Acorn Way and Raynesway approaches. The impact of these works on the operation of the junction has been modelled and demonstrate that the proposed improvements would mitigate the traffic impact of the proposed development and provides a betterment over the baseline position.

3.19 On the basis of the above, it is considered that there are no transport or highway issues that would preclude the residential development of Land at Acorn Way, Derby. The allocation of the site is considered to be robust, justified and, therefore, sound in this regard.

#### *Education Provision*

3.20 The Inspector highlights that there is a lack of evidence to support the location requirements of the Strategic Policy 1.3 with regards to education provision. As such, the Council have amended the policy wording to remove reference to financial contributions being made towards the provision of additional public capacity at appropriate schools in Oakwood and Chaddesden where necessary.

- 3.21 Redrow are supportive of the removal of this elements of the policy wording, recognising the Local Education Authority are the primary provider of educational places. It is for the LEA to determine the available capacity of nearby schools and seek an appropriate financial contribution to provide additional spaces, if necessary.
- 3.22 It is, therefore, considered that the query from the Inspector in terms of education provision has been addressed and the policy wording is, therefore, sound.

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