

Erewash Green Belt Review

Approach to Review / Methodology - November 2024

Context:

The Planning Inspector appointed to examine the Erewash Core Strategy Review (CSR) has in post-Hearings correspondence to the Borough Council indicated that a Green Belt Review should be undertaken as part of a wider programme of work required to improve the prospects of the CSR being found sound. In response, the Council have confirmed its commitment to the production of a Review which carries out a systematic evaluation of the Erewash section of the Nottingham-Derby Green Belt against the purposes of the designation as set out by national planning guidance.

The availability of a Green Belt Review enables the Council to subsequently assess, in accordance with the findings of the systematic evaluation, the impacts of development at each of the proposed housing allocations and objection sites at locations around the Borough.

To enable understanding of the work carried out, a short methodology has been produced which sets out the Council's approach towards how it plans to assess the Green Belt designation throughout Erewash.

Study approach:

The starting point for the Council's Green Belt Review requires consideration of whether the five established purposes of Green Belt set out by **Paragraph 143** of the National Planning Policy Framework (NPPF) (December 2023) are held to be relevant and necessary in their application as part of the Council's subsequent assessment work. Each of the five purposes of Green Belt are considered below with brief commentary confirming their level of relevance to the Review.

a) to check the unrestricted sprawl of large built-up areas

Yes. A number of settlements throughout the Borough are inset from the Nottingham-Derby Green Belt. This makes the evaluation of this purpose relevant and necessary.

b) to prevent neighbouring towns from merging into one another

Yes. The close proximity of Derby to the west and Nottingham to the east of the Borough makes the evaluation of this purpose relevant and necessary. These cities are supplemented by a network of smaller towns in adjacent local authorities, each located at varying distances away from the Erewash Borough boundary and separated from Erewash by Green Belt designation. These are identified by the Review. The Borough's towns of Ilkeston and Long Eaton, and their relationship to all other towns identified by the Review, further strengthens the need to evaluate this purpose.

c) to assist in safeguarding the countryside from encroachment

Yes. A sizeable Green Belt designation spans the Erewash countryside. This countryside also extends beyond the Borough's boundary into neighbouring local authorities ensuring the evaluation of this purpose is relevant and necessary.

d) to preserve the setting and special character of historic towns

No. This purpose is considered to apply to a limited number of circumstances nationally where the historic setting of a town is protected by Green Belt designation. The neighbouring cities of Nottingham and Derby both have historic cores, although neither are considered to be historic towns with special character and setting due to the extensions of both cities over recent decades, seeing the growth and establishment of modern suburbs contribute to the weakening of their historic character.

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

No. The Council's position in relation to the shortfall in housing delivery in the Borough demonstrates that the retention of Green Belt land for the purposes of encouraging brownfield development has met its limits and is unable to encourage an adequate supply of housing development from derelict or other urban land. This position is confirmed in the CSR and in the Council's examination statements which present the approach taken to the identification of housing land within the Borough.

In conclusion, two of the five Green Belt purposes **d)** and **e)** have been held to not represent appropriate purposes in which to evaluate the wider effectiveness of Green Belt designation throughout Erewash. These purpose will therefore not form any part of the Review.

The methodology now sets out how work to assess the three remaining Green Belt purposes will be undertaken as part of a systematic evaluation.

Technical assessment:

At this point, the Review forms three distinct sections. Each remaining Green Belt purpose will be subject to comprehensive assessment within its own section, with the approach the Council plan to take to undertake the evaluation of each purpose being set out in turn later on within this Methodology paper.

An appropriate sequence of the sections is also felt to be an important aspect of the review with regards to producing an effective systematic assessment of the Erewash Green Belt. The NPPF lists checking the unrestricted sprawl of large built-up areas as the first of the five (although for the purposes of this Review, three) purposes. However, as explained further when the approach to the assessment of preventing neighbouring towns from merging is introduced, the Review plans to evaluate this

purpose first. This is as a result of previous work carried out at a sub-regional, strategic level reviewing the role of the entirety of the Nottingham-Derby Green Belt.

This Paper now sets out how the Review plans to assess each of the three relevant Green Belt purposes.

1. Prevention of neighbouring towns from merging into one another:

This section builds upon work carried out by the county councils of Derbyshire and Nottinghamshire back in 2005 to comprehensively assess the role and purpose of the Nottingham-Derby Green Belt.

A major principle at the centre of the Nottingham-Derby Green Belt Review was the identification of several corridors throughout the wider designation, and the subsequent technical assessment of how Green Belt contributed to the continuation of separation between a number of towns located across the study area. This approach represents a sensible starting point to assess a smaller area of Green Belt, but still follows an identical principle established by the previous work.

Technical assessment of this purpose will therefore involve the following:

- Identification of relevant towns outside the Borough's boundary (in addition to the towns of Ilkeston and Long Eaton within Erewash) as defined by neighbouring local planning authority in adopted or emerging settlement hierarchies;
- Identification of each corridor between relevant towns that contribute to separation;
- Justifying the geographic extent of a corridor;
- Broadly assessing the characteristics evident within the corridor;
- Identification of all existing Green Belt in Erewash located outside a corridor after its identification; and
- Offering a conclusion on the degree to which the corridor fulfils the purpose of separating towns.

Appropriate mapping will support the technical work as described above and will help with presenting the conclusions reached for each corridor.

2. Assisting in safeguarding the countryside from encroachment

This section of the Review assesses the role made by Green Belt designation throughout the Borough in safeguarding the countryside from encroachment.

As reflected by the Derbyshire Landscape Character Appraisal (LCA), countryside in Erewash stretches from the fringes of the Derby main built-up area right across to the edges of the Borough's two principal towns, Ilkeston and Long Eaton. In general, much of the land outside the two towns and the inset settlements within the

Nottingham-Derby Green Belt possesses a countryside character. The wide expanse of countryside throughout Erewash therefore requires disaggregation into smaller, more functional units in order for the Review to be able to more effectively assess the impact that Green Belt designation has on safeguarding this land from encroachment.

It is also recognised that the Green Belt designation inside the Borough continues across boundaries over into several neighbouring local authority areas. The creation of Countryside Units identified by this section of the Review therefore span the Borough's boundary, recognising that countryside is not wholly contained within a single local planning authority.

The identification of Countryside Units as a basis for more detailed assessment within a Green Belt review sees the following physical features be used to determine their extent as a consequence of the visual prominence these typically make as they run throughout the countryside:

- **Motorway (M1)**
- **Trunk roads (A6 (SE of Derby), A38, A50 & A52)**
- **A-classified roads (A6 N of Derby), A61, A608, A609, A6005, A6096)**

It should be noted that some of the roads listed above help define the extent of Countryside Units outside Erewash Borough in neighbouring local authorities.

Railways, minor classification (i.e. B-roads or lower) highways and country lanes all pass throughout the countryside whilst still forming a functional part of rural character areas. As a consequence, these features do not contribute to the defining of Countryside Units used by the Review. In the case of waterways, these too are also held to be features commonly found within a countryside setting. Erewash's local authority boundary consists of a sizeable section of watercourse, be it the River Erewash, Derwent or Trent, around the Borough's periphery. In these settings, landscape appraisal has shown broadly similar character areas existing on both sides of the watercourse, with riverside meadow creating continuity in countryside beyond the Borough's boundary helping to justify the continuation of Countryside Units into neighbouring local authority areas.

Working in conjunction with the higher classification highways shown above in order to define the extent of Countryside Units, inseting Green Belt boundaries where these adjoin settlements inside the Borough also contribute to the delineation of Units. Depending on the alignment of the higher classification highways, this may see an inset settlement located either wholly within, or adjoin more than one Countryside Unit.

Countryside Units will be identified by accompanying mapping. Each Unit will have its full extent shown within the Review. In all instances, assessment will list the area of the Countryside Unit in hectares, and where the Unit extends over into one or more neighbouring authorities, the respective sizes of each of these areas.

Of the three sections assessing the purposes, evaluation of whether Green Belt designation is assisting in safeguarding the countryside from encroachment will be determined mostly on descriptions of the characteristics evident within each Unit. Whilst sections addressing sprawl and merging are predominantly centred around mapping and a study of physical features on the ground or distances of gaps, analysis of encroachment takes the form of building an understanding of an area's sensitivity to encroachment. The Review therefore builds a picture of conditions across each of the Countryside Units, which in some instances will see sizeable areas of countryside, both inside and outside of Erewash, subject to assessment.

In reaching conclusions whether or not development in each Unit could or would not encroach on the countryside, a set of general principles will be utilised in assessments. These are based around the following factors:

- The scale of openness evident throughout a Unit
- Assessed landscape character areas and types across a Unit
- The geographic extent and size of a Unit
- The sense of enclosure within a Unit
- Network of settlements (inset and 'washed over') within a Unit
- Notable major developments within a Unit

3. Checking the unrestricted sprawl of large built-up areas

This section will assess the effectiveness of Green Belt designation in preventing the unrestricted sprawl of large built-up areas within Erewash.

Whilst an understanding of 'large' built-up areas may in the majority of instances see benchmarking made to settlements that function as towns or even larger conurbations, it is important to consider some of the context which has led to a need for a Green Belt Review.

The examination of the Council's preferred settlement hierarchy (Strategic Policy 1 – Housing) as part of a spatial growth strategy that has been unable to identify sufficient land in which to demonstrate both a five-year and plan-wide housing land supplies, the Planning Inspector has instructed the Council to consider the appropriateness of housing growth in rejected tiers of the settlement hierarchy. This includes the extension of rural area settlements (Villages) into the Green Belt. To understand the level of impact any housing growth planned as part of this tier would have, assessment of the effectiveness of Green Belt to check the unrestricted sprawl around each village is necessary. The requirement to subject villages to such assessment through a Review is further strengthened by the restricted width of Green Belt designation along an east-west alignment in the south of the Borough. In addition to the assessment of inset villages throughout the Borough, both of Erewash's principal towns, the large built-up areas of Ilkeston and Long Eaton, will also be the subject of appraisal against this purpose.

Assessment of this purpose will involve evaluation of three different groups of settlements/areas.

Group 1: All inset built-up settlements within the Borough

The Review will assess the existent Green Belt boundaries around each of the inset built-up settlements within Erewash. As explained previously, the definition of a large built-up area has been amended for the purposes of this Review's work owing largely to the geographic circumstances which exist within the Borough. Due to the relatively close proximity between many of the Borough's inset settlements, harmful sprawl of some of the villages does potentially threaten the wider ability of the Green Belt to function throughout Erewash.

Settlements to be assessed:

Breadsall, Breaston, Borrowash, Draycott, Ilkeston*, Long Eaton*, Little Eaton, Ockbrook, Risley, Stanley, Stanley Common, Stanton-by-Dale & West Hallam.

*Unlike settlements listed that are inset by Saved Policy H3 (Village Housing Development), Ilkeston and Long Eaton do not benefit from a specific Development Plan policy which has established a settlement boundary. However, both adjoin the Green Belt which enables this section to assess the degree to which GB designation is assisting with checking the unrestricted sprawl of the Borough's two principal towns.

Land surrounding each settlement will be subject to granular analysis, with particular focus on the ability of the current Green Belt designation adjoining a settlement to check urban sprawl. This will involve detailed assessment of the form of land within designation immediately adjoining current Green Belt boundaries. Factors include:

- general pattern and form of land
- field networks
- degree of enclosure
- Notable landscape characteristics
- physical features on the ground (roads, watercourses, railway lines, woodland)
- recent expansions of settlements and prevalence of modern development, and
- the availability of defensible and permanent boundaries

Each of the above factors will be assessed around the entirety of a settlement which abuts Green Belt. Assessment will then confirm the suitability of the current GB designation in preventing sprawl. Where it is felt Green Belt cannot achieve this purpose, such areas of land, along with suggested new boundaries that allow for the 'rounding off' of settlements (i.e. the forming of boundaries which promote a more logical alignment that reflects patterns of development), will be identified by accompanying mapping.

Group 2:

A second group of settlements currently 'washed over' by Green Belt will be assessed to establish whether any justification exists for these to be inset from the designation. These locations are:

Dale Abbey and Morley hamlets

The assessment of these settlements will look carefully at the extent to which they display any opportunities for self-containment which would allow for their potential inset from Green Belt designation. Assessment will consist of reviewing the form of existing development within these areas, identifying whether the pattern and cohesiveness of built development and associated land parcels evident throughout the settlement forms a clear justification to remove these locations from Green Belt designation.

Group 3:

The final group consists of built-up areas (largely comprising residential development) which do not form part of a settlement and are washed over by Green Belt designation. Such areas are likely to have pre-dated the introduction of Green Belt policy and may now benefit from reconsideration to establish if they should be removed from designation. Several areas displaying these characteristics exist at locations around Erewash.

Assessment of these areas will broadly follow the approach taken in respect to **Group 2**, with the level of self-containment and physical extent of these areas allowing for consideration of whether they should continue to be washed over by Green Belt designation.

High Lane East and Central (West Hallam), The Leys (Little Eaton) and Cole Lane (Ockbrook)**Conclusion:**

As highlighted at several points throughout this Methodology, the role of mapping the findings from each of the three sections that assess the purposes of the Green Belt will be significant in presenting information about the degree to which existing designation across the Borough continues to keep areas of the Nottingham-Derby Green Belt open.

To accompany the individual mapping generated from each of the three sections, a main central master map will bring the conclusions together and enable an overall view to be reached on the role and function of the Green Belt in Erewash. In reaching overall conclusions, the map will show which areas within of the Borough perform all, some or none of the three purposes that have been held to be relevant for the assessment of the Green Belt to occur. This can then assist with the ongoing examination of the Erewash Core Strategy Review by adding important context

which enables the impacts of development on Green Belt at locations around the Borough to be better understood.