



Erewash Core Strategy Review Examination

Hearing Statement - Matter 4

Representations on behalf of
Green 4 Developments Limited

Reference Ockbrook Cricket Club

December 2023

1.0 Introduction

- 1.1 These representations have been prepared by Green 4 Planning on behalf of Green 4 Developments Ltd (Green 4) in response to the Inspectors Matters, Issues and Questions specifically in relation to Matter 4.
- 1.2 Green 4 Planning have now taken on the instruction in respect of the representation reference 311, which specifically referred to Ockbrook Cricket Club.
- 1.3 We note Varsity Planning are also acting on behalf of Green 4 Developments, we are instructed on different sites and our representations are made accordingly.
- 1.4 We do not wish to repeat the representation made by P&DG on behalf of Green 4 (reference 311) and therefore this response merely clarifies our position in respect of some of the questions raised.

2.0 Matter 4 Green Belt

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

2.1 No.

2.2 Para 142 of the NPPF states *When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.... Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*

2.3 As per our response to the spatial strategy Matter 3, Green 4 maintain that once it had been established that sites would need to be released from the Green Belt to meet the housing need, the Council should have undertaken a full Green Belt Review to identify sites or directions for growth which, if developed, would create the most sustainable patterns of development.

2.4 Instead, as explained in The Green Belt Technical Paper (EBC05), 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. This seems a backwards approach, and risks conclusions being drawn on erroneous grounds.

2.5 Green 4 would expect a Green Belt review to inform where the strategic growth areas could be located or at least form part of the initial decision making when establishing directions for growth. This is critical, as otherwise sites that may have represented a better option in terms of Green Belt release will have been overlooked, as they will have been discounted on the basis that they are not

preferred for strategic growth. This hierarchy seems to undermine the evidence based approach to plan-making.

- 2.6 The approach to identifying potential allocations, and then 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.
- 2.7 The approach taken by the Council has the potential to miss opportunities in sustainable locations.
- 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.
- 2.9 In addition, as per the requirement in para 142, no mention is made of compensatory improvements for the loss of Green Belt land and environmental quality or access to the remaining Green Belt land.
- 2.10 In addition to its shortcomings, the late publication of the Green Belt technical paper following some considerable time after the publication of the Review, and after all of the consultation stages had been completed, calls into question its validity and the weight that should be attributed to it.

Qu.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?

- 2.11 The Green Belt Technical Paper was produced following the questions from the Inspector and is a post hoc analysis of the sites selected by the Council as part of the Strategic Growth Assessment.
- 2.12 The Green Belt Technical Paper (EBC05) clearly illustrates that the extremely limited assessment of the Green Belt did not inform the Core Strategy review in

any meaningful way. It has not influenced the spatial distribution of growth set out in the Core Strategy Review. We acknowledge that the presence of Green Belt was a factual assessment in the Strategic Growth Area Assessments and the SHLAA, but no value judgement was made on the suitability of land for release from this designation and no account was taken of the relative additional benefits that may mitigate Green Belt loss on one site compared to another.

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

2.13 As set out above, we do not believe that this exercise has been undertaken. There is nothing presented in evidence that this exercise was undertaken.

Qu 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?

2.14 Green 4 agree that there are exceptional circumstances to alter the Green Belt in Erewash. The circumstances include a significant housing land supply shortfall combined with its location being almost entirely within the Derby – Nottingham Green Belt. There are very limited opportunities for growth within existing settlement limits as the Green Belt is tightly drawn.

2.15 However, as set out under our response to Main Matter 3, Paragraph 140 of the NPPF tells us that exceptional circumstances needed to be “fully evidenced and justified”, and this is where the Erewash Core Strategy Review falls down.

2.16 The evaluation of Green Belt quality should be a significant part of the evidence supporting the spatial strategy, and this has not occurred.

2.17 Erewash did not undertake a Green Belt review as part of their evidence base to properly evidence and justify if they were able to accommodate the identified need and where this should logically go. The spatial distribution of their housing target has not been fixed in the context of evaluating Green Belt releases. Instead, there has been a Green Belt analysis, undertaken post Regulation 19

submission, of the sites that Erewash think might be deliverable in the plan period.

- 2.18 The approach taken by Erewash does not meet the requirements of the NPPF. Green Belt will need to be released in Erewash borough, the evaluation of Green Belt quality should be a significant part of the evidence supporting the spatial strategy and this has not occurred.

