



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

P&DG on behalf of Wheeldon Brothers 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 Wheeldon Brothers Limited in response to Erewash Borough Council's Core Strategy Review amendment consultation.
- 1.2 Wheeldon Brothers 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 Inspectorate. 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 Wheeldon Brothers are in control of **Land North of Breadsall Hill Top** and **Land West of Borrowash**, which have been identified as 'new allocations' in the amended Core Strategy Review. Both of these sites are available, suitable, viable and deliverable sites for residential development. Their allocation is, therefore, very much welcomed by Wheeldon Brothers.
- 1.5 Overall, it is considered that the additional evidence prepared by the Council and the subsequent proposed amendments to the Core Strategy Review is sufficient to ensure that the plan is positively prepared, justified, effective and consistent with national policy in accordance with the requirements of the NPPF.

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 30th 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 5th 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 Wheeldon Brothers, 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 plan-led 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 Site Selection Process

- 3.1 Wheeldon Brothers are in control of **Land North of Breadsall Hill Top** and **Land West of Borrowash**, which have been identified as 'new allocations' in the amended Core Strategy Review.
- 3.2 The allocation of these sites is in direct response to the Inspectors concerns regarding the soundness of the Plan and are necessary to ensure that the Borough Council are able to demonstrate a 5-year housing land supply at the point of adoption and to help meet the housing requirements of the whole plan period.
- 3.3 The Site Selection Paper provides a clear and robust methodology of how the new additional sites have been identified by the Borough Council. The site selection process has been directly informed by a systematic Green Belt Review and a re-evaluation of sites taking into account the Council's spatial strategy and settlement hierarchy, as well as their merits of individual sites in terms of their suitability, availability, deliverability and economic viability.
- 3.4 It should be noted that there is no prescribed way to undertake a Green Belt Review. However, the Council's methodology reasonably assesses the performance of different areas of the Green Belt against the fundamental purposes of the Green Belt. The review identifies areas of the Borough that only fulfil limited purposes, which are considered to be the less sensitive parts of the Green Belt that could be released to residential development to meet the housing needs of the Borough over the plan period.
- 3.5 The newly allocated sites, including **Land North of Breadsall Hill Top** and **Land West of Barrowash**, all fall within land that serves limited purposes to the Green Belt. The allocation of these sites and release from the Green Belt is considered to be appropriate in order to meet the housing needs of the Borough. Our views with respect to appropriateness of the allocation of each of these sites is considered in further detail below.
- 3.6 Overall, it is our view that the Borough Council's selection of new housing allocations have been carried out using a comprehensive and transport process that is based on a robust evidence base. The approach taken is logical and justified, and the reasoning behind allocating the additional sites in the Core Strategy Review amend is, therefore, soundly based.

4.0 Land West of Borrowash, Borrowash

- 4.1 Land West of Borrowash, Borrowash is an entirely appropriate and sustainable location for residential development and the proposed allocation of the site is fully supported by Wheeldon Brothers.
- 4.2 The site is available, suitable, deliverable and economically viable and there are no technical constraints that would preclude its development that cannot be appropriately mitigated.

Spatial Strategy

- 4.3 Borrowash is identified as one of the 'Key Settlement's' within the settlement hierarchy and, are the most sustainable settlements in the Borough, after the Nottingham Conurbation (which incorporates the Long Eaton Urban Area, and the Derby Conurbation which abuts the Erewash boundary). The allocation of the site is in accordance with the Borough Council's spatial strategy and settlement hierarchy.
- 4.4 Indeed, this reflects the sustainable location of Borrowash within close proximity to and sharing an established relationship with the city of Derby and the wide range of services, facilities and sustainable transport opportunities therein. There are also a number of local services and facilities within the settlement including a number of convenience stores, a school, community centre and health centre.
- 4.5 Borrowash is, therefore, 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 evidenced as part of the Core Strategy Review process.

Green Belt Review / Amendment

- 4.6 As noted above, the selection of new housing allocations, including Land West of Borrowash, has been a direct result of a comprehensive site selection process, which the Council have undertaken in accordance with the requests of the Inspector to address the soundness of the plan in terms of meeting the Borough's housing requirements.

- 4.7 This is considered in detail in the Site Selection Paper that has been prepared and published as part of this consultation process provides a clear methodology of how the new additional sites have been identified.
- 4.8 Overall, it is our view that there is a robust and logical approach to the selection of sites, which has taken into account the Green Belt, the Council's spatial strategy, alongside consideration of the suitability, availability and deliverability of potential development sites. The reasoning behind allocating the additional sites to meet the Borough's housing needs over the plan period is clear and justified and, therefore, soundly based.

Capacity & Development Parameters

- 4.9 Proposed Strategic Policy 1.12 allocates Land West of Borrowash for approximately **280 homes** across 14ha of land, which will form a logical extension to the west of Borrowash. This includes an area of safeguarded land (4.6ha) to the north of the site (for future development), along with a substantial area of park land to the west of the site.
- 4.10 The Council's proposed capacity of 280 homes is supported by Wheeldon Brothers and is considered to be an appropriate reflection of the site and its development constraints. The capacity ensures efficient use of land in accordance with the requirements of 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).
- 4.11 The indicative masterplan that has been prepared for the site is based on a robust landscape framework, which includes a substantial area of parkland to the west of the site. This area will contain green infrastructure, public open space and ecological and landscape mitigation. The parkland would ensure the beneficial use of the Green Belt including unrestricted access to the planned open space (currently private land) that would be enhanced in terms of its landscape character and value. The existing public right of way (Ockbrook Footpath 41) will also be retained and incorporated into the parkland. The area would also ensure the delivery of 10% Biodiversity Net Gain requirements and improve visual amenity.
- 4.12 The site can be readily accessed via a new vehicular access taken from Derby Road. The surrounding highway network is considered to be capable of accommodating the scale of development proposed without adverse impact in terms of traffic or

highway safety. There is also opportunity to provide pedestrian link access towards Ashbrook School via Victoria Avenue, to ensure that the site appropriately integrates into the existing settlement of Borrowash.

- 4.13 There are no technical constraints that proposed residential development of the site that cannot be appropriately mitigated.
- 4.14 The site is, therefore, considered to be capable of accommodating the amount of development proposed within the new allocation whilst also ensuring the delivery of a sufficient amount of biodiversity, drainage and landscape provision.

Housing Trajectory / Deliverability

- 4.15 The Borough Council have published an updated Housing Trajectory as part of the amended Erewash Core Strategy Review consultation. This estimates that the 280 dwellings at Land West of Borrowash will come forward in 2027/28, providing 25 dwellings that year, and 50 dwellings per annum in subsequent years until 2031.
- 4.16 It is considered that this presents a realistic timescale for the delivery of the site with respect to reasonably expected annual delivery rates. Indeed, Wheeldon Brothers are a derby-based housebuilder with a proven track record within the area of consistently achieving build out rates of approximately 50 dwellings per annum.
- 4.17 Additionally, there are no landowner or marketability constraints that would preclude residential development on site in terms of viability or its prompt delivery. There are no significant infrastructure required to deliver the site.
- 4.18 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.

5.0 Land North of Breadsall Hill Top, Derby

- 5.1 Land North of Breadsall Hill Top, Derby is an entirely appropriate and sustainable location for residential development and the proposed allocation of the site is fully supported by Wheeldon Brothers.
- 5.2 The site is available, suitable, deliverable and economically viable and there are no technical constraints that would preclude its development that cannot be appropriately mitigated.

Spatial Strategy

- 5.3 The site is located immediately adjacent to the established residential edge associated with Breadsall Hilltop within the northern extents of the city of Derby. Breadsall Hilltop falls within the Derby Conurbation. The allocation of the site is in accordance with the Borough Council's spatial strategy and settlement hierarchy.
- 5.4 Moreover, the site lies immediately to the north of the newly constructed residential development on Land North West of Mansfield Road that was approved by Derby City Council (under planning application ref: 12/15/01520) in 2016. The suitability of the area to accommodate new development has, therefore, already been established. The new allocation would constitute an entirely logical extension to the recent residential development.
- 5.5 Breadsall Hilltop is, therefore, 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 evidenced, as part of the Core Strategy Review process.

Green Belt Review / Amendment

- 5.6 As noted above, the selection of new housing allocations, including Land North of Breadsall Hill Top, has been a direct result of a comprehensive site selection process, which the Council have undertaken in accordance with the requests of the Inspector to address the soundness of the plan in terms of meeting the Borough's housing requirements.

- 5.7 This is considered in detail in the Site Selection Paper that has been prepared and published as part of this consultation process provides a clear methodology of how the new additional sites have been identified.
- 5.8 Overall, it is our view that there is a robust and logical approach to the selection of sites, which has taken into account the Green Belt, the Council's spatial strategy, alongside consideration of the suitability, availability and deliverability of potential development sites. The reasoning behind allocating the additional sites to meet the Borough's housing needs over the plan period is clear and justified and, therefore, soundly based.

Capacity & Development Parameters

- 5.9 Proposed Strategic Policy 1.8 allocates Land North of Breadsall Hilltop for approximately 160 homes across 8.2ha of land, which will form a logical extension to the Oakwood neighbourhood that forms part of the Derby conurbation.
- 5.10 The Council's proposed capacity of 160 dwellings is supported by Wheeldon Brothers and is considered to be an appropriate reflection of the site and its development constraints. The capacity ensures efficient use of land in accordance with the requirements of 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).
- 5.11 The capacity of the site is supported by the indicative masterplan that has been prepared for the site, which has been informed by a series of technical assessment to guide development parameters and mitigation requirements. This includes vehicular and pedestrian access to the site being taken via Dale Acre Way and Hungerhill Close. It also includes a strong landscape buffer to the north, which includes the strengthening of the existing woodland along the north west boundary of the site along the boundary with the existing Greenway. The landscape frameworks also includes the opportunity for the retention of existing pedestrian routes through the site and into the surrounding public right of way network.
- 5.12 There are no technical constraints that proposed residential development of the site that cannot be appropriately mitigated.

- 5.13 The site is, therefore, considered to be capable of accommodating the amount of development proposed within the new allocation whilst also ensuring the delivery of a sufficient amount of biodiversity, drainage and landscape provision.

Housing Trajectory / Deliverability

- 5.14 The Borough Council have published an updated Housing Trajectory as part of the amended Erewash Core Strategy Review consultation. This estimates that the 160 dwellings on Land North of Breadsall Hilltop will come forward in 2027/28, providing 20 dwellings that year, and 40 dwellings per annum in subsequent years until 2031.
- 5.15 It is considered that the housing trajectory presents a realistic timescale for the delivery of the site with respect to reasonably expected annual delivery rates. Indeed, Wheeldon Brothers are a derby-based housebuilder with a proven track record within the area of consistently achieving build out rates of approximately 50 dwellings per annum.
- 5.16 Additionally, there are no landowner or marketability constraints that would preclude residential development on site in terms of viability or its prompt delivery. There are no significant infrastructure required to deliver the site. 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.

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