

# **Erewash Core Strategy Review Examination Response to Matters, Issues & Questions (MIQs)**

## **Main Matter 4: The Green Belt**

### **Issue:**

**Whether the approach to the alteration of the Green Belt and development within it is justified and consistent with national policy.**

### ***Principle of Green Belt Release***

#### **1. What proportion of new housing allocated in the Core Strategy Review would be on land currently designated as Green Belt?**

The Core Strategy Review makes provision for 5,800 net new homes, of which 2,350 are on Green Belt sites, which is 40% of the total.

#### **2. What is the capacity to accommodate housing development in the Borough on non-Green Belt land? How has this been assessed and is this robust?**

The Core Strategy Review makes provision for 5,800 net new homes, of which 3,450 are on non-Green Belt sites, which is 60% of the total.

1,000 homes (18% of the total) are allocated on the brownfield land at South Stanton, the portion of the former Stanton Ironworks that remains undeveloped. This is the residual of the allocation for 2,000 homes in Policy 20 of the extant Erewash Core Strategy. That policy failed to bring about the redevelopment of this site, hence the reduced ambition of the Core Strategy Review. The other part of that site, Stanton North, has instead been allocated for employment, consent for which has already been granted and development of which is under way.

The remaining 2,450 homes (42% of the total), are sourced from the Strategic Housing Land Availability Study (SHLAA), an estimate of additional supply from Council owned land, and an estimate of supply from windfall development (additional brownfield and infill sites not identified in the SHLAA). The SHLAA (EBH4), is based on a robust and NPPF compliant methodology and considers all sites that are currently available for redevelopment, either by virtue of being vacant or by being promoted to the Council by landowner or other development interests. The Council's Open Space Needs Assessment, (EBEN1) identifies a significant quantity of Council owned land that is surplus to any open space need requirement. This has already evidenced the marketing of four such sites for disposal, with further sites in the pipeline. The windfall estimate is based on a robust assessment of trends in housing delivery.

### **3. How is this affected by the spatial strategy?**

The Spatial Strategy is driven by the extant Spatial Objectives of 2014 Erewash Core Strategy to maximise brownfield opportunities to deliver housing and regeneration. Consequently the Spatial Strategy of the Core Strategy Review remains one of urban concentration, as is the Spatial Strategy of the extant Erewash Core Strategy. As set out in the Council's responses to Matter 3 – Spatial Strategy, the approach has been to maximise delivery within the Long Eaton Urban Area which falls within the Nottingham conurbation, then within the Ilkeston Urban Area which is a free-standing town, and finally within the rural villages of the Borough. It was only after the capacity of those areas was fully taken into account, that use of Green Belt was considered.

### **4. How is it affected by other constraints?**

Not all land outside the Green Belt is suitable for housing development. Some non-Green Belt land has a landscape value, biodiversity value, and or heritage value that singly or in combination renders its development unsuitable. Some non-Green Belt has contamination, land stability or flood risk constraints that also render it unsuitable for housing. And some non-Green Belt is subject to market demand for other forms of use such as employment or retail that make it unavailable for redevelopment for housing. All of these factors have been taken into account on a site by site basis in the Strategic Housing Land Availability Assessment from which the housing capacity of the Borough's towns and villages has been assessed.

### **5. Has the Council sought to make as much use as possible of suitable brownfield sites and underutilised land?**

Yes, as set out in the Council's responses to questions 2, 3 & 4 above.

### **6. How has the Council sought to optimise the density of development?**

The extant Erewash development plan, comprising the 2014 Erewash Core Strategy and Saved Policies from the 2006 Erewash Local Plan, does not include any restrictive policies such as minimum levels of parking provision, garden sizes or on-site open space requirements that restrict development densities. As a consequence achieved densities on large development sites have been consistently high, e.g. 42 dwellings per hectare at Elka's Rise, a greenfield site on the edge of Ilkeston, and 58 dwellings per hectare at Britannia Mills, a brownfield site in Long Eaton. Similarly ambitious densities have been applied to the capacity of sites identified in the Strategic Housing Land Availability Study.

However, the market appetite for higher density development in Erewash is limited by site values. Boden House on Westgate in Long Eaton has the unique distinction of being the only four storey building to have been built in the Borough since the

second world war. The fact is that high-rise development is not viable in Erewash, and it is illusory to suggest that development would come forward at higher densities than they currently are simply by stating in planning policy that they should.

**7. Has the Council assessed whether there is any realistic potential to accommodate some of the development needs of the Borough in other authority areas, reducing the need to alter the Green Belt? How has this been assessed / investigated?**

As set out in the Council's response to Matter 2- The Duty to Cooperate, discussions have been held with both the Nottingham Housing Market Area and Derby Housing Market Area, including written requests to the constituent local planning authorities of those Housing Market Areas through regulation 18 consultation, to seek opportunities for those authorities to accommodate some the Erewash Borough Objectively Assessed Need specifically in order to reduce pressure on the Green Belt. As recorded in the submitted Statements of Common Ground and the representations made by those local planning authorities to the Erewash Core Strategy Review, no such provision has been forthcoming.

***Green Belt Review***

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

The Council's approach was reasonable in all respects, as it takes account of all the requirements set out in Chapter 13 of the National Planning Policy Framework. The Council is unaware of any other government policy or guidance on how Green Belt release should be considered, nor any government endorsed sector lead guidance.

**9. How has the assessment of Green Belt land informed the Core Strategy Review and specifically proposals to alter the Green Belt to accommodate development needs?**

Green Belt considerations were taken into account in selecting individual Green Belt sites for development, rejecting those sites that had a significant impact on the purposes of the Green Belt.

**10. Has the Council assessed the suitability of land parcels and their contribution towards the purposes of including land in the Green Belt?**

Every Green Belt site promoted to the Council through the SHLAA was assessed against all 5 purposes of the Green Belt set out in NPPF paragraph 138. These assessments are included in the Council's Strategic Growth Area Assessments (EBH1).

### ***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?**

Without de-allocating parts of the Green Belt in the Borough, the Borough's housing needs can not be met. This is considered to provide the exceptional circumstances required to justify Green Belt release.