

**Erewash Borough Council
Draft Sustainability Appraisal
of the
Proposed Core Strategy Review
January 2022**

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1 INTRODUCTION

1.1 Core Strategy review process:

In accordance with Government policy, the strategic policies of the Erewash Core Strategy (adopted in 2014) which deal with matters including housing delivery, economic growth, infrastructure delivery and the environment, are now deemed out of date as the document has exceeded five years since adoption. In response to this, a review of the Erewash Core Strategy has been initiated, culminating in the first stage of public consultation (Regulation 18) occurring in January 2020. This opening stage of the review focussed on potential strategic locations for housing growth within the Borough, culminating in the **Growth Options document**. This was supported by a Sustainability Appraisal that rigorously tested a set of potential growth options (the Strategic Growth Options Sustainability Appraisal).

Following consideration of the responses to the first stage of public consultation, the **Revised Growth Options document** was published alongside commencement of a second stage of Regulation 18 public consultation in March 2021. The original Strategic Growth Options Sustainability Appraisal continued to underpin this work and demonstrate the suitability of the proposed spatial hierarchy of growth.

The two stages of public consultation referenced above collectively amount to a completion of Regulation 18 (Issues and Options) stage of the Erewash Core Strategy Review. This document, which includes two additional components of the Sustainability Appraisal (on the topics of **Policies** and **Allocations**) has been prepared to inform Regulation 19 (Draft/Publication Local Plan) stage of the Erewash Core Strategy Review. The purpose of this document is to bring together all stages of Sustainability Appraisal – and ancillary work – undertaken to inform the Erewash Core Strategy Review to date.

1.2 The purpose of Sustainability Appraisal (SA):

The Planning and Compulsory Purchase Act 2004 introduced the requirement to carry out a Sustainability Appraisal as an integral part of the preparation of a new or a revised Local Plan. Sustainability Appraisal is an iterative process that should be undertaken throughout the preparation of a plan or strategy. The purpose of Sustainability Appraisal is to assess the economic, social and environmental impacts of plans or strategies (in this case, the policy proposals of a new Local Plan) so that the preferred option promotes, rather than inhibits, sustainable development. It also acts as a valuable tool for minimising adverse impacts and resolving as far as possible conflicting or contradictory outcomes of the plan or strategy.

Strategic Environmental Assessment (SEA):

European Directive 2001/42/EC requires local planning authorities to undertake an ‘environmental assessment’ of any plans and programmes they prepare that are likely to have significant effect upon the environment. This Directive was translated into legislation in the UK in July 2004. It remains a requirement of UK law despite the UK now having left the European Union. The main purpose of Strategic Environmental Assessment is to consider the key likely significant effects on the environment including on issues such as:- biodiversity, population, human health,

fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape and the interrelationship between the above factors.

Relationship between Sustainability Appraisal and Strategic Environmental Assessment:

Both Sustainability Appraisal and Strategic Environmental Assessment are similar processes that involve a comparable series of tasks. This document encompasses the requirements of both into a single Sustainability Appraisal process. More information on the background to the relationship between Sustainability Appraisal and Strategic Environmental Assessment can be found within the Scoping Report (2019) which is available as a separate document.

1.3 Sustainability Appraisal for the Erewash Core Strategy review

Several stages of Sustainability Appraisal have been carried out to support preparation of the new Local Plan. These stages are summarised below.

Scoping Report (2019):

The Scoping Report was carried out alongside the other Greater Nottingham Housing Market Area authorities. The purpose of the Scoping Report was to decide the scope and level of detail of the Sustainability Appraisal. It set out the information required to determine the scope of the Sustainability Appraisal, suggested a list of sustainability issues and set out the Sustainability Appraisal Framework against which the effects of the Erewash Core Strategy Review would be assessed. Statutory consultees were consulted on the Scoping Report (Environment Agency, Historic England and Natural England). No substantive issues arose from that consultation and as a result, the Scoping Report was considered a good basis from which to carry out a Sustainability Appraisal. The Scoping Report should be referenced alongside each stage of Sustainability Appraisal. Individual sections of the Sustainability Appraisal will highlight where changes may have occurred to method or approach since the Scoping Report, but otherwise the Scoping Report amounts to the basis for each stage of Sustainability Appraisal that follows. This document is available to view by request.

Sustainability Appraisal 1 (Strategic Growth Options) (2020):

Sustainability Appraisal 1 (Strategic Growth Options) (SA1) tested eight potential approaches to growth, amounting to eight different 'growth options' as follows:

- A. Growth within Long Eaton Urban Area (the conurbation)
- B. Growth within Ilkeston Urban Area (the town)
- C. Growth within the Rural Area (the villages)
- D. New Settlements not in the Green Belt
- E. Extension of the conurbations (including Derby City) into the Green Belt
- F. Extension of the town into the Green Belt
- G. Extension of the villages into the Green Belt
- H. New Settlements in the Green Belt

At this stage, the options above were appraised at a macro level and did not focus on individual sites which may have been known to the Council which fell within the options; the appraisal therefore avoided focus on detailed characteristics of

individual sites and was primarily concerned with identifying a sustainable 'order' of broad approaches to growth. Some minor modifications were made to the wording of the Sustainability Appraisal Objectives and Policy Criteria Questions established by the Scoping Report, but these were considered inconsequential, yet worthwhile to improve the clarity of questions. These are detailed within SA1. SA1 provided the basis for the Regulation 18 version of the new Local Plan that was consulted on in January 2020. It led to the Council being able to present an initial set of 'preferred sites' within the Regulation 18 version of the new Local Plan that were known to be available for development and which fell within the more sustainable growth options as determined by SA1. It later also provided support to Sustainability Appraisal 3 (Housing Allocations Options), summarised below, and the drafting of the Regulation 19 version of the new Local Plan. SA1 is available to view by request.

Sustainability Appraisal 2 (Policy Options) (2021):

Sustainability Appraisal 2 (Policy Options) (SA2) has been produced following completion of Regulation 18 consultation and prior to commencement of Regulation 19 (Publication) consultation. It considers a range of policy options across four topic areas; Employment, Green and Blue Infrastructure, Town Centres and Transport. SA2 has provided the basis for the drafting of non-housing related policies for the Regulation 19 version of the new Local Plan.

Sustainability Appraisal 3 (Housing Allocations Options) (2021):

Sustainability Appraisal 3 (Housing Allocations Options) (SA3) appraised 25 potential housing allocations – sites which had been made known to us by interested parties either prior to commencement of the Erewash Core Strategy Review or over the course of the two public consultations comprising Regulation 18 which were undertaken during 2020 and 2021. All potential housing allocations known to the Council were appraised, with sites spanning the entire range of spatial strategic growth options appraised by SA1.

Habitats Regulations Assessment:

The Habitats Regulation Assessment (HRA) is a process that determines whether a not a development project (in this instance, a Local Plan) will impact on a recognised protected European site. As a result of Brexit, elements of HRA have now altered with jurisdiction moving from the European Commission to relevant authorities in England. Insofar as a Local Plan is concerned, the first stage of HRA involves a screening of policies prepared as part of an emerging Plan. Work undertaken by the Council has provisionally confirmed that development proposals within its emerging Plan do not adversely affect the network of European sites. This is largely because of the relatively long distances between European sites from proposed strategic housing and employment site allocations inside Erewash, confirming the lack of any meaningful impact pathways. With this conclusion, no requirement exists to move to the next stage of HRA that would involve appropriate assessment (AA) of any demonstrable linkages between development proposals and European sites.

Equalities Impact Assessment:

Public authorities are specifically required to undertake an Equalities Impact Assessment (EqIA) under the Equality Act 2010. This requirement for EqIA

originates from the duty placed on public authorities to eliminate any unlawful discrimination in carrying out its functions, and promote equality of opportunity. The EqlA produced in conjunction with the emerging replacement Local Plan therefore assesses the potential impact of its policies on different groups of people within Erewash Borough. An assessment of draft policies has been undertaken in relation to the nine protected characteristics that provide an individual from discrimination. The EqlA confirms that none of the draft policies currently part of the emerging Local Plan are likely to result in any adverse impact to protected characteristics. The EqlA is available as a separate document.

Total, Cumulative and Synergistic Effects assessment:

Most environmental issues arise from the accumulation of numerous small, and sometimes indirect and inconsequential effects, rather than a few large, notable ones. Such effects are difficult to deal with on a project-by-project basis through individual Environmental Impact Assessments (EIA), so it is at a SA/SEA level that effects are best identified and addressed. The SEA Directive requires assessment of effects including secondary, cumulative and synergistic effects. Indirect secondary effects are those that do not directly occur as a result of a Local Plan, but take place away from the original effect. Cumulative effects arise where several developments a Plan makes provision for each display insignificant effects, but taken together have a significant effect. Synergistic effects come together to produce a total effect in excess than the sum of the individual effects.

This Sustainability Appraisal has undertaken an assessment of the total, cumulative and synergistic effects arising from the policies contained within the draft Local Plan. Details of the assessment can be found later in this document at **Section 4**.

Mitigation Analysis:

Mitigation Analysis (Appendix D1) follows on from completion of the three stages of options appraisal (SA1 – SA3) and:

- Confirms the options taken forward to form policies within the Draft Publication Local Plan (the preferred options);
- Highlights where for each preferred option there were adverse effects identified by the SA, mitigation is required and make suggestions for mitigation;
- Identifies where the perceived benefits of each preferred option can be maximised; and
- Proposes measures to monitor any significant effects of implementing the options (the Draft Local Plan).

1.4 Purpose and structure of this document:

This overarching document brings together all elements of Sustainability Appraisal carried out to support the Erewash Core Strategy Review, as summarised in **Section 1.3**. Where appropriate, different elements are contained within Appendices and referred to as required in order to help ease of understanding. **Section 2** repeats and clarifies the Sustainability Framework against which the various elements have been considered, although a more detailed outline as well as a wide range of additional

information is contained within the Scoping Report (2019). **Section 3** deals with the appraisal process carried out within SAs 1-3. Where appropriate, the actual appraisals are contained within appendices, as referenced in Section 3, but context and a summary of outcomes is provided directly within Section 3. Whilst it is important for readers to consider the appendices, the key purpose of this overarching document is to provide a compact and accessible avenue for readers to engage with the overall Sustainability Appraisal process. It is hoped that this approach helps readers to understand how the Sustainability Appraisal process has influenced the content of the new Local Plan in an iterative manner.

2 SUSTAINABILITY FRAMEWORK

2.1 Role of the Sustainability Appraisal Framework:

The Sustainability Appraisal Framework contains a list of objectives that are the culmination of work carried out for the Scoping Report (2019), based on a review of other relevant plans, policies and programmes, the analysis of the baseline data and the identification of key sustainability issues. The Sustainability Appraisal Framework has provided the basis against which the various elements of Sustainability Appraisal as summarised in **Section 1.3** were carried out.

2.2 Sustainability Appraisal Objectives:

A table of Sustainability Appraisal Objectives, including any minor alterations to its content taken forward by the Council since the Scoping Report (highlighted in bold) is below.

Table 1 Sustainability Appraisal Objectives

	Sustainability Appraisal objectives	Sustainability Appraisal objective description	Strategic Environmental Assessment Directive topics
1	Housing	To ensure that the housing stock meets the housing needs of the population , including gypsies, travellers and travelling showpeople.	<ul style="list-style-type: none"> • Population • Material assets
2	Employment and Jobs	To create employment opportunities.	<ul style="list-style-type: none"> • Population • Material assets
3	Economic Structure and Innovation	To provide the physical conditions for a high quality modern economic structure including infrastructure to support the use of new technologies.	<ul style="list-style-type: none"> • Population • Material assets
4	Shopping Centres	Increase the vitality and viability of existing shopping centres.	<ul style="list-style-type: none"> • Population • Human health
5	Health and Wellbeing	To improve health and wellbeing and reduce health inequalities.	<ul style="list-style-type: none"> • Population • Human health
6	Community Safety	To improve community safety, reduce crime and the fear of crime.	<ul style="list-style-type: none"> • Population • Human health
7	Social Inclusion	To promote and support the development and growth of social capital and to improve social inclusion and to close the gap between the most deprived areas within the plan area.	<ul style="list-style-type: none"> • Population • Human health
8	Transport	To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to improve travel choice and accessibility.	<ul style="list-style-type: none"> • Air • Climatic factors

	Sustainability Appraisal objectives	Sustainability Appraisal objective description	Strategic Environmental Assessment Directive topics
9	Brownfield Land	To make efficient use of brownfield land and recognise biodiversity value where appropriate.	<ul style="list-style-type: none"> • Soil • Material assets
10	Energy and Climate Change	To minimise energy usage and to develop low carbon energy resource, reducing dependency on non-renewable sources.	<ul style="list-style-type: none"> • Climatic factors
11	Pollution and Air Quality	To manage air quality and minimise the risk posed by air, noise and other types of pollution.	<ul style="list-style-type: none"> • Air • Climatic factors • Human health
12	Flooding and Water Quality	To minimise the risk of flooding and to conserve and improve water quality.	<ul style="list-style-type: none"> • Water • Climatic factors
13	Natural Environment, Biodiversity, Green and Blue Infrastructure	To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	<ul style="list-style-type: none"> • Biodiversity • Fauna • Flora
14	Landscape and Built Environment	To protect and enhance the landscape and townscape character, including heritage and its setting and enhancing the place through good design.	<ul style="list-style-type: none"> • Landscape
15	Heritage	To conserve the area's heritage and provide better opportunities for people to enjoy culture and heritage.	<ul style="list-style-type: none"> • Cultural heritage
16	Natural Resources and Waste Management	To prudently manage the natural resources of the area including soils, safeguarding minerals and waste.	<ul style="list-style-type: none"> • Soil • Material assets

2.3 Sustainability Appraisal Criteria Questions:

The objectives identified in Table 1 form the basis for appraisal of options across the various stages undertaken. Specifically, two key mechanics which are central to the appraisal process have been informed by Table 1; **Criteria Questions** and **Scoring**.

Criteria questions

The original Scoping Report (2019) proposed different sets of questions for appraising 'policy' based options and 'allocation' based options. SA1 utilised the original 'policy criteria questions' to undertake appraisals as set out in the Scoping Report (2019) notwithstanding some minor amendments to the wording for purposes of clarity.

Upon considering the next stages of Sustainability Appraisal following completion of SA1, it was clear that a continuation of use of the original policy-based criteria questions would allow for a more detailed and consistent analysis of allocation options (for SA3) to occur as well as provide an appropriate foundation for assessing policy options in SA2. In general, it was considered that the originally proposed allocations-based criteria questions were not particularly informative, lacked depth and failed to engage adequately with the Sustainability Objectives when compared with the policy-based criteria questions used for SA1, particularly when considering the need to assess differences between options which in general terms shared many similarities (specifically, the potential allocations). It was however identified that two criteria questions within the allocations-based criteria questions set out in the original Scoping Report (2019) were of value and should be incorporated into the criteria questions for SAs 1 and 2. In effect, a 'hybridised' set of general criteria questions were developed for application to both SA2 and 3 (Policy and Allocation options respectively). The hybridised criteria questions, with the two additional criteria questions in bold, are in Table 2 below.

Table 2 Hybridised Criteria Questions

Sustainability Appraisal Objectives	Policy Criteria Questions
1. Housing (to ensure that the housing stock meets the housing needs of the population, including gypsies, travellers and travelling showpeople)	2. Will it increase the range and affordability of housing for all social groups?
1. Housing	2. Will it provide sufficient pitches and plots for gypsies and travellers and travelling showpeople?
1. Housing	3. Will it reduce homelessness?
1. Housing	4. Will it reduce the number of unfit/vacant homes?
1. Housing	5. Will it provide the required infrastructure?
2. Employment and Jobs (to create employment opportunities)	1. Will it improve the diversity and quality of jobs?
2. Employment and Jobs	3. Will it reduce unemployment?
2. Employment and jobs	4. Will it improve rural productivity in terms of employment opportunities?
3. Economic Structure and Innovation (To provide the physical conditions for a high quality modern economic structure including infrastructure to support the use of new technologies).	1. Will it provide land and buildings of a type required by businesses?
3. Economic Structure and Innovation	2. Will it provide business/university clusters?
3. Economic Structure and Innovation	3. Will it create jobs in high knowledge sectors?
3. Economic Structure and Innovation	4. Will it encourage graduates to live and work within the plan area?

Sustainability Appraisal Objectives	Policy Criteria Questions
3. Economic Structure and Innovation	5. Will it provide the required infrastructure
4. Shopping Centres (increase the vitality and viability of existing shopping centres)	1. Will it encourage the vitality of the city centre, town centre, district centre or local centre?
5. Health and Wellbeing (To improve health and wellbeing and reduce health inequalities)	1. Will it reduce health inequalities?
5. Health and Wellbeing	2. Will it improve access to health services?
5. Health and Wellbeing	3. Will it increase the opportunities for recreational physical activity?
5. Health and Wellbeing	4. Will it provide new open space or improve the quality of existing open space?
5. Health and Wellbeing	5. Will it improve access to local food growing opportunities?
6. Community Safety (To improve community safety, reduce crime and the fear of crime)	1. Will it reduce crime and the fear of crime?
6. Community Safety	2. Will it contribute to a safe and secure built environment?
7. Social Inclusion (To promote and support the development and growth of social capital and to improve social inclusion and to close the gap between the most deprived areas within the plan area)	1. Will it protect and enhance existing cultural assets?
7. Social Inclusion	2. Will it improve access to, encourage engagement with and residents' satisfaction in community activities?
7. Social Inclusion	3. Will it increase the number of facilities e.g. shops, community centres?
7. Social Inclusion	4. Will it provide for the educational needs of the population?
8. Transport (To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and improve travel choice and accessibility)	1. Will it use and enhance existing transport infrastructure?
8. Transport	2. Will it help to develop a transport network that minimises the impact on the environment?
8. Transport	3. Will it reduce journeys undertaken by private car by encouraging alternative modes of transport?

Sustainability Appraisal Objectives	Policy Criteria Questions
8. Transport	4. Will it increase accessibility to services and facilities?
9. Brownfield Land (To make efficient use of brownfield land and recognise biodiversity value where appropriate)	1. Will it make efficient use of brownfield land?
9. Brownfield Land	2. Will it minimise impact on the biodiversity interests of land?
10. Energy and Climate Change (To minimise energy usage and to develop low carbon energy resource, reducing dependency on non-renewable sources)	1. Will it result in additional energy use?
10. Energy and Climate Change	2. Will it improve energy efficiency of the building stock within the plan area?
10. Energy and Climate Change	3. Will it support the generation and use of renewable energy?
10. Energy and Climate Change	4. Will it support the development of community energy systems?
10. Energy and Climate Change	5. Will it ensure that buildings are able to deal with future changes in climate change?
11. Pollution and Air Quality	1. Will it increase levels of air, noise and other types of pollution?
12. Flooding and Water Quality (To minimise the risk of flooding and to conserve and improve water quality)	1. Will it minimise or mitigate flood risk?
12. Flooding and Water Quality	2. Will it improve water quality?
12. Flooding and Water Quality	3. Will it conserve water?
12. Flooding and Water Quality	4. Will it improve or help to promote water efficiency?
12. Flooding and Water Quality	5. Will it cause a deterioration of Water Framework Directive status or potential of onsite watercourses?
12. Flooding and Water Quality	6. Will it cause any harm to a Source Protection Zone or the water environment?
13. Natural Environment, Biodiversity, Green and Blue Infrastructure (To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment)	1. Will it help protect and improve biodiversity and avoid harm to protected species?
13. Natural Environment, Biodiversity, Green and Blue Infrastructure	2. Will it allow for biodiversity net gains?

Sustainability Appraisal Objectives	Policy Criteria Questions
13.Natural Environment, Biodiversity, Green and Blue Infrastructure	3. Will it conserve and enhance the geological environment?
13.Natural Environment, Biodiversity, Green and Blue Infrastructure	4. Will it maintain and enhance woodland cover and management?
13.Natural Environment, Biodiversity, Green and Blue Infrastructure	5. Will it provide new open space or green space?
13.Natural Environment, Biodiversity, Green and Blue Infrastructure	6. Will it improve the quality of existing open space?
13.Natural Environment, Biodiversity, Green and Blue Infrastructure	7. Will it encourage and protect or improve Green and/or Blue Infrastructure Networks?
14.Landscape and Built Environment (To protect and enhance the landscape and townscape character, including heritage and its setting and enhancing the place through good design)	1. Does it respect or preserve identified landscape character?
14.Landscape and Built Environment	2. Does it have a positive impact on visual amenity?
14.Landscape and Built Environment	3. Will it maintain and/or enhance the local distinctiveness of the townscape or settlement character?
14.Landscape and Built Environment	4. Will it conserve or enhance the interrelationship between the landscape and the built environment?
15.Heritage (To conserve the area's heritage and provide better opportunities for people to enjoy culture and heritage)	1. Will it conserve and enhance the historic environment, designated and non-designated heritage assets and their settings?
15.Heritage	2. Will it respect, maintain and strengthen the local character and distinctiveness e.g. landscape/townscape character?
15.Heritage	3. Will it provide better opportunities for people to access and understand local heritage and to participate in cultural activities?
15.Heritage	4. Will it protect or improve access and enjoyment of the historic environment?
15.Heritage	5. Will it conserve and enhance the archaeological environment?

Sustainability Appraisal Objectives	Policy Criteria Questions
16. Natural Resources and Waste Management (To prudently manage the natural resources of the area including soils, safeguarding minerals and waste)	1. Will it lead to reduced consumption of raw materials?
16. Natural Resources and Waste Management	2. Will it promote the use of sustainable design, materials and construction techniques?
16. Natural Resources and Waste Management	3. Will it result in additional waste?
16. Natural Resources and Waste Management	4. Will it reduce hazardous waste?
16. Natural Resources and Waste Management	5. Will it protect the best and most versatile (BMV) agricultural land?
16. Natural Resources and Waste Management	6. Will it prevent the loss of greenfield land to development?
16. Natural Resources and Waste Management	7. Will it sterilise mineral resources?

2.4 Objective Scoring:

It is scores applied to overall objectives against each option of a sustainability appraisal that highlights where there may be sustainability deficiencies that require mitigation. In order to assign a score for each objective, individual criteria questions as outlined in Table 3 above are appraised and equivalent scoring parameters applied.

Table 3 Score Coding for Individual Criteria Questions

Major positive (+2)	Minor positive (+1)	Neutral (0)	Minor negative (-1)	Major negative (-2)
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Each of the criteria questions receive an award in accordance with the scoring system in Table 3 above and this is based on a consideration of the question and discussion within the assessment table, with a score applied accordingly. Each award against the criteria questions includes a descriptor ('major positive' for example) as well as numeric value between -2 and +2 (+2 in the case of major positive in this example).

The criteria questions under each objective and scores applied to them are used to inform what the objective score should be. This is done numerically by adding each of the criteria questions' numeric values together, resulting in an overall score. The descriptor against each objective will be applied when the numeric value shown in Table 3 above is met or exceeded in the case of 'major' scores.

The benefit of the numeric approach to scoring and reason for the shift from the previous approach utilised for SA1 is it provides the opportunity for more nuanced

comparison between options. For example, an objective against one option that is awarded major positive and a numeric value of **+2** is not the same as the same objective against another option receiving the same major positive descriptor, but with a score of **+6**, with the former method effectively acting as a 'cap' and thus preventing an understanding of a substantially negative or positive effect. The benefit of this approach is more strongly felt when assessing potential allocations which on many levels share similarities. Ultimately, it allows for options across both SAs 2 and 3 to be better compared through a range of matrix tables that are contained in Section 3. Additionally, the move to use of numeric values in representing the sustainability of an option is aligned well with modern accessibility requirements. Notably, it does weaken the role of the descriptors that have carried through from the Scoping Report (2019); instead, the resulting numeric values applied against each objective provide the required insight.

Each option presented within SAs 2 and 3 receives a total score that is the sum of all of the individual objective scores for that option. It is this overall number that can provide for general comparison between options, whilst the individual objective scores can be used to identify areas where mitigation might be required to improve an option's sustainability if it were to be selected as the approach to be incorporated into the new Local Plan's policies. In this way, this Sustainability Appraisal process is truly iterative and has genuinely informed the evolution and creation of land-use policies. One important caveat worth noting is that the total score against an option only really has meaning when compared with its counterparts. For example, a result of **-5** awarded to an option may not indicate a negative outcome if the alternative options are awarded **-10** or more.

In addition to the above, the terms 'uncertain' and 'no impact' have been replaced with 'neutral'. All appraised option outcomes are uncertain to some extent until such time that outcomes can be clearly observed and it is considered unrealistic that options would ever result in 'no impact' at all. The use of neutral also works well with the new scoring method where for example a **+1** and **-1** cancel each other out to result in an award of **0** (neutral).

3 ASSESSMENTS

3.1 Introduction:

Assessments are carried out and organised in table format within which a commentary is provided in consideration of each criteria question that fall under each of the Sustainability Appraisal objectives. An additional column then provides the score for each of the Sustainability Appraisal objectives, as informed by the criteria question scores.

The assessment tables for SA1 are contained within the original document that is available separately. As explained earlier in this document, SA1 employed a slightly different scoring approach and this remains unaltered. SAs 1 and 2 are dealt with independently in the following sections of this document, but the assessment tables are contained within the Appendices as indicated.

Conclusion matrices are included within each of the following sections to provide a useful oversight of the outcomes from the appraisal process, along with brief commentary around key headline findings. Total, cumulative and synergistic effects are considered for SAs 2 and 3 at Section 4.

3.2 Sustainability Appraisal 1 (Strategic Growth Options):

SA1 tested eight potential approaches to growth, amounting to eight different 'growth options' as follows:

- A. Growth within Long Eaton Urban Area (the conurbation)
- B. Growth within Ilkeston Urban Area (the town)
- C. Growth within the Rural Area (the villages)
- D. New Settlements not in the Green Belt
- E. Extension of the conurbations (including Derby City) into the Green Belt
- F. Extension of the town into the Green Belt
- G. Extension of the villages into the Green Belt
- H. New Settlements in the Green Belt

At this stage, the options above were appraised at a 'macro' level and did not focus on individual sites that may have been known to the Council that fell into each of the spatial options. The appraisal therefore avoided any focus on the detailed characteristics of individual sites and was primarily concerned with identifying a sustainable 'order' of broad approaches to growth. SA1 is available as a separate document.

3.3 Sustainability Appraisal 2 (Policy Options):

SA2 tested a range of policy options across four topic areas; Employment, Green and Blue Infrastructure, Town, Local and Village centres and Transport. It has provided the basis for the drafting of non-housing related policies for the Publication version (Regulation 19) of the new Local Plan. Assessment tables for each option are contained within **Appendices A1-A4**. A description of the range of policy options that were appraised is contained in Table 4 below.

Table 4 Range of Options Tested within Sustainability Appraisal 2 (Policy Options)

Policy theme	Policy option description	Policy option reference under theme
Employment	Allocation of existing strategic employment zones	Option 1
Employment	Allocation of strategic employment zones in Erewash, plus the allocation of new employment land at Stanton Regeneration Site (SRS)	Option 2
Employment	Allocation of strategic employment zones in Erewash, plus the allocation of employment space at West Hallam Storage Depot (WHSD)	Option 3
Employment	Allocation of strategic employment zones in Erewash, plus the allocation of new employment land East of Breaston (EoB)	Option 4
Green and Blue Infrastructure	Do nothing ('business as usual')	Option 1
Green and Blue Infrastructure	Allocate Strategic Green Infrastructure Zones (SGI Zones)	Option 2
Town, Local and Village centres	Existing retail hierarchy (town centres at Ilkeston and Long Eaton and local centres at Borrowash and Sandiacre)	Option 1
Town, Local and Village centres	Existing retail hierarchy plus new local centre at Kirk Hallam within SGA25 (potential allocation south west of Kirk Hallam)	Option 2
Town, Local and Village centres	Existing retail hierarchy plus new local centre at Kirk Hallam within SGA25 (potential allocation south-west of Kirk Hallam) and designation of village centres at existing areas of higher retail concentration in Breaston, Draycott and West Hallam.	Option 3
Town, Local and Village centres	Existing retail hierarchy plus new local centre at Kirk Hallam within SGA25 (potential allocation south west of Kirk Hallam) and designation of village centres at existing areas of higher retail concentration in Breaston, Draycott, West Hallam and Little Eaton. New village centre at Stanton South.	Option 4
Transport	Implement the Kirk Hallam relief road.	Option 1
Transport	Safeguard the High Speed 2 route.	Option 2
Transport	Safeguard and enhance Trent Valley Way and Great Northern Greenway (including Bennerley Viaduct).	Option 3

Policy Options – Employment:

Table 5 Conclusion Matrix – Policy Options (Employment)

Sustainability Objective	Option 1	Option 2	Option 3	Option 4
Housing	0	+2	0	0
Employment & Jobs	-1	+3	+2	+2
Economic Structure & Innovation	-2	+5	-1	0
Shopping Centres	+1	+1	0	0
Health & Wellbeing	0	0	+1	0
Community Safety	+1	+2	0	-2
Social Inclusion	0	+2	+1	+1
Transport	0	0	-1	-1
Brownfield Land	2	+3	+1	-2
Energy & Climate Change	-2	+3	+2	+1
Pollution & Air Quality	0	-1	0	-1
Flooding & Water Quality	1	-2	-1	-3
Natural Environment, Biodiversity & Green and Blue Infrastructure	0	+5	+5	-1
Landscape & Built Environment	+1	+2	0	-6
Heritage	0	+1	+2	-1
Natural Resources & Waste Management	+1	-1	0	-5
Totals	+2	+25	+11	-18

Summary of employment policy option

Option 2 (Allocation of strategic employment zones in Erewash, plus the allocation of new employment land at Stanton Regeneration Site (SRS)) scores most highly when compared with the three alternative options considered. Option 4 (Allocation of strategic employment zones in Erewash, plus the allocation of new employment land East of Breaston (EoB)) performs the most weakly, and represents a stark contrast to the assessment outcome against Option 2. The conclusion matrix shows Option 4 performs poorly in sustainability terms, particularly around the likely impacts on matters concerning the natural landscape and use of natural resources when compared with Option 2. Option 2 also capitalises on the SRS's largely brownfield status, as a consequence of its long industrial heritage that has previously seen the site accommodate a large number of businesses before becoming increasingly vacant across a number of decades.

Policy Options – Green and Blue Infrastructure:

Table 6 Conclusion Matrix – Policy Options (Green and Blue Infrastructure)

Sustainability Objective	Option 1	Option 2
Housing	0	+3
Employment & Jobs	0	+1
Economic Structure & Innovation	0	0
Shopping Centres	0	+1
Health & Wellbeing	0	+3
Community Safety	0	+1
Social Inclusion	0	+1
Transport	-3	+6
Brownfield Land	0	0
Energy & Climate Change	0	0
Pollution & Air Quality	0	0
Flooding & Water Quality	0	+1
Natural Environment, Biodiversity & GBI	-3	+9
Landscape & Built Environment	0	0
Heritage	0	0
Natural Resources & Waste Management	-1	+1
TOTALS	-7	+27

Summary of green and blue infrastructure policy option

Option 2 (Allocate Strategic Green Infrastructure (SGI) Zones) clearly provides a wide range of sustainability benefits when compared with the option of not identifying SGI zones (a 'business as usual' approach). In particular, Option 2 provides significant benefits in sustainability around the topics of transport (in particular by helping to provide the environment necessary to accommodate sustainable forms of non-motorised transportation around the Borough) and natural environment, biodiversity and green and blue infrastructure. Benefits in the latter topic area also include the knock-on protection of the natural environment and its biodiversity and ecological value and the increased focus on long-term protection of existing green and blue infrastructure that would be expected to result from pursuing the option. Complimenting these benefits is a distinct lack of significant negative effects on any of the sustainability objectives, resulting in an overall very positive outcome against implementation of Option 2 in sustainability terms.

Policy Options – Town, Local and Village Centres

Table 7 Conclusion Matrix – Policy Options (Town, Local and Village Centres)

Sustainability Objective	Option 1	Option 2	Option 3	Option 4
Housing	+3	+3	+3	+3
Employment & Jobs	+1	+3	+3	+4
Economic Structure & Innovation	0	+1	+2	+3
Shopping Centres	+1	+2	+2	+2
Health & Wellbeing	0	+2	+3	+3
Community Safety	+1	+2	+2	+2
Social Inclusion	+1	+1	+2	+2
Transport	+1	+3	+3	+5
Brownfield Land	+1	0	+2	+3
Energy & Climate Change	0	-1	-1	-1
Pollution & Air Quality	0	0	0	0
Flooding & Water Quality	0	0	0	0
Natural Environment, Biodiversity & GBI	+1	-4	-4	-5
Landscape & Built Environment	+1	-2	-1	-1
Heritage	+2	+2	+4	+3
Natural Resources & Waste Management	+1	-4	-4	-5
TOTALS	+14	+8	+16	+18

Summary of Town, Local and Village centres policy option

The options presented within the Town, Local and Village centres policy approach increase in their levels of scope and intervention from Option 1 (a ‘business as usual’ approach, i.e. the retention of the existing Town and Local centre designations) through to Option 4 (retention of existing retail hierarchy plus new Local centre at Kirk Hallam within SGA25 (south west of Kirk Hallam) and designation of Village centres at existing settlements with higher retail concentration in Breaston, Draycott, West Hallam and Little Eaton with a new village centre at Stanton South). The increase in assessed levels of sustainability correlate closely with the potential increases in policy intervention; that is, the widening of the scope of the retail hierarchy and designation of additional tiers of retail centres appears to result in increased positive sustainability outputs. The margins in the total scores from the four options are narrow, but it is clear that Option 4 as described above has been assessed as the most sustainable option for policy to pursue. Notwithstanding this, it appears that the sustainability objective relating to natural environment, biodiversity and green and blue infrastructure is most negatively impacted upon progressively between Options 1 and 4, although this is mitigated elsewhere – particularly around employment-based topics - to such an extent that the overall order of sustainability is not effected.

Policy Options – Transport

Table 8 Conclusion Matrix – Policy Options (Transport)

Sustainability Objective	Option 1	Option 2	Option 3
Housing	+4	-1	+5
Employment & Jobs	+2	+2	+3
Economic Structure & Innovation	1	-5	+1
Shopping Centres	1	1	+1
Health & Wellbeing	-1	-3	+4
Community Safety	-2	-2	+2
Social Inclusion	+5	+1	+2
Transport	0	-2	+7
Brownfield Land	-3	+3	0
Energy & Climate Change	+1	-1	+1
Pollution & Air Quality	-1	-1	+1
Flooding & Water Quality	-3	-2	-1
Natural Environment, Biodiversity & Green and Blue Infrastructure	-4	-9	+1
Landscape & Built Environment	-5	-3	+7
Heritage	0	-5	+5
Natural Resources & Waste Management	-7	-4	0
TOTALS	-12	-31	+39

Summary of Transport policy option

Option 3 (Safeguard and enhance Trent Valley Way and Great Northern Greenway (including Bennerley Viaduct) stands out as being significantly more sustainable when compared with the other two options. This is unsurprising, given the relatively limited proposal involving the safeguarding and enhancement of what are already existing assets – albeit requiring completion and enhancement – when compared with Options 1 and 2 that would represent significant new development and intensive/invasive programmes of construction presenting associated sustainability challenges. Such challenges appear to be centred heavily on topics of natural environment, landscape and natural resources, indicating a clear direction required in terms of mitigation strategy should either option form part of the new Local Plan.

Option 2, relating to the safeguarding of the proposed HS2 route, faces the most challenges in sustainability terms. In particular, this option has a range of negative effects on sustainability objective topics relating to the natural environment, landscape and biodiversity, with the act of safeguarding of land for long-term redevelopment resulting in localised effects, particularly on economic structure and housing-related issues (related to the associated sterilisation of land for other economic uses and the loss of existing housing stock that would result in the medium term).

3.4 Sustainability Appraisal 3 (Housing Allocations Options):

SA3 appraised 25 potential housing allocations – sites that had been made known to the Council by promoters either prior to commencement of the Erewash Core Strategy Review or over the course of the two public consultations (Regulation 18) which were undertaken during 2020 and 2021. Background evidence prepared in support of the Local Plan's production refer to these sites as Strategic Growth Areas (SGAs). All potential housing allocations known to the Council were appraised, and spanned the entire spectrum of strategic growth options appraised within SA1.

All information available to the Council on each site was considered as part of the appraisal process; including any submission information provided by site promoters. This meant the level of detail available to inform the appraisals varied from site-to-site. Where detailed site promoter information was not available, the Council alternatively relied upon on its own extensive evidence base whilst also seeking guidance from external sources of information to help inform and aid the robustness of the appraisal process.

The assessment tables for SA3 are contained within **Appendices B1-B6**.

Table 9 Conclusion Matrix (ranked) – Sustainability Appraisal 3 (Housing Allocations Options)

Potential Housing Allocation sites	O1	O2	O3	O4	O5	O6	O7	O8	O9	O10	O11	O12	O13	O14	O15	O16	TOTAL SCORE
SGA21 - Stanton	+4	+2	0	+1	+5	+2	+7	+5	+3	+2	0	0	+4	+3	+3	-3	+38
SGA15 - West Hallam Storage Depot	+4	-1	-3	+1	+3	+2	+4	0	+1	+2	0	-2	+6	+1	+2	-3	+17
SGA25 - SW of Kirk Hallam	+4	+4	+4	+1	+5	-2	+7	+6	-3	+1	-1	-4	-1	-2	+2	-5	+16
SGA7 - North of Cotmanhay	+2	0	0	+1	+5	-1	+2	+3	-3	+1	-1	-2	-1	-2	+1	-5	0
SGA1 - Acorn Way	+3	+2	0	+2	+3	-2	+3	+3	-3	0	-1	-4	0	-3	0	-5	-2
SGA16 - North of West Hallam	+4	+4	0	+1	+2	-2	+4	-1	-3	0	-1	-2	-2	-5	+2	-6	-5
SGA20 - North of Draycott and Breaston	+4	+5	+3	+1	+2	-2	+8	-3	-4	+1	-1	-5	+1	-7	-1	-8	-6
SGA26 - North of Spondon	+2	-1	0	+1	+3	-2	+2	+2	-3	+1	-1	-2	-2	-4	+2	-5	-7
SGA10 - South of Little Eaton	+1	0	0	0	+3	0	+2	-1	-3	+1	-1	-7	-1	0	+1	-5	-10
SGA23 - North West of Kirk Hallam	+3	+1	0	+1	+2	-2	+2	+1	-3	0	-1	-3	-3	-4	+1	-5	-10
SGA3 - Breadsall Hilltop	+2	-1	0	0	+1	0	+2	0	-2	0	-1	-3	-4	-2	+2	-5	-11
SGA6 - West of Borrowash	+3	+1	0	+1	0	-2	+2	+1	-3	0	-1	-1	-3	-4	+1	-6	-11
SGA13 - South of Sawley	+3	+2	0	+2	+4	-2	+3	+2	-3	0	-1	-6	+1	-7	-4	-5	-11
SGA5 - East of Borrowash	+1	0	0	+1	+3	-1	+1	-2	-2	+1	-1	-2	-3	-4	+1	-5	-12

SGA17 - North of Lock Lane	0	0	0	+1	+1	-2	+2	+2	-4	+1	-1	-4	-4	-1	+2	-5	-12
SGA2 - Land at Beech Lane West Hallam	+2	-1	0	+1	+3	-2	+2	-2	-3	+1	-1	-1	-1	-4	-1	-5	-12
SGA27 - Hopwell Hall	+4	+4	+3	-1	+6	-4	+8	-5	-4	+2	-2	-7	0	-7	-5	-6	-14
SGA19 - Maywood Golf Course	+3	+1	0	+1	+1	-2	+2	-5	-3	0	-1	-2	-2	-7	+1	-6	-19
SGA28 - Rushy Lane, Risley	+3	+1	0	+1	-1	-2	+3	-4	-3	0	-2	-1	-1	-7	-2	-6	-21
SGA31 - South of Longmoor Ln, Breaston	+2	-1	0	+1	-1	-2	+1	-4	-1	+1	-2	-1	-1	-5	-1	-7	-21
SGA24 - Croft Lane Breadsall	+1	-1	0	0	0	-2	+2	-2	-3	0	-1	-3	-3	-5	0	-5	-22
SGA11 - Risley village extension	+1	-1	0	0	-2	-2	+1	-4	-4	+1	-1	-2	-2	-3	+1	-5	-22
SGA29 South of Derby Road, Risley	+2	-1	0	+1	0	-2	+3	-3	-3	+1	-1	-6	2	-8	-1	-6	-22
SGA30 - South of Derby Road, Draycott	+1	-1	0	0	-1	-2	+2	-3	-3	+1	-1	-5	-1	-4	-1	-6	-24
SGA22 - Botany Bay, Ilkeston	+1	0	0	0	0	-3	0	+3	-4	+1	-1	-8	-4	-5	-1	-5	-26

Summary of Housing Allocations Options

In relative terms, potential housing allocations that attract an overall score of **-10** and upwards can be said to fall comfortably within the most sustainable half of site options appraised by the Council.

In general, many of the fundamental characteristics of sustainability identified within SA1 (which assessed the suitability of a potential spatial hierarchy) are played out on a site-specific basis; this can most notably be seen with the very strong performance of the two strategically sized brownfield sites within the Borough – Stanton (SGA21) and West Hallam Storage Depot (SGA15). Indeed, SA1 identified the locating of housing development on new settlements not in the Green Belt – which these two sites would theoretically be capable of accommodating – as the most sustainable approach to the locating of housing growth. This demonstrates that the *type of land* upon which housing allocations might be located has a notable effect on levels of sustainability.

The levels of sustainability of the two strategic brownfield sites when compared with the next ranked site also highlights the sustainability challenges which persist in building on greenfield land. However, sites that would result in extensions of the town and conurbations also feature highly in the matrix at Table 9 even though this would result in the development of greenfield land. This in itself indicates that the *location* of potential housing allocations also has a strong bearing on levels of sustainability in general, primarily based around their proximity – or otherwise – to existing services, facilities and sources of employment. The potential allocation south-west of Kirk Hallam (SGA25) performs particularly well despite its greenfield status primarily because of its location adjacent to the town (in this instance, Ilkeston). When compared with other greenfield sites SGA25 performs particularly well, largely because of the associated delivery of a proposed relief road that would be a unique requirement of infrastructure of any allocation at this location.

The issue of *scale* also appears to play a consistent role in determining the levels of sustainability displayed by a site option through the appraisal process. A larger site resulting in a significant expansion of population in the locality results in generally positive effects on objectives relating to housing, the economy and retail. Additionally, larger sites are more likely to accommodate services, facilities and more expansive areas of green and open space provision internally, resulting in positive effects on a wide range of sustainability objectives through delivering such enhancements. However, this pattern is not unceasing; in the case of the Hopwell Hall site (SGA27), its vastness ensures the resulting negative effects on the environmental related sustainability objectives generally counterbalance positive effects the site achieves in those sustainability objectives considered above.

Overall, assessment of the 25 SGA sites, each of which has been viewed as a potential option to help the Council address its Plan-wide housing requirements, has followed a comprehensive approach in evaluating whether the sites achieve general sustainability against the 16 sustainability objectives. The wide variance between the assessed most and least sustainable sites (spanning scores between **+38** and **-26**) demonstrates a stark disparity in site characteristics and conditions across the

portfolio of SGAs. As explained by **2.4**, the scoring method employed by SA2 and SA3 has contributed to the wide variation of scores awarded to individual sites. This has helped the Council gain a more detailed understanding of the relative strengths and weaknesses of all 25 sites, providing valuable insight into their respective attributes as shown by Table 9.

4 TOTAL, CUMULATIVE AND SYNERGISTIC EFFECTS

As discussed at 1.3, one of the key roles a Sustainability Appraisal should undertake is to assess the effects that a councils' Local Plan should have on identified sustainability objectives. SAs 2 and 3 have extensively explored and assessed the links and associations between the 16 SA objectives and the general policies and site-specific policies.

The next stage is to consider the overall impact of the collective portfolio of policies, both topic-based and site-based, on the ability to deliver general sustainability through the implementation of policies in the emerging Local Plan. Prior to undertaking analysis on Total, Cumulative and Synergistic effects, the SA presents a table setting out the aggregated impacts of policies resulting from the scoring system as described by 2.4. The conclusion results shown in this table give a strong indication of the assessed level of sustainability, providing helpful context to the subsequent consideration of effects.

Tables 1.1 and 1.2 of Appendix C1 omit an aggregated score derived from totalling the assessments of each of the 16 SA objectives. This is deliberate as it may overshadow the more important element of work that considers the Total, Cumulative and Synergistic effects in a greater detail in Appendix C1. However, it is worth mentioning that the overall total from assessments of the various policies featured within of the emerging Plan scores well in excess of **+100**. This provides a useful, 'top line' conclusion that helps to confirm the wider sustainability that can be demonstrated from the comprehensive analysis.

As the contents of **Table 2** in Appendix C1 unsurprisingly show, a range of cumulative impacts, synergistic effects and overall effects exist. Despite this, Table 2 is also able to offer a degree of comfort that many of the negative effects flagged through the exercise can readily be mitigated. This can be achieved through the contents of topic-based and site-specific policies in the Local Plan Publication version, together with other mechanisms such as external strategies, national planning guidance and other regulatory regimes (e.g. Building Regulations). Collectively, these help to demonstrate practical measures that are able to reduce, or in some instances remove altogether, any negative effects on aspects of sustainability covered by the framework of objectives.