

Erewash Core Strategy Review – Public Examination Hearings

Matter 4: The Green Belt

Date: 21st December 2023

Name: Liane Dodd

Respondent number: 337

This written submission is for consideration by the Planning Inspector during her independent examination of Erewash Borough Council's (EBC) Core Strategy Review (CSR) at the Public Enquiry with reference to Matters, Issues and Questions. This accompanies my attendance at some of the Hearing Sessions.

This written submission is made in support of objections previously submitted to include written statements (Core Strategy Review Representation Form Submission) via the Erewash Borough Council (EBC) website April 2022.

I write to raise concerns specifically about the following points of the above Matter:

Issue: Whether the approach to the alteration of the Green Belt and development within it is justified and consistent with national policy:

4.4 Opportunity to Maximise the Capacity on non-Green Belt - Brownfield Sites

There is no evidence that the Council has taken all opportunities to maximise the capacity on non-Green Belt land or given substantial weight to the value of using suitable brownfield sites and supporting the development of under-utilised buildings.

The NPPF requires that brownfield sites take precedence over changes to Green Belt boundaries, unless there are exceptional circumstances. It is unclear what the exceptional circumstances are and where these circumstances are evidenced.

Erewash Borough Council publish a Brown Field Land Register. EBC reports that 'Erewash was being hampered by a lack of large-scale strategically sized sites'. Despite the previously Conservative led Council's attempts to identify a sufficient supply of non-Green belt land 'by scouring the Borough in a mini-bus' it appears that the Council has not succeeded in this regard. It remains unclear and of concern why this Register does not include two of the largest brownfield sites in the Borough, being the sites at Oakwell brickworks and West Hallam Colliery and brickworks. Erewash Borough Council has previously reported that these sites are not viable due to contamination. The absence of these sites from the Register brings

doubt about the accuracy and transparency of what non-Green belt land is available as well as the Council's rationale and justification for excluding it from consideration.

Heavy contamination has not prevented other Boroughs (Amber Valley and Broxtowe) neighbouring EBC from proposing such sites for development. EBC appear to omit significant brownfield sites from the register at the outset, preferring to concentrate the distribution of development in the overly populated high-density sites around Ilkeston, in particular land North of Cotmanhay. The Council's response in the *Statement of Consultation* is that the infrastructure network in built up areas is far better placed and resilient to cope with sizeable new growth than if development were dispersed out to villages or open countryside. If this is the Council's position it implies that that overly populated high-density sites will always be the first choice for development. I fail to see how this is fair and not disadvantageous to areas such as Ilkeston.

It seems that the EBC gave up on brownfield use when the Stanton Regeneration site appeared to have contamination issues that required extensive workarounds. There are businesses being developed on this site. If it is considered to be 'safe' for employees working on the land and in business premises therein, why is this land not suitable for residential use?

Green Belt Land Owned by EBC

EBC own the land consisting of the former Pewit municipal golf course which it is proposed to use as a nature reserve. There is already a nature reserve in close proximity, another one is unnecessary. It is of concern that EBC did not choose to utilise this land, which is situated adjacent to Ilkeston town centre for housing. As well as contributing to the requirement for housing this would have also released significant monetary value to EBC. Development of this land is not included in the CSR. Why is this the case? Development of this land in combination with the brownfield site at Oakwell brickworks would provide a linear development to the west of the town centre and provide access to major transit routes and schools.

Inequitable use of Green Belt

The use of Green Belt land is heavily biased to the North and South of Ilkeston. This unequal distribution of housing is evidenced in document *EBC04 Viability Assessment September 2023 by Andrew Gollard Associates*. Dr Andrew Gollard reports at 5.1 that that the analysis of small sites was not a remit of this work. At 7.8 it is also reported that the sites of SW Kirk Hallam and North Cotmanhay in particular, have significant infrastructure loadings. In the case of North Cotmanhay it is also reported that there would be exceptional development costs.

The inequitable consideration of allocation of Green Belt land is further evidenced in EBC's *Green Belt Technical Paper*, 'table 3: Sites within the spatial strategy' with reference to land North of West Hallam. This land was rejected as 'development here would encroach into open countryside, contrary to the purpose of Green Belt'. It is of considerable concern that the rationale used here is inconsistent when considering encroachment on open countryside at North of Cotmanhay and Kirk Hallam. Again, it seems development in the poorer, high-density, parts of the Borough are deemed to be EBC's preferred option, ensuring that the parishes remain protected.

The road network around the site North of Cotmanhay already more than exceeds effective capacity. Traffic grinds to a halt along the main road A6007, even during non-peak times. (My attempts to travel towards Ilkeston in the morning is almost impossible; the traffic is virtually at standstill necessitating the need to add additional miles to my journey by turning the car around and travelling in the opposite direction). This road is the egress and exit road for all traffic from the proposed Cotmanhay site. The use of this Green belt land will add to the already failing, over-burdened road network, which will be further compromised by more traffic adjoining the A6007 less than half a mile away from an ongoing extensive small town-like development at Shipley Lakeside?

Taking cognisance of the above concerns alone, brings into question why development considerations are not fairly and equally distributed across the Borough rather than placing the burden onto the residents of Ilkeston.

End.