



Erewash Core Strategy Review Amendment Consultation

Representations on behalf of
Green 4 Development

May 2025

1.0 Introduction

- 1.1 These representations have been prepared by Green 4 Planning on behalf of Green 4 Development in response to the Core Strategy Review Amendment Consultation.
- 1.2 Green 4 Development have interest in a number of parcels of land throughout Erewash which have consistently been promoted throughout the Local Plan Period. These include;
 - CSR0027 Land around Hopwell Hall
 - CSR0030 Ockbrook Cricket Club
 - CSR0032 Maywood Golf Club
 - CSR0033 Land of Alfreton Road Little Eaton
- 1.3 These representations are made in the context of seeking to work with the Council to ensure that an effective and deliverable Plan for the area is achieved.
- 1.4 To note none of these sites have been included within this consultation as a new draft allocation.
- 1.5 Our representations relate to the background evidence prepared by the Council to support their choice of new allocations and highlights the inherent risk of the approach taken to the housing numbers required both over the next five years and the plan period.
- 1.6 We wish to make the point that the link from the consultation page only takes you to a page containing the selected sites, not the background information. We are concerned if members of the public use the consultation link, as directed by the website they will not see any of the recent background evidence.

2.0 Erewash Site Selection Process

- 2.1 In understanding the process of site selection, which is the basis of this current consultation, we look to the Site Selection Paper included as part of the new evidence. This sets out that the process was firstly underpinned by the Sustainability Appraisal (March 2025) which in turn is based upon an identified settlement hierarchy including a new category G ii. This new category is supported by a key settlements paper (also March 2025). Sites were then considered against the Green Belt Review (January 2025).
- 2.2 Suitable, available, deliverable and economically viable site allocations are exhausted at each level of the hierarchy before moving onto the next until the Council considers it has adequate allocations to meet its 5-year and plan wide supply.
- 2.3 We therefore structure our representations as follows;
- Key Settlement Review
 - Sustainability Appraisal
 - Green Belt Review
 - Site Selection Paper
 - Housing Numbers and Trajectory
- 2.4 We note that the new evidence also includes a viability assessment which we provide no comment on and a transport assessment which models the original allocations and mitigation measures as opposed to any commentary on the proposed new allocations.

3.0 Erewash Key Settlements Paper March 2025

- 3.0 The Key Settlements Paper supports the settlement hierarchy set out in the proposed new Strategic Policy 0, and specifically a newly defined group of key settlements.
- 3.1 We welcome Little Eaton being identified as a Key Settlement.
- 3.2 Although we understand the rationale behind the definition of 'key settlements' and 'other settlements' we do not agree with the approach whereby the other settlements are then not considered in the site selection process.
- 3.3 The 'other' settlements could accommodate smaller levels of growth, and this is reflected in the size of sites being submitted (as shown on the sites assessed (rejected)) plans. Indeed many of these settlements would benefit from some small, planned growth to help support and sustain the existing services and facilities.
- 3.4 We also question how 230 new homes will be delivered in these other settlements and countryside (Strategic Policy 1), when no amendments are proposed to their tightly drawn boundaries.

4.0 Sustainability Appraisal

- 4.1 Our comments within this representation relate solely to the latest Sustainability Appraisal (Appraisal) March 2025 which seeks to assess the 44 sites submitted as part of the 2024 call for sites exercise.
- 4.2 Given the number of sites we represent, we make a general commentary below, using CSR0027 and CSR0030 as examples to illustrate how the scoring does not seem equitable or accurate. This representation highlights the inconsistencies within the Appraisal which then questions how robust this process has been and how much weight can be applied to it in terms of site selection.
- 4.3 We note that nowhere in the evidence documents is a plan showing all the assessed sites. Despite evaluating each submitted site by reference number, only the rejected sites are shown on the attached plans.

CSR0027 Land Around Hopwell Hall

- 4.4 We are pleased to see land around Hopwell being fully considered and the positives that allocating a new large strategic settlement could bring being recognised. The site scores very highly in terms of providing housing, provision of services and employment, and infrastructure.
- 4.5 However to score a -4 on community safety seems excessive and is based on the creation of a new settlement being more unsafe than extensions to existing settlements. We are unsure why this would be the case when design codes and forward planning, would seek to design out crime and create new neighbourhoods and a new community that could be 'safer' than just adding 200 homes onto the edge of an existing settlement. We note that all other sites being promoted on essentially greenfield land have a -2 score. We are not clear why a new settlement with the ability to start from basic principles of good design should have a -4 score.
- 4.6 We also contend that transport should not score -4. This not representative of the proposal put

forward throughout the plan process.

- 4.7 Transport and movement is a particularly important issue in determining the sustainability of a location. Preliminary work, in the form of the evidence base for Hopwell Village e supplied at the growth options stage and at the recent call for sites stage, evidences that the site is extremely sustainable in access terms. Hopwell is founded on the development of a wholly sustainably focused strategy for access and movement. The approach to this is two-fold:
- Looking to the future, at emerging trends and changes in behaviour, technology and attitudes to create a place that is resilient to changes like necessary climate change responses; and
 - Planning positively for people to use sustainable modes, and hence making positive provision for the outcomes that we want to see and deliver, rather than making reactionary provision based out of concerns that behaviour won't change.
- 4.8 The proposals provided the following measures in relation to transport;
- Priority infrastructure for walking, cycling, 'micro-mobility' modes and public transport over the use of the private car including high quality pedestrian, cycle and micro mobility routes throughout the development, and connecting the site to both Ockbrook and Borrowash, bus only routes and displaced car parking
 - Provision for highly sustainable transport connections including a travel hub with electric vehicle charging, express coach services, integrated bus-only connections to the A52, and future proofing for major future transport interventions such as High Speed 2 ('HS2') and the Nottingham Express Transit ('NET') extension
 - Flexible and targeted bus services, using 'Demand Responsive' services, traditional local bus routes, bespoke coach services and other emerging technologies such as Mobility-as-a-Service ('MaaS') to provide for a wide range of different journey purposes

- 4.9 This negative scoring highlights that the sustainability appraisal has taken the red line on face value and does not understand the principles behind the proposal resulting in transport achieving an overall major negative score.
- 4.10 Additionally, the site has a negative score against heritage due to its proximity to Ockbrook. Despite being buffered from the village, the Council identify a significant negative impact on heritage assets due to the increase in traffic through the village. There would be no reason for traffic to route through Ockbrook when it provides access to a strong east/west link via the A52.

CSR0030 Ockbrook Cricket Club

- 4.11 Ockbrook Cricket club has a very low score in the Appraisal of -12 placing it at 16th in the rankings table. This is a site that is to all intent purposes within the village, not within a flood zone, or adjoining any heritage assets it is easily accessible and represents a sustainable location for development.
- 4.12 When looking in more detail as to how the site has been assessed, it scores as a major negative in terms of the loss of recreational facilities. This assessment gives no recognition to the information provided during the Local Plan process and call for sites. The landowner is prepared to give the cricket club 10 acres of land on the edge of Ockbrook settlement, which the cricket club will then own. We attach as Appendix 1 the plans illustrating the parcel of land and the facilities which have been offered to the club. We appreciate this would be subject to obtaining planning, but given outdoor recreation is to be encouraged in the Green Belt we would anticipate that this would be supported.
- 4.13 It is expected that the new facilities for the cricket club, would be a significant improvement over the existing, and would secure the future of the cricket club, which otherwise has no long-term security on the existing site. The current lack of tenure prevents the club from securing grant funding, to allow the club to grow and develop further as a key local amenity. The cricket club can

then remain in perpetuity within Ockbrook while allowing the well-located and sustainable parcel of land they currently occupy, the opportunity to be developed.

- 4.14 This information has been consistently provided through the plan process and call for sites but it has been completely ignored within the Appraisal. If acknowledged the site would not be scored as a major negative on the basis of loss of recreational facilities.
- 4.15 The site scores negatively for Flooding and Water quality, despite being within Flood Zone 1. We would argue that giving the site a minor negative score for improving water quality, conserving water and causing deterioration of the Water Framework Directive seem unduly harsh for such a small development and these indicators should be scored neutrally.
- 4.16 In addition under Objective 13 which refers to maintaining and enhance woodland cover, there is no woodland on the site and any boundary trees can be retained, so to score this negatively again seems unjustified.
- 4.17 In terms of heritage, we acknowledge that the site is within the Conservation area but no detailed analysis or management plan for this is provided by the Council. Any potential impact on this can be mitigated through good design. There are two of Grade II listed buildings to the north of the site, but it is anticipated that development of the site would not impact on them. If necessary, the far northern extent of the site could be treated appropriately with landscaping to mitigate any potential impact. We do not believe this warrants a major negative score.
- 4.18 Overall in terms of scoring the cricket club scores negatively or neutrally on the majority of the indicators and only has two small positives which does not seem proportionate to a site that effectively sits within the heart of the village. It is surrounded on three sides by the village envelope and is located, within 100m of the public house and coffee shop/gift and 200m of the parish hall and post office, pre-school and other small shops.

Summary

- 4.19 We use two examples of the submitted sites to highlight a number of discrepancies with the overall approach and scoring given. The two sites we have provided are almost extremes of the development spectrum with one being a small development in the heart of the village and the other the creation of a new settlement, both have significant advantages in terms of sustainability and the opportunities presented, yet both sites receive comparatively negative scores and sit in the bottom half of the sustainability table.
- 4.20 We believe there could be issues in relying on this appraisal when choosing the most appropriate sites to bring forward within this plan period.

5.0 The Green Belt Review

- 5.1 We welcome the Council undertaking a Green Belt Review. The need for this review has been highlighted since the start of the Local Plan Review process, in order to fully and robustly evaluate where new housing should be located.
- 5.2 However we do have significant concerns in respect of the methodology and the resultant conclusions drawn from this.
- 5.3 National Guidance on the role of Green Belt is set out in the NPPF and within the Government Guidance Note specifically relating to Green Belt.
- 5.4 The PPG confirms that where necessary, the review should;
- to ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes.
 - A small number of large areas will not be appropriate in most cases.
 - In certain locations, smaller parcels might be more appropriate - e.g. around existing settlements or public transport hubs/corridors.
 - Applies rankings of Strong / Moderate / Weak / None
- 5.5 Whilst we appreciate the recent PPG has been updated post the Green Belt Assessment undertaken by the Council, it is helpful to compare the assessment undertaken to the latest information available.
- 5.6 We agree with the Councils approach to focus on criteria;
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another
 - c) to assist in safeguarding the countryside from encroachment

- 5.7 The Review starts with evaluating purpose c) then b) and then a), and when seeking to assess each purpose, a different method and form of assessment area is used. This does make comparison and overall contribution of parcels of land, to the purposes of the Green Belt, difficult to evaluate.
- 5.8 In terms of the approach, as we set out below the review does not use any standard form of ranking for evaluating land against each purpose, and the parcels of land being assessed are hugely different in terms of scale. Only when considering sprawl does the Council look in any granular detail at parcels of land and their contribution.
- 5.9 Given that the Council have a Sustainability Appraisal which sets out the hierarchy for the site search and this only looks at sites adjoining settlements, it would have been a more useful and robust review if parcels of land adjoining settlements were looked at in more detail against all three purposes of Green Belt land identified above, as opposed to huge swathes of land being considered and no real conclusions drawn from this.
- 5.10 We review each section below in the format as presented by the Council.

Purpose c) Safeguarding the Countryside from Encroachment.

- 5.11 This section uses areas called 'Countryside Units' and a small point to note is that firstly the maps provided are incredibly hard to read, using a green line along boundaries of green areas, makes it incredibly hard to decipher what is included in the unit and what is a different unit. In some cases you have to read the text to decipher what is in the unit and what is not.
- 5.12 Within the Review, conclusions are firstly reached in respect of the extent to which the unit is assessed as contributing to a role in safeguarding the countryside from encroachment.
- 5.13 Then secondly, a conclusion as to whether development within the unit of Green Belt, could or would not be likely to encroach into the countryside.
- 5.14 The assessment uses 'Could' and 'Would not' as the only two conclusions reached. There is no scoring

or range of assessment. Could does not mean 'definitely would' and is a very loose term open to interpretation, whereas to conclude 'Would Not' is far more clear cut. This does not seem a robust or clear and transparent way of assessing the development potential of these parcels.

- 5.15 The units' range in size from 52hectares (CU14) up to 2229 hectares (CU15) and a significant number of parcels are over 1000 hectares in size. Unsurprisingly given the size of area they cover, the conclusion reached on every larger countryside unit, is that it does contribute to safeguarding the countryside from encroachment and therefore any development 'could' encroach on the countryside.
- 5.16 This seems a pointless exercise. Absolutely no consideration is given to the settlements these units adjoin, the units are huge swathes of land that stretch in some cases from Derby to Nottingham. Therefore when taken as a whole, of course the conclusion is that they contribute to safeguarding the countryside from encroachment.
- 5.17 The units with a 'would not' encroach conclusion are all smaller such as CU2 which is a small 36ha parcel of land not directly connected to any settlement a small island of land that has been singled out for its own assessment. The conclusion of 'would not encroach' for this parcel becomes meaningless, as if this parcel were developed it would sit as island of isolated development surrounded by green space so it obviously would appear as encroaching on the countryside.
- 5.18 When looking in more detail at sites CSR0027/30 and 32, they all fall within Unit 15 a parcel of 2229ha stretching from the boundary of Derby across to the M1 and the built up area of Sandiacre.
- 5.19 To conclude that development of **any** parcel of land in this unit 'could' encroach on the countryside does not provide a meaningful basis for site selection for the Local Plan period.
- 5.20 In terms of encroachment into the countryside this ranks a small extension to Ockbrook or Risley on the same level as a new settlement such as land around Hopewell, this quite frankly ridiculous.
- 5.21 This is such a generalised approach to this form of review and the conclusion of 'could' encroach particularly when applied to a parcel of land that is over 2000ha becomes meaningless and not something that should be relied upon for site selection.

Purpose b) Preventing Neighbouring Towns from Merging

- 5.22 In evaluating the contribution to this purpose a usual starting point would be to identify the ‘towns and then to make judgement as to the extent to which development of a parcel would result in settlements merging (both physically and perceptually) with each other.
- 5.23 Whilst the towns have been identified, as with encroachment, large parcels of land have then been used to evaluate the contribution they make to this purpose, and the impact of development on them.
- 5.24 Our sites sit predominantly within Corridor B this is a wide corridor of around 3-4miles, separating Derby from Ilkeston.
- 5.25 Within the conclusion it states that the importance of this corridor *‘is subject to further study around the status of Green Belt between the villages of Borrowash and **Ockbrook**, and Stanley, Stanley Common, West Hallam and West Hallam Storage Depot to ensure that land between these inset settlements does not cumulatively contribute to a lessening of separation within the identified zone’*.
- 5.26 However no further study is forthcoming, and no definitive conclusions reached in the text or ranking or scoring given, and no attempt is made to determine if any land between or adjoining the inset villages could be released without harming the purpose of preventing the merging of settlements.
- 5.27 The conclusion is that the corridor remain important to separate Derby from Ilkeston, which we would agree with, but there is no analysis as to how small development parcels adjoining existing settlements would impact on that function.

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

- 5.28 It is only when considering Sprawl do the Council look at smaller parcels around the settlements.
- 5.29 The conclusions are again brief only identifying which parcels of land make limited contribution to

checking sprawl. No ranking or scoring is provided. Parcels of land are shown as red or blue but there is no key provided and in some instances the text and the plans do not match, making understanding this part of the review more difficult.

5.30 In respect of Ockbrook the commentary identifies that *Green Belt has proven effective in limiting the growth of this settlement across recent decades. Few examples of new housing developments of any meaningful scale have occurred over this time*

5.31 In considering site CSR0030 which is shown as Area A on the Green Belt Review the review identifies that *Area A represents an opportunity to 'round off' the inseting boundary at this part of Ockbrook, which would remove Green Belt from abutting the two aforementioned roads.*

5.32 The review states the following

The potential to inset land containing the main pitch with more advanced facilities, whilst leaving the secondary pitch within Green Belt would not be desirable as it would subject different parts of the same cricket facility to different planning policies

To omit land within Area A from Green Belt designation would leave this part of Ockbrook vulnerable to development, and whilst a defensible boundary exists in the form of hedgerow with occasional trees and a public right of way along the outer extent of Area A, the realignment of boundary could subject this area of Ockbrook to further development pressures seeing sprawl of the village at this location

5.33 None of this commentary is justified. We have repeatedly stated that the cricket pitch would relocate to land adjacent to the village under the same land ownership. Part of the cricket pitch would not remain, and it all would be subject to the same designation as it is now, which is Green Belt.

5.34 The Review then states;

Whilst not a specific consideration in the context of preventing urban sprawl, national planning guidance requires local planning authorities to plan positively to enhance the Green Belt's beneficial use by, amongst other objectives, providing opportunities for outdoor sport and recreation. To remove an important local sporting facility from Green Belt by inseting it from the designation is therefore

inappropriate, and alongside other justifications set out above, determines that Green Belt here continues to contribute to checking the unrestricted sprawl of the village.

- 5.35 This is the unjustifiable and unreasonable conclusion reached in the text, which again ignores that the cricket club would be replaced. It also seems to confuse the purpose of sprawl, with the provision of sporting facilities.
- 5.36 Despite this conclusion in the text under the ‘overall conclusion’ the site is assessed as only having a limited contribution to checking the unrestricted sprawl of the area.
- 5.37 However on the ‘final conclusion’ plan on page 141 the site is shown in dark green and therefore fulfilling all three categories.
- 5.38 In addition, we note, as mentioned above there is no key to the plans and part way through the assessment the colour key appears to change whereby land highlighted with a blue boundary on the plans have so far been parcels that make a limited contribution, when we get to Little Eaton, one parcel shown red and one blue are considered to have a limited contribution and when we get to Ockbrook, both parcels, evaluated as making a limited contribution are shown in red.
- 5.39 This may seem a minor point, but this leads to confusion when examining the plan on page 139 as despite having no key an assumption is made that the black areas make a limited contribution to preventing sprawl and the red a more significant contribution. This just does not match up with the plans that proceed it, or the conclusions from the text and more pertinently, this plan is then used to create the plan on page 141 which sets out the conclusions of the study.
- 5.40 This plan is evidence that is then relied on in site selection, so it is important that it is accurate and also legible.

Summary

- 5.41 The conclusion of the Green Belt Review is a map showing dark green and light green areas. No real granular analysis of parcels of land and no rankings.

- 5.42 In addition we question whether this map is even accurate.
- 5.43 All three purposes should have been consistently and clearly dealt with in the relevant sections of the Green Belt Review. Followed by an overall assessment of parcels of land which considered all three indicators and provided detailed assessment and rankings.
- 5.44 We have serious concerns about the size of parcels and level of analysis provided and this approach seems contrary to all recent guidance on how a Green Belt review should be undertaken.
- 5.45 The assessment of CSR0030 via the Green Belt review highlights the inherent issues with the approach taken. On the basis of this Green Belt Review the development of site CSR0030 the Cricket Club, is shown to encroach upon the countryside to the same extent as say a new settlement at land around Hopwell, to narrow the gap between settlements despite the council themselves identifying that it would 'round off the village settlement boundary' and to lead to the sprawl of the village, not by its development, but by virtue of losing the cricket pitch and opening up opportunities for further future development in this direction.
- 5.46 The assessment of this site highlights the inherent issues with this Green Belt Review. The conclusions its reaches are neither justified or reasonable.

6.0 Site Selection

- 6.1 The site selection is underpinned firstly and foremostly by the Sustainability Appraisal of the Strategic Growth Options undertaken as part of SA1 and subject to an earlier consultation.
- 6.2 We do not re-iterate all our previous presentations on that matter here. Rather we focus on the latest evidence which seeks to support the new draft allocations. However we stand by our representations made then in respect of Option H, which we do not believe were given due consideration at that time.
- 6.3 We also wish to make a point regarding Option C as opposed to option G ii. Within the site selection process no sites within Option Gii are even considered as the Council considers it has met its target without having to look to these settlements. However some of the sites put forward do, to all intents purposes, function as part of the established settlements. In the case of Ockbrook Cricket Club this is within and functions as part of the settlement. To not even consider its release as part of this site selection process seems extremely short sighted and is not in accordance with creating a sustainable plan.
- 6.4 The site selection process in following the Strategic Growth option hierarchy, looks firstly at the sustainability appraisal of each submitted site, then sites are considered against the Green Belt Review.
- 6.5 This is why the preceding two sections of these representations are crucial in determining if the sites now selected as draft allocations represent the most appropriate way to plan for development over the plan period.
- 6.6 We feel there is some disparity with the scoring with the sustainability appraisal but perhaps more importantly is the inherent issues we have with the Green Belt Review.
- 6.7 A Green Belt Review that did not look at encroachment or the merging of settlements in any meaningful way only looking in detail at sprawl, thereby one could argue giving sprawl a greater

weight than the other two purposes but with no justification to do so.

- 6.8 If the Council are to base their site selection predominantly on a Green Belt Review then this review needs to be undertaken in a clear robust manner that allows all parcels of land to be evaluated in a consistent manner against a similar set of criteria and the results presented clearly and accurately.
- 6.9 It is also not clear what the status of the safeguarded land is. We have no plan showing all the sites that have been promoted and so it is not clear if the safeguarded land is actually available, or as stated in some of the reasoning, would in the Councils opinion, just form an obvious extension to an draft allocation that is shown. This needs to be rectified so that everyone can properly understand if the safeguarded land is actually available for development, and represents a genuine alternative to some of the promoted sites that have been rejected.

7.0 Housing Trajectory

- 7.1 The emerging plan falls under the transitional arrangements of the NPPF however from the outset it is pertinent to note that Erewash have failed to deliver against their housing targets for over the last 10 years. They do not have a 5-year HLS and they are at 67% on the Housing Delivery Test.
- 7.2 This plan review is an opportunity to rectify their poor performance and plan positively for housing delivery going forward.
- 7.3 However, the Council continue to plan to under-deliver against targets. The previous standard housing delivery method identified 386p.a. which is what the Draft Plan is currently planning for.
- 7.4 The new standard method as per December 2024, is 515, a 33% increase.
- 7.5 Overall, using the pre 2024 methodology, the Council need to plan for 6948 new homes over the plan period, their projected completions are at 7124. Given that some of the allocations are questionable (such South Stanton 1000 new homes allocated since 2014 never delivered). The Council are very unlikely to reach that target without allocating or permitting development on more sites.
- 7.6 Given this Partial Review, even with the new draft allocations, is not within 80% of the new Standard methodology, (which would require 9,270 new homes over the same time period), if adopted the Council will need to start an immediate review of the Plan.
- 7.7 We ask the question why not plan now to at least meet the 80%? And to provide some form of flexibility if, as predicted some of the larger allocations (such as South Stanton) do not come forward.
- 7.8 In terms of the published Housing Trajectory we have the following specific comments;
- 7.9 We are not clear on the evidence for the safeguarded land. It is not clear if these parcels of land have been promoted and are available, or if it is just the Council's opinion that they form a logical extension to the sites allocated. This is a significant point, as these sites account for 960 homes over the Local Plan period.

- 7.10 We are not clear on the evidence for the assumptions around windfall numbers, and especially how and where these might be accommodated in a Borough with a significant Green Belt and very tightly drawn settlement boundaries.
- 7.11 Although there has been a reasonable provision of housing on windfall sites in Erewash in the past, there needs to be evidence that this will continue in the future, and that the Council has undertaken appropriate work to show that this will be the case.
- 7.12 It is clear that the historic provision of windfall sites across the Borough has included a large number of units on larger sites of 50 or more dwellings. Given the recent call for sites we would envisage that if a site is capable of accommodating 50+ dwellings it would have been promoted and included within this assessment.
- 7.13 Overall, we would need to some evidence that is level of windfall provision is a realistic assumption, over and above the newly allocated sites, given the tight constraints of the Green Belt.
- 7.14 Every new allocation is shown as not only commencing development in 2026/2027 but having some level of completion. This seems optimistic given the current status of the Plan and the need for each site to have gone through the process of a planning application and discharge of conditions application.
- 7.15 Despite no agreement from the landowners and no site promotion or representation to the Local Plan process, the Council continue to use the figure of 1000 dwellings for the South Stanton site to meet their housing need over the Local Plan period. It is not appropriate to continue to include and rely on this site as a strategic allocation.
- 7.16 The housing trajectory provides only a surplus/cushion of 158 dwellings over the plan period. Given our concerns over South Stanton, and as set out above, the requirement for Erewash to have to begin an immediate plan review once this plan is adopted. We strongly consider that now is the opportunity to allocate additional sites to provide certainty and flexibility for the Local Plan to deliver. We see this lack of ambition as another missed opportunity and does not represent a positively prepared plan.

8.0 Conclusion

- 8.1 These representations look in some detail at the scoring and ranking applied through the Sustainability Appraisal and Green Belt Review and although some points may appear minor, they are important, as the site selection for this Borough, which will effectively direct development for the next fifteen years, is based on these reviews and assessments.
- 8.2 It is clear from just considering two of the forty-four assessed sites that there are discrepancies in the sustainability appraisal scoring.
- 8.3 The Green Belt review appears to follow no established methodology. Huge parcels of land are assessed and then compared to much smaller parcels, no granular assessment, no rankings given or methods of comparison available, resulting in a plan with only two outcomes.
- 8.4 The site selection is then solely based on these two assessments.
- 8.5 The Council then continue to plan to under-deliver against targets, there is no positive plan making happening, no in-built flexibility for the Local Plan to deliver. We see this continued lack of ambition as another missed opportunity and does not represent a positively prepared plan.

Appendix 1







