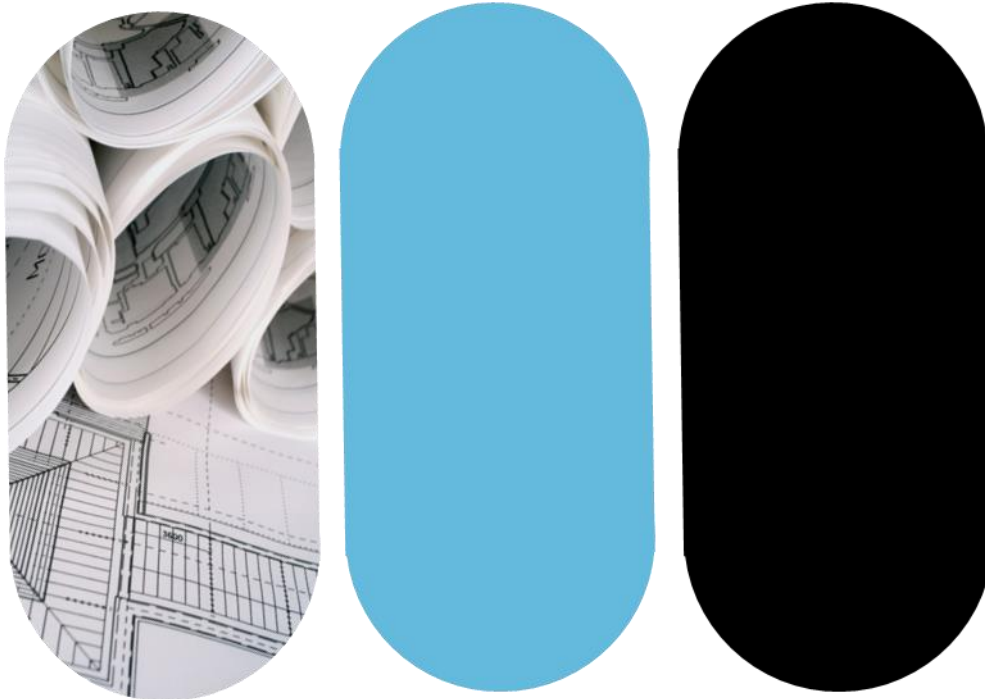




MATTER 4 HEARING STATEMENT THE GREEN BELT

On behalf of William Davis Homes



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ISSUE 1 – Whether the approach to the alteration of the Green Belt and development within it is justified and consistent with national policy.

Question 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?

1. The capacity for accommodating development outside of the Green Belt is not clear from the Core Strategy Review (CSR) or its evidence base. There is no urban capacity study or similar underpinning the CSR, so it is hard to know how this has matter has been assessed or the robustness of the approach used.
2. Whilst the Council's response to the Inspector's Initial Questions discusses in general terms maximising the urban area's contribution to meeting housing needs, there is no analysis of what sites are relied upon in this regard and which sites aren't and why. Understanding this is not only important in terms of establishing the exhaustion of other alternatives to Green Belt release, but also whether the assumed contribution of the urban areas to the plan-led supply is realistic and deliverable. The Council has already established in its response to the Initial Questions that it has experienced significant difficulty in respect of achieving sufficient urban housing completions to meet its needs. Yet just slightly under half of the plan-led supply is derived from such sites. Without clearly understanding the components of the urban area's housing supply, the rate at which such sites will come forward and how this has been determined, it will be impossible to understand the level of Green Belt release necessary to provide for sufficient housing over the plan period.

Question 3: How is this affected by the spatial strategy?

3. The spatial strategy is still heavily weighted in favour of urban housing provision which one might expect if that level of urban housing provision is realistic and deliverable over the plan period. The lack of non-strategic allocations within the CSR make this difficult to assess and whilst it is accepted that windfall housing will continue to come forward in the urban areas in general terms, this is an uncertain source of supply which historically has not delivered upon the Council's significant growth needs, hence the need for the CSR.
4. In order to establish a strategic case for Green Belt release it is important that the sites chosen for release are selected carefully in line with a coherent spatial strategy which represents the most appropriate and justified response to the strategic issues facing the Borough. As set out in our Matter 3 statement we have considerable concerns that the spatial strategy does not address housing need

where it is likely to be most acute having regard to affordability pressures and similarly, where it can be most sustainably accommodated having regard to the hierarchy of settlements within the Borough. In that context, the lack of Green Belt release around and near the Long Eaton/Sandiacre area will prevent the Council from meeting unmet housing need close to where it arises adjacent the Nottingham urban area and in the most sustainable locations.

Question 7: Has the Council assessed whether there is any realistic potential to address 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?

5. As set out in our Matter 2 statement we are of the view that the preparation of the CSR has been almost entirely inward-facing and has not been influenced by proactive and positive engagement with adjacent authorities on strategic issues such as Green Belt release. That said, we recognise in the context of the wider Nottingham HMA that the constituent authorities have constraints of their own including Green Belt and that dispersing a portion of Erewash's need throughout the Nottingham HMA is therefore unlikely to avoid the release of Green Belt more generally. A comprehensive Green Belt study across the HMA would be able to identify strategic parcels of Green Belt that are least valuable for release, although this would need to be balanced with wider sustainability considerations.
6. In respect of the Derby HMA of which the western part of Erewash forms part, the situation is different, particularly in the context of the CSR's proposed Green Belt release adjacent to Derby. Unlike Nottingham which is entirely constrained on its fringes by Green Belt, Derby is not constrained in that regard on its southern or western fringes, which raises the possibility of whether the Green Belt release on the fringes of Derby in Erewash might be re-apportioned through the wider Derby HMA. Unfortunately, discussions with the Derby HMA have seemingly been quite minimal so it is not clear what assessment has been made in this regard and how it has influenced the content of the CSR.

Question 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 view?

7. The Inspector requested a topic paper to understand how the Council has gone through the two steps required firstly to establish the strategic-level exceptional circumstances to alter Green Belt boundaries and secondly to identify which sites there are exceptional circumstances to release. Contrary to the exercise which it was meant to carry out, the Green Belt Technical Paper [EBC05] does not appear to address either element of the exceptional circumstances test, but rather details the process for selecting those sites proposed for release from the Green Belt over others. That does not equate to a case for exceptional circumstances either

at the Borough-level or at the site-level. In fact, it is not possible to make out either case without a strategic-level Green Belt Review that thoroughly assesses parcels and prospective sites across the Borough on a consistent and rigorous basis which would require a much more involved piece of work than that which has evidently influenced the site selection process. Demonstrating exceptional circumstances for Green Belt release to meet housing need also requires a clear understanding of housing needs for market, affordable and specialist housing types and tenures which has not been fully assessed through the evidence base.

Question 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?

8. The assessment work undertaken in respect of Green Belt land was carried out via the Strategic Growth Area (SGA) assessments, which were extracted from the 2019 Strategic Housing Land Availability Assessment (SHLAA) based on the criterion of size (greater than 200 units). Within the subsequent SGA assessments [EBH1] officers assessed sites located in the Green Belt against the five purposes of the Green Belt set out in the National Planning Policy Framework (NPPF). Regrettably, these assessments were perfunctory, performed in accordance with no particular methodology, lacked technical rigour and were carried out in tandem with considering a variety of other non-Green Belt considerations. They were also supported by no particular strategic assessment to understand the contribution of the broader parcels of which these sites form part to the purposes of the Green Belt that should have been undertaken as part of a broader Green Belt Review/Study.

Question 10: How has the Council assessed the suitability of land parcels and their contribution towards the purposes of including land in the Green Belt?

9. The Council has carried out no particular comprehensive assessment of strategic Green Belt parcels throughout the Borough. Rather, the assessment of Green Belt purposes and general suitability for release has been undertaken at the site-level via the identified SGAs including a very high level analysis of defensible boundaries and contribution to Green Belt purposes.
10. A methodology for Green Belt assessment that helps draw out where the harm would be caused and, in turn, which sites should or shouldn't be kept permanently open should be implemented. This should outline measures to ensure that retained sites can contribute to the beneficial use of remaining land as set out by the NPPF. High level SGAs do not provide the same function or evidence as an appropriately undertaken Green Belt review which should feed into the case for exceptional circumstances on both the Borough and site level.

11. There are also elements of the assessment within the SGAs which are questionable. In respect of assessing the matter of safeguarding the countryside from encroachment, the SGA Assessment has presented quantitative figures relating to the distance between the centre of the particular settlement and the outer most extent of the site considered. There is no or very little qualitative consideration of how, for example, the countryside is already affected by urbanising influences such as road infrastructure, land use or buildings that may be germane to a land parcel's contribution in this regard. The important issue of coalescence has also been seemingly so assessed, despite it being well-established that coalescence has a visual as well as a spatial component with established and retained distances between settlements only being one element of the overall assessment which should be undertaken. .

Question 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?

12. There are exceptional circumstances to alter the Green Belt in principle, given that, in following an urban-focused strategy, the Council has persistently failed to deliver sufficient housing to meet its needs and to establish a sufficient supply of deliverable housing land. In addition, Erewash is a constrained authority, washed over by the Green Belt and located between two major conurbations (Nottingham and Derby). Other than the delivery of land within the urban area, there is little other alternative to Green Belt release if development needs are to be met.
13. Relying on previously developed sites to meet housing need in the past has clearly failed to deliver sufficient housing, and so it is welcome that the Council is pursuing a new strategy, albeit one that is still heavily influenced by urban and strategic-level brownfield sites coming forward despite the previous issues with that approach. There would appear little scope in principle to export Erewash's housing needs appertaining to the Nottingham HMA to neighbouring authorities noting that these authorities have their own Green Belt constraints and other restrictive designations, as well as their own significant development needs.
14. Releasing the Green Belt generally within sustainable locations well-related to the built-up areas will help to address serious shortfalls in housing delivery and deliver much needed affordable homes in sustainable locations close to where people live and work. Like the Council, we consider it unlikely that the development needs identified can be met within the urban area. However, without understanding at a high level the components of housing supply within the urban area and how these could be expected to come forward through the plan-period, it is hard to know what quantity of Green Belt release is necessary to meet needs over the plan period and whether the urban housing apportionment remains deliverable.

15. As expressed elsewhere, the strategic case for and the CSR's response to exceptional circumstances needs to be shaped by a variety of evidence in respect of housing needs, Green Belt, unmet needs from the wider HMA and spatial strategy which unfortunately is lacking. Without a firm and robust understanding of and approach to these issues, it is unlikely that that plan-making can respond effectively. Therefore whilst there is little doubt that Erewash will need to release Green Belt land to address its own needs and likely those of the Nottingham HMA, the approach to this exercise needs to be reconsidered in light of our wider comments on the CSR and its approach.