



The countryside charity
Derbyshire

Erewash Borough Council
Town Hall
Wharncliffe Road
Ilkeston
Derbyshire
DE7 5RP
By email: Planning@erewash.gov.uk

Dear Sirs,

Ref: Appeal by Wulff Asset Management (11/5/23) relating to rejection of Application Number 0722/0038 in October 22.

CPRE wish to register their concerns over the appeal raised by Wulff Asset Management on the 11th May 2023 relating to Application Number 0722/0038. The application was for up to 196 dwellings to be built on land north west of Twelve Houses, Sowbrook Lane, Stanton by Dale, Derbyshire. Erewash Borough Council rejected this application in October 22. CPRE remain in objection to this proposal, and not supportive of the current appeal by the developer.

CPRE is the leading organisation that stands up for the Green Belts. Around 22%, or just under 3 million hectares, of England's land area consists of countryside within 5km of large towns and cities with populations greater than 100,000. This countryside is often the most valuable to people as 'the countryside next door.' At the same time, it is also on the frontline of pressures for development. Of these 3 million hectares, approximately half is designated as Green Belt. There are 14 Green Belts that together cover 13% of England, or just over 1.6 million hectares. The fundamental aim of Green Belt policy is, as set out in the National Planning Policy Framework issued by Government, to prevent urban sprawl by keeping land permanently open. There are stricter controls over new development, particularly housing, within Green Belts than within most of the countryside.

There should continue to be a general presumption against development on Green Belt land. CPRE have proven that there is currently enough brownfield land suitable for redevelopment for over 1 million new homes across England, at conservative estimates of density, and more new brownfield sites are coming forward all the time.

Overall, we are strong supporters of the current policies on Green Belt as they are set out in the National Planning Policy Framework (NPPF); we believe there are potential loopholes or weaknesses in the policy which need tightening. We have been increasingly concerned by research that is indicating an increase in the number of proposals to build on the Green Belt. Most proposals are being approved by local authorities and/or planning inspectors, and these in turn are setting a precedent for further releases elsewhere.

The NPPF states that Green Belt boundaries can only be altered in 'exceptional circumstances. CPRE believes that this policy should be further strengthened so that assisting in the mitigation of, and adaptation to, climate change is also a specific purpose of Green Belt policy. 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.

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 Local Plan period

Erewash has been successful in previous plans to resist allocations of housing development in the greenbelt. 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 on Revised Options for Growth has been presented as part of its Core Strategy Review. CPRE's policy stance is to protect greenbelt land areas with an increase in control. In view of the national requirements laid out in the NPPF where development is to be allowed on greenbelt land it should be in exceptional circumstances. This should apply to allocations also.

The challenge for Erewash is the lack of available sites. 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. Ilkeston requires a degree of economic regeneration and the Stanton ironworks site was established as an allocation to deliver much needed housing. However, half of this site has now been put forward by its owners for employment use which is an already established primary use on brownfield land. Given its location this would seem appropriate. Strategically, the greenbelt area in Erewash is more essential for the purposes of protecting the gap between Nottingham and Derby than areas of green belt in the south and east of Nottingham.

The proposed Erewash Local Plan is in the process of approval by the Government Inspectorate and it has asked to use four Green Belt sites at the edge of existing settlements to be included in the Plan at Kirk Hallam, Cotmanhay, Spondon Wood and land off Acorn Way, Spondon. To partially mitigate this reduction to 3% of Erewash's Green Belt, the council proposed to put the land off Sowbrook Lane into the Green Belt. Clearly this application goes against this proposal.

The draft Core Strategy Review Policies Map identifies this site as one to be included in the Green Belt. It would also be contrary to the emerging Core Strategy, compromising the development of land within a proposed Strategic Green Infrastructure Corridor.

Additionally, the following points raise cause for concern:

- It's not in the approved Erewash Local Plan, awaiting Government Inspector approval
- This would put additional pressure onto local roads and infrastructure. The island adjacent Bull's Head already suffers severe congestion at peak times. There is regularly queuing traffic from Quarry Hill Road and the direction of the proposed development. The main A6096 backs up into Kirk Hallam and from Ilkeston direction. We consider this would compound the problem. Many residents will recognise this as a concern, myself included.



The countryside charity
Derbyshire

- There are no safe areas for pedestrians as no pavements in that area on the main roads.
- Cycling is currently hazardous along this stretch of road. I can also speak from personal experience in this. The development would potentially also compound this.
- The proposed location is remote, and adjacent significant industrial development.
- The proposed development would significantly impact hedgerow and habitat for ground nesting birds. It would significantly and irrevocably impact the open space.

CPRE, in view of the above, would therefore please respectfully object to the appeal and any reconsideration of the application. Please would Erewash Borough Council kindly acknowledge receipt of this letter.

Yours faithfully,

