



NOVEMBER
2023

Erewash Core Strategy Review Examination

Matter 4 Statement

Iceni Projects Limited on behalf of
GLP

November 2023

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ON BEHALF OF GLP

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CONTENTS

1. INTRODUCTION 1

2. MATTER 4 – THE GREEN BELT 2

1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Icen Projects on behalf of GLP, the promoters of land to the southwest of Junction 25 of the M1.
- 1.2 Representations were submitted at the Regulation 19 stage by GLP, classified under representation numbers 136 & 273.
- 1.3 This Statement builds upon those previous representations in response to the Inspector's Matter 4 questions.

2. MATTER 4 – THE GREEN BELT

Green Belt Review

8. The Council has produced a Green Belt Technical Paper (EBC05). Was the Council's approach to assessing Green Belt appropriate? What are your reasons for this?

- 2.1 The Green Belt Technical Paper (EBC05), along with the Council's response to the Inspector's Initial Questions (EBC01), explains that the Council first identified potentially suitable strategic housing sites through the Strategic Growth Area Exercise, and then as part of the SGA assessment considered the Green Belt function and potential for release from the Green Belt. The Council's rationale for this is that it was only necessary and proportionate to assess potential strategic sites, given the housing supply issues affecting Erewash in recent years apparently arise from a shortage of larger scale strategic sites, and the Core Strategy Review is focussed only on strategic policies.
- 2.2 The practical result of this approach is that no borough-wide Green Belt assessment has been undertaken, as would often be the case to inform the preparation of a Local Plan in a Green Belt authority. The Council has identified potential sites and subsequently considered the case for releasing them from the Green Belt, rather than first assessing the contribution of particular parcels and then using this to inform decisions about potential allocations.
- 2.3 Alongside this, the Council determined (as explained in its response to the Inspector's Initial Questions (EBC01)) that it would not be necessary to consider sites within the Green Belt for potential employment allocations, as in its view Stanton North would deliver sufficient capacity to meet identified employment needs. Given this, it did not consider that Exceptional Circumstances existed to justify releasing Green Belt for employment development.
- 2.4 We disagree with this conclusion, and (as explained below in response to Question 11), we consider that Exceptional Circumstances exist to justify the release of Green Belt land for employment development. As a result, we do not consider that the Council's approach to assessing Green Belt was appropriate, as it entirely omitted any consideration of potential sites for employment development.
- 2.5 Given the scale of the need for strategic logistics development, we consider that the Council should have assessed reasonable alternatives such as the land adjacent to Junction 25 of the M1. If the Council had undertaken a more comprehensive Green Belt review, this would have facilitated an informed assessment of such alternatives. Instead, the decision to dismiss the principle of any Green Belt options for employment development was based on an assumption that any release of Green Belt would be unacceptable for this purpose, rather than being based on evidence. A comprehensive

Green Belt Review was necessary to assess the reasonable alternatives, and given this did not take place, the Council's site selection methodology for employment development cannot be justified, in terms of being based on evidence.

- 2.6 The Council's assessment that Stanton North will deliver more than sufficient employment land to meet its needs was made before the publication of the 2022 Nottinghamshire Core & Outer HMA Logistics Study (EBE2), which identifies a significant need for additional land for strategic logistics floorspace. Notwithstanding, should the Council consider that Green Belt now restricts its ability to make a greater contribution towards the wider strategic need identified for the HMA, the absence of a comprehensive Green Belt review undermines any case in this regard. The Council would first need to consider the function and potential for releasing additional land from the Green Belt, before concluding that Green Belt represents an in-principle policy constraint to delivering additional employment land for this purpose. Without the relevant evidence, this assessment cannot be made.
- 2.7 The approach to identifying potential allocations, and only considering the Green Belt function and potential for release of those specific sites, results in an overly narrow assessment of Green Belt. A more comprehensive Green Belt review would ensure any parcels performing poorly against the purposes of the Green Belt identified at paragraph 138 of the NPPF were identified and their potential for development assessed, and that boundaries are capable of enduring for the long term, in accordance with paragraph 140 of the NPPF. The focus on a few preferred housing sites results in the potential to miss wider opportunities that the Council may not be aware of.
- 2.8 As a result, we consider that the Council's methodology was inappropriate, and a more comprehensive Green Belt review should have been undertaken, to help inform decisions around the extent to which additional land can be released to meet the unmet need for strategic logistics development and to assess reasonable alternatives.

Exceptional Circumstances

11. Are there exceptional circumstances to alter the Green Belt in the Borough in principle? If so what are they? If not, how could housing and employment needs be met in other ways?

- 2.9 In addition to the Exceptional Circumstances identified by the Council for the in-principle release of Green Belt for housing, we consider that there are compelling Exceptional Circumstances to justify the release of land to meet employment needs.
- 2.10 As discussed in our previous representations and in our Matter 8 Statement, there is a significant need for strategic logistics floorspace, which will not be met at Stanton North. The 2022 Nottinghamshire Core & Outer HMA Logistics Study (EBE2) quantifies the total need across the HMA as being 425 ha. As discussed in our Matter 8 Statement, we consider the current residual need is

134.9-150.9 ha, taking into account the latest supply and proposed allocations across the HMA. Even taking account of the Greater Nottingham Planning Partnership's lower estimate, the residual need would still be very significant, at 63-79 ha¹. Erewash has a key role in delivering strategic logistics development given its access to the strategic road network and local labour supply. Consequently there is a pressing need for Erewash to plan to accommodate a meaningful portion of this identified need within the borough, which otherwise will remain unmet, perpetuating an under-supply of premises and an associated lack of investment, employment opportunities and economic growth. The need to support economic growth should be given significant weight in planning policies, as advocated by paragraph 81 of the NPPF.

- 2.11 We therefore consider that the acute and pressing need to identify additional large sites for strategic logistics development provides the Exceptional Circumstances in principle to justify release of Green Belt land in Erewash Borough.

¹ As detailed in the [Strategic Distribution and Logistics Background Paper \(September 2023\)](#)