



The countryside charity
Derbyshire

Please give details of why you consider the Erewash Core Strategy Review is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Core Strategy Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

“The NPPF states that Green Belt boundaries can only be altered in ‘exceptional’ circumstances. Local authorities in areas constrained by Green Belt should not set planning targets for levels of growth beyond that which can be accommodated without harm to the Green Belt. Erewash District council have failed to protect the Green Belt in its current Local Plan proposal. Local reviews of Green Belt should only take place if:

- they are part of a broader, Green Belt-wide development plan or policy
- they are primarily based on the five purposes of Green Belt as well as any additional local criteria where relevant and agreed locally and seek to minimise harm to the Green Belt

The Green Belt boundaries did not significantly change in the previous Erewash Local Plan period. Erewash has been successful till now in previous plans to resist allocations of housing development in the Green Belt. This is due to allocation of large brownfield sites such as Stanton and a balanced approach to housing provision in the wider Nottinghamshire area covering other boroughs. However, Erewash is now struggling to deliver the housing supply targets set by government and in its proposed Core Strategy Review has put forward a number of proposed developments on the edges of its’ Green Belt, which would reduce its Green Belt by 2% .CPRE’s policy stance is to protect Green Belt land areas from development by maximising the use of brownfield site redevelopment first . In view of the national requirements laid out in the NPPF where development is to be allowed on Green Belt land only in exceptional circumstances, we don’t believe that the current proposals by Erewash District Council to build on sites in Green Belt areas meet these exceptional criteria. In our opinion not enough work has been done by the Council and its planning officers to justify why some of these proposed site allocations in the Green Belt meet the ‘exceptional’ criteria, nor have the Council done enough work with other Borough and District Councils to determine whether they can meet some of Erewash’s housing targets. In the Erewash Council Report it states that none of the Council’s have responded to date, which is not in our view meeting the spirit of co-operation. The planning officers should be following up with these other councils. Though we have some sympathy with Erewash, with the high % of its area outside of the urban conurbations being Green Belt, they need to create more opportunity within the existing urban areas and maximise use of brownfield sites first to meet the proposed housing targets. Strategically, the Green Belt area in Erewash is more essential for the purposes of protecting the gap between Nottingham and Derby than other areas of Green Belt in the south and east of Nottingham. Long Eaton is constrained and forms a ribbon of development westward of Nottingham that needs to be safeguarded from joining up and leading to coalescence of settlements between Nottingham and Derby.

We consider that the previous core strategy in line with protecting the Green belt was the correct stance for Erewash to take.

The lack of stronger evidence-based assessments from a more recent Strategic Green Belt review than the 2006 Nottinghamshire/Derbyshire review, detailed site LVIAs and landscape character assessments on the impacts on the countryside, then CPRE will maintain its strong objection to the inclusion of 3 of the 4 proposed Green Belt sites in the proposed local area plan (Kirk Hallam, South of Spondon Wood and North of Cotmanhay) as we have not seen any evidence justifying the 'exceptional circumstances' for planning to build houses in this area of the Green belt."

Please set out the modification(s) you consider necessary to make the Core Strategy Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Core Strategy Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"With respect to the 3 proposed Green Belt sites:

Strategic Policy 1.5 - Kirk Hallam

We have major concerns regarding the size of the proposed increase to the estate by 50% (1300 additional houses). This will have significant impact on the village of Kirk Hallam, will significantly impact traffic levels on the roads which are already very busy at peak times of the day with traffic queuing in and out of Ilkeston, will need to build new primary schools and extend the senior schools, and will need further capacity in primary healthcare too. It also has significant impact on the landscape and landscape character which the local population enjoys today. The Pioneer Meadows nature reserve and Sow Brook green corridor will be potentially cut off from surrounding countryside by housing which will lead to fragmentation of the existing green infrastructure. There are a number of concerns that surrounding the Pioneer Meadows nature reserve with housing will lead to a loss of habitat and the loss of wildlife. The publicly accessible recreational footpaths have poor legibility with narrow paths and could be lost in any subsequent development, affecting the enjoyment of the countryside for existing residents of Kirk Hallam. In addition, the proposed Kirk Hallam relief road (Transport Policy 4) is a "road to nowhere" as it won't ease the traffic situation as it reroutes most of the traffic back to the Bulls Head roundabout on Ilkeston/ Kirk Hallam junction, where most of the congestion is today at peak times. It would be a total waste of taxpayers' money.

Strategic Policy 1.4 – Spondon Wood

In respect of the land South of Spondon Wood, this site is a long linear site between existing housing and Spondon Wood. Although, there are limited views of the countryside and therefore limited impact on the openness of the greenbelt, we wish to support residents in their objections to this site on the basis that it will impact on natural habitat, and also be a poor result on the pattern of development by bringing the urban edge directly up to the edge of the woodland, again potentially impacting wildlife and their habitats.

Strategic Policy 1.6 - Cotmanhay

Similarly, the proposal to extend Cotmanhay by a further 250 houses, puts incremental pressure of local infrastructure, schools, primary healthcare and public transport. The Council should not be proposing further eradications of the Green Belt and its needs protecting, as the area around Cotmanhay Woods, is an important wildlife habitat and the main area of green space that the residents of Cotmanhay enjoy for walking their dogs and for helping with their mental wellbeing. The proposal would also adversely impact the landscape and the views towards Shipley.

Including some of the other proposed housing proposals including Stanton Works circa 70% of the housing growth will be around Ilkeston, which is disproportionate to the rest of Erewash District.

There are a number of options which Erewash District Council should consider to avoid planning to allocate future housing on these 3 sites, highlighted above.

- **To build more houses on existing brownfield land**

By increasing densities, building more townhouses and more social housing on the proposed Stanton site, it would increase housing numbers from 1000 to 1300 homes.

Additionally, instead of building new houses on Green Belt land, Erewash could propose instead to build 1000 houses on the West Hallam storage depots, an existing brownfield site. This was the plan in the last Core Strategy and needs revisiting. **This would offset the need to build 1300 houses in Kirk Hallam's Green Belt.**

- **Look to other boroughs to meet demand through the duty to cooperate**

Erewash District Council have failed to fully co-operate with other local authorities in the provision of future housing. They did not take part in the Greater Nottingham Strategic Plan Growth Options Consultations July 2020, between Broxtowe, Gedling, Nottingham City Council and Rushcliffe, even though Erewash is part of the same housing market.

In view of not being able to meet housing targets a more strategic approach needs to be taken between neighbouring councils with a regional approach to housing delivery. One that respects green belt policy to preserve land between towns. The last full and comprehensive greenbelt review was in 2006 and we consider this should be the first stance. The Strategic Growth Assessments documents produced by Erewash assesses options for growth and on each site only in relation to its own portion of greenbelt, not on the overall impact to the Green Belt. Erewash and the other local authorities need to undertake a more up-to-date assessment of the Nottingham/Derby Green Belt.

- **To increase housing density by building more town houses and low-level apartment blocks**

Increase densities within brownfield allocations or urban conurbations. Where urban extensions into the Green Belt are decided through the local planning process to be the most sustainable option, CPRE would want them to meet the Smart Growth criteria set out in our Housing Policy Guidance note. In particular any new urban extensions should have medium or high densities and be well linked to public transport and other social infrastructure so that car use can be minimised. There should also be a significant contribution to meeting social housing need in the local area. By increasing densities, we believe that both Ilkeston and Long Eaton could absorb a further 100 houses each in their allocations, **which would mitigate the need to build 200 houses in Spondon's Green Belt.**

- **To meet more of the need through the building of smaller developments**

Look towards smaller sites to have less overall impact on the countryside. Exception sites have always been acceptable on a small scale. Build an additional 15 to 20 house development outside the main urban areas each year. **This would remove the requirement to build an additional 250 houses in the Green Belt around Cotmanhay.**

Appendix 1

Future Housing Growth Proposals – Erewash Local Area Plan

	Proposed	Alternative
Long Eaton Urban	700	800
Ilkeston Urban	1400	1500
Rural Areas	350	600
Brownfield Stanton	1000	1300
Greenbelt- Derby Area	800	600
Greenbelt- Ilkeston Area	1550	0
Brownfield West Hallam	0	1000
Total	5800	5800