

Green Belt Technical Paper

Erewash Borough Council

September 2023

Purpose of the Paper

This Paper sets out the process that all sites currently proposed to be released from the Green Belt were subjected to, and how these sites were favoured over the alternatives.

Background Context

At the outset of the Core Strategy Review in January 2020, Erewash Borough Council (EBC) calculated a need to provide **6,680** dwellings over the Local Plan period commencing from 2022, the assumed adopted date, as per the calculation using the Government's standard methodology. Informing the provision of sufficient land for the required number of homes, EBC established the following Spatial Growth Strategy to rank an individual site's sustainability.

1. Growth within Long Eaton Urban Area (the conurbation)
2. Growth within Ilkeston Urban Area (the town)
3. Growth within Rural Area Settlements (the villages)
4. New Settlements not in the Green Belt
5. Extension of the conurbations into the Green Belt
6. Extension of the town into the Green Belt
7. Extension of the villages into the Green Belt
8. New settlements in the Green Belt

After the Council's 2019 SHLAA was completed, it was confirmed that there was a significant shortage of realistic and deliverable housing land in non-Green Belt locations across the Borough. It therefore became evident that the Council would have to consider alternative options for growth to meet the housing needs requirement throughout the plan period.

With the above in mind, EBC determined that the best approach to address the shortfall in deliverable and developable housing land was to consider the suitability of strategic growth sites within the Green Belt, to be supplemented by two strategically sized brownfield sites at Stanton South and West Hallam Storage Depot, each with the potential to deliver 1,000 homes outside of designated Green Belt.

The Council started the process of seeking alternative options for growth by undertaking a Sustainability Appraisal (SA) on the Spatial Growth Strategy to confirm which areas of the Borough represented the most suitable for housing growth.

Firstly, the Council assessed broad areas across the Borough to assess the general suitability of these areas for development. This SA process was based on the areas listed above which collectively comprised the Spatial Growth Strategy. The conclusions of the SA exercise showed that the Spatial Growth Strategy as ordered above was the correct approach to be following.

Following the exercise to determine the suitability of the respective tiers set out within the Spatial Growth Strategy as part of SA work, a number of individual sites

(discussed in the following section) were then assessed through the Sustainability Appraisal and placed within the Spatial Growth Strategy, as shown above.

The submission of sites:

Strategic Call for Sites (2019)

To understand locations where strategic housing sites may exist around Greater Nottingham, EBC participated, along with the four other Housing Market Area councils, in the Nottingham Core HMA Strategic Call for Sites exercise. This was an opportunity for developers, landowners, and/or agents to submit sites to the five councils that were considered to have potential for housing. Sites had to provide a minimum of 200 dwellings to be considered through this consultation. There were no restrictions placed on the classification of land that was submitted to any of the councils. The sites submitted to EBC are listed in the table below along with the SGA site reference number subsequently assigned to each.

Table 1: Green Belt sites in Erewash submitted through the HMA Strategic Call for Sites exercise

Site Name	Suggested number of dwellings in Regulation 18 Consultation
Acorn Way (SGA1)	600
South-west Kirk Hallam (SGA18)	600
Lock Lane (SGA17)	300
Maywood Golf Club (SGA19)	2,086
Land surrounding Hopwell Hall (SGA9)	3,360
North of Draycott and Breaston (SGA20)	3,115
Risley Village Extension (SGA11)	338

Erewash Strategic Housing Land Availability Assessment (SHLAA)

The remaining sites were known to the Council through the 2019 SHLAA. The SHLAA contains a database of all known sites which may be suitable to accommodate housing across the Borough. Sites were able to be submitted to the Council by anyone, where they are then subsequently assessed using an established methodology that can be found at **EBH9 – Joint Methodology Report for Greater Nottingham SHLAAs**.

SHLAA sites became Options for Growth sites where the number of dwellings exceeded 200 units, and there was active developer/agent interest on the site. At this stage, sites that met the above criteria concerning site size were separated from the SHLAA and were put forward for assessment and consideration through the Strategic Growth Area (SGA) process. The sites extracted from the SHLAA are listed in the table shown below.

Table 2: Green Belt sites extracted from the SHLAA for SGA assessment

Site name	Suggested number of dwellings
South of Beech Lane (SGA2)	228
Breadsall Hilltop (SGA3)	214
North of West Hallam (SGA16)	1,085
East of Borrowwash (SGA5)	304
West of Borrowwash (SGA6)	630
Cotmanhay Woods (SGA7)	600
South of Little Eaton (SGA10)	200
South of Sawley (SGA13)	525

Assessing the sites

Once all the sites has been identified, the Council began the process of assessing each site individually through SGA assessments. These assessments can be found in the Examination Library titled **EBH1 – Strategic Growth Area Assessments**. Within the assessments, Officers assessed those sites located in the Green Belt, of which all but two were, against the five purposes of Green Belt set out at **Paragraph 138** of the National Planning Policy Framework to understand the impact the potential development of each site for housing would have on the purposes of the designation. The findings from this set of assessments, along with the assessment of a wide number of other key topics, were used in conjunction with the Spatial Growth Strategy to inform a preferred set of options for development.

Ranking the sites against the spatial strategy

The table below shows where each of the sites considered by the SGA assessment process rank against the various tiers of the Spatial Growth Strategy. This table covers the entirety of the Core Strategy Review right through to its submission. This table also includes sites/dwellings that are already known to the Council through the SHLAA or live applications, but which however are not large enough to be deemed strategic. The non-strategic SHLAA sites which contribute to the Council’s assessed local housing need figure are all accounted for within the top three rows/tiers of the Spatial Growth Strategy, whilst the tiers of the Strategy which do not involve sites identified in Green Belt are shaded in the table below.

Table 3: Sites within the Spatial Strategy

Spatial Strategy	Site	Number of dwellings	Reason site was preferred/rejected
Growth within Long Eaton	Identified small scale sites	780	These sites identified through the 2019 SHLAA will deliver growth within the conurbation, having no impact on the Green Belt.
Growth within Ilkeston	Identified small scale sites	1,560	These sites identified through the 2019 SHLAA

Spatial Strategy	Site	Number of dwellings	Reason site was preferred/rejected
			will deliver growth within a town, having no impact on the Green Belt.
Growth within rural villages	Identified small scale sites	130	These sites identified through the SHLAA will lead to growth within villages in Erewash, having no impact on the Green Belt.
New settlements not in the Green Belt	Stanton South	1,000	Stanton South is brownfield land with long-term proposals for housing redevelopment. It is expected development of Stanton South is likely to occur within the plan period.
	West Hallam Storage Depot	1,000	The current employment use of the site was not considered to be efficient or sustainable long term. It was considered that redevelopment of this brownfield site as a 1,000 home garden village was achievable within the plan period.
Extension of the conurbations into the Green Belt	Lock Lane (SGA17)	300	Site extends the conurbation. This site is filled land and sits above the floodplain of the River Trent. The site was available and being actively promoted for development.

Spatial Strategy	Site	Number of dwellings	Reason site was preferred/rejected
	Acorn Way (SGA1)	600	Site extends the conurbation of Derby. Release of this area of Green Belt forms a logical extension to Oakwood and would not compromise the historic setting of any rural villages.
Extension of the town into the Green Belt	Cotmanhay Wood (SGA7)	600	Green Belt release at this location could enable the Wood itself to be brought into public use as community woodland linked by an east-west multiuser trail to give recreational access to the Erewash Valley and Shipley Country Park.
	South-west Kirk Hallam (SGA18)	600	Green Belt release at SGA18 would lead to the extension of the town of Ilkeston and would unlock land for a relief road acting as a Kirk Hallam bypass from the new development heading towards Derby. In respect of SGA18, this relief road would act as a bypass for traffic towards Nottingham.
Extension to the Conurbations	South of Sawley	525	Development of this Green Belt site would be in an area of flood risk.

Spatial Strategy	Site	Number of dwellings	Reason site was preferred/rejected
	Breadsall Hilltop	214	Green Belt release at this location would reduce the separation currently in place between Breadsall village and the outer extent of Derby, contrary to the purposes of the Green Belt.
Extension of the villages into the green belt	North of Draycott and Breaston (SGA20)	3,115	Green Belt release here would effectively lead to the coalescence of Draycott and Breaston, therefore this site was considered inappropriate.
	East of Borrowash	304	Development here would encroach into the open countryside, contrary to the purposes of the Green Belt. As a result, this site was rejected.
	West of Borrowash	630	Development of this area of Green Belt would reduce the current level of separation between Borrowash and Spondon.
	South of Little Eaton	200	Development here could not be progressed until major upgrading works to the A38/A61 Little Eaton junction are complete, therefore it is not considered achievable within

Spatial Strategy	Site	Number of dwellings	Reason site was preferred/rejected
			the plan period and the site was rejected.
	North of West Hallam	1,085	Development here would encroach into the open countryside, contrary to the purposes of Green Belt. As a result, this site was rejected
	South of Beech Lane	228	Development of this site was assessed as harming the historic setting of the adjacent Conservation Area
	South of Risley	338	Development here was assessed as affecting the setting of Risley Conservation Area.

Regulation 18 Consultation

All SGA assessments were made available for comment throughout the Regulation 18 Consultation. The consultation initially was scheduled to run for eight weeks between January 27th 2020 and April 20th 2020. However, this deadline was extended indefinitely due to the Coronavirus pandemic. The consultation eventually closed on Monday 20th July 2020.

Amendments following Regulation 18 Consultation

As a consequence of responses received to the Regulation 18 Consultation, and due to changes in circumstances on several of the proposed sites, a series of modifications were made to the above Green Belt sites. Some sites at this stage of the Plan's review were also removed from the process for reasons mentioned in the above table. Further explanation for the decisions made can be found in **EBC03 – Revised Options for Growth (Reg 18) March 2021**. The changes are outlined in the table below.

Table 4: Amendments to Green Belt sites following Regulation 18.1

Site Name	Changes made to Green Belt section	New proposed number of dwellings
Acorn Way (SGA1)	No changes made	600
South West Kirk Hallam (SGA25)	<ul style="list-style-type: none"> • Updated site size to 50ha • Updated number of dwellings to reflect new site size • Update all measurements based on new site size and proposed developable area • Referred to as SGA25 from Regulation 18.2 onwards 	1,300
Cotmanhay Wood (SGA7)	<ul style="list-style-type: none"> • Changed number of dwellings from 600 to 250 • Changed the site size to 7.2ha • Update all measurements based on new site size and proposed developable area 	250
Lock Lane (SGA17)	<ul style="list-style-type: none"> • Site withdrawn as a result of a response to Regulation 18 consultation by a statutory consultee 	Withdrawn
Maywood Golf Club (SGA19)	<ul style="list-style-type: none"> • Confirmed the number of housing units as 1,200 as opposed to 2,086 calculated by using the density calculations at Reg 18.1. 	1,200
Land surrounding Hopwell Hall (SGA27)	<ul style="list-style-type: none"> • Site size increased from 96ha to 215.5ha • Updated number of dwellings to reflect new site size • Update all measurements based on new site size and proposed developable area • Referred to as SGA27 for Reg 18.2. 	7,504
North of Draycott and Breaston (SGA20)	<ul style="list-style-type: none"> • Site size reduced from 89ha to 87ha • Number of dwellings reduced from 3,115 to 2,103 • Update all measurements based on new site size and proposed developable area. • Site still considered unsuitable for development as per table 3 	2,103

Risley Village Extension (SGA11)	<ul style="list-style-type: none"> • Site size reduced from 9.7ha to 5.6ha • Number of dwellings reduced from 338 to 100 • Update all measurements based on new site size and proposed developable area • Site still considered unsuitable for development as per Table 3 	100
South of Beech Lane (SGA2)	<ul style="list-style-type: none"> • No changes made to the site • Site still considered unsuitable for development as per Table 3 	228
Breadsall Hilltop (SGA3)	<ul style="list-style-type: none"> • Site's development would reduce the separation between Breadsall Village and the suburban edge of Derby, contrary to the purposes of Green Belt, therefore the site was withdrawn 	Withdrawn
North of West Hallam (SGA16)	<ul style="list-style-type: none"> • No changes made to the site • Site still considered unsuitable for development as per Table 3 	1,085
East of Borrowash (SGA5)	<ul style="list-style-type: none"> • No changes made to the site • Site still considered unsuitable for development as per Table 3 	304
West of Borrowash (SGA6)	<ul style="list-style-type: none"> • No changes made to the site • Site still considered unsuitable for development as per Table 3 	630
South of Little Eaton (SGA10)	<ul style="list-style-type: none"> • No changes made to the site • Site still considered unsuitable for development as per Table 3 	200
South of Sawley (SGA13)	<ul style="list-style-type: none"> • No changes made to the site • Site still considered unsuitable for development as per Table 3 	525

Table 4 above identifies **2,150 dwellings** on preferred sites located within the Green Belt. This is supplemented by the 2,470 dwellings located within existing settlements. There is also a reduction in the number of dwellings proposed in new settlements outside of the Green Belt, as West Hallam Storage Depot was withdrawn after this round of consultation at the request of the landowner. The Stanton Regeneration Site, referred to within the Core Strategy Review as Stanton South, was carried forwards with provision made for 1,000 housing units. This gives a total of **5,620** proposed dwellings, of which **2,150 dwellings** are within Green Belt.

Regulation 18.2 additions

Along with the changes made as described above, there were new additional sites considered by the Core Strategy Review process which were necessary to account for the loss in dwellings detailed above.

At this stage of the Core Strategy Review, the number of required units the Plan needed to make provision for was revised to **5,800 dwellings**. This was necessitated by the availability of new data on housing affordability as part of the Government's standard methodology to calculate local housing need. This meant the revised shortfall in dwellings from the Regulation 18.1 consultation now totalled **180 units**.

Table 5: Sites added for Regulation 18.2

Site	Growth Strategy Position	Number of units
North of Spondon (SGA26)	Extension of the conurbation (Derby) into the Green Belt	240
Land at Botany Bay, Ilkeston (SGA22)	Extension of the town into the Green Belt	60
Thacker Farm, North-West Kirk Hallam (SGA23)	Extension of the town into the Green Belt	830
Croft Road, Breadsall (SGA24)	Extension of a village into the Green Belt	120
Land at Rushy Lane, Risley (SGA28)	Extension of a village into the Green Belt	800
Pastures Farm, Land south-west of Risley (SGA29)	Extension of a village into the Green Belt	430

Of the above sites, the highest performing against the tested and established Spatial Growth Strategy is the North of Spondon (SGA26) site. The presence of Spondon Wood, directly to the north of the site, provides a robust Green Belt boundary preventing further outward growth. As the 240 dwellings this development would provide would lead to a total of 5,860 proposed dwellings (60 dwellings above the requirement), sites which fell within the lower tiers of the Spatial Growth Strategy were therefore surplus and subsequently rejected for reasons including their adverse impact on Green Belt purposes.

Following these changes, the sites were re-assessed through the SGA process based on these amendments and a further round of Regulation 18 consultation was undertaken (Referred to as Regulation 18.2).

Regulation 19 (Submission) stage:

Table 6 below shows the set of preferred strategic housing allocations approved by Councillors and which were included within the Regulation 19 Submission document. It also presents information on the amount of Green Belt designation that would be deallocated as a consequence of the allocations.

Table 6: Proposed Green Belt allocations for Regulation 19

Site	Proposed number of housing units	Loss of Green Belt (ha)
Acorn Way	600	26 ha
Cotmanhay Wood	250	7.2 ha
South-West Kirk Hallam	1,300	50 ha
North of Spondon	240	12.3 ha
Total Number of housing units	2,390	
Total Loss of Green Belt	95.5 ha	

The Council proposes in its submission version Core Strategy Review an additional **27 ha** of land between Kirk Hallam and the former Stanton Ironworks (now split between two separate strategic housing and employment sites) to form part of the Green Belt, as referenced in the supporting text of **Strategic Policy 1.5**. This results in a net loss of **68.5 ha of Green Belt**.

The Green Belt allocations listed in **Table 6** are accompanied by the brownfield site at the Stanton South allocation, where 1,000 housing units are proposed.

The submitted Core Strategy Review also makes provision for **2,470 housing units** to be delivered across the plan period at locations within the MBUA, towns and villages, as per Table 3.

A breakdown of the proportion of planned housing development between Green Belt and non-Green Belt locations is provided in the table below. The final two rows show the proposed growth planned to occur within the Green Belt.

Table 7: Breakdown of planned housing as per Spatial Growth Strategy

Strategic Growth Strategy Area	Site source	Proposed Number of units	Percentage of overall proposed housing growth
Growth within MBUA	SHLAA	780	13%
Growth within towns	SHLAA	1,560	27%

Growth within villages	SHLAA	130	2%
New Settlements not in the Green Belt	Amended policy from current Core Strategy	1,000	17%
Extension of the conurbations into the Green Belt	Strategic Call for Sites	840	14%
Extensions of the town into the Green Belt	Strategic Call for Sites	1,550	26%

Conclusion

This Paper sets out how the Council has managed the identification and assessment of Green Belt locations, as part of developing a wider Spatial Growth Strategy, in which housing – both strategic and non-strategic in scale, is planned by the Core Strategy Review. As consistent with other responses provided on this matter, it informs how all sites, those rejected and those ultimately included within the submitted CSR came to be identified. It then shows how those sites in Green Belt locations were assessed and managed between each of the consultation stages of the CSR. In summary, the Council is of the view that its approach to using the Green Belt to meet its local housing need is appropriate and proportionate, something which this Paper is able to demonstrate.