Objection to the Erewash Borough Council Core Strategy Review Amendment

New Allocations

North of Breadsall Hill Top

**Strategic Policy 1.8 – North of Breadsall Hilltop**

**Land at North of Breadsall Hilltop as shown on the policies map is allocated for residential development of around 160 homes across 8.2 hectares of land. The development will form an extension to the Oakwood neighbourhood which forms part of the Derby conurbation.**

East of Breaston

**Strategic Policy 1.13 – East of Breaston**

**Land East of Breaston to the north of Heath Gardens as shown on the policies map is allocated for residential development of around 50 homes across 2.6 hectares of land. The development will form an extension to the key settlement of Breaston.**

North of Borrowash

**Strategic Policy 1.11 – North of Borrowash**

**Land North of Borrowash located to the west of Cole Lane as shown on the policies map is allocated for residential development of around 60 homes across 2 hectares of land. The development will form an extension to the key settlement of Borrowash.**

West of Borrowash

**Strategic Policy 1.12 – West of Borrowash**

**Land at West of Borrowash as shown on the policies map is allocated for residential development of around 280 homes across 14 hectares of land. The development will form an extension to the key settlement of Borrowash.**

South West of Draycott

**Strategic Policy 1.14 – South-West of Draycott**

**Land at South-West of Draycott as shown on the policies map is allocated for residential development of around 190 homes across 8.3 hectares of land. The development will form an extension to the key settlement of Draycott.**

West of Sandiacre

**Strategic Policy 1.7 – West of Sandiacre**

**Land west of Sandiacre at Cloudside as shown on the policies map is allocated for residential development of around 180 homes across 4.8 hectares of land. The development will form an extension to the Long Eaton urban area, which itself forms part of the Nottingham conurbation.**

North of West Hallam

**Strategic Policy 1.10 – North of West Hallam**

**Land North of West Hallam to the north of High Lane West as shown on the policies map is allocated for residential development of around 35 homes across 1.6 hectares of land. The development will form an extension to the key settlement of West Hallam.**

South of West Hallam

**Strategic Policy 1.9 – South of West Hallam**

**Land South of West Hallam to the south of Beech Lane as shown on the policies map is allocated for residential development of around 90 homes across 3.9 hectares of land. The development will form an extension to the key settlement of West Hallam.**

Amended Allocations

Acorn Way

**Strategic Policy 1.3 – Acorn Way**

**Land west of Acorn Way as shown on the Policies Map is allocated for strategic residential development of around ~~600~~ 550 homes across ~~26~~ 24 hectares of land that will extend the Derby neighbourhood of Oakwood.**

South West Of Kirk Hallam

**Strategic Policy 1.5 – South West of Kirk Hallam**

**Land south west of Kirk Hallam as shown on the Policies Map is allocated for strategic residential development of around 1,000 ~~1300~~ new homes, a new primary school, a new local centre, an extension to the Pioneer Meadows Local Nature Reserve, and a relief road across 50 hectares of land. The development will form an extension to the community of Kirk Hallam.**

Dear Steve and Curtis

CPRE Derbyshire, the countryside charity, is supportive in principle of well-planned development that accounts thoroughly for local needs. We apply the same principles to evaluate the location, design and impact of the proposed site as to any other development taking place in the countryside and considering national and local planning policy. Our primary focus and objective is to ensure that sensitive landscapes are protected from detrimental impacts of development and in line with the NPPF guidelines on sustainability, are preserved for both current and future generations from the perspective of distinctive landscape character assets as well as important access and amenity to cherished green spaces conveniently close to where people live.

The value of countryside to people’s wellbeing and as a buffer against climate change has never been more obvious and its heritage value, once lost or seriously degraded is virtually impossible to retrieve. Development proposals in open countryside or on undeveloped green field sites, we believe, must be considered holistically in terms of what these places mean to people and contribute to communities now and for the future.

CPRE – The Countryside Charity - believes in countryside and green spaces that are accessible to all, rich in nature and playing a crucial role in responding to the climate emergency. We work with our community, members and stakeholders for a thriving local countryside for all. We support plan-led development which accounts for the needs and preferences of local communities by robust consultation and sound evidence.

Land is a precious resource and must be used wisely, CPRE supports a ‘brownfield first, greenfield last’ strategy as a general principle.

CPRE Derbyshire believes that to permit the change from Green Belt to Grey Belt for all of the new allocation sites and the subsequent development would be contrary to our aims and to those of the local communities. It is important to remember that most of the Green Belt is high value countryside and in the instances detailed is productive farmland or grazing land. It is not *Land that does not make an important contribution to the functioning of the Green Belt* as stated in the Erewash Local Plan documentation

[Brownfield Policy Guidance Note - CPRE](https://www.cpre.org.uk/brownfield-policy-guidance-note/)

[Our view on Labour's five golden rules for development on the 'grey belt' - CPRE](https://www.cpre.org.uk/opinions/our-view-on-labours-five-golden-rules-for-development-on-the-grey-belt/)

Detailed Objections :

**Public Consultation**

1. The Public consultation period runs for 6 weeks. This is the minimum time frame for a Public Consultation and limits the detail that individuals and concerned groups can bring together to provide detailed and evidential responses
2. The Public consultation does not appear to be inclusive as the main mechanism for responding to the change in the New Allocations is via the Erewash Borough Council Website. This does not provide for the Erewash residents who do not have easy access to the Portal. The ability to respond via a multi based method would support a full and inclusive set of views and concerns. A recent example of an inclusive Public consultation was the National Grid’s Chesterfield to Willington Grid Upgrade project. This delivered a number of resident engagement sessions and allowed 18 weeks for feedback by phone, email, written feedback forms and on line forms all supported by a Web Site.

**Green Belt Objection**

NPPF states that Green Belt serves five purposes which are to;

check the unrestricted sprawl of large built-up areas

prevent neighbouring towns from merging into one another

safeguard the countryside from encroachment

reserve the setting and special character of historic towns

assist urban regeneration by encouraging the recycling of derelict and other urban land.

1. NPPF refers to Grey Belt as areas of previously developed land or other land that do not strongly contribute to Green Belt purposes. The green belt land identified for Grey Belt Development is neither of these and strongly contributes towards Green Belt purposes as it acts as a buffer, safeguards the countryside and acts as a barrier to urban sprawl. *Note The Greenbelt land has and is being used for Food production or grazing land in all locations*
2. NPPF states the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where the development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. It is clear the authority is now altering existing and acceptable Green Belt land to suit this paragraph/approach of the NPPF by converting it to Grey Belt. This is an incorrect interpretation of what Grey Belt land is.
3. NPPF 8. Promoting healthy and safe communities:- 104. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users.
4. It was previously thought that the land of the former Stanton Ironworks was taken out of the EBCs core strategy due to contamination that rendered the site unusable. Yet a recent Freedom of Information (FOI) request which was answered by EBC has advised the site is indeed to be utilised and has been allocated 1000 houses. Can EBC please advise of the status of the Stanton Ironworks sites and if this is included within the Core Strategy and how the planned 1000 houses impacts the Greenbelt review and use of Greenbelt land.
5. NPPF 4. States that local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. EBC needs to demonstrate what appraisals have been undertaken on the 109 Brownfield sites as detailed within their own Brownfield Register, and why these sites have not been prioritised for development over the identified Green Belt land.
6. NPPF 13. Protecting Green Belt Land:- The government attaches great importance to Green Belts. The fundamental aim of Green Belt is to keep land permanently open; the essential characteristics of Green Belts are their openness and their permanence. This is an inappropriate development in the Green Belt and there is No evidence from the appraisals that have been undertaken on existing Brownfield sites within EBC which there are 109 with 8 of these giving over 51H and the opportunity to develop over 500 dwellings**.**
7. NPPF 20. States that the target level of housing development within the plans should be capped in line with the capacity of Brownfield sites to accommodate it, to protect Green Belt, yet these plans significantly exceed it.
8. NPPF 146. The applicant and authority must make as much use as possible of Brownfield Sites and underutilised land; And prove that there is nothing left before encroaching on the Green Belt. • There is no proof of the authority discussing with neighbouring authorities about whether they could accommodate some of the identified need for this development, in order to not use the Green Belt.
9. The recent pandemic has highlighted the valuable and regular use of the footpaths around and across the green belt, promoting and fostering good mental health. The amenity and enjoyment of these pathways provides an important means by which residents of the local villages can get access to the countryside with substantial benefits for their physical and mental health as well as providing means of sustainable transport. For the people of these locations , this will have a negative effect on the enjoyment of walks, replacing green space with houses.
10. What are the impacts on Local Heritage assets for all of the proposed locations
11. NPPF states that sustainable development should be achieved. There is an obvious lack of definition of what makes a site a “sustainable location”.
12. NPPF 150. States that if it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt
13. NPPF 151. States that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. This development will remove existing green spaces forever which residents currently have access to including footpath, walks and spatial openness.
14. There would be a detrimental effect on the Carbon Sink opportunities by the loss of open land and the effects of a housing development of this size.
15. This application will and is already having a negative effect on mental health and emotional wellbeing of all impacted residents in the village locations
16. To conserve and enhance the Borough landscape character. This proposal does not promote the conservation or enhancement of the local landscape and is inappropriate development.
17. CPRE Derbyshire believes development on these sites will set a precedence for future developments on and beyond the settlement boundary of these villages as they stand today.

[State-of-the-Green-Belt-2023-online.pdf](https://www.cpre.org.uk/wp-content/uploads/2023/08/State-of-the-Green-Belt-2023-online.pdf)

**Number of Houses**

1. All of the proposed sites have direct access to footpaths and nearby bridlepaths. This allows for simple and accessible access to the countryside from the surrounding villages . All of the villages have thriving communities, keen cyclists, horse riders and numerous walking and rambler groups. They all happily coexist and share these paths throughout the locality. Increased urbanisation and the increase in traffic will impact this from Day 1. The villages will lose their rural identity and risk morphing into combined towns. This is a real risk for Breadsall Top and Derby City limits and between Draycott, Breaston and Borrowash.
2. The scale of the developments is not in keeping with the character of the villages. The proposed development should follow existing settlement patterns. New buildings and the volume of housing should harmonise with the neighbourhood, retain local character and the retention of open spaces as is the character of the village. Views into and out of the village should be preserved.
3. NPPF 73. States that the authority should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. Within Erewash there are **109** Brownfield sites detailed on the last EBC Brownfield Register 2024, with **103** of these having full planning consent. Of these sites, **8** are over 1H each, giving the ability to develop over 500 houses. Why are these sites not being prioritised first over Green Belt land.

**Type of Houses**

1. The proposed percentages of affordable housing within the developments is stated as 40% . How will this figure be achieved
2. How will the need for affordable housing be fulfilled by developing on these greenbelt village locations where local property values for new build properties currently starts at circa £300,000.

I would appreciate a timely response to allow for review and reflection

Best wishes,

*John Ydlibi*

John Ydlibi

Chair- CPRE Derbyshire, the Countryside charity

Tel 07925839664