

APPENDIX E

Statement of Consultation For the Growth Options Consultation Regulation 18 Part 2

Contents

1.0 Introduction	2
2.0 Consultation questions – summary of responses.....	3
3.0 Who and how the Council consulted	5
4.0 Key facts	7
Appendix I – List of bodies and persons	8
Appendix II – Full summary of issues raised and the Council’s responses.....	11

1.0 Introduction

- 1.1 This statement provides a record of the second Regulation 18 public consultation carried out between 29 March and 10 May 2021, which amounted to the second stage of review for the Erewash Core Strategy local plan document (hereafter referred to as Regulation 18 Part 2).
- 1.2 This statement will eventually form part of a proposed submission document, the required content of which is detailed at Regulation 17(d) of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (“the Regulations”), in satisfying requirements for the publication of a local plan set out at Regulation 19.
- 1.3 Whilst not required ahead of completing Regulation 18, for the purpose of consistency this statement reports on the consultation so far undertaken by addressing the points set out at Regulation 17(d). This statement therefore summarises:
 - I. which bodies and persons were invited to make representations under Regulation 18 ;
 - II. how those bodies and persons were invited to make such representations;
 - III. a summary of the main issues raised by those representations; and
 - IV. how those main issues have been addressed in the local plan
- 1.4 Preceding the above topics, Section 2 considers responses received in the context of the five questions which framed the topics of consultation. The rest of the report then provides a detailed look at the nature of consultation carried out and issues raised in responses received.
- 1.5 It is worth noting that the Council’s commitments with regards to undertaking public consultation are outlined in its Statement of Community Involvement (SCI) which was last updated in 2019. This document seeks as a minimum to carry out consultation activities which go above and beyond the base requirements set out in The Regulations. Critically, this first stage of public consultation exceeded even those additional expectations contained within the SCI despite clear challenges which arose resulting from the Covid-19 Coronavirus pandemic.

2.0 Consultation questions – summary of responses

2.1 The Growth Options consultation (Regulation 18 Part 2) asked five questions, as follows:

- Q1** – Do you have any comments on the revised housing strategy?
- Q2** – Have you any suggestions for an emerging employment strategy?
- Q3** – Have you any suggestions for a town centre strategy?
- Q4** – Have you any suggestions for a green infrastructure strategy?
- Q5** – Have you any suggestions for a transport strategy?
- Q6** - What other topics should be addressed by the Core Strategy Review?

2.2 This section summarises the broad consensus identified in responses relating to each of the questions above. Some representations did not respond to each individual question directly, but still addressed the issues. The following summary takes into account the full body of representations received as they relate to the issues in the questions, not just those which answered the questions directly.

Q1 Do you have any comments on the revised housing strategy?

- 2.3 This question generated the highest response rate. The vast majority of comments were in the form of objections to the allocation of specific Green Belt sites for development. These included concerns that brown field land was not being prioritised, and that consequently there was insufficient evidence to justify the release of Green Belt for housing. The impact of such development on biodiversity and accessible greenspace was also raised, as was the impact on existing infrastructure including highways, education and healthcare. All of these issues were addressed in the Revised Options for Growth document and the Strategic Growth Area Assessments that supported it.
- 2.4 Alternative Green Belt sites were promoted for housing on the boundary with Derby City Council around Derby County FC Training Ground, and to both the east and west of the Stanton site. However, when subjected to assessment these were found to be less suitable and sustainable than the sites proposed in the Revised Options for Growth.
- 2.5 Some neighbouring local planning authorities questioned whether the duty to cooperate had been satisfied, including whether Erewash Borough Council had given adequate consideration to the potential to accommodate additional growth from those local planning authority areas. Active engagement in accordance with the duty to cooperate was ongoing at the time these comments were made, and is continuing.

Q2. Have you any suggestions for an emerging employment strategy?

- 2.6 Comments were generally positive about the allocation of employment land at Stanton. The need for employment land for warehousing was highlighted, particularly in light of the recent growth in online retail leading to a demand for logistics sites. As a result the owners of West Hallam Depot indicated that their site would be retained as a distribution depot for the time being. An alternative logistics site was proposed in the Green Belt at Junction 25 of the M1, but this is not considered necessary given the extensive allocation at Stanton.

Q3. Have you any suggestions for a town centre strategy?

2.7 General comments called for diversity of uses in town centres in order to increase vibrancy and footfall, including change of use to residential development. Town centres were also highlighted as providing opportunities for healthy living, by connecting walking cycling and public transport.

Q4. Have you any suggestions for a green infrastructure strategy?

2.8 There was strong support for the protection and enhancement of green infrastructure, including support for this to include blue infrastructure (rivers, lakes and canals). Reference was made to existing guidance which can support the relationship between new development and Green Infrastructure. It was suggested that allocations should be capable of incorporating new green infrastructure and linking with existing assets. It was suggested that playing fields and sports facilities should form part of the wider Green Infrastructure Strategy.

Q5. Have you any suggestions for a transport strategy?

2.9 There was some support for the Kirk Hallam Relief Road on the basis of reducing existing traffic congestion through Kirk Hallam and strengthening connections to nearby employment areas. However, other comments thought that the relief road would be ineffective. Nevertheless, previous modelling has indicated that it would be effective. Some respondents expressed uncertainty around the validity of the transport strategy whilst the future location of the HS2 Hub Station remained undecided. Some specific route amendments to existing bus services were proposed and there was support for proposals to improve the Great Northern Greenway and Trent Valley Way sustainable transport routes to multi-user standard. Ongoing concern around HGV movement through Sandiacre. A Sandiacre bypass was suggested as a way of resolving the issue.

Q6. What other topics should be addressed by the Core Strategy Review

2.10 It was suggested that the core Strategy Review could include additional policy on climate change. However, as this issue is already addressed in Policy 1 of the Erewash Core Strategy, which will be retained, this is not considered necessary.

3.0 Who and how the Council consulted

Who was consulted?

3.2 All Specific and General Consultees, as required by the Regulations and listed in the Council's adopted SCI, were contacted at the beginning of the consultation to invite them to engage and make representations. A list of all those consulted who fall within these groups is at **Appendix 1**.

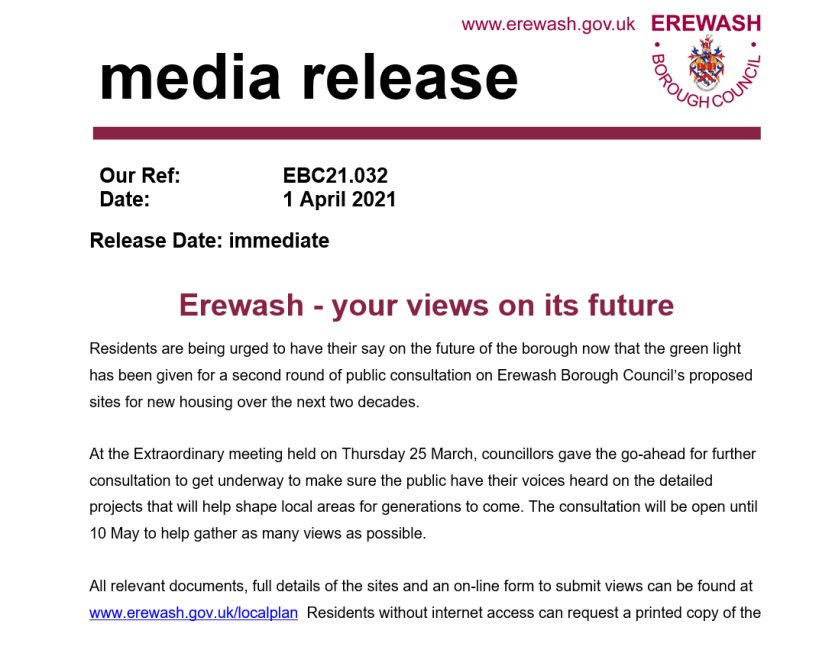
3.3 In addition to the specified consultees, the council also notified those who had opted to receive local plan consultation updates, which included most of the respondents to the Part 1 consultation in 2020. This amounted to many more direct contacts being made.

3.4 Aside from making direct contact as detailed above, the Council employed a variety of additional mechanisms to promote engagement with stakeholders, organisations and the community and these are detailed below. In view of the Covid-19 lockdown, announced by government in January 2021, the consultation was carried out largely online. The Town Halls were closed to the public until 12 April 2021, at which point hard copies of the consultation documents were placed in the Ilkeston and Long Eaton receptions for the remainder of the consultation.

How was the consultation undertaken?

3.5 The Council employed a variety of mechanisms through which to engage with stakeholders, organisations and the community. The following table lists and describes some of these.

Mechanism	Description
Provision of documents online	All documents pertaining to this stage of Local Plan Review including the Growth Options document, Sustainability Appraisal, relevant evidence base and representation forms were provided online alongside detailed instructions for use. Additionally, the option of submitting a representation via a live online form was provided for additional convenience.
Provision of documents in hardcopy form at identified locations	Due to the National Covid 19 Lockdown, the Town Halls were closed at the beginning of the consultation on March 29 th . Following the re-opening of the Town Hall Receptions, consultation documents were placed for public viewing on 12 April.
Social media adverts	The Council utilised social media platforms to post numerous adverts and reminder bulletins over the course of the consultation to raise awareness and maintain interest.

Mechanism	Description
	 <p><i>Figure 1 Example of promotion via twitter from 13 April 2021</i></p>
Media release	<p>A media release was prepared and published on 1 April 2021. A number of articles were published by local news organisations over the course of the consultation.</p>  <p><i>Figure 2 Example of press release</i></p>

4.0 Key facts

4.1 This section highlights some key facts relating to engagement carried out, before Section 5 identifies the key issues highlighted by respondents.

Overall participation

4.2 A total of 2,503 written representations were received during the Part 2 consultation period. This figure takes account of duplication; for instance, identical electronic and hard copy representations from the same individual have been counted as one representation.

4.3 Table 1: Categories of participation

Category	Count
General Public: Erewash residents	1628
General Public: Non Erewash	760
General Public: Location unknown	56
Other Stakeholders	59
Total	2503

Official representation form

4.4 Six questions were asked on the Council's official representation form. The information below shows as a percentage of the total number of respondents, how many chose to answer each of the questions asked. In the majority of cases, respondents opted not to answer the specific questions but provide comments separately, either on the form itself or via a separate e-mail / letter.

Q1 – Do you have any comments on the revised housing strategy? (97%)

Q2 – Have you any suggestions for an emerging employment strategy? (30%)

Q3 – Have you any suggestions for a town centre strategy? (35%)

Q4 – Have you any suggestions for a green infrastructure strategy? (41%)

Q5 – Have you any suggestions for a transport strategy? (49%)

Q6 – What other topics should be addressed by the Core Strategy Review (41%)

In total, **1916** respondents (**76%** of total) chose to provide their own representation via e mail or letter instead of the official response form.

Erewash perspective

4.5 As a proportion of all respondents, **65%** were Erewash residents, the majority of whom were commenting on SGA 25 (Land SW of Kirk Hallam) and SGA 7 (Land N. of Cotmanhay).

Preferred site perspective

4.6 The Growth Options consultation proposed the development of six strategic sites across Erewash. Four of these were in the Green Belt and two were Brownfield sites outside of the Green Belt (Stanton consisting of an employment allocation to the north of Lows Lane and housing to the south).

Appendix I – List of bodies and persons

Specific consultee bodies:

Such bodies are statutory stakeholders in the planning system:

General consultation bodies:

Such bodies include groups and organisations active within Erewash. Regulations define this group of consultees into the following sectors:

- a. Voluntary bodies whose activities benefit any part of Erewash;
- b. Bodies who represent the interests of different racial, ethnic or national groups;
- c. Bodies representing the interests of different religious groups;
- d. Bodies representing the interests of different disabled persons in Erewash; and
- e. Bodies representing the interests of Erewash's business community.

Residents and other persons:

These include persons carrying out business in Erewash from which the Council considers it appropriate to invite representations. This regulatory provision means the Council can invite anyone it considers would be interested in a document even if they form no part of its consultation database and isn't listed as a Specific or General Consultation Body.

Those on the Planning Policy database:

This contains anyone who has previously indicated to the Council a desire to stay updated on local planning developments. As already mentioned, the content of those on the database is open to much alteration and as part of preparing for the introduction of the GDPR, the database was overhauled to ensure compliance with the new data protection regulations. To help focus on certain groups and organisations, it may look at the feasibility of grouping stakeholders together in line with any particular interests disclosed to the Council.

Analysis of stakeholders has helped the Council to identify the following key groups:

- Adjoining councils (District/Borough, Parish and County);
- Business, retail and private sector interests;
- Community and the voluntary sector;
- Councillors (Borough, Parish and County);
- Developers, agents and landowners;
- Frequent customers & users of the planning service;
- General public;
- Hard to reach groups;
- Local media outlets;
- Local education authority;
- Other service providers; and
- Regulatory organisations

A list of specific, general and other consultees can be found below. The Council will endeavour to keep the list as up to date as possible despite regular additions and withdrawals.

Specific & General Consultation Bodies:

Specific Consultation Bodies:

Erewash Parish Councils (PC):

Breaston PC
Breadsall PC
Dale Abbey PC
Draycott PC
Little Eaton PC
Morley PC
Ockbrook & Borrowash PC
Risley PC
Sandiacre PC
Sawley PC
Stanley & Stanley Common PC
Stanton-by-Dale PC
West Hallam PC

Adjoining and covered Local and County Councils:

Amber Valley BC
Broxtowe BC
Derby City Council
Derbyshire County Council
Leicestershire County Council
Rushcliffe BC
South Derbyshire DC
North West Leicestershire DC
Nottinghamshire County Council

Parish and Town Councils adjacent to Erewash Borough:

Amber Valley area:

Aldercar & Langley Mill PC
Duffield PC
Holbrook PC
Horsley PC
Mapperley PC
Shipleigh PC
Smalley PC

Broxtowe area:

Awsworth PC
Cossall PC
Greasley PC
Stapleford Town Council
Trowell PC

North West Leicestershire area:

Castle Donington PC
Lockington & Hemmington PC

Rushcliffe area:

Barton-in-Fabis PC

Thrumpton PC

South Derbyshire area:

Aston-on-Trent PC

Elvaston PC

Shardlow & Great Wilne PC

Other Specific Consultation Bodies:

The Coal Authority

Environment Agency

Highways England

Homes England

Historic England

Severn Trent (i.e. a sewerage undertaker)

Severn Trent Water (i.e. a water undertaker)

Western Power

Natural England

Network Rail

East Midlands Airport

Marine Management Organisation

Derby, Derbyshire & Nottingham, Nottinghamshire (D2N2) - Local Enterprise Partnership

Local Nature Partnership (Lowland Derbyshire & Nottinghamshire LNP)

NHS Derby & Derbyshire Clinical Commissioner Group (CCG)

Any Neighbourhood Forums designated under Section 61F(3) of the 1990 Town & Country Planning Act (as amended)

Those to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003 – [a full list is held by Ofcom](#).

There is also a requirement to consult prescribed bodies to comply with Section 33A of the Town & Country Planning Act 1990 (as amended). These are listed at [Section 4\(1\) the 2012 Local Planning Regulations \(as amended\)](#)

Appendix II – Full summary of issues raised and the Council's responses

Biodiversity

Issue/Question	Response
Suggested that appropriate wording is included in site-specific policy that gives confidence that a strong buffer will be introduced between homes and Spondon Wood.	This has been achieved through Strategic Policy 1.4 – North of Spondon. Provision of a suitable interface between the development and Spondon Wood, to include a semi-natural buffer zone, to protect the biodiversity interest of the wood is included within the policy.
Should use Biodiversity Metric 2.0 to implement policies on biodiversity net gain.	Due to the time elapsed between the consultation and the publication of the Draft Plan; Biodiversity Metric 3.0 has superseded Metric 2.0. Detailed mitigation, should it be required on allocation sites, will be based on the most up-to-date metric available.
There is an opportunity to create similar habitat as neighbouring Section 41 on Spondon site and this would buffer and expand existing ancient woodland.	Biodiversity Net Gain will primarily be sought within the development site itself (see Strategic Policy 1.1). However, where this is not possible, net gain will be sought elsewhere to ensure the assessed level of biodiversity net gain is delivered as a result of development. Along with biodiversity net gain, provision of a suitable interface between the development and Spondon Wood, to include a semi-natural buffer zone is provided by Policy 1.4 to protect the biodiversity interest of a key biodiversity asset.
Four sites are within catchment of Sites of Special Scientific Interest (SSSIs) which are sensitive to changes in water quality and water dependency which will require consideration in developing the sites.	As noted following the Regulation 18 consultation, the Council remain fully committed to the long-term protection of Erewash's two SSSIs by avoiding any development that threatens their character and setting. It should be noted that several thousand homes, largely in the Oakwood area of Derby City, sit much closer to Breadsall Cutting SSSI than the proposed development site at Acorn Way (SGA1). The identification of the Acorn Way site is influenced by its connectivity to existing forms and patterns of development on the western side of Morley Road, part of the Derby Main Built-Up Area. Locations within the Green Belt closer to the SSSI are not considered appropriate for new housing and are not supported by the Council.

Issue/Question	Response
	<p>The identification of the four Green Belt sites goes a long way to helping the Borough meet its long-term housing growth requirements, presenting a coordinated development strategy that should help protect other parts of Green Belt within Erewash including those nearer to important statutory designations such as SSSIs.</p>
<p>Welcome intention to include Green Infrastructure Strategy. Suggest this should be a Green and Blue Infrastructure Strategy given prominence of rivers etc.</p>	<p>The decision to title Strategic Policy 5 the way it has been reflects the fact that green infrastructure encompasses both green and blue forms of infrastructure. Strategic Policy 5 focuses both on green and blue infrastructure throughout Erewash. This is supported by the development of a HMA-wide Green Infrastructure Strategy, which has been developed with fellow Greater Nottingham councils.</p>
<p>Woodland Highly valued by the local communities (SGA7).</p> <p>It should be permanently protected as greenbelt and safeguarded for the protection of the natural world and for future generations (SGA7).</p> <p>A unique habitat to a vast amount of wildlife that lives in and around the surrounding fields, ancient woodland and hedgerows (SGA7).</p> <p>Acts as wildlife corridor (SGA7).</p>	<p>No public open space is being lost to development through any of the strategic growth allocations. Development of private land actually presents the opportunity for creating public access to new and existing assets. An example of this is to the woodland north of Cotmanhay, which at this time sees public access unauthorised. By incorporating Cotmanhay Wood as a protected asset alongside new housing development at this location, opportunities for better woodland management and related biodiversity enhancements may also emerge.</p> <p>Development within Green Belt north of Cotmanhay is not deemed to be inappropriate development as the de-allocation of Green Belt is being undertaken as part of a Local Plan review where releases are felt to constitute exceptional circumstances. It is the review of strategic policies within the current Local Plan that has established a need for changes to the Green Belt's boundaries, although the identification of the four strategic housing allocations in the Green Belt contributes to the long-term permanence of remaining Green Belt.</p> <p>The site covered by Strategic Policy 1.6 (N. of Cotmanhay) does not contain any wildlife designations that require the Council to avoid</p>

Issue/Question	Response
	development. However, the Council takes specific advice from bodies such as Derbyshire Wildlife Trust and Natural England around how to most effectively manage any impacts on biodiversity assets resulting from the site's redevelopment. This may be by way of providing compensatory habitat either on-site or elsewhere if the site accommodates protected species.
Concern that Pioneer Meadows Nature Reserve will be cut off from countryside (SGA25).	Although development will enclose Pioneer Meadows from surrounding agricultural land, Strategic Policy 1.5 requires development to provide a green corridor through the site to link Pioneer Meadows Nature Reserve to the wider countryside. Strategic Policy 1.1 also requires, where possible, existing hedgerows and tree belts are maintained and enhanced with the open countryside. Sufficient tree planting must also be incorporated as per Strategic Policy 1.1. Alongside these requirements, an appropriate level of biodiversity net gain must be delivered on or, where this is not possible, off-site. These interventions will ensure any impact of the Local Nature Reserve being surrounded by development will be mitigated and potentially outweighed by positive outcomes arising from the implementing of strategic allocation policies.
Impact on existing species and migration routes, increase in footfall disturbing the wildlife and their habitat, increase in littering and disturbance from dogs (SGA25).	<p>Strategic Policy 1.5 (SW Kirk Hallam) requires development to provide a green corridor through the site to link Pioneer Meadows Nature Reserve to the wider countryside. Strategic Policy 1.1 also requires, where possible, existing hedgerows and tree belts are maintained and enhanced with the open countryside. This should mitigate impact on migration routes into, and out of, Pioneer Meadows Local Nature Reserve (LNR) and the wider surrounding countryside.</p> <p>Development of SGA25 improves access to Pioneer Meadows Local Nature Reserve and the surrounding countryside for a significant number of people, which can have positive impacts on people's health and wellbeing. Whilst this is likely to lead to an increase in</p>

Issue/Question	Response
	<p>footfall in and around the LNR, this is also likely to lead to an increase in provisions of litterbins around the LNR and the development site itself. This however, is not something that requires to be incorporated into policy, as it would be considered at the planning application stage.</p>
<p>Water bodies on-site in which inhabit a wide diversity of wildlife (SGA25).</p>	<p>Previous consultation with statutory bodies and Derbyshire Wildlife Trust did not raise any specific concerns about the impact of development on the on-site water bodies. Overall, the ecological status of the land was rated low. Notwithstanding this, the Council will work with statutory consultees and stakeholders to ensure that biodiversity net gain enhances the ecological value of the site (as per Strategic Policy 1.1).</p>
<p>The adverse impact development will have on wildlife habitat and species such as wild birds, deer, bats etc. (SGA26).</p> <p>Wildlife benefit from the open fields that border the woodland (SGA26).</p> <p>Concern that the deer that use the surrounding land would be forced in to smaller pockets of land and onto the roads in the area (SGA26).</p>	<p>Strategic Policy 1.4 (North of Spondon) requires development to have a suitable interface between the development and Spondon Wood, including a semi-natural buffer zone to protect the biodiversity interest of the wood. Development of SGA26 protects Spondon Wood from development and through several policies, seeks to enhance habitats for wildlife through the protection of existing hedgerows and tree belts within the site boundary along with an appropriate amount of biodiversity net gain to be established through the Biodiversity Metric (Strategic Policy 1.1).</p> <p>Whilst development of SGA26 would result in a loss of greenfield land where deer can sometimes be found, development itself is not closing off all surrounding countryside to the deer or other wildlife. Should development occur, there is still substantial open countryside to the north and west of Spondon Wood, along with the retained amount of open space to the east of the Wood, separating the Wood from Dale Road. Within Strategic Policy 1.1, provision to retain existing hedgerows and tree belts is proposed on all strategic growth sites, further reducing the chances of wildlife straying onto nearby roads. Therefore, the chances of deer and other wildlife straying onto</p>

Issue/Question	Response
	nearby highways is not considered a possibility stemming from development of SGA26.
<p>Spondon Wood is one of the larger areas of woodland in the Erewash district and should be preserved as a substantial habitat (SGA26).</p> <p>Destruction of open fields and habitats (SGA26).</p>	<p>The proposed development of SGA26 does not include Spondon Wood itself. Spondon Wood would be protected from development and preserved as a substantial habitat. Policy 1.4 - North of Spondon makes specific provision for a semi-natural buffer zone to provide suitable separation between development and Spondon Wood. This, coupled with the delivery of an appropriate level of biodiversity net gain and the protection and enhancement (where possible) of existing hedgerows and tree belt boundaries (Strategic Policy 1.1) would work to further enhance the habitat at Spondon Wood.</p>

Green Belt

Issue/Question	Response
<p>Erewash Borough Council should work to identify more suitable brownfield sites, or green belt sites that better relate to towns and villages in Erewash.</p> <p>Green belt land should only be proposed as a last resort for development (SGA26).</p>	<p>The Borough Council's Strategic Housing Land Availability Assessment (SHLAA) extensively identifies available brownfield sites throughout Erewash to maximise the role brownfield land plays in meeting the Borough's housing needs. The Plan's selection of green belt sites originates from its supporting Sustainability Appraisal (SA), which demonstrates the most sustainable locations for strategic green belt housing sites were adjacent to cities (Derby & Nottingham) and towns (Ilkeston inc. Kirk Hallam).</p>
<p>Small, incremental and piecemeal release of GB is inappropriate.</p>	<p>Successive Erewash Local Plans have avoided the need for green belt land to meet the Borough's housing needs. Therefore the identification of several green belt sites in this Plan cannot be considered as incremental. The identification of strategic housing sites as part of this Local Plan review will help to meet housing needs over the lifetime of the plan that runs to 2037 demonstrating an approach that is long-term, not piecemeal.</p>

Issue/Question	Response
<p>Erewash greenbelt is unique with a wide variety of wildlife, environmental features, and countryside that should all be preserved forever.</p> <p>Footpaths that are enjoyed daily by many people from the area and beyond it.</p>	<p>The quality of environment Green Belt encompasses is not a planning function justifying its designation and continued existence. Wildlife assets and environmental features are both subject to their own separate national planning guidance setting out how such assets are managed. Where important wildlife and environmental features are impacted by development proposals, Local Plan policies will require biodiversity net gain to be achieved.</p>
<p>Forms part of the separation corridor between the towns of Ilkeston and Heanor (SGA7).</p>	<p>Intra-war housing development extends north of SGA7 along Heanor Road (A6007). With a ribbon pattern of existing housing extending beyond the northern-most point of SGA7, new housing at the site would not further reduce the current gap and openness that exists between the towns of Ilkeston and Heanor.</p>

Redeveloping Brownfield Land Instead

Issue/Question	Response
<p>Requests that housing development is pursued first in number of unspecified brownfield sites elsewhere within Erewash.</p> <p>Suggests alternative brownfield sites should be considered for housing and doesn't feel brownfield opportunities have been fully exhausted.</p> <p>Considers that brownfield opportunities have not yet been exhausted.</p>	<p>The Council, in line with national planning guidance, has maximised efforts to identify suitable brownfield sites able to accommodate new housing. Technical work presented by the Council's Strategic Housing Land Availability Assessment (SHLAA) shows an extensive range of brownfield sites identified to assist meeting housing needs. However, a shortage of developable or deliverable brownfield sites has resulted in a need to look beyond urban areas to identify land to contribute towards meeting the Council's housing requirement.</p>
<p>Must be a concerted effort to shrink Erewash's town centres and provide more opportunities for new housing close to established facilities.</p>	<p>Strategic Policy 3: Town, Local and Village centres introduces greater flexibility in the types of development that are deemed suitable within the Borough's hierarchy of retail centres. This provides greater scope for new housing opportunities to be positively pursued within designated centres.</p>

Traffic/Roads

Issue/Question	Response
<p>Concerns over the function and effectiveness of the Kirk Hallam Relief Road.</p> <p>The relief road will not help; it will cause even more traffic and long queues during rush hour at Bulls Head (SGA25).</p> <p>Problems already occur with traffic on Ladywood Road, Bulls Head roundabout, Stanton Road and at Sowbrook Lane (SGA25).</p> <p>The current roads cannot support the volume of traffic or weight (SGA25).</p> <p>The cumulative traffic impacts of the following sites is presently unknown: South West Kirk Hallam, West Hallam Storage Depot and Stanton Regeneration Site.</p> <p>Recommend running East Midlands Gateway model to understand impacts from sites across the wider transportation network.</p> <p>Suitable mitigation should be offered on the Strategic Road Network or local transport networks.</p> <p>Advised transport modelling should be undertaken with other Local Highway Areas.</p> <p>At peak times, it takes an hour sometimes to get from Kirk Hallam into Ilkeston town (SGA25).</p>	<p>The Kirk Hallam Relief Road will mitigate the impacts of additional traffic generated by the housing development at South West Kirk Hallam (SGA25). Previous transport modelling undertaken in support of the Stanton Regeneration Supplementary Planning Document (SPD) concluded that a Relief Road, in conjunction with selected junction improvements, would contribute positively to maintaining acceptable traffic flows through key individual junctions and across the wider Kirk Hallam and south Ilkeston road network. Newly-commissioned transport modelling using the a validated East Midlands Gateway model (incorporating growth from adjacent areas) will analyse the cumulative impacts of all strategic housing and employment growth identified in the draft Local Plan. This will help to identify what, if any, mitigation measures are necessary to contribute towards maintaining safe and effective highway conditions.</p>
<p>Long-term strategic plan for infrastructure is needed which includes the creation of Junction 25a.</p>	<p>Proposals to install an additional junction on the M1 have previously been considered and rejected on technical grounds by Highways England. Site specific and transport policies in the draft Local Plan provide a comprehensive plan to deliver the transport infrastructure necessary to support the proposed strategic growth.</p>

Issue/Question	Response
<p>Concerned regarding the suggested access points for SGA21 (Stanton Regeneration Site) potentially prejudicing the access strategy serving employment allocation north of Low's Lane.</p> <p>There should be evidence for transport and highway modelling to support any level of trip generation from SGA21.</p> <p>Would like qualifications against SGA21 access points.</p>	<p>Strategic Policy 1.2 requires multiple vehicular accesses onto Lows Lane, but does not specify the exact locations where these should be provided. Evidence in the SGA assessment prepared for SGA21 showing access points is simply indicative. It will be for a future application promoting the development of Stanton South to identify suitable access points to Lows Lane which work safely and in conjunction with those required to access the employment development across Stanton North.</p>
<p>A more thorough focus on active travel and public transport options in any transport strategy that is developed.</p>	<p>Several of the strategic policies support a strengthened role for active travel and public transport. Site specific policies for those strategic housing sites adjacent to public transport routes require the provision of bus halts to ensure buses are able to serve these sites. Strategic Policies 4 & 5 (Transport & Green Infrastructure) collectively recognise a number of significant non-motorised corridors within the Borough and seek enhancement to, amongst other roles, enable stronger patterns of active travel.</p>
<p>SGA1 requires entrance/exit on to either Nottingham Road or Acorn Way, must be considered carefully due to the traffic, density, speed of vehicles, lighting and lack of pedestrian refuges.</p>	<p>Evidence assessing suitable access points to serve SGA1 from the site's SGA assessment were an indicative guide as to where junctions may be needed. Strategic Policy 1.3 requires the formation of at least two new junctions onto Morley Road, although it will be for a future planning application to justify where the most safe and effective points are located for all new accesses.</p>
<p>The road network is already under pressure, with the addition of the American Adventure site development (SGA7).</p> <p>An already overstretched road system, congested and at times at standstill, in particular Heanor Road and Hassocks Lane South (SGA7).</p>	<p>Traffic modelling will be undertaken to assess the impact of strategic housing growth planned across Erewash, including the likely traffic generated by the North of Cotmanhay (SGA7) site. This will help to identify what, if any, mitigation measures are necessary to contribute towards maintaining safe and effective highway conditions. Evidence assessing a suitable access point to serve SGA7 from the site's SGA assessment were an indicative guide as to where junctions may be needed. Strategic Policy 1.6 requires the formation of a suitable</p>

Issue/Question	Response
There is a lack of information concerning access arrangements to SGA7 off Heanor Road meaning it would be imprudent to continue site's inclusion in the plan.	vehicular access onto Heanor Road (A6007), although it will be for a future planning application to show in more detail how access between SGA7 and Heanor Road should be formed.
Current roads are narrow, have potholes, subsidence and flooding at the lowest points where there are watercourses (SGA25).	The maintenance of adopted highways across Erewash is a matter for Derbyshire County Council as the Borough's highway authority. The provision of the Kirk Hallam Relief Route will enable traffic to route onto more suitable distributor roads that are of a higher specification to manage larger flows of traffic.
<p>Roads are already not fit for purpose (SGA26).</p> <p>Approaches to the A52 in Spondon and Ockbrook will come under greater pressure (SGA26).</p> <p>The access would be on to the A6096 that is a 60mph road (SGA26).</p> <p>The majority of traffic would either be using Willowcroft Road or go through Ockbrook and Borrowash (SGA26).</p> <p>Spondon Village, Dale Road where currently traffic is very heavy leading to severe delays on people trying to get to work, and the school run (SGA26).</p>	Traffic modelling will be undertaken to assess the impact of strategic housing growth planned across Erewash and neighbouring council areas, including the likely traffic generated by the North of Spondon (SGA26) site. This will help to identify what, if any, mitigation measures are necessary across the network to contribute towards maintaining safe and effective highway conditions. The requirement in Strategic Policy 1.4 for a bus halt on each side of Dale Road (A6096) (off-setting reliance on the private car and promoting sustainable travel) and for a new vehicular junction with pedestrian access will influence motorists' behaviour along this section of road with the introduction of new access arrangements resulting in additional care required due to movements through the junction.

Contaminated Land

Issue/Question	Response
Spondon Wood (SGA26) site's location is next to a historic landfill.	Prior to any future development of SGA26: North of Spondon, ground survey will demonstrate whether the land is safe for new housing. In the event of ground contamination, specific development proposals will need to show how land can be made safe to accommodate new homes in a safe manner, both through the constructions stages and also for future occupants of homes.

Issue/Question	Response
Toxic water can be found between the farm and the school (SGA25).	Prior to any future development of SGA25: South West of Kirk Hallam, ground survey will demonstrate whether the land is safe for new housing, whilst any watercourses or waterbodies within the site boundaries will also be subjected to survey. In the event of ground contamination, specific development proposals will need to show how land can be made safe to accommodate new homes in a safe manner, both through the constructions stages and also for future occupants of homes.

Education

Issue/Question	Response
Lack of education capacity - schools oversubscribed.	In addition to the County Council's modelling of future pupil numbers, the Local Education Authority will also investigate whether its facilities can accommodate any projected increase in pupils arising from development at strategic housing allocations. In many instances, the re-design and reconfiguration of school estate, either in part or in full, can result in increasing a school's capacity. Developer contributions agreed as part of a planning application process will ensure work to increase capacities occurs in line with any expected future rises in the pupil roll through appropriate phasing.
A new primary school may be needed if both SGA1 (Acorn Way) and SGA26 (South of Spondon Wood) come forward.	The site capacities of SGA1 and SGA26 do not lend themselves to the construction of new primary schools. Notwithstanding this, Strategic Policy 1.2 requires financial contributions to be made towards the provision of additional pupil capacity at schools in Oakwood and Chaddesden in adjacent Derby City where necessary. These contributions will be accompanied by financial contributions to increase the frequency of bus services along Morley Road, improving access to the Primary schools located in nearby Oakwood and Chaddesden.

Issue/Question	Response
New primary schools would be needed at South West Kirk Hallam, West Hallam Storage Depot and Stanton sites in line with Derbyshire County Council Contributions Supplementary Planning Document - with secondary school contributions may also being needed.	Derbyshire County Council is the Borough's Local Education Authority advise that developments consisting of more than 1,000 homes are likely to lead to the provision of a new primary school. This is reflected within Strategic Policies 1.2 and 1.5 in which development shall provide a new primary school well located within the site to encourage access by active modes of travel. West Hallam Storage Depot (SGA15) is no longer being put forward as a preferred location for growth in the Local Plan Review.

Health

Issue/Question	Response
May be option to use surplus capacity at Long Eaton for development.	The Council will continue working with the Clinical Commissioning Group (CCG), the responsible organisation for managing and funding local healthcare facilities, to understand the current capacity of local facilities in Long Eaton and across Erewash as a whole. This will act as a precursor to investment/estate management decisions taken by the CCG that, if necessary, will look to enhance capacity at particular locations in line with strategic locations for growth.
There are capacity issues in Erewash Eastern Growth Area (Ilkeston, Cotmanhay, Kirk Hallam, West Hallam etc).	Ongoing liaison and engagement with the Derbyshire CCG to understand the impacts of growth plans for these areas will help identify any current 'pinch-points' in local healthcare facilities and serve to guide the CCG's short and longer-term investment decisions.
A feasibility study to assess and best manage impact of housing growth on facilities is recommended.	The accompanying Sustainability Appraisal published alongside the Publication version Local Plan assesses health issues as one of a wide framework of SA objectives across all preferred and rejected strategic growth locations. This is deemed an appropriate assessment of the impact of housing growth on local facilities and helps, in part, advise of the suitability of strategic sites. Should the CCG wish to assist in the undertaking of any further studies, the

Issue/Question	Response
	Council would welcome the opportunity for the CCG to provide data to help assess specific capabilities and capacity of their existing facilities.
Request that Clinical Commissioning Groups be consulted on planning applications for development sites including 30 or more dwellings.	This request has been forwarded to the Council's Development Management team who will consult the CCG on any future applications consisting of 30+ dwellings.
<p>The healthcare in the area is overburdened. Hopewell Ward at Ilkeston Hospital was recently closed. Nursing homes are also in the process of being closed (SGA7).</p> <p>Concern over capacity of GP to accept new patients (SGA7).</p>	Ongoing liaison with the Derbyshire CCG to understand the impacts of preferred growth plans for Cotmanhay & North Ilkeston will help to identify any current 'pinch-points' in local healthcare facilities and serve to guide the CCG's short and longer-term investment decisions.

National Policy

Issue/Question	Response
The Council should plan for flexible contingency recognising that the housing need figure is a minimum and SGA3 could provide flexibility.	The Council's overall housing requirement as shown at Strategic Policy 1(3) states that the 5,800 home figure represents "a minimum" which could see additional housing provided. In respect to SGA3: Breadsall Hilltop, the evidence demonstrates that its development would have a harmful impact on the openness of Green Belt between the settlement of Breadsall and the edge of the Derby urban area. In wider terms, supporting evidence contained in the Sustainability Appraisal (SA) also concludes other sites would be more sustainable than SGA3.
Insufficient provision made for employment uses in an area of high demand.	Strategic Policy 2 requires the provision of 40 hectares of high quality employment uses in response to the conclusions of the 2021 Employment Land Needs Study undertaken by Lichfields. However,

Issue/Question	Response
	<p>the Stanton North strategic employment allocation offers the potential for the delivery of as much as 80 hectares of employment land, far in excess of the scale that employment evidence suggests is the level of need for the Borough.</p>
<p>Lack of flexibility in housing figure planned for, particularly with neighbouring city councils (35% uplift expected).</p> <p>Erewash Borough Council have taken a unilateral approach to setting its housing figure without consideration of unmet needs from elsewhere which is contrary to the National Planning Policy Framework.</p> <p>Should be planning for a higher housing growth figure. Criticism of not responding to the uplift in supply required by Local Housing Need modifications in Nottingham & Derby. Require more flexibility in housing target, with a buffer of 20% above Local Housing Need appropriate to plan for. This is justified with the designation of a Freeport at East Midlands Airport and plans for HS2 hub at Toton.</p> <p>Lack of flexibility in not considering alternative housing need figures as per planning for higher growth required by Paragraph 10 of National Planning Policy Framework.</p> <p>No consideration of reasonable alternatives in the planned for housing numbers and growth – there is risk of the plan being unjustified because of its lack of flexibility.</p> <p>Should seek to identify safeguarded land for housing towards the end and beyond the plan period to provide greater flexibility.</p>	<p>The Council's overall housing requirement as shown at Strategic Policy 1(3) states that the 5,800 home figure represents "a minimum". This figure represents Erewash's local housing need and is therefore considered a robust requirement in which to plan for. It is proposed that a long-standing saved policy protecting the West Hallam Storage Depot against non-employment uses (Saved Policy E5) is discontinued, returning the site to the status of white land. This offers the potential to pursue, in conjunction with a supportive landowner, housing-led regeneration at SGA15 in the long-term – contributing to a degree of flexibility in the Borough's plan-wide housing supply.</p> <p>The Council, as is required by the Duty to Cooperate, has formally asked neighbouring authorities in both the Nottingham Core and Derby Housing Market Areas (where areas outside of the Green Belt exist) if councils are able to accommodate any of Erewash's housing requirement intended to be delivered in its Green Belt. The Council do not feel this question has been sufficiently addressed. The Council is also aware of the recently introduced 35% uplift in housing need which applies to the neighbouring cities of Derby and Nottingham. Guidance contained in the National Planning Practice Guidance (NPPG) requires a 35% uplift be added to a council's housing needs figure as calculated through the standard method. As the NPPG states, there is an expectation that the uplift should be met in the area where it is needed, with any redistribution into neighbouring authorities (such as Erewash) being at odds with the intended impact of the requirement.</p>

Issue/Question	Response
	<p>The recent publication of the Integrated Rail Plan (IRP) announces the previous intention of providing a regional East Midlands hub rail station at Toton Sidings is no longer part of plans to develop the HS2 network. As a consequence, the proposed major scale of economic growth planned at the site will be substantially reduced, weakening any justification that the Borough must increase the number of new homes it is planning for.</p>
<p>Erewash Borough Council should consider the identification of the safeguarded land in the event other allocations in the Local Plan (Stanton & West Hallam Storage Depot) do not come forward in the anticipated timescales.</p>	<p>SGA15 at West Hallam Storage Depot is no longer being promoted by its owner as a location for a strategic housing development. However, it is proposed that a long-standing saved policy protecting the West Hallam Storage Depot against non-employment uses (Saved Policy E5) is discontinued, returning the site to the status of white land. This offers the potential to pursue, in conjunction with a supportive landowner, housing-led regeneration at SGA15 in the long-term – contributing to a degree of flexibility in the Borough's plan-wide housing supply. Any windfall housing provision arising from SGA15 would be additional to that identified by Strategic Policy 1 – Housing. Strategic Policy 1.2 – South Stanton recognises the difficulties in site delivery with the plan not expecting housing development to begin within the first five year period of the plan.</p>
<p>The requirement to demonstrate exceptional circumstances regarding Green Belt Release have not been made by Erewash.</p> <p>No exceptional circumstances justify the selection of a greenbelt site (SGA7).</p>	<p>The use of designated Green Belt to meet housing needs is necessary due to the Council's exhaustive identification of all available non-Green Belt options to develop brownfield land within the Borough's towns and villages. This is demonstrated by the most up-to-date Erewash Strategic Housing Land Availability Assessment (SHLAA). An insufficient supply of brownfield sites and constrained urban capacity in general helps to demonstrate the exceptional circumstances.</p>
<p>Site would bring Kirk Hallam into closer proximity with Stanton by Dale (SGA25).</p>	<p>The openness of Green Belt between Kirk Hallam and West Hallam would not be affected in the event of strategic housing at West Hallam Storage Depot as development would not extend beyond the</p>

Issue/Question	Response
The separation of Kirk Hallam and West Hallam will be reduced (SGA15).	employment site's present boundaries. However, SGA15 is now no longer being taken forward as a strategic housing allocation. Whilst the separation between Kirk Hallam and Stanton-by-Dale would be reduced as a result of development at SGA25, a considerable amount of white land exists between the two settlements, much of which is industrial land to the west of Littlewell Lane.

Health and Wellbeing

Issue/Question	Response
The air and noise pollution from the traffic on Hassocks Lane South and Heanor Road is already unhealthy (SGA7).	At a macro level, air pollution is unlikely to be impacted, as those who would move into new developments within the Borough are very likely to be already driving vehicles and contributing to omissions elsewhere. The sustainable locations of growth allocation sites means there is an opportunity to lower vehicle usage as services and facilities available within existing settlements are in close proximity. At a local level, there will be an unavoidable increase in vehicles on the road network as a result of proposals; however, the increase in trips will be dispersed across the wider road network rather than focused on one small section of highway as a result of the proposed strategy. This will help to ensure any increases in air pollution within any single locality are minimised.
<p>Open space around Kirk Hallam provides a welcome escape that is essential for individuals' mental and physical health (SGA25).</p> <p>Green space is beneficial to all, especially those in underprivileged communities (SGA25).</p> <p>Used by residents to relax and go for walks (SGA25).</p>	Whilst new homes at previously undeveloped land will lead to local change, it does not signal the loss of access to nearby land that is able to accommodate leisure and recreational activities. All strategic growth sites identified within the Green Belt are immediately adjacent to land that facilitate activities such as walking, jogging etc. All allocation sites are of a scale that means infrastructure can be created to ensure the adjacent countryside becomes more accessible to future residents. Furthermore, it is very possible that a network of specific routes through an allocation site will be established through the development process and, as such, will aid

Issue/Question	Response
	<p>in improving the ability of existing residents to access the wider countryside.</p> <p>The Council acknowledges that green spaces play an important role in maintaining good physical and mental wellbeing. However, much of the land within SGA25 is private with access prohibited to the public. SGA25's development will help to contribute to improvements to the Green Infrastructure network, enabling better access to nearby public rights of way, green spaces and waterways.</p>
Effects on the air quality and environment, especially at Pioneer Meadows Nature Reserve (SGA25).	Accommodating the scale of growth required within the Borough to meet will unavoidably lead to an increase in vehicles on the highway network. However, this increase will be dispersed across the Borough's road network rather than concentrated on a small section of it, helping to ensure any increases in air or noise pollution within any single locality are minimised.

Community Facilities

Issue/Question	Response
Each of the sites (allocations) should be checked to see if they meet the requirements of National Planning Policy Framework Paragraph 96 (focuses on access to a network of high quality open spaces and opportunities for sport and physical activity). An up-to-date sports and leisure evidence base would be required for this.	Each site will be checked to ensure they meet the requirements of NPPF Paragraph 96. The Council are currently in the process of updating its Playing Pitch Strategy (PPS), which is nearing completion. This will be published as part of the evidence base once it is complete.
Policies for open space, sport and recreation should be based on robust and up-to-date assessments of need.	
New developments should contribute financially to the demand generated on on-site facilities or contribute to the provision of off-site facilities regarding open spaces and opportunities for sport and physical activity.	The development of strategic allocations will generate s106 monies that could be purposed towards the provision of improved or new infrastructure to meet the needs of local residents. There is also an expectation upon developers to provide an appropriate amount of

Issue/Question	Response
	open space within each of the strategic allocations, proportionate to the size of development.
A deprived area with overburdened services that is in need of investment (SGA7).	Early and ongoing engagement with key infrastructure providers will inform the Council of any issues regarding current pressures or strains on local infrastructure around SGA7 caused directly by new development. The Council, or those responsible for infrastructure provision, cannot ask developers to make good any current infrastructure deficiencies not caused by proposed housing development, so new growth is often the catalyst to focus new investment in areas where this is needed.
Cotmanhay lacks greenspaces (SGA7).	The development of SGA7 would not result in the loss of any formal public green space. Instead, development would see the re-purposing of private land that is currently inaccessible for the public and thus does not represent a community asset. Development of private land would result in a better relationship with the existing Woodland and countryside beyond, potentially through enhanced natural surveillance and a management plan for the Wood's continued health. Existing Public Rights of Way would be retained.
No new facilities planned (SGA15).	SGA15: West Hallam Storage Depot is no longer included within the replacement Local Plan as a preferred option for strategic housing growth.
Green space needs to be easily accessible to all (SGA25)	The Council acknowledges that green spaces play an important role in maintaining good physical and mental wellbeing. However, much of the land within SGA25 is private and beyond the public rights of way, cannot be accessed by the public. SGA25's development will help contribute towards improvements to the local Green Infrastructure network, enabling better access to nearby trails, public rights of way, green spaces and waterways - whilst also making The Pioneer Meadows Local Nature Reserve much more accessible to new residents.

Issue/Question	Response

Loss of Countryside

Issue/Question	Response
<p>Site encroaches into the open countryside (SGA25).</p> <p>Encroachment on to the countryside (SGA26).</p>	<p>Whilst SGA25: Land South-West of Kirk Hallam would extend built development out into the surrounding countryside, Strategic Policy 1.5 makes provision for development to enhance existing Public Rights of Way and provide a green corridor to enhance linkages between Kirk Hallam, the new development and Pioneer Meadows Local Nature Reserve and the wider countryside around SGA25.</p>

Infrastructure (General) - EA

Issue/Question	Response
<p>Request for the Green Infrastructure Strategy to be retitled to Green and Blue Infrastructure Strategy and to consider including Natural Flood Management to improve flood risk and create biodiversity, which would help meet biodiversity improvements.</p> <p>Would like to see more consideration of Blue Infrastructure alongside Green Infrastructure in policy development.</p>	<p>Erewash has worked with the Greater Nottingham Authorities to develop the Draft Greater Nottingham Blue-Green Infrastructure Strategy. This was consulted on in summer 2021.</p> <p>The strategy provides a detailed evidence base concerning existing BGI which should be protected, their functions and connectivity (within the plan area and beyond the boundary within the region (this will be examined within part 2 of the strategy)), and opportunities to improve them or create more. The strategy has informed the draft Erewash Local Plan. The Local Plan contains Strategic Policy 5 – Green Infrastructure that provides detail on the designation of Strategic Green Infrastructure Corridors. The corridors incorporate key Blue infrastructure with the Borough. For example the River Trent, Erewash Canal and Nutbrook Canal. The policy also explains that the corridors aim to provide sustainable floodwater management, biodiversity improvements, active travel and open space recreational uses.</p>

Issue/Question	Response
The footpath running through the middle needs to remain (SGA25).	Development at SGA25 aims to preserve existing footpaths as much as possible. The masterplan for the site is yet to be finalised. The proposed Local Plan Strategic Policy 1.5 – South West of Kirk Hallam proposes enhancements to Dale Abbey Footpath 2 and Dale Abbey Footpath 49 that link Kirk Hallam and the new development to the wider countryside, including safe pedestrian crossings of the planned Kirk Hallam Relief Road.
Insufficient public transport. The 21 bus runs once an hour from Kirk Hallam and is mentioned as running from Wirksworth Road which it does not (SGA25).	The Ilkeston Flyer bus service runs every 15 minutes during peak times from the Cat and Fiddle, Ladywood Road, Kirk Hallam to Ilkeston, Derby and Heanor. Strategic Policy 1.5 – South West of Kirk Hallam of the Publication version Local Plan proposes improvements for pedestrians from the development. Access to local bus services serving the development is described in the policy that outlines the requirement for a new pair of bus halts served by pavements and a suitable road crossing. These facilities will be further integrated into safe walking and cycling access along Ladywood Road to help link the new development, including the proposed local centre, into Kirk Hallam.
<p>The best walking and wildlife open country in the area (SGA25).</p> <p>Numerous public footpaths to Stanton by Dale and Dale Abbey in this area that are accessed through the meadows area woodland (SGA25).</p>	Strategic Policy 1.5 - South West of Kirk Hallam proposes enhancements to local walking routes and wildlife areas. The policy refers to enhancements of Dale Abbey Footpath 2 and Dale Abbey Footpath 49 that link Kirk Hallam and the allocation site to the wider countryside. Therefore, good connections to natural areas will be maintained following the development of SGA25. The policy also requires the creation of a green corridor through the site to link Pioneer Meadows Local Nature Reserve linking the allocation to the wider countryside. The corridor will provide flood management and recreational access benefits, and should be positively managed so that it can be added as a physical extension of Pioneer Meadows Local Nature Reserve.

Issue/Question	Response
<p>Difficult to integrate into the surrounding neighbourhood, new residents will make shortcuts across the remaining fields to access local amenities (SGA26).</p> <p>Footpath required - public use personal gardens as a shortcut from the Huntley Avenue area to the centre of Spondon (SGA26).</p>	<p>Strategic Policy 1.4 – North of Spondon of the Publication version Local Plan outlines how the proposed allocation will be integrated within the existing neighbourhood. A new pedestrian access onto the A6096 (Dale Road) in addition to bus halts and a pavement along the west side of the road will provide access to Spondon centre. New and existing residents of Spondon should only use designated public pavements and Public Rights of Way to navigate the neighbourhood.</p>
<p>Remote from the main settlements and services of Erewash (SGA26).</p> <p>Not close to EBC council core services (SGA26).</p> <p>Not within a practical distance to be serviced by Erewash Borough Council (SGA26).</p> <p>Extension of Spondon services will be provided by Derby City Council (SGA26).</p>	<p>Spondon forms part of Derby City, so this proposal forms an extension of the Derby main built-up area into the Green Belt and the development will expand the Spondon community. Strategic Policy 1.4 - North of Spondon outlines what the development will provide, which includes the creation of vehicular and pedestrian access points, an extension of a local public right of way, financial contributions to school places and affordable housing contribution. This will ensure adequate connectivity to services and infrastructure is provided to support the new community.</p>
<p>It won't be served by public transport (SGA15).</p>	<p>SGA15 at West Hallam Storage Depot is no longer being promoted by its owner as a location for strategic housing growth. However, it is proposed that a long-standing saved policy protecting the West Hallam Storage Depot against non-employment uses (Saved Policy E5) is discontinued, returning the site to the status of white land. This offers the potential to pursue, in conjunction with a supportive landowner, housing-led regeneration at SGA15 in the long-term – contributing to a degree of flexibility in the Borough's plan-wide housing supply. Should residential development occur in future, policies would expect public transport improvements in order to offer choice to residents to travel sustainably.</p>

Flood Risk

Issue/Question	Response
<p>For South West of Kirk Hallam (SGA25), it would be expected that development is located away from the flood risk areas (Flood Zone 2 and 3). If development occurred within these, agreement would be required with the Lead Local Flood Authority.</p> <p>If South West Kirk Hallam (SGA25) is developed, a test should be undertaken to ensure development is sited on land that has the lowest risk of flooding.</p>	<p>The housing at SGA25 will not be built on the area of flood risk. Instead, the area of flood risk is designated as part of the Nutbrook Strategic Green Infrastructure Corridor (as per Strategic Policy 5 - Green Infrastructure, and draft policies map).</p>
<p>For the Stanton development (SGA21) it must be ensured that there is sufficient capacity in the sewerage network and at the sewage treatment works to deal with foul water generated by development.</p>	<p>Severn Trent have identified that a scheduled capital project looking to pump flows from Stapleford Waste Water Treatment Works (WWTW) to Toton WWTW will need to include the Stanton redevelopment as part of the scheme. The Council will work alongside Severn Trent to ensure that development at SGA21 can be absorbed into planned works.</p>
<p>Should consider updating Strategic Flood Risk Assessments with the other Greater Nottingham Authorities, although the Environment Agency is expected to update flooding modelling of the River Erewash and its tributaries after 2023.</p>	<p>The Council does not envisage notable changes to flood outlines as defined within the current Greater Nottingham Strategic Flood Risk Assessment. As a result, it is not agreed that progression of the plan should be delayed until after the updated 2023 modelling is concluded. When the 2023 modelling becomes available, the Council will revisit the existing SFRA and all planning decisions will be based on the findings of the updated work.</p>
<p>Expect surface water to be managed in line with Government's Water strategy, Future Water.</p>	<p>Surface water will be managed in line with National Policy and the Government's water strategy.</p>
<p>Concern over flood risk from the brook in areas behind Dallimore School and Sowbrook Lane (SGA25).</p>	<p>New developments must be designed in a way that ensures they do not increase the risk of flooding to existing communities. The use of green spaces and incorporation of sustainable drainage features as part of SGA25's development will ensure that it does not increase the risk of flooding to nearby areas.</p>

Pressure on Neighbouring Council Areas

Issue/Question	Response
<p>Would require the principles of Derby Local Plan policy CP1(b) to be followed in the event that SGA1 (Acorn Way) and/or SGA26 (Spondon Wood) are advanced.</p> <p>The service for these properties would be a burden on Derby City Council (SGA26).</p> <p>Already heavily stretched local amenities, Schools, Doctors, Dentists etc. (SGA26).</p>	<p>Whilst the Council notes this policy in an adjoining council's adopted Local Plan, Policy CP1(b) does not have any influence in the management of development within the boundaries of Erewash Borough. It does however replicate much of what is set out by Strategic Policy 1.1 – Strategic Housing Sites, with the Council's policy requiring all of its strategic housing sites to demonstrate the principles of good design with this embedded within new development. Policy CP1(b) does call for effective engagement with neighbouring authorities to help coordinate the delivery of infrastructure, although the Borough Council has encountered some difficulty in ascertaining the capacity of services and facilities within Derby City close to the shared boundary. In light of this, the Council has done as much as it can in understanding what, if any, impact housing development at SGA1 and SGA26 would have on the available infrastructure inside Derby City.</p>
<p>The former American Adventure site must also be considered in this proposal as that is going to have an additional impact (SGA7).</p>	<p>Traffic modelling commissioned to assess the impacts of strategic housing sites on the highway network will incorporate any nearby major developments, such as the redevelopment of the American Adventure site, occurring just beyond the boundaries of the Borough in adjacent authorities to offer a comprehensive assessment of network conditions and identify specific mitigation measures required to deliver strategic growth in Erewash.</p>

Utilities

Issue/Question	Response
<p>A policy focusing on renewable energy should be considered to take account of future energy needs and requirements.</p>	<p>Policy 1: Climate Change of the 2014 Core Strategy is being saved as part of the Local Plan review. This policy focuses on increasing</p>

Issue/Question	Response
	renewable energy and sustainable methods of development with full consideration to climate change.
Encourage Erewash Borough Council to impose expectation on developers that properties are built to optional requirement in Building Regulations of 110 litres of water usage per person/day.	Developers are required to build in accordance with the latest regulations. The Council expects all development to be in conformity with the latest building regulations, but schemes can, should they wish to, advance ahead of expectations around water usage.
<p>Potential for localised impact on sewerage network caused by SGA25 (South West of Kirk Hallam) so this will need fully assessing once layout/ yield is set</p> <p>Electricity supply would also be a problem as Kirk Hallam suffers from dimming lights and is currently insufficient to meet demand (SGA25).</p>	<p>Severn Trent noted that development may impact overflow operations. As a result, developers and the Council will work closely with Severn Trent to establish a solution to any risks caused by development prior to the commencement of any future approved scheme.</p> <p>Electricity supply may require a new primary point of connection. Developers and the Council will work closely with Western Power to establish any potential issues and how to resolve these prior to the commencement of any future approved scheme.</p>

Housing should be in other areas

Issue/Question	Response
Supportive of development at Pewit Golf Course.	Pewit Golf Course presently forms an important recreational resource on the edge of Ilkeston. It is Council-owned land. There are no plans to develop the sport facility for housing.
Need to find alternative sites not in the greenbelt.	The Council has reviewed all options for housing including brownfield sites within the conurbations of Ilkeston and Long Eaton. A thorough assessment was undertaken via the 2019 SHLAA and call for strategic sites back in 2019. This enabled the Council to consider potential housing sites in Erewash including both Green Belt and non-Green Belt sites. Having exhausted all available options to develop housing outside of Green Belt, there is a need for some Green Belt development. This is in order to meet both the housing

Issue/Question	Response
	requirements for delivery over the plan period to 2037, and the ongoing requirements to maintain a 5-year supply of deliverable housing land.
Alternative sites should be explored first (SGA25).	The Council has reviewed many other sites in addition to SGA25. Regulation 18 Part 2 consultation saw the publication of 25 SGA site assessments undertaken. The site allocations in the Publication version have been chosen as they presented the most sustainable and suitable options for housing development, one of those options being SGA25. This analysis is presented by the accompanying Sustainability Assessment.
Use alternative sites including countryside next to villages in Erewash before Spondon (SGA25).	Spondon forms part of Derby City, so this proposal would extend the Derby conurbation into the Green Belt. By definition, development in this location this is more sustainable than an extension to the town into the Green Belt, or of the villages into the Green Belt, or a new settlement in the Green Belt. The presence of Spondon Wood to the north of the site helps to provide a robust and defensible Green Belt boundary, and vehicular and pedestrian access to SGA25 is available from the A6096.

Rejected sites

Issue/Question	Response
Council have concluded against SGA11 that "it will not make strategic contribution to housing requirements" which makes clear the Council have not considered the correct Call For Sites strategic submission which identifies possibility of additional land further west.	The Council notes the larger parcel of land (Parcel 3 as per the representation) that was submitted to the Strategic Call for Sites prior to the commencement of the Local Plan review. However, as these landholdings potentially could lead to inclusion as strategic housing allocations in our Local Plan the Council must have certainty over ownership. The Council considered a site comprising Parcels 1 & 2 (as details of their ownership is known) at Regulation 18 Part 1, but appraisal through the SGA assessment flagged a number of constraints. It is therefore considered unreasonable to include Parcel 3 in the Council's appraisal as the landowners are unknown (as stated in the submission to the Strategic Call for Sites) and as a consequence, the Council have no way of knowing whether the landowner(s) are aware that their land is being promoted.
Supportive of development at SGA3 (Breadsall Hilltop). The Council should identify a range of housing sites in terms of size and location in order to maximise housing delivery.	Both the Council's SGA site assessment, as well as the Publication version's accompanying Sustainability Appraisal collectively highlight the unsustainability of SGA3 as a strategic growth option. Development of SGA3 would lead to the loss of openness in designated Green Belt between Breadsall and the Derby main built-up area.
Promoting development of a much smaller area (37ha) of SGA20 (north of Breaston and Draycott) than that originally assessed (87ha) with only 14ha developed for 300 homes.	The assessment of SGA20 through the Publication version Local Plan's Sustainability Appraisal performed moderately well as a consequence of the site's vast size and scale of housing – something which would necessitate the requirement of substantial and complex infrastructure. Any subsequent reduction in SGA20's size and dwelling capacity would weaken those positives from the original assessment as the reduction in necessary infrastructure reduces the overall sustainability of development.

Historic environment

Issue/Question	Response
The plan should be clearer in demonstrating a positive approach to addressing the historic environment.	The existing Policy 11 – Historic Environment from the adopted Core Strategy (2014) is being saved. This focuses on the continued protection and enhancement of the historic environment.
Heritage statements are required to support redevelopment of Stanton (SGA21) and West Hallam Depot (SGA15), showing how redevelopment will impact designated and non-designated heritage assets.	In response to advice from Historic England, the Council produced a Heritage Impact Assessment for the former Stanton Ironworks site. Assistance was kindly provided throughout the HIA's production by Historic England. As West Hallam Storage Depot (SGA) is no longer a preferred strategic growth option, it was deemed unnecessary by both Council and Historic England to complete a HIA for this site.
The SA should focus more on historic characteristics rather than the growth options.	The information provided within the growth options supplements the SA, therefore we feel there is no need to repeat the findings of the site specific growth options in the SA.

Duty to cooperate

Issue/Question	Response
<p>Erewash Borough Council accused of failing Duty to Co-operate through insufficient dialogue with Derby City.</p> <p>No evidence of consultation with neighbouring councils in Nottingham & Derby Housing Market Areas.</p> <p>Council have completely disregarded need to positively prepare Local Plan through input of dialogue with neighbours to discuss unmet needs.</p> <p>Erewash not fulfilling its legal obligations in regard to the Duty to Cooperate.</p>	The Council has sought to proactively identify strategic cross-boundary spatial planning matters and address infrastructure issues with adjacent authorities in the Derby and Nottingham Core Housing Market Areas (HMA) from the outset of the Local Plan review. This has involved the Council's continued participation in meetings with officers and councillors of the Nottingham Core HMA as part of joint working arrangements, and additional meetings with officers of Amber Valley Borough Council, Derby City Council and South Derbyshire District Council. In addition to these, two separate stages of public consultation (January- July 2020 and March to May 2021) encompassing the Regulation 18 stage, have allowed adjacent councils to make clear their views towards proposals in the draft Local Plan. These exercises have presented an opportunity to offer information about the impact proposed development is likely to have

Issue/Question	Response
<p>Welcomes the opportunity for the Derby Housing Market Area councils to meet with Erewash to explore ways in which strategic concerns can be overcome. Derby Housing Market Area want to create a more collaborative dialogue on issues of shared importance moving forwards.</p> <p>Concerns remain over Duty to Cooperate not being met with partners.</p> <p>EBC has not done enough to satisfy the Duty to Cooperate.</p>	<p>on infrastructure, particularly on those services and facilities in locations close to shared authority boundaries.</p>
<p>Calls for effective and ongoing working with other Core Housing Market Area Councils to determine where additional strategic infrastructure is necessary and whether development needs that cannot be wholly met in one or other authority can be met in others.</p> <p>Plans should be informed by Statement of Common Ground, particularly in dealing with any unmet housing need. Failure of Duty to Cooperate by lack of discussions with neighbouring Housing Market Area. Erewash Borough Council should realign their Local Plan with Greater Nottingham in order to satisfy the Duty to Co-operate.</p>	<p>The Council has entered into formal dialogue with partner authorities in both the Derby and Nottingham Core HMAs to identify what, if any, strategic cross-boundary planning matters need addressing in order to meet its obligations and help with the production of a Statement of Common Ground (SoCG). As part of this approach, the Council has formally asked neighbouring HMAs (those where non-Green Belt land exists) if they are in a position to accommodate any of Erewash's assessed housing requirement that is proposed to occur on designated Green Belt.</p>
<p>Requires the emerging plan to demonstrate flexibility around housing requirements, potentially demonstrating an ability to assist with unmet needs from Derby Housing Market Area as a consequence of the strong economic and housing ties between Derby and Erewash.</p> <p>Unsound approach to consider meeting housing requirements solely within Erewash's own administrative area. Erewash haven't looked at housing needs and growth within neighbouring authorities. In particular Derby City is subject to a 35% increase in housing need who need to work with neighbouring authorities, including Erewash to assess the impacts of this.</p>	<p>It is proposed that a long-standing saved policy protecting the West Hallam Storage Depot against non-employment uses (Saved Policy E5) is discontinued, returning the site to the status of white land. This offers the potential to pursue, in conjunction with a supportive landowner, housing-led regeneration at SGA15 in the long-term – contributing to a degree of flexibility in the Borough's plan-wide housing supply.</p> <p>National Planning Practice Guidance sets out its expectation that the 35% uplift Derby is required to plan for should be met within the area it has been allocated. Any redistribution into neighbouring authorities (such as Erewash) would be at odds with the intended planning</p>

Issue/Question	Response
	purpose of the uplift, particularly as incursions into Erewash's designated Green Belt have already been necessary to assist with meeting the Borough's housing requirement. Redistribution should firstly be addressed to authorities within an HMA where non-Green Belt land outside its inset towns and villages exists.
Erewash should work with partners to demonstrate alternative strategies across the whole of Greater Nottingham have been considered. This should be agreed in an overall strategy for the distribution of development and this should be set out through the preparation of a new Duty to Cooperate.	The Council's Local Plan is out-of-date having been adopted in March 2014. Consequently, an urgent need exists to produce a replacement Core Strategy that addresses, amongst other matters, the need for a step change in available housing land and boosted delivery, directing new development to sustainable locations. The urgency of this has prompted the Council to produce a replacement Local Plan that identifies sustainable locations for strategic growth. Positive dialogue and cooperation with Greater Nottingham councils remains in place however, demonstrated by the continued commitment to developing a shared evidence base.
<p>Erewash Borough Council has failed Duty to Cooperate. Have not engaged with Derby City since the start of the process. SGA26 (Spondon Wood) is a bolt on addition.</p> <p>EBC has a duty to communicate with neighbouring Derby City Council over this proposal (SGA26).</p> <p>Would welcome discussing the impact of development sites in more detail along with other potential cross-boundary issues at a further meeting and confirm their willingness to work collaboratively with Erewash on these and wider strategic planning issues.</p>	<p>The North of Spondon (SGA26) site was promoted to the Borough Council between the two Regulation 18 consultations. It was incorporated into its emerging strategy because of its compatibility with the sustainability of the Council's preferred spatial growth hierarchy. Derby City Council have been provided with an opportunity at the second of the two Regulation 18 consultations to provide any information helping to demonstrate the impact that development at SGA26 would have on local services, facilities and the capacity of infrastructure in general. The Council have also instigated dialogue with Derby City Council, amongst others, to firstly identify and then seek to address any strategic, cross-boundary spatial planning matters flagged since the second of the two Regulation 18 consultations. The Borough Council remain committed to productive dialogue with all of its Duty to Cooperate partners as a precursor to delivering sustainable development.</p>

Consultation

Issue/Question	Response
EBC should speak openly to all residents in the local area.	The Council has publicised all previous rounds of Local Plan consultation on its website, via social media and have had copies of documents available to view in libraries across the Borough and both Town Halls, when deemed safe enough and in full compliance with Covid regulations. During the first consultation in early-2020, consultation events were held within the locality of the preferred strategic growth sites to offer residents the opportunity to speak to officers face to face regarding any of the proposed sites. The Council has exercised its duties set out within its Statement of Community Involvement (SCI).

Density

Issue/Question	Response
Masterplan indicates a design for 205 homes at SGA26, not 240 homes as draft Local Plan suggests site can accommodate.	The Strategic Growth Area Assessment provided an estimate of what the site capacity of SGA26 could provide (approximately 240 dwellings). The Publication version Local Plan includes Strategic Policy 1.4 – North of Spondon. This specifies the site has capacity for around 200 homes. Consideration of key evidence around environmental constraints and the need for a walkable development has altered the site capacity, allowing for policy provisions such as open space and the establishment of an appropriate buffer between the proposed development and Spondon Wood.
Make best use of land by ensuring high-density development.	The density of development at each of the allocated strategic developments is guided by a number of factors and constraints in place on or immediately around the site. Proposed capacities should respect the locality of development to help create sustainable schemes.

Due Process

Issue/Question	Response
Sustainability Assessment is fundamentally flawed because it only considers high level growth options and not different sites within the growth options. As a result, the revised growth options put forward have not been robustly assessed against reasonable alternatives. The Sustainability Assessment should consider each site otherwise the strategy is fundamentally flawed. Sustainability Assessment needs to assess individual sites within the growth options.	The version of the Sustainability Appraisal released alongside the Publication version of the Local Plan looks at each of proposed site-specific strategic housing locations. This version therefore progresses beyond the consideration of high-level growth options and considers in detail the sustainability of each of the 25 Strategic Growth Areas (SGAs), helping to inform the selection of strategic allocations in the Publication version.
A new option within the Sustainability Appraisal should be included called "extensions to the conurbation/town not in the Green Belt". This should be placed between Options 2 and 3.	Spatial options for growth were consulted upon at the first stage of the Local Plan review back in early 2020. The Council asked whether the hierarchy of growth options was robust and no response was able to demonstrate omissions or deficiencies in the various options set out by the draft version. Development in such locations as indicated by the issue would be assessed on their merits against the sustainability of development, and its non-Green Belt location would be a consideration in the determination of any proposal.
The consultation incorrectly refers to Stanton proposals as a new settlement despite it being part of the Ilkeston urban area.	The Stanton South proposals, as shown by Strategic Policy 1.2, clearly demonstrates the need for new community facilities to be delivered which help support the creation of the planned 1,000 new homes. Despite Stanton South forming part of the Ilkeston urban area, with no existing residential footprint on an increasingly redundant industrial site, it is legitimate to view this strategic allocation as creating a new settlement.
For at least next 0-10 years the West Hallam Storage Depot (SGA15) site will remain in employment use. Now object to inclusion of site for development as housing site within the emerging plan.	The Publication version Local Plan omits inclusion of the West Hallam Storage Depot (SGA15) as a strategic housing allocation.
Can the Stanton North allocation boundary correspond with the area of land under Verdant's ownership?	The allocation proposed shows the area of land considered suitable for development, which is different from the area of land in the ownership of Verdant.

Issue/Question	Response
<p>Site (SGA28) should be considered as extension to main built-up area of Nottingham rather than extension to village. In any case, extensions to villages close to urban conurbations should not be so heavily penalised through sustainability appraisal.</p>	<p>It is appropriate SGA28: Rushy Lane is viewed in the context of its role in extending the village of Risley, rather than how it would form an extension of Nottingham's main built-up area (MBUA). A hard and wide physical barrier in the form of the M1 separates SGA28 from Sandiacre, preventing direct connectivity. Long-established planning practice has always seen the outer extent of the Nottingham MBUA end at the M1, and development west of this would both undermine the containment of the MBUA and allow isolated growth to spill into the open countryside, eroding the openness of Green Belt. In terms of how any SGA site is assessed through the SA, each is independently critiqued against a diverse and broad range of questions within the 16 SA objectives, helping sites to be assessed on their own merits rather than being unduly influenced by where they fit within the wider spatial hierarchy for growth.</p>
<p>No commentary on why alternative strategic site options have been dismissed. Site-specific Sustainability Assessment is required to show why preferred sites are more sustainable than rejected sites.</p>	<p>Site-specific appraisal of all 25 SGA strategic growth options has now been carried out and forms part of the Sustainability Appraisal that supports the policies of the Local Plan Publication version.</p>
<p>Series of comments within supporting technical notes which disagree with the findings of the council's Sustainability Appraisal in relation to certain topics (landscape, heritage, flood risk). Also should reconsider some of the conclusions made from the draft Sustainability Appraisal.</p> <p>Inconsistencies in the Sustainability Assessment testing.</p>	<p>The Sustainability Appraisal (SA) is a highly complex body of work supporting the testing and refinement of policy options to be included in the Local Plan. It is conducted by Officers having regard to a vast framework of questions spanning 16 separate SA objectives. The extensive and diverse range of topics covered through the assessment process ensures that findings can be seen as robustly representative of the main sustainability issues each site raises.</p>
<p>Strongly believes there should be a distinction between higher and lower order villages to reflect availability of facilities.</p>	<p>The Council are satisfied that the spatial growth hierarchy set out at the initial Growth Options stage represent all realistic options in which the impacts of strategic growth can be assessed against. The distinction between higher and lower order villages is often imperceptible, with aspects such as a shared highways network and amalgamated traffic movements over the rural parts of the Borough overcoming any differences in village size. The current policy</p>

Issue/Question	Response
	framework also only identifies village settlements (Saved Policy H3), so a distinction between higher and lower order villages, even if only for the purpose of SA assessment, would represent a departure from adopted policy.

Supporting development

Issue/Question	Response
<p>Do not object to SGA15 being included for future housing development 10 years+. Propose the site is identified as a broad location for growth for years 11-15 of the plan.</p> <p>Supportive of site as an alternative to developing in the Green Belt (SGA15).</p>	<p>SGA15 at West Hallam Storage Depot is no longer being promoted by its owner as a location for a strategic housing development. However, it is proposed that a long-standing saved policy protecting the West Hallam Storage Depot against non-employment uses (Saved Policy E5) is discontinued, returning the site to the status of white land. This offers the potential to pursue, in conjunction with a supportive landowner, housing-led regeneration at SGA15 in the long-term – contributing to a degree of flexibility in the Borough's plan-wide housing supply.</p>
<p>Support the proposal, highlighting the need for it to be used before any greenbelt is released (SGA21).</p>	<p>SGA21: Stanton Regeneration Site (SRS) forms one of the five strategic housing allocations (Stanton North). Recently employment proposals for the land north of Lows Lane have come forward for the site with a planning application for strategic employment uses. The Options for Growth document had already concluded that no more than 1,000 new homes could be built at the SRS over the next plan period, not least because progress on housing development here is insufficient to commence housing delivery within the next five years. The emerging employment proposals do not contradict the housing objectives for the former Stanton Ironworks site because there is adequate land available to the south of Lows Lane to accommodate a 1,000 home scheme. Whilst 1,000 homes contributes greatly to Erewash's plan-wide housing requirement, Green Belt sites are also needed in order for the Borough to meet both its plan-wide</p>

Issue/Question	Response
	requirement and the requirements to demonstrate a continuous 5-year supply of deliverable housing.

Climate change

Issue/Question	Response
There should be a policy relating to climate matters arising from growth.	Climate change matters have been addressed within the Publication Version of the Local Plan and core principles have been embedded within individual policies. For instance, the strategic housing sites will prioritise non-motorised transport and will be expected to include suitable greenspace that takes account of local context, improves biodiversity, and adapts to climate change through providing seasonal shade and sustainable drainage infrastructure. Strategic Policy 4 – Transport and Strategic Policy 5 – Green Infrastructure also contain proposals that mitigate and combat climate change. For example, promoting improved sustainable transport provision more widely within the Borough. Strategic Policy 5 also supports the designation of Green Infrastructure Corridors with their objectives being to provide sustainable floodwater management, active travel and carbon capture. The Council also proposes to retain Policy 1: Climate Change of its adopted Core Strategy to ensure new development meets its provisions.
Green belt development should be avoided at all costs and especially with the change in global environmental awareness (SGA25).	There is insufficient capacity within the conurbation, the towns and the villages to accommodate the level of housing suggested by standard housing methodology calculating local housing need. Therefore, a process to identify the most sustainable Green Belt locations for strategic housing growth has been followed. This is presented both by the library of Strategic Growth Area assessments and the Local Plan's accompanying Sustainability Appraisal. The allocation South-west of Kirk Hallam (SGA25) performs particularly well despite its greenfield status primarily because of its location adjacent to the town (Ilkeston). When compared with other greenfield sites SGA25 performs particularly well, largely because of the

Issue/Question	Response
	associated delivery of a proposed relief road. This would help to address wider capacity issues across the local road network in the north of the Borough.

Lack of evidence

Issue/Question	Response
<p>New housing extent of Stanton will not be able to deliver 1,000 dwellings. Additional land is required.</p> <p>Housing delivery at Stanton very uncertain so cannot plan for this to occur.</p>	<p>Evidence suggesting the reasons why the Stanton South allocation cannot deliver 1,000 new homes has not been adequately demonstrated. The dividing of the Stanton Regeneration Site into distinct residential and employment zones north and south of Lows Lane will help bolster deliverability of development at both. The Publication version of the Local Plan recognises the challenges of bringing forward the Stanton South allocation by acknowledging housing delivery is likely to occur towards the latter stages of the plan period, utilising some of the infrastructure provided by the strategic employment development north of Lows Lane.</p>
<p>Traffic generation assumptions made for SGA21 excessively high and not based on evidence. Sets misleading precedent ahead of more detailed work for New Stanton Park. Requires a robust transport modelling exercise to assess the cumulative impacts of traffic around the Stanton & South West Kirk Hallam sites with a view to demonstrating a reduction in trips due to co-location of homes and jobs. This would then form basis for knowing where highway/transport improvements are needed.</p>	<p>Assessments around traffic generation in connection with SGA21 were indicative to offer a general guide as to the scale of trips generated by a scheme of a 1,000 homes with supporting community uses. The Council are committed to the commissioning of detailed transport modelling to robustly assess the impacts of all strategic growth identified in the Publication version of the Local Plan on the Borough's road network – focusing on any impacts across a wider area than just Stanton and South West of Kirk Hallam.</p>
<p>Suggests Local Plan or Sustainability Appraisal incorporates assessment of extensions to large villages in Green Belt.</p>	<p>The Council are satisfied that the spatial growth hierarchy set out at the initial Growth Options stage represent all realistic options in which the impacts of strategic growth can be assessed against. The distinction between higher and lower order villages is often imperceptive, with aspects such as a shared highways network and</p>

Issue/Question	Response
	<p>amalgamated traffic movements over the rural parts of the Borough overcoming any differences in village size. The current policy framework also only identifies village settlements (Saved Policy H3), so a distinction between higher and lower order villages, even if only for the purpose of SA assessment, would represent a departure from adopted policy.</p>
<p>Lack of Green Belt review. Produce a Green Belt review so not to result in same outcome as St Albans and Amber Valley Local Plans. Key omission from evidence base. A topic paper could rectify some issues about selection of certain sites over others.</p> <p>There has been no comprehensive review of the Green Belt which influences site selection.</p> <p>Erewash Borough Council must do a Green Belt Review if insisting on building in Green Belt.</p> <p>No Green Belt review justifying Green Belt releases.</p> <p>Weak evidence base to support Green Belt release with no proper justification for this.</p> <p>There should be an up-to-date strategic Green Belt Review to inform decision-making.</p>	<p>The topic of Green Belt has been extensively appraised through the production of SGA assessments. These form an important part of the Council's overall evidence base supporting the review of the Local Plan. A section of each SGA is devoted to the impact development would have on the five purposes of Green Belt. National planning guidance is silent on the need for a Green Belt review with no explicit request for local planning authorities to conduct such an exercise. The Council is satisfied that the work published by its library of SGAs is sufficient to assess each of the 25 sites and their relationship to designated local and national Green Belt policy.</p>
<p>Site based Landscape and Visual Impact Assessments and broader landscape character assessments should be undertaken for the sites.</p> <p>There is a lack of evidence base surround employment need, landscape sensitivity or flood risk that should be used to guide the sites chosen for strategic development.</p>	<p>The Strategic Growth Area (SGA) assessments consider a wide range of matters, with commentary and analysis provided using the Derbyshire Landscape Character Assessment (LCA) to understand what impact any future development may have in the various character areas around Erewash. The review of the Local Plan in general has been progressed in conjunction with the availability of an extensive evidence base. A 2021 Employment Land Needs Study undertaken across the Nottingham Core and Outer HMA provides a</p>

Issue/Question	Response
<p>Lack of employment, landscape, flood risk, ecological or green belt review evidence.</p> <p>No evidence base to make site-specific decisions.</p>	<p>steer on the scale of employment land required in Erewash, whilst a recent Strategic Flood Risk Assessment (SFRA) covering the Greater Nottingham area allows Officers to establish whether SGAs are likely to have any impact on sensitive areas prone to flooding. The Publication version Local Plan has been influenced by a suitably up-to-date and informative evidence base, with the Sustainability Appraisal also playing a key role in the Council making decisions over which strategic sites should be included.</p>
<p>There are unknown factors influencing the delivery of housing growth - viability, HS2 housing uplift & strategic infrastructure issues have yet to be examined.</p>	<p>The Publication version Local Plan plans for known circumstances and eventualities. The recent Government announcement over the future of HS2 raised significant doubt over the commitment to a regional hub station at Toton. It is therefore appropriate for the Local Plan to not rely on planning for factors which have no certainty of occurring. The Council are committed to a timely review of its Core Strategy. This will aid the delivery of much-needed housing growth whilst also being the catalyst for the delivery of key supporting infrastructure. Strategic Policies in the Publication version address the infrastructure requirements connected to all strategic growth allocation sites.</p>
<p>There has been a too narrow a focus on housing and Erewash cannot progress onto Regulation 19 Consultation without a strategy that focuses on broader matters.</p>	<p>The Revised Options for Growth consultation (May 2021) asked what its non-housing related policies should cover. Consequently, the Council have developed a range of policies that address a range of strategic, non-housing matters and these can be seen in the Publication version of the Local Plan.</p>
<p>Evidence base is lacking regarding the capacity for schools to absorb the increase in pupils and how local roads will cope with additional traffic generated from development.</p> <p>Lack of evidence concerning school capacities and how developments will impact existing education facilities</p>	<p>The Council benefits from strong dialogue with its Local Education Authority (Derbyshire County Council) over long-term education planning. This has resulted in the Publication version making provision for school facilities, whether this involves the building of new schools or the enlargement of existing facilities, as part of strategic site allocation policies. Growth around the fringes of the Borough would undoubtedly affect education infrastructure in</p>

Issue/Question	Response
	adjacent Derby City, and the Council have sought to establish its current capacity in order to guide mitigation. Commissioned traffic modelling will help to assess the impacts of developments identified in the Local Plan on the local highway network and help to advise on suitable mitigation should this be necessary.
Localised impacts of the allocations on matters such as landscape character, ecology, flood risk etc. are not as detailed as they could be, meaning the level of mitigation of harm is difficult to understand.	Additionally to the consideration of each of these matters within the Council's library of Strategic Growth Area (SGA) assessments, the Sustainability Appraisal accompanying the Publication version of the Local Plan also looks in detail at how these factors relate to every site considered as part of the Core Strategy Review process. This has enabled policies to address any negative impacts identified by the SA for the Council's preferred strategic development sites by making suitable provision for mitigation as a means of reducing or altogether removing, any assessed harm.

Promoting other sites

Issue/Question	Response
Supports land for housing (120 dwellings) to east of Seven Oaks Road.	This land is located within Green Belt and at 120 dwellings, fails to meet the Council's minimum threshold for what is considered a strategic housing location (approx. 200 homes).
Supports land for housing (200-240 dwellings) at Ilkeston Road/Sowbrook Lane.	The site sits within an area of land which the Council proposes to designate as Green Belt to ensure the long-term separation of a redeveloped Stanton site (both Stanton North and South allocations) and strategic housing growth at SGA25: Land South West of Kirk Hallam. Therefore, a proposal to designate this site for housing is contrary to emerging Local Plan policy.
Supports land for employment to north of Low's Lane and west of the M1.	A sizeable amount of land as part of the Stanton North strategic employment allocation (Strategic Policy 2.1) is proposed at this

Issue/Question	Response
	location. The Council supports the transformation of land north of Low's Lane to provide for a wide range of employment uses and facilities.
There is an employment site immediately south west of M1 Junction 25 - this is an extension of SGA12 (south of A52 at Risley) southwards down to Longmoor Lane. Identified to help satisfy growing demand for logistics and advanced manufacturing.	The SGA12 site was discontinued from further assessment beyond the Growth Options (Regulation 18 Part 1) consultation owing to a lack of promotor. Together, Strategic Policy 2 – Employment and Strategic Policy 2.1 - Stanton North demonstrate that the Publication version Local Plan provides in full for the Borough's assessed employment land needs.
Interested in developing land area safeguarded south of Derby County training ground complex and north/north-east of Acorn Way.	The Council has been able to identify sufficient housing land to meet the Borough's needs across the plan period. As explained elsewhere in this table, some flexibility for additional housing land, should this be required, may be possible at SGA15: West Hallam Storage Depot which has seen a long-standing employment protection policy discontinued. This location also has the advantage of being brownfield, with any future development being preferable to additional Green Belt releases.