

Appendix D

Statement of Consultation for the Growth Options Consultation

Regulation 18 Part I

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1.0 Introduction

- 1.1 This statement provides a record of the first part of Regulation 18 public consultation carried out between Monday 27th January and Monday 20th July 2020 which amounted to the first stage of review for the Erewash Core Strategy local plan document.
- 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 (Part 1);
 - 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 1) asked five questions, as follows:

Q1 – Is there an alternative method of calculating our housing requirements that should be used instead of the Government's standard methodology? If so, what is it and why should it be used?

Q2 – Are there any other strategic growth options that we should have considered? If so, what are they?

Q3 – Are the conclusions of the Sustainability Appraisal of the options correct? If not, why not and what should the conclusions be?

Q4 – Should any of the sites identified as preferred options for growth be rejected? If so why?

Q5 – Should any other sites be identified as preferred options for growth? If so, why?

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. Is there an alternative method of calculating our housing requirements that should be used instead of the Government's standard methodology? If so, what is it and why should it be used?

2.3 Respondents generally supported the Council's use of the Government's Standard Method to calculate its housing requirements. Where this question was addressed negatively was in the context of other issues such as around suggestions the Council should be planning for higher housing growth at this stage, or should be incorporating residual housing need from other authorities for example. Some responses considered the Standard Method should represent the 'starting point', but ultimately this suggestion does not find that use of the Standard Method is erroneous. Ultimately the Council found no evidence in responses submitted to find that use of the Government's Standard Method was inappropriate. No alternative to the Standard Method was presented by respondents.

Q2. Are there any other strategic growth options we should have considered? If so, what are they?

2.4 No other strategic growth options were identified in responses. Even where alternative sites were identified, all of these fell into one of the existing strategic growth options already under consideration.

Q3. Are the conclusions of the Sustainability Appraisal of the options correct? If not, why not and what should the conclusions be?

2.5 Only modest criticism of the Sustainability Appraisal was received, including from agents representing specific site interests about which they considered the Sustainability Appraisal was not favourable in its conclusions. Given this limited scope of interest, many of these criticisms - for example suggesting that one option should be assessed a more positive ranking than another because the Sustainability Appraisal did not adequately recognise a certain benefit attributable to a specific site – did not correlate with the scope of the Sustainability Appraisal

which was produced to assess broad options for growth, not specific sites. Additionally, criticism was generally subjective owing to the nature of analysis of the topic of broad growth areas against sustainability criteria which can be open to interpretation.

- 2.6 Ultimately, the Council found that no submissions provided compelling evidence so as to warrant alternative conclusions (for example, specific reports on topics contained within the Sustainability Appraisal which provided new evidence that would undermine its original conclusions).

Q4. Should any of the sites identified as preferred options for growth be rejected? If so why?

- 2.7 SGA7 and SGA17 received the vast majority of objections calling for these sites to be rejected by the Council. The main focus of objection to these sites related to loss of Green Belt, ecological impact, accessibility (in the case of SGA17 specifically) and loss of community open space. Following the consultation, SGA17 has been removed as a potential growth option site and SGA7 has been halved in size. Other sites did receive objections but at a drastically reduced scale compared with the response to SGA7 and SGA17. Rather than calling for their rejection, responses from planning stakeholders tended to focus on promoting the virtues of their own sites.

Q5. Should any other sites be identified as preferred options for growth? If so, why?

- 2.8 The formal boundaries of 10 sites were submitted to the Council in response to the Growth Options consultation. Most of these were new alternative sites, though some were extended versions of sites already consulted on. These alternative sites have been appraised and will be consulted upon at the next round of public consultation. In addition, a number of responses including from members of the public suggested the use of small sites such as car parks, or land emerging through the regeneration of town centres as alternatives to the preferred options for growth. However, many of the sites put forward were not large enough to be considered as strategic locations for growth.

3.0 Who and how the Council consulted



Who was consulted?

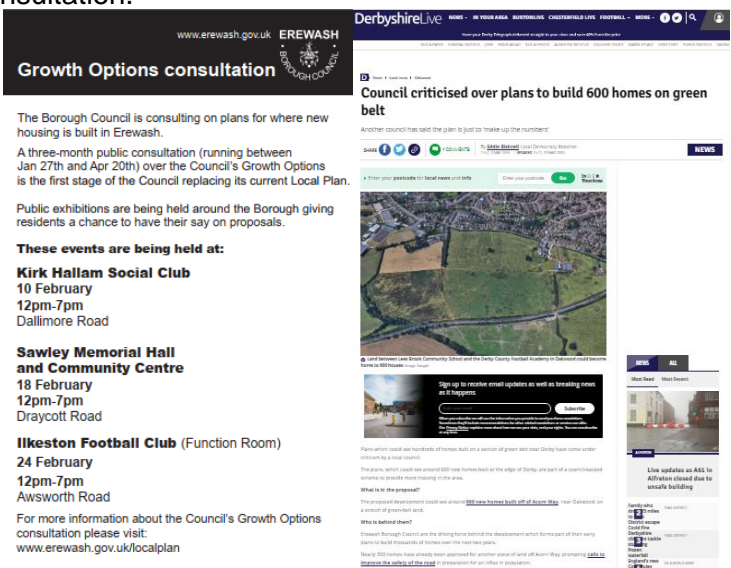

- 3.1 All Specific and General Consultees as required by the Regulations and listed in the Council's adopted SCI were contacted at the beginning of the consultation to invite them to engage and make representations. A list of all those consulted who fall within these groups is at **Appendix 1**.
- 3.2 In addition to the specified consultees, the Council contacted all those who had requested to be notified through the Consultation Database and this amounted to many more direct contacts made.
- 3.3 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 Coronavirus pandemic, the consultation was significantly extended beyond the statutory 6-week period to ensure all stakeholders were given the best possible opportunity to engage with the process. In all, the consultation ran between January 27th and July 20th, lasting a period of 6 months. A pause in consultation which contributed to this length of time enabled the Council to fully understand the difficulties faced by those wishing to engage, and resulted in the agreed closing date referred to above.



How was the consultation undertaken?

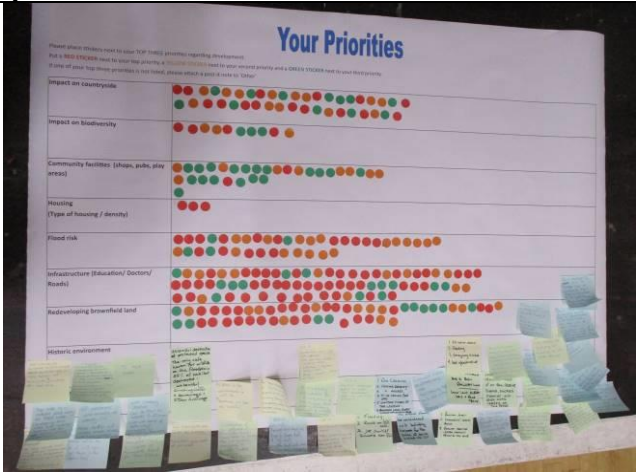

- 3.4 The Council employed a variety of mechanisms through which to engage with stakeholders, organisations and the community. The following table lists and describes some of these.


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	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 in hardcopy form alongside detailed instructions for use at locations across the Borough (and beyond in Derby City) as identified within the Council's latest Statement of Community Involvement (August 2019). This included libraries and town halls.
Primary schools leaflet drop	Selected Primary Schools within the Long Eaton and Ilkeston urban areas were provided with leaflets to distribute to children and parents to raise awareness of the consultation in areas near to proposed growth sites.
Promotional digital advert	A promotional advert was designed and provided to appear on all televisions across the receptions of the Council's two town halls to raise awareness of the consultation.

Mechanism	Description
	
Parish notice	<p>A notice to all Parish Councils was published and distributed to clerks and representatives.</p> <p>2020 Erewash Core Strategy Review Public Consultation Have your say on future growth within the Borough</p> <p>Erewash Borough Council are committed to the timely replacement of the 2014 Core Strategy. A meeting of the Borough Council's Full Council on Thursday 23rd January 2020 approved a 12-week consultation over the Growth Options document, the first stage of Local Plan review. This helps to identify the locations of sufficient land to deliver the housing requirements of the Borough, including a map of rejected and preferred sites.</p> <p>In total, 17 Strategic Growth Areas (SGAs) have been identified as part of the spatial growth options. An assessment of each SGA has been produced and includes a wide-range of information, including mapping, for each of the 17 sites and is available at www.erewash.gov.uk/localplan.</p> <p>Several public exhibitions have been arranged where Council Officers will be on hand to discuss Growth Options proposals. These are scheduled to take place at the following locations:</p> <ul style="list-style-type: none"> Monday 10 February (12 noon to 7pm) – Kirk Hallam Social Club, Dallimore Road, Kirk Hallam Tuesday 18 February (12 noon to 7pm) – Sawley Community Hall, Draycott Road, Sawley Monday 24 February (12 noon to 7pm) – Function Room at Ilkeston Football Club, Alesworth Road <p>The Borough Council would like to hear views over its choice of preferred housing sites. Consultation begins on Monday 27th January 2020, ending on Monday 20th April 2020. To let the Council know your view, please complete the Representation Form, found at www.erewash.gov.uk/localplan and return your completed representation by Monday 20th April 2020 via email or post to the below listed contact methods.</p> <p>All documents and further information can also be found at</p>
Social media adverts	<p>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.</p> 
Media release	<p>A media release was prepared and published across various publications including the Derby Telegraph. A number of</p>

Mechanism	Description
	<p>follow-on articles were published over the course of the consultation.</p>  <p>The Borough Council is consulting on plans for where new housing is built in Erewash.</p> <p>A three-month public consultation (running between Jan 27th and Apr 20th) over the Council's Growth Options is the first stage of the Council replacing its current Local Plan.</p> <p>Public exhibitions are being held around the Borough giving residents a chance to have their say on proposals.</p> <p>These events are being held at:</p> <p>Kirk Hallam Social Club 10 February 12pm-7pm Dallimore Road</p> <p>Sawley Memorial Hall and Community Centre 18 February 12pm-7pm Draycott Road</p> <p>Ilkeston Football Club (Function Room) 24 February 12pm-7pm Awworth Road</p> <p>For more information about the Council's Growth Options consultation please visit: www.erewash.gov.uk/localplan</p>
Mobile public displays	<p>Mobile information 'pop-up' display banners were located at key locations including libraries and town halls to raise awareness of the consultation and direct people on how to engage.</p> 
Public exhibition and information events	<p>Public exhibition and information events were held at locations in the Long Eaton and Ilkeston urban areas. These were advertised and detailed in local media, on the Council's website and at the various locations across the Borough where documentation had been placed. Posters advertising the events were attached to lamp posts to attract passing footfall. Each event took place over the course of the afternoon and evening to provide greater opportunities for a wide range of stakeholders to attend at different times of day. Information boards, a rolling presentation, relevant documentation and a number of interactive activities were</p>

Mechanism	Description
	<p>provided all with the support of numerous members of staff who were present throughout to answer any questions and engage with stakeholders directly.</p> 
Footfall posters	<p>Posters advertising the public exhibition and information events and providing directions were attached to lamp posts to attract passing footfall:</p> 
Interactive activities	<p>Interactive activities were provided as part of the public exhibition and information events. They invited people to submit what their priorities were in light of proposed growth on a three-stage priority scale and provided an additional opportunity to submit specific comments anonymously on post-it notes.</p>

Mechanism	Description
	
Rolling presentation	<p>A rolling presentation was screened at each public exhibition and information event and provided information on the process of Local Plan Review, the existing planning policy context within Erewash, the reasons why a Local Plan Review was necessary and what the Council were proposing among a range of other topics. It also set out clearly why it was important that people engaged and reiterated the process by which they could.</p> 
Presentation boards	<p>Presentation boards were erected at each of the three public exhibition and information events held and were of a bespoke design recognising the location of each event, taking into account the nearest strategic growth area under consideration.</p>

Mechanism	Description
	
Information leaflets	Based on the public exhibition and information event rolling presentation, information leaflets containing identical information were made available at the public exhibitions and locations across the Borough including libraries and town halls.
Parish Council Forum	A Parish Forum was held at the Council Chamber at Long Eaton Town Hall. It was led by Councillor Carol Hart (Council Leader) and senior officers. All parishes were invited to be present and most were represented. The forum provided an informative event that helped to disseminate important information through parishes via their councils, allowing questions to be asked of Council officials and further raising awareness of the consultation and proposals therein.

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 In total, **1,518** individuals or organisations submitted representations to the Growth Options consultation.

Official representation form

4.3 Five questions were asked on the Council's official representation form. The information below shows as a % of the total number of respondents, how many chose to answer each of the questions asked.

Q1 – Is there an alternative method of calculating our housing requirements that should be used instead of the Government's standard methodology? If so, what is it and why should it be used? **(7%)**

Q2 – Are there any other strategic growth options that we should have considered? If so, what are they? **(13%)**

Q3 – Are the conclusions of the Sustainability Appraisal of the options correct? If not, why not and what should the conclusions be? **(17%)**

Q4 – should any of the sites identified as preferred options for growth be rejected? If so why? **(20%)**

Q5 – Should any other sites be identified as preferred options for growth? If so, why? **(32%)**

4.4 As well as the five questions considered above, the representation form also allowed respondents to provide their own comments. In total, **1,159** respondents **(73% of total)** chose to add comments outside of the five formal questions asked.

Erewash perspective

4.5 As a proportion of all respondents, **65%** were Erewash residents. Of those residents, **73%** focused on SGA7: Land North of Cotmanhay and **25%** on SGA17: Land North of Lock Lane, Sawley. The other four preferred SGA sites combined received interest from only **2%** of Erewash residents who submitted representations.

Preferred site perspective

4.6 The Growth Options consultation proposed the development of six strategic sites across Erewash. Four of these are in the Green Belt and two are Brownfield sites outside of the Green Belt. This section analyses responses received relating to each of the sites.

SGA1 (Acorn Way)

4.7 2% of respondents mentioned SGA1 (Acorn Way). Of those, the majority **(55%)** came from locations within Derby City.

SGA7 (Land North of Cotmanhay)

4.8 79% of respondents mentioned SGA7 (Land North of Cotmanhay). Of those, 20% came from locations in Amber Valley and 23% from within Cotmanhay wards. In

general, respondents mentioning this site were located more broadly across and outside of the Borough when compared with other sites.

SGA15 (West Hallam Storage Depot)

4.9 1% of respondents mentioned SGA15 (West Hallam Storage Depot). Of those, the majority (67%) were statutory consultees and otherwise a single response was received from the Kirk Hallam and Wilsthorpe wards as well as a location outside of the Borough.

SGA17 (Lock Lane, Sawley)

4.10 17% of respondents mentioned SGA17 (Lock Lane, Sawley). Of those, 79% were located within Sawley wards with 99% being Erewash residents.

SGA18 (Land South West of Kirk Hallam)

4.11 1% of respondents mentions SGA18 (Land South West of Kirk Hallam). Of those, 27% consisted of statutory consultees whilst other respondents were primarily located around the central areas of the Borough.

SGA21 (Stanton Regeneration Site)

4.12 897 representations mentioned SGA21 (Stanton Regeneration Site). All of these mentions supported its redevelopment ahead of developing sites within the Green Belt. In the vast majority of instances, such support emerged from representations which had focussed on objecting to the proposed development SGA7 (North of Cotmanhay) and – to a lesser extent – SGA17 (Lock Lane, Sawley).

5.0 Key Issues

5.1 This section identifies key issues raised by respondents.

Overall perspective

5.2 The table below sets out the matters mentioned in each representation ranked from most to least mentioned, split across 31 categories. It provides a more in-depth understanding of the common issues raised, and the priority applied to each by the pool of respondents.

Matter	No. of mentions	% of reps raising this issue	Matter	No. of mentions	% of reps raising this issue
Biodiversity	1,410	93%	Utilities	177	12%
Green Belt	1,394	92%	Type of housing	140	9%
Redeveloping brownfield instead	1,236	81%	Housing should be in other areas	125	8%
Traffic / roads	1,176	77%	Use of agricultural land	103	7%
Contaminated land	1,077	71%	Rejected site	27	2%
Education	945	62%	Historic environment	24	2%
Health	919	61%	Duty to cooperate	22	1%
Redevelop Stanton first	897	59%	Consultation	20	1%
National policy	888	58%	Density	15	1%
Health & wellbeing	774	51%	Due process	15	1%
Community facilities	694	46%	Supporting development	10	1%
Loss of countryside	605	40%	Climate change	9	1%
Infrastructure (general)	506	33%	Lack of evidence	8	1%
Flood risk	339	22%	Promoting other sites	6	<1%
Pressure on neighbouring council areas	320	21%	Land ownership	4	<1%
Other infrastructure	210	14%			

5.3 It is clear from the above data that Green Belt and biodiversity are key priorities for a great proportion of respondents. Indeed, both issues were often conflated within responses, largely within the context of the potential loss of Green Belt land to accommodate development giving rise to concerns over the loss of natural habitats and thus harm to biodiversity. There was a consistent assumption made that land within the Green Belt – even farmed land – was almost always the most biodiverse type of land.

5.4 Whilst the redevelopment of brownfield land first was identified as a wide issue and clearly a significant priority for respondents, it was primarily raised within the context of supporting the redevelopment of SGA21 (Stanton Regeneration Site) *instead* of sites within the Green Belt, but primarily SGA7 (Land North of Cotmanhay) and SGA17 (Lock Lane, Sawley).

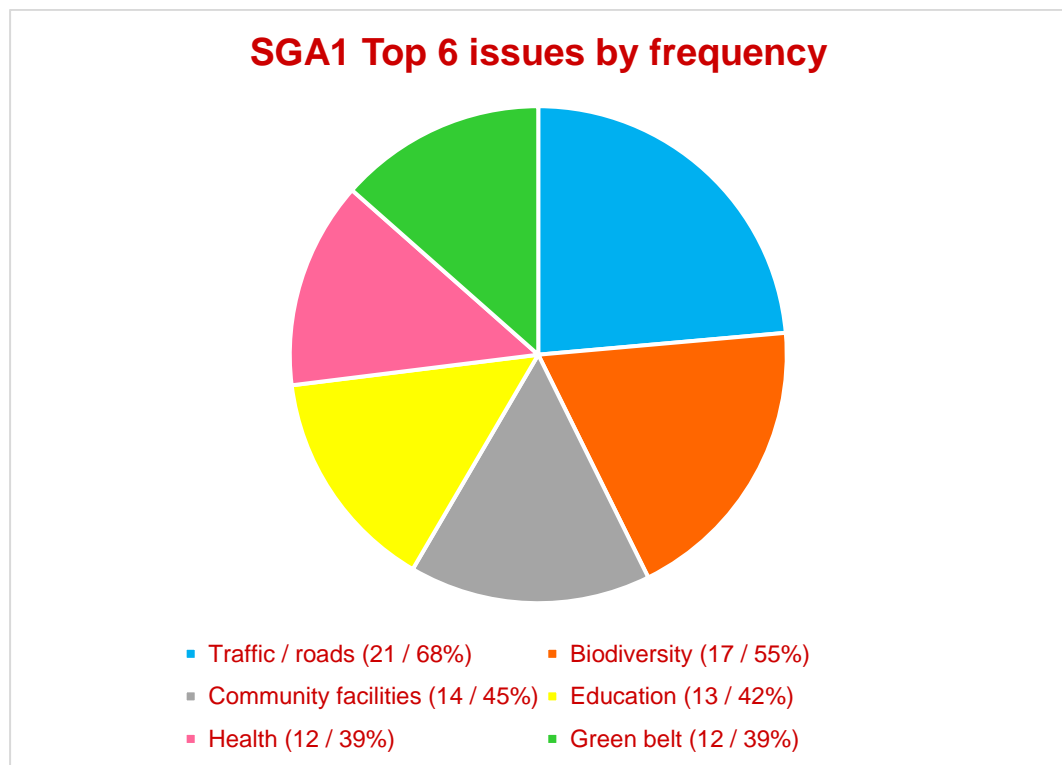
5.5 Contaminated land shows as being a key issue. In many cases, this was raised in the context of concerns around past uses on land at SGA17 (Lock Lane, Sawley) and also in relation to it inhibiting redevelopment opportunities on existing brownfield sites, including SGA21 (Stanton Regeneration Site) and sites in general within the town and conurbation.

5.6 Key issues such as health, education (and community facilities in general) and traffic / roads were consistently raised by respondents, but not necessarily within a specific context such as site-specific arguments. Indeed, these issues will need addressing in the event of any development, wherever growth occurs.

Preferred site perspective

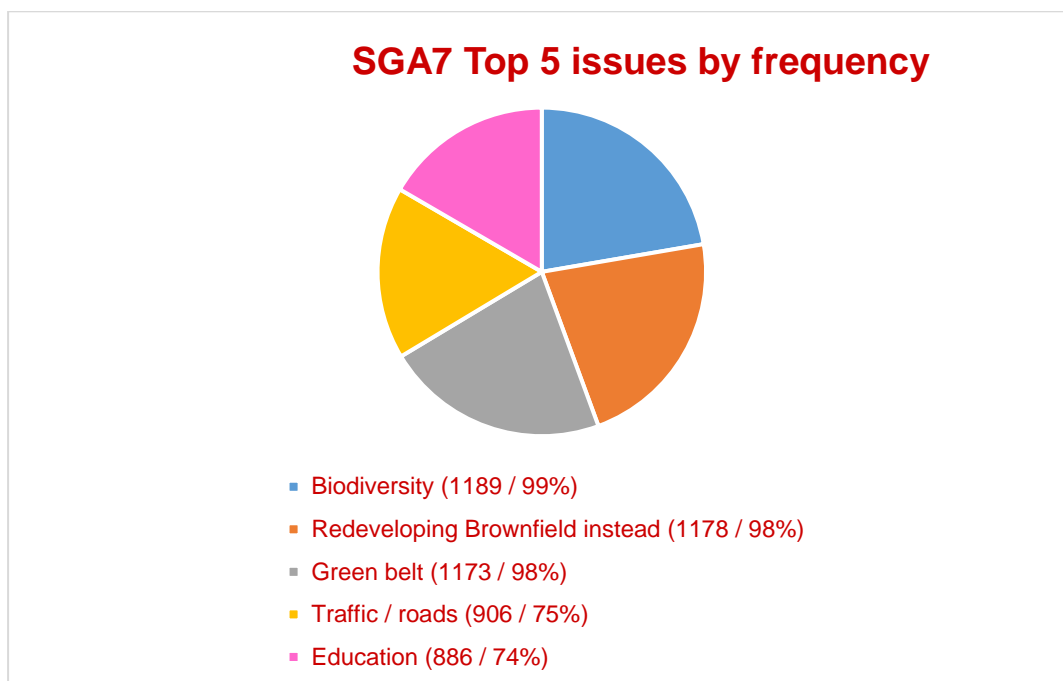
5.7 Whilst the above provides a broad look at key issues raised by respondents in general, it is worthwhile to consider key issues raised by respondents who focused on specific preferred sites. The following section attempts to do this and presents the five or six most frequently raised issues in pie chart form against each of the six preferred strategic sites.

SGA1 (Acorn Way)



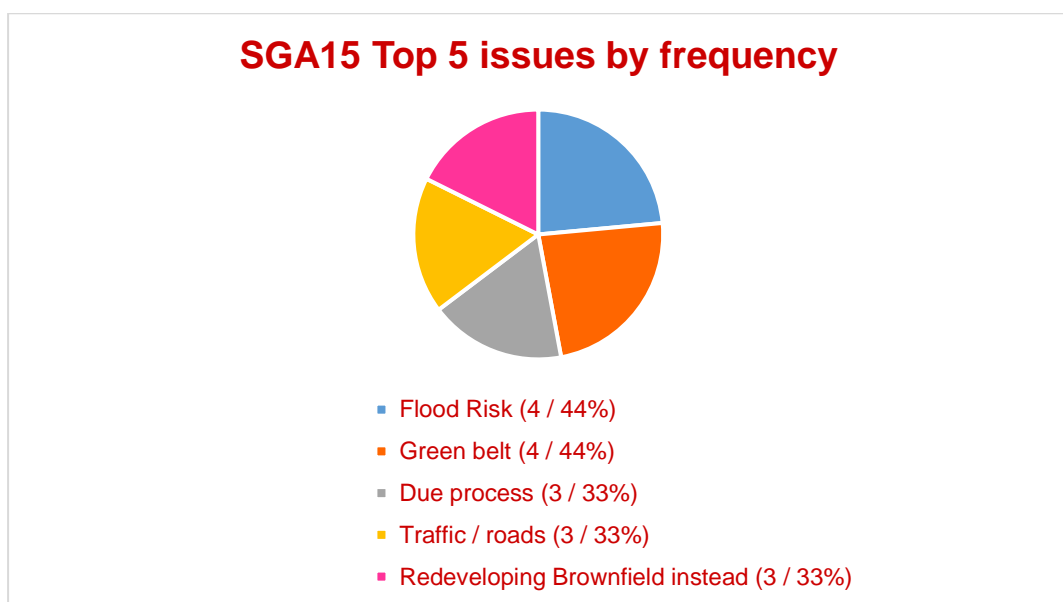
5.8 Respondents focusing on SGA1 (Acorn Way) were most concerned about impact on traffic levels and roads, but also in facilities particularly in the context of they being reliant on those provided within Derby City, not Erewash.

SGA7 (Land North of Cotmanhay)



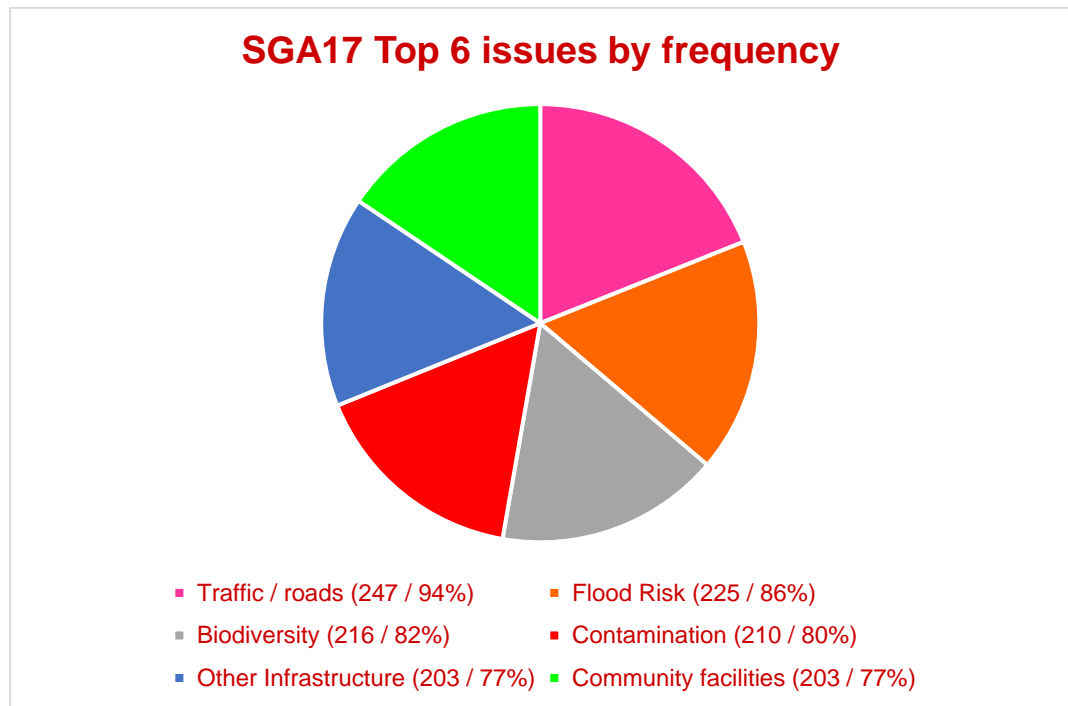
5.9 Respondents focusing on SGA7 (Land North of Cotmanhay) were most concerned about impact on biodiversity and Green Belt. As already mentioned at 5.3 above, these two issues are often conflated as land within the Green Belt is automatically assumed to be more biodiverse than any other. It therefore is no surprise that these two issues, where focused on, have appeared together.

SGA15 (West Hallam Storage Depot)



5.10 Flood risk was the most mentioned issue by respondents focused on SGA15 (West Hallam Storage Depot). Due process was also a key issue unsurprisingly given the largest group of respondents were statutory consultees.

SGA17 (Lock Lane, Sawley)



5.11 Traffic/roads was the most frequently mentioned issue by respondents who focused on SGA17 (Lock Lane, Sawley). This was largely in relation to the single access route available and the land-locked nature of the site providing few options for traffic to disperse or interact with the site.

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 on 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:

Awsorth 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

Community Facilities:

Issue/Question:	Response:
Concern that development will threaten the continued availability and ease of access to key local leisure, recreational and environmental assets in the vicinity of SGA17, but mainly those facilities around Trent Lock and the Canal.	The proposed redevelopment of a private golf course would not undermine or adversely affect access to key local, recreational and environmental assets nearby to SGA17 and such assets would remain unaltered. New development offers opportunities to direct new investment towards enhancing the Green Infrastructure network along the Trent Valley corridor, of which SGA17 sits within, to help improve facilities and the accessibility of routes flowing throughout it.
Concern that development of SGA1 & SGA17 will put unacceptable levels strain on local community facilities, but mainly schools, GPs and dentists.	The Council continue to discuss growth plans with the providers of key local community facilities who hold responsibility for school provision (Derbyshire County Council) and local healthcare provision (Derbyshire Clinical Commissioning Group) to assess the impact on existing education and health facilities. In the case of schools, discussions will identify where additional capacity is required and form the basis for seeking developer contributions to fund works. For healthcare, the CCG will be expected to allocate additional funding to expand local facilities based on an enlarged population arising from additional homes.
Concern that local schools close to SGA7 are already overcrowded, and will become even more so should development occur.	Working with the County Council, the modelling of future pupil numbers (which incorporates planned new housing developments) will identify to what extent the expansion of current facilities is necessary to meet rising pupil populations. This information will then form the basis to secure appropriate developer contributions to finance the expansion of schools, with such work programmed to coincide with the construction of any future housing development at SGA7.
Concern over current deficiencies in Cotmanhay's open space, and SGA7's development removing further land from a local	Despite public rights of way (PRoW) passing within the suggested boundaries of SGA7 east of Cotmanhay Wood, the land itself is currently private. As such, public access to the vast majority of the site is

Issue/Question:	Response:
community who use it to engage with wildlife and the natural environment.	prohibited and therefore cannot be fully enjoyed. Development of SGA7 would safeguard the Wood through the establishment of appropriate management measures, whilst development would be sensitive of the Wood's ecological value. New development would also help to provide the Wood with an appropriate setting which would include the provision of green spaces for the recreational use of local residents and which would allow for enhancements in biodiversity.

Education:

Issue/Question:	Response:
Safety concerns about the suitability of highways close to local schools coping with additional journeys being made to schools.	Responsibility for the safety of highways rests with the County Council who have powers to control aspects such as localised speed limits, parking restrictions and prioritisation of walking/cycling over other forms of travel in areas close to schools.
Concerns over schools close to SGA7 and SGA17 already being over-capacity with large class sizes, and in SGA7's case, little flexibility at the local school to expand education facilities in order to accommodate extra pupils.	In addition to the County Council's modelling of future pupil numbers, it will also investigate whether its facilities can accommodate any projected increases in pupils. In many instances, the re-design and reconfiguration of school estate, either in part or in full, can deliver increases in school capacities. Development contributions agreed as part of a planning permission will ensure work to increase capacities occurs in line with any expected future rises in the pupil roll through appropriate phasing.
Concerns over pupils having to travel further away from their homes to access education.	Pupils being able to access education at their nearest school is always more preferable as it lessens the need for travel and removes pressure on the local road network. School facilities will therefore be expanded in line with the County Council's pupil projections. However, with greater flexibility now afforded to parents and guardians in choosing a school more distant from a home residence, this factor must also be recognised.

Health:

Issue/Question:	Response:
Concern over the ability for existing medical and healthcare facilities in Sawley to cope with additional patients from homes at SGA17. Recognition that current services are struggling to meet current levels of demand.	The Council are 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 Sawley, and across Erewash as a whole. This will act as a precursor to investment/estate management decisions taken by the CCG which, if necessary, will look to enhance capacity at particular locations.
Concern over the capacity and accessibility of healthcare facilities in Oakwood, Derby (near SGA1).	Same as above. With the CCG now covering a Derbyshire-wide geography, the impacts of growth close to local authority boundaries within the County can be better understood and planned for operationally. Housing growth and a need to enhance local healthcare facilities can therefore be better coordinated.
Concern over the limitations of healthcare facilities and provision in Cotmanhay (near SGA7).	Ongoing liaison with the Derbyshire CCG to understand the impacts of growth plans for Cotmanhay & North Ilkeston will help to identify any current pinch-points in local healthcare facilities and serve to guide short and longer-term investment decisions.
Concerns over potential for deteriorating local air quality around SGA7, and recognition that greenspaces play an important role in maintaining a person's physical and mental wellbeing.	The Council acknowledges that greenspaces play an important role in maintaining good physical and mental wellbeing. However, much of the land within SGA7 is private and cannot be accessed to enjoy by the general public. Development of SGA7 will help to contribute to improvements to the Green Infrastructure network, enabling better access to nearby trails, green spaces and waterways.

Infrastructure (General):

Issue/Question:	Response:
<p>Concern raised over the role the Borough Council ought to be taking in securing the necessary improvements needed to general infrastructure that can adequately support and meet the demands of local communities across Erewash.</p>	<p>The Council is currently working with all service providers who collectively support and maintain local infrastructure. Early knowledge of the impacts new housing at preferred growth locations will have will help all parties to understand what, if any, enhancements to infrastructure are necessary and put in place mechanisms to generate, or prioritise, required investment from developer contributions or other funding routes.</p>
<p>Concern that the general infrastructure (and emergency services) around SGA7 is not fit-for-purpose and will struggle to meet rising demand from new households.</p>	<p>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.</p>
<p>Concern that the general infrastructure around SGA1 is not in place and will struggle to meet rising demands from new households, with a fear s106 monies will be diverted away from the area where it is needed.</p>	<p>Similarly to the answer above, infrastructure providers will work with the Council through the development of growth plans to identify the current provision in areas where new housing is planned. Where enhanced infrastructure is necessary as a result of new growth, the Council will be justified in seeking developer contributions to fund improvements. Once these are negotiated by the Council, the monies must be used to mitigate the impacts of a particular development.</p>
<p>Concerns over the poor accessibility between SGA17 and the nearest bus stop on Tamworth Road due to distance and physical barriers, mainly the level crossing on Lock Lane.</p>	<p>The issue of the level crossing acting as physical barrier to accessing facilities west of it is currently being investigated by Network Rail. Whilst the level crossing will remain, the possibility of smarter signalling on the section of railway either side of the crossing could help reduce the duration of time that barriers are lowered. It would be a personal choice for potential future inhabitants of SGA17 to consider whether this issue would make occupancy unacceptable.</p>

Issue/Question:	Response:
Sizeable infrastructure assets such as a new road, new GPs, new schools and a dentist are necessary in Long Eaton to cope with demands.	As explained in the answers above, the Council continues to liaise with key infrastructure providers to understand the suitability of current levels of provision. This is no different in Long Eaton where assessment of facilities will be assessed to understand whether growth at SGA17 requires additional investment in local infrastructure.
Infrastructure would be spared the likely demands and pressures upon it if smaller scale developments were dispersed around Erewash villages.	Existing forms of infrastructure are more advanced and comprehensive in Erewash's main two towns and in the urban east of the Borough in general. The infrastructure network in built-up areas is far better placed and resilient to cope with sizeable new growth than if development was dispersed out either to the Borough's villages or open countryside where infrastructure is far more limited in its availability.

Other infrastructure:

Issue/Question:	Response:
Concern that the Lock Lane level crossing in its current configuration presents a notable barrier to access to SGA17 and is unsuitable to facilitate the additional vehicles which requiring access to areas east of the level crossing.	The Council is in dialogue with Network Rail to establish what, if any, enhancements are required to enable the Lock Lane crossing to allow for the safe use by pedestrians and road users.
Concerns about the varying, but nevertheless lengthy, durations that barriers are lowered at the crossing for passing trains and the impacts this has on localised traffic congestion and ease of access to and from SGA17 for emergency vehicles. This may also risk increases in instances of reckless behaviour from motorists using the crossing.	Further investigations are required in order to understand the technical reasons as to why barriers at the crossing are lowered for sometimes lengthy periods of time despite the absence of trains. More effective 'smart' signalling serving this section of track has the scope to reduce instances where gates are lowered for sizeable durations and would also contributing to a reduction in reckless behaviour from motorists who attempt to 'beat the barriers' dropping.
Concerns about how economic growth and development is planned for in Erewash, with identified housing sites causing a	Four of the Council's six preferred growth option sites would require deallocation from the Green Belt and represent the most sustainable

Issue/Question:	Response:
likely displacement of businesses, jobs and skills, with alternative locations constrained in accommodating these.	locations for growth as demonstrated by the accompanying Sustainability Appraisal. These four sites have at no time been earmarked for employment or business uses, so their possible development would not play any role in the displacement of business, jobs and skills.
Concerns about how HS2 is addressed alongside emerging growth proposals.	The scheduled opening date for the eastern leg of the HS2 line north of Birmingham is currently 2037. This date, which due to the current Covid-19 pandemic may see construction further delayed, represents the very end of the replacement Local Plan's lifespan. With councils now formally required to review their Local Plan every five years, the need to address any impacts of HS2 is felt to be premature, particular as none of the preferred growth options would directly or indirectly impact on the line's construction.
Concerns regarding the limitations of the nearby public transport network, with congestion limiting the appeal of bus travel and occupancy issues of Long Eaton railway station and the capacity of rail stock that serves it.	The Council has consulted public transport bodies about its preferred growth options. The vast majority of transport bodies operating within Erewash are now commercial 'for profit' operations, so new housing development offers scope for bodies to consider current network capabilities and the desirability and commercial viability of running additional services to an enlarged population.

Green Belt:

Issue/Question:	Response:
Questions what exceptional circumstances exist to use GB land in the face of alternative brownfield options.	Erewash's notably deficient current housing land supply has led the Council to undertake a wider review of locations within Erewash (including those the Green Belt) where new development is suitable and necessary to increase the volume of new homes being built and achieve a level of housebuilding which helps the Council to meet Government-calculated housing needs for the Borough. Detailed work spanning several years has been undertaken to firstly identify and then encourage

Issue/Question:	Response:
	<p>development to take place on brownfield land opportunities across Erewash. However, constraints associated with the re-use of brownfield sites (scale of contamination and the costs of remediation/clean-up) has served as a major constraint in the delivery of new housing. Whilst the Council continues to do everything within its power to facilitate new housing development on brownfield land, it must be recognised that to address the current deficiency in Erewash's housing land supply, the replacement Local Plan needs to provide development opportunities that are attractive to housebuilders, free from restrictive financial constraints caused by ground contamination and where much-needed new housing can be delivered at speed in the short-term.</p>
<p>Concern that the loss of Green Belt will impact on the ability for future generations to enjoy land within its designation.</p>	<p>The four sites identified in the Growth Options consultation which are currently within the Green Belt account for around 1.5% of Erewash's total Green Belt designation. The vast majority of remaining land designated as Green Belt across the Borough falls under private ownership with restrictions in place preventing access to the general public. However, provisions within national planning guidance in the National Planning Policy Framework (NPPF) at Paragraph 138 now require any council proposing the removal of Green Belt to consider ways in which the impact of doing so can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The identification of the four Green Belt sites for residential development offers an excellent opportunity for the Council to work proactively with local landowners and explore ways in which Erewash residents can benefit from much greater access to neighbouring land around SGA sites for recreational and leisure purposes, whilst also looking to strengthen biodiversity assets.</p>
<p>Concern that incremental losses of GB will undermine the purposes of Erewash's Green Belt.</p>	<p>The Council are identifying suitable locations for new housing development through a review of its Local Plan. This exercise is following a spatial hierarchy informed by a robust Sustainability Appraisal to ensure the location of growth is directed to the most sustainable places in</p>

Issue/Question:	Response:
	<p>Erewash. The NPPF advises local authorities to conduct the identification of strategic-scale housing land through a Local Plan review, allowing councils the opportunity to assess long-term development needs as a whole. The proposed deallocation of Green Belt to enable this to occur would be carried out in a coordinated manner with the Council required to demonstrate the exceptional circumstances justifying the loss of Green Belt land. Given the exercise of identifying housing land is occurring through the Local Plan, the Council can demonstrate that the consideration of Green Belt development is being progressed using an appropriate process. This is in contrast to a position which would see pressure for housing across the Borough's Green Belt in unsustainable locations, distant from existing towns and infrastructure. In total, the four proposed housing developments in the existing Green Belt account for 1.5% of Erewash's Green Belt and none of the sites threaten the ability of the wider designation to maintain openness and sufficient separation either between the Nottingham and Derby built-up areas or individual settlements within Erewash.</p>
<p>The Council should be doing more to protect its GB and focus on alternative non-GB locations where more sustainable development is encouraged.</p>	<p>The Council has consistently taken all necessary measures to ensure new housing development is directed to locations outside of the Nottingham-Derby Green Belt. A succession of Local Plans have been effective in identifying locations outside of the Green Belt where the Borough's growth requirements have been met. The 2014 Erewash Core Strategy was criticised by some developers and land promoters for being too brownfield-focused with the entirety of Erewash's required growth proposed within the Borough's towns and villages. Since the document's adoption, the Council has produced several Brownfield Land Registers identifying preferable locations for housing development. In addition, the Council has developed a Masterplan to attempt to kick-start redevelopment of the Borough's largest brownfield site at the former Stanton Ironworks, whilst the production of a Developer Contributions Supplementary Planning Document (SPD) has attempted to simplify arrangements around the costs of making development of brownfield</p>

Issue/Question:	Response:
	<p>land more affordable to undertake. A significant number of the Borough's brownfield sites are subject to varying degrees of ground contamination owing to their industrial history. This adds substantial costs to redevelopment given the need for remediation, which in many cases makes the re-use of brownfield land unviable. Despite this, the Council remain committed to accommodating as much of its housing requirements on brownfield land as possible. However, it cannot ignore the need for development (both brownfield and greenfield) to be economically viable by providing a fair financial return to a landowner, something required by national planning guidance.</p>
<p>Concern that development in GB north of Cotmanhay constitutes inappropriate development, is contrary to NPPF guidance on permanence, would lessen the open gap between Ilkeston & Heanor and contribute to a loss of character and identity of Cotmanhay and Shipley.</p>	<p>Development within Green Belt north of Cotmanhay is not deemed to be inappropriate development as the deallocation of Green Belt is being undertaken as part of a Local Plan review where releases will be fully justified through demonstrating exceptional circumstances. It is the review of strategic policies within the current Local Plan which has established a need for changes to the Green Belt's boundaries, although the identification of the four SGA sites fully intends to help provide for the long-term permanence of remaining Green Belt.</p> <p>In terms of the lessening of an open gap between Ilkeston and Heanor, it must be noted that ribbon housing development extends northwards out of the Borough along Hassock Lane South (A6007). The proposed boundaries of SGA7 does not project any further north than the final residential property in the row of houses which continues north of Long Lane. SGA7 is actually surrounded by existing residential development to its south, west and east demonstrating that the land is well enclosed and with existing built development projecting further north than the northernmost point of SGA7, the site is considered to 'round off' the physical form of Ilkeston rather than impact the current openness of Green Belt between Ilkeston and Heanor.</p>

Issue/Question:	Response:
	<p>It is not felt that SGA7's development would contribute to any loss of Cotmanhay and Shipley's character and identity. The former, mainly consisting of a large-scale housing development constructed during the 1940's and 1950's, displays little special, historic character except to serve as an example of a notable post-war expansion of Ilkeston. Shipley Village is predominantly located on the western side of the A6007, so SGA7 is sufficient distant from it to have any impact on its character or identity.</p>
<p>Concern over development in the GB so close to Breadsall Cutting Site of Special Scientific Interest (SSSI), risking impacts and opening door for further housing growth in the wider area.</p>	<p>The Council remain fully committed to the long-term protection of Erewash's two SSSI's by avoiding development which 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 the 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 would not be supported by the Council. 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 nearby to important statutory designations such as SSSI's.</p>
<p>Concern over the absence of a Borough-wide or dual-HMA GB review to provide legitimacy to the identification of growth options in council's draft plan and provide informed evidence/information on the selection of certain sites/areas over others.</p>	<p>The Council has worked comprehensively to identify all non-Green Belt locations thought able to contribute towards Erewash's long-term local plan requirements. After exhausting all suitable sites within its towns and villages, and also at two notable brownfield sites (Stanton Regeneration Site and West Hallam Storage Depot), development within the Green Belt is felt to be necessary and justifiable. Faced with this situation, the Council has chosen to identify locations for growth within the GB based on a spatial hierarchy of locations guided by general sustainability</p>

Issue/Question:	Response:
	<p>principles and the availability of infrastructure. Inevitably this begins with extensions to the Nottingham and Derby main built-up areas (including Long Eaton), extension of the town of Ilkeston, extension of the Borough's rural settlements before finally considering free-standing new settlements within Green Belt. The Council maintains the validity of such an approach in influencing its choice of growth sites as it directs locations for growth near to existing local forms of infrastructure.</p>
<p>Lack of coordination on Green Belt release across HMAs could impact on soundness of Plans prepared across the Nottingham & Derby HMAs.</p>	<p>The approach taken to identifying suitable locations for housing growth in Green Belt locations is partly in response to the Council needing to take positive action to address the very real concern of poor current performance around housing delivery and short-term housing supply. As explained elsewhere, the identification of potential sites has been guided by a sustainable spatial hierarchy which gives favour to locations adjoining the larger urban areas in the Borough. Whilst there is no formal coordination over Green Belt release across individual or adjoining HMAs, the Council recognises the urgency in identifying sites within its Green Belt where exceptional circumstances have been demonstrated in order to plan positively to significantly boost local housing delivery and meet needs. Further delay before the commencement and completion of a Green Belt review would only serve to increase the threat to the Borough's GB designation given the out-of-date status of the Erewash Local Plan and housing delivery performance dropping to a level which will realistically see the presumption in favour of sustainable development invoked.</p>
<p>The release of Green Belt land elsewhere throughout the Nottingham-Derby Green Belt (such as in Rushcliffe Borough) sets a precedent.</p>	<p>The purposes of land within Green Belt need to be assessed upon its own merit. The release of Green Belt in one part of the strategic area does not automatically devalue any other part. In any case, there is strong evidence concluding that Green Belt land within Erewash Borough serves a significantly higher value in Green Belt purposes than other sections of the Nottingham-Derby designation. This is primarily because of its role in ensuring the ongoing separation of Nottingham and Derby.</p>

Biodiversity:

Issue/Question:	Response:
Concerns that the environmental impact development of SGA17 would have on the adjacent nature reserve will cause irreparable harm to it.	The Council recognises the Local Wildlife Site adjacent to SGA17 – as identified by Derbyshire Wildlife Trust – as an important asset to the local community and important feature of the natural environment. The extent of the proposed development site specifically excludes all elements of the Local Wildlife Site for this very reason. As the Local Plan develops and policies relating both to the site specifically and broader issues such as biodiversity are formulated, the protection and enhancement of the asset will remain a Council priority.
Development of SGA17 will threaten the continued existence of habitats relied upon by a rich and varied range of animal, mammal, insect and grass species (some red list species) recorded as being present on both SGA17 and the neighbouring local wildlife site.	The Council recognises the Local Wildlife Site adjacent to SGA17 – as identified by Derbyshire Wildlife Trust – as an important asset to the local community and important feature of the natural environment. The extent of the proposed development site specifically excludes all elements of the Local Wildlife Site for this very reason. As the Local Plan develops and policies relating both to the site specifically and broader issues such as biodiversity are formulated, the protection and enhancement of the asset as well as any elements of the site extent deemed to be of value will remain a Council priority. At this time, the evidence available to the Council does not indicate the presence of protected species within the proposed extent of SGA17 which at this time is heavily manicured as an active golf course. However, evidence will be developed to investigate any such possibilities as the Local Plan and development intentions for the site develop. Through the site's redevelopment, opportunities to enhance the existing conditions of the site in biodiversity terms (such as through the introduction of green corridors) will may also present themselves.
Concern at the diminishing amount of green space in Sawley for wildlife to live and for local residents to enjoy.	In terms of public enjoyment, SGA17 is currently a private members golf course. As such, public access across the site is not permitted unless at the owners discretion. Additionally, there are no Public Rights of Way

Issue/Question:	Response:
	<p>across the site and therefore the proposals would not result in the removal of any green space intended for public enjoyment. In terms of wildlife habitats, the Local Wildlife Site is excluded from the site extent and thus will be protected. The Council will take specific advice from bodies such as Derbyshire Wildlife Trust and Natural England around how to best manage any impacts upon wildlife resulting from the site's redevelopment. This may be by way of providing compensatory habitat either on site or elsewhere if the site is deemed to be playing host to vulnerable species.</p>
<p>Concerns that proposals to develop SGA17 are contrary to the NPPF insofar as protecting wildlife habitats.</p>	<p>The Local Wildlife Site adjacent to SGA17 is excluded from the site extent and thus will be protected. This accords with NPPF requirements particularly Paragraph 174, recognising it as a wildlife-rich habitat. The Council will take specific advice from bodies such as Derbyshire Wildlife Trust and Natural England around how to best manage any impacts upon wildlife resulting from the sites redevelopment. This may be by way of providing compensatory habitat either on site or elsewhere if the site is deemed to be playing host to vulnerable species. Indeed, the NPPF makes provision for the Council to seek to adequately mitigate or compensate for impacts on wildlife, particularly at Paragraph 175.</p>
<p>Concern that wildlife corridors serving the SGA1 will be destroyed and that important green spaces around Oakwood which support wildlife are being lost.</p>	<p>SGA1 does not contain within it any wildlife designations which require the Borough Council to avoid development. That being said, the Council will take specific advice from bodies such as Derbyshire Wildlife Trust and Natural England around how to best manage any impacts upon wildlife resulting from the site's redevelopment. This may be by way of providing compensatory habitat either on site or elsewhere if the site is deemed to be playing host to vulnerable species. There are also opportunities to provide wildlife enhancements through redevelopment – such as, the creation of green wildlife corridors connecting Oakwood through the site to the countryside beyond.</p>

Issue/Question:	Response:
Concern that protected and endangered animal, insect and bird species resident at SGA7 would be lost and/or displaced by the site's development.	SGA7 does not contain within its extent any wildlife designations which require the Council to avoid development. That being said, the Council will take specific advice from bodies such as Derbyshire Wildlife Trust and Natural England around how to best manage any impacts upon wildlife resulting from the site's redevelopment. This may be by way of providing compensatory habitat either on site or elsewhere if the site is deemed to be playing host to vulnerable species.
Concern at the impacts of the loss of valued open space and ancient woodland, with uncertainty over how any remaining woodland would be managed if housing development occurred.	No public open space is being lost to development through Growth Options proposals. Development of private land actually presents the opportunity for formal public access to new and existing assets to be extended or established. An example of this is to the woodland north of Cotmanhay, which at this time should not be accessed by the public. By incorporating the woodland as a protected asset alongside new development at this location, opportunities for better woodland management and related biodiversity enhancements may also emerge.

Matters outside of Erewash:

Issue/Question:	Response:
Concern around the cumulative impact of other developments outside of Erewash Borough, including the former American Adventure site in Amber Valley and Lime Lane in Derby City. In particular, a concern that cumulatively these will impact negatively on local services (including health provision), traffic and pollution levels.	The Council is required to plan for the delivery of its own housing requirement and as part of this must work with partners to implement measures to mitigate impacts resulting from related growth. This includes in terms of effects on infrastructure, local services and pollution levels. The Council is not directly responsible for coordinating the mitigation of impacts resulting from growth outside of its control such as within neighbouring authority administrative areas. However, all relevant bodies are consulted and kept part of the Local Plan process so that their input can influence what types of mitigation should be sought and measures may have mitigating impacts on multiple authority areas. These bodies include the Clinical Commissioning Group (for health services) and

Issue/Question:	Response:
	Derbyshire County Council Highways Authority which perform their functions across multiple administrative areas and, as such, will consider the cumulative effects of development when providing mitigation advice and guidance in terms of their relevant specialisms.

Stanton first:

Issue/Question:	Response:
Erewash Borough Council should compulsory purchase the Stanton Regeneration Site to deliver 2,000 homes.	The Council is not in a position to be able to compulsory purchase the site due to the substantial cost and potential legal complications associated with the Compulsory Purchase Order (CPO) process. In any case, the Council would still require willing housebuilders to deliver 2,000 dwellings upon the site, which under current Local Plan proposals it does not consider feasible in the short-term.
The Stanton Regeneration Site cannot be relied upon to deliver housing given its poor track record in delivery thus far.	The Stanton Regeneration Site was originally identified within the 2014 Erewash Core Strategy as a site with potential to deliver 2,000 dwellings over the plan period (2011-2026). The Council adopted a Supplementary Planning Document to set out a masterplan for development in 2017 outlining preferred land-uses and necessary transport/access interventions required to unlock the site's potential. Despite this, as well as active marketing of the site and interest from multiple public and private sector developers, the site operator has not agreed to sell the site. In view of this context, the Council is sympathetic towards the view that the site cannot be relied upon to deliver housing but does not entirely agree. Instead, the Growth Options document sensibly recognises the complexities around the site and expects around 1,000 dwellings to be delivered on the site within the entire plan period (17 years); half that which was expected by the Erewash Core Strategy. It is the Council's view that the site cannot deliver housing to the extent first established by the 2014 Erewash Core Strategy, but that it can still play a role in

Issue/Question:	Response:
	accommodating some of the Borough's housing needs, albeit on a much more limited scale.

Rejected sites:

Issue/Question:	Response:
Breaston, Draycott and Borrowash sites should be reconsidered to be included in the Borough's Spatial Strategy. Specifically, they represent more suitable propositions than those in Sawley.	The Sustainability Appraisal which sits alongside the Growth Options document and which has directly informed the development of the proposed spatial strategy in its current form, makes clear that in sustainability terms, strategic extension of the conurbations – such as at Sawley – is a more suitable proposition than directing the same scale of growth to villages. In any case, there is no strategic case for considering strategic growth at the villages because the Borough's housing requirement is able to be accommodated wholly through more sustainable options as detailed in the Growth Options document.
To all practical purposes, Risley functions as part of the Long Eaton Urban Area and should be considered as part of it, not separate from it.	The Council disagrees that Risley should be considered part of the conurbation. Risley is distinct in character and form from the main built-up area of Nottingham to which Long Eaton and Sandiacre form a part through their continuous built form out from the centre of the city. There is a strong sense of separation enhanced further by the presence of the motorway as well as countryside – falling within Green Belt designation – between the M1 and eastern edge of the village. The strategic importance of the Erewash element of the Green Belt is well documented and the inclusion of Risley within the existing conurbation extent would undermine the strong and continuous defensible boundary afforded by the settlement extent formed by the conurbation which in its current form acts as an important policy mechanism on intrusion into the countryside.

Redeveloping brownfield instead:

Issue/Question:	Response:
<p>There are no exceptional circumstances that justify the selection of Green Belt sites when there remain brownfield sites that are not utilised.</p>	<p>The Growth Options document and Sustainability Appraisal make clear that growth within the conurbation, town and villages (Options A, B and C respectively) followed by new settlements not in the Green Belt (Option D) are the most preferred approaches to growth. All of these options rely on an exhaustive use of brownfield land where the Council wishes to see development maximise the effective use of land by encouraging high, but realistic densities. These sites are identified within the SHLAA and Brownfield Land Register and include the Stanton Regeneration Site and West Hallam Storage Depot, though the vast majority of sites identified in these two documents are sites within settlements. The Council considers that it has identified all available brownfield sites which have a realistic prospect of delivering residential development within the plan period. Despite this, there does remain unmet need and sites within the Green Belt are being presented only as a last option.</p>
<p>Emphasis should be placed on redevelopment of brownfield sites and empty buildings first and foremost.</p>	<p>The Council agrees and considers that it has prioritised the redevelopment of brownfield sites before all other options. The Growth Options document and Sustainability Appraisal make clear that growth within the conurbation, town and villages (Options A, B and C respectively) followed by new settlements not in the Green Belt (Option D) are the most preferred approaches to growth and these rely primarily on the re-use of brownfield land. Not all empty buildings will be available for the Council to include in its land supply and the Council must be careful to only include sites with realistic prospects of delivering residential development. In particular, sites and buildings must be available.</p>
<p>Erewash Borough Council should use its compulsory purchase powers to acquire brownfield sites, including Stanton Regeneration Site and vacant residential properties.</p>	<p>Compulsory purchase of land or buildings is an extremely costly and complex process which the Council is unable to realistically undertake. In any case even acquiring every vacant residential property known about</p>

Issue/Question:	Response:
	within the Borough would not result in any tangible effects on contributing towards the borough-wide housing requirement.
Removing the Green Belt sites identified in this review from the Local Plan will ensure brownfield sites in the towns are redeveloped instead.	No strategic sites have ever been released from Erewash's Green Belt land over numerous plan periods and yet required levels of housing delivery have consistently fallen short of what is evidenced as being required. Indeed, the Erewash Core Strategy is based wholly on a strategy of urban concentration, and sites – including the Stanton Regeneration Site – have failed to deliver. The Council concludes from this that brownfield sites cannot be relied upon exclusively to deliver its housing requirements.
Redevelopment of town centres should accommodate new housing to help revitalise these areas.	The Council supports opportunities to regenerate Erewash's two town centres and recognises the role introducing new residential development can offer in contributing to improved economic conditions. Upper floors in town centres can already be converted into residential uses and there is no suggestion at this time that a new Local Plan would reverse or restrict this. The Council does consider it important however that within defined town centres, ground floor units are retained for appropriate retail uses so as to reinforce the long-term function of town centres as retail and cultural centres. However, where opportunities arise, including on land which may be appropriate for redevelopment, the Council will strongly encourage the provision of new residential units in its town centres.
Some brownfield land is of high environmental value, providing habitats for protected or priority species and other environmental and amenity benefits. These issues will need to be taken into account and mitigated when allocating land.	The Council agrees and will seek to mitigate environmental impacts at every opportunity in the same way it would for greenfield sites. Whilst a new Local Plan will contain policies which help to direct this, it is envisaged that mitigation measures will need to be identified and implemented primarily through the Development Management process and on a case by case basis.

Historic environment:

Issue/Question:	Response:
There is an ancient woodland within SGA7 and this should be protected and safeguarded.	The Council agrees. The suggested developable area of SGA7 excludes the ancient woodland and this will remain safeguarded. Through development of SGA7, there are opportunities to enhance the protection and value afforded to Cotmanhay Wood and thus enhance the positive role it plays for surrounding communities over the long term. The Council will work closely with relevant partners to ensure the woodland is protected for the long-term through appropriate management strategies.
Location of SGA1 nearby to Locko Park (a Grade II Registered Park and Garden that includes the Grade II* Listed Locko Park House) is an important consideration when allocating sites.	The Council agrees. There are a number of solutions available to ensure that the assets and their settings are not detrimentally impacted upon as a result of the development of SGA1. It will be for policies developed further on within the Local Plan review process and ultimately the application of such policies through the Development Management process to ensure assets are appropriately safeguarded and relevant mitigation measures are implemented.
Trent Lock Conservation Area would be irreparably spoilt by the development of SGA17. Removing the pleasant walk down to the Conservation Area by introducing housing would reduce tourist numbers.	Trent Lock Conservation Area is a considerable distance from the SGA17 site and the Council does not consider that redevelopment of SGA17 would be of detriment to the Conservation Area including its wider setting. Pedestrian access to the Conservation Area will remain unaltered. The Council will work with relevant partners including Historic England to ensure any strategically-sized development within the Borough is implemented sympathetically.
Development of SGA7 would impact detrimentally on the historic character of Ilkeston.	The Council's view is that the site is a sufficient distance from Ilkeston town centre and its related Conservation Area that development of SGA7 would not be of detriment to the historic character of Ilkeston. In any case, all relevant partners including Historic England have been consulted and the Council will be guided by advice and recommendations received in relation to any potential risks to nearby heritage assets and the historic character of nearby settlements.

Issue/Question:	Response:

Type of housing:

Issue/Question:	Response:
Need for any new homes within the Borough to be ecologically sustainable with minimal carbon footprint.	The new Local Plan will contain a wide range of policies to influence development. This may include policies to tackle climate change and implement positive design standards and it can be used to influence developers to adopt ambitious standards such as Building For Life. However, the Local Plan currently does not perform the role of managing specific building standards and cannot enforce anything beyond the minimum standards set by national building regulations.
There should be sufficient affordable housing.	The Council agrees. As the Local Plan is developed, a more precise understanding of the Borough's affordable housing requirements will emerge. The Local Plan will contain specific policies which tackle the delivery of affordable provision based on the most up-to-date evidence, including documents such as a strategic housing market assessment (SHMA).
Smaller scale development is required in all cities, towns and villages – all should do their bit.	The Growth Options document proposes growth – of varying scales - in both Ilkeston and Long Eaton as well as within Erewash's villages and thus does require different settlements to contribute to meeting the Borough's housing needs. Distribution of new housing growth is favoured towards Ilkeston and Long Eaton for sustainability reasons, as detailed within the Sustainability Appraisal also published as part of this consultation.
Current Growth Options do not address rural housing needs around the Borough. Rural exception sites would meet Erewash's needs without the need to remove land from the Green Belt.	The Growth Options stage of the Local Plan review is the first step in replacing the current out-of-date Core Strategy. The scope of the Growth Options stage was solely to seek views on the preferred locations for strategic-sized housing growth around the Borough. Rural housing needs is a matter which the Local Plan will focus on at subsequent stages of its

Issue/Question:	Response:
	production in conjunction with the availability of evidence identifying what levels of need exist throughout Erewash's rural areas. It is important to note that mechanisms to deliver affordable rural housing continue to exist, both in Core Strategy policies and also saved policies from the 2005 Local Plan. Regarding exception sites, policy encouragement is provided for the development of smaller schemes well-linked to existing settlements. With a modest scale being required by adopted policies, it is unrealistic to think that a series of small rural exception sites would meet the full market and affordable housing needs of rural locations in Erewash.
Lead-in times for strategic sites appear optimistic and additional land may be needed to ensure flexibility in delivery.	The Council relies on input from landowners, site promoters and developers to establish realistic expectations for the length of build-out of strategic housing sites and obtaining this information is a key purpose of the Local Plan consultations. If it emerges that those with direct control over sites maintain a different view over build-out rates, the Council will need to take account of this appropriately in progressing the Local Plan.
Emerging Local Plan too weighted towards delivery of major strategic sites and should make provision for a wider range of smaller sites to help secure greater flexibility.	A significant proportion of the expected build-out within the proposed Growth Options document is delivered via small sites within urban areas as identified within the 2019 Strategic Housing Land Availability Assessment. The Council believes it is striking an appropriate balance between small and strategic scale sites which represents an important shift when compared with the existing Erewash Core Strategy which identified only one strategic site. The need to review the Local Plan is driven in no small part by the Borough's record of under delivery within that framework.
Option D is less sustainable than Option E.	Delivering Option D will secure the remediation and re-use of historic employment sites and help to minimise the extent to which the countryside – much of which is not farmland - must be eroded to accommodate the required levels of growth within the Borough. The clean-up of these sites, and the fact that any biodiversity value within

Issue/Question:	Response:
	<p>them is generally on a limited and localised scale (given the sites are, in part, still in use) represent sustainable benefits over Option E and these factors are key to the Council recognising Option D as being more sustainable – though not significantly – than Option E. Whilst it is expected the sites making up Option D are of a scale that would attract infrastructure, the relationship between the two sites as well as one within Option E (SGA18) must be considered when analysing the sustainability of the emerging strategy. Critically, these sites are located in close proximity to each other and the potential for new infrastructure to be incorporated strategically in response to the emergence of a critical mass is strong.</p>
<p>Government policy suggests the greater the house prices, the higher demand and therefore homes dwellings required. Rural areas are generally more expensive thus should take more housing.</p>	<p>The Sustainability Appraisal clearly finds that strategic development on the scale required to satisfy the housing requirement within Erewash would be inappropriate in rural areas, away from the critical mass of services and infrastructure already in place within the conurbations and towns. The Government's view is also based on a consideration of Local Planning Authority areas as a whole, rather than specific locations within those areas and only a Housing Needs Assessment can reflect the true level of demand at the more localised scale.</p>
<p>It is better to build small numbers of houses next to each settlement.</p>	<p>This would represent one of the least sustainable methods for satisfying the Borough's housing requirement. Such small-scale development would not invite the potential for infrastructure investment or improvements, yet would result in a net increase in demand. Such small-scale development will very likely meet viability constraints as economies of scale (achieved through strategic level development) could not be achieved. A restrictive approach to delivery such as this would also exclude input from most if not all of the medium and large-scale house builders, not least because of these issues.</p>

Traffic/roads:

Issue/Question:	Response:
Work done by EBC so far is lacking in practical detail around how to mitigate traffic issues.	The work done so far represents the very first stage of plan making to replace/review aspects of the currently adopted Local Plan. As a result, the Growth Options document is based on a high-level analysis of impacts from development including aspects relating to traffic and highways. Moving forward, the Council will work with partners including the Highways Authority (Derbyshire County Council) and where necessary, Highways England. These stakeholders will be able to offer detailed analysis of growth plans including the identification of specific mitigation measures wherever these are necessary. In the event of a planning application being submitted for any of the identified sites, the Council would expect a transport appraisal to fully consider the impacts development would have on the road network, whilst identifying what scale of mitigation is needed.
The road network is a technical failure and already fails to cope with current traffic levels. The proposed developments will exacerbate this.	The absence of any new development will not mitigate the existing limitations of the local road network. On the contrary, the Growth Options document presents an opportunity for improvements to be implemented as sites are developed, not least in terms of the proposed link road around Kirk Hallam which is modelled to provide wide-reaching benefits to the network within Erewash.
Developments outside of the Borough, cumulatively with the proposed development within, will have a significant impact on the functioning of the road network.	The Council is not in control of developments outside of the Borough and their presence does not remove the requirement to deliver homes within Erewash. Notwithstanding this, the Council will work with relevant partners including the Highways Authority and neighbouring authorities in both the plan-making and development management processes to seek to minimise as far as possible any impacts to the network within Erewash.
Highway safety will be reduced as a result of the proposals.	Any development which would have an unacceptable impact on highway safety would be refused planning permission. There is no reason why

Issue/Question:	Response:
	highways safety should reduce by unacceptable levels as a result of new development. New development can in fact present opportunities to make improvements to the local road network.
The 1:1 ratio (cars to households) is an unrealistic claim, most households have more cars than this.	The ratio referred to within the SGA Assessment evidence base documents relates to the expectation that on average, one car from each household is likely to be engaged with either the early morning or early evening peak flow of traffic window at any one time. It does not reference the expected number of total cars associated with an average household. For example, a household with three cars would not generally see all three vehicles leave an address at the same time during the morning peak or arrive back simultaneously during the early evening peak.
The access points proposed as part of the background work are poor.	The access points identified within the SGA assessment evidence base documents are for illustrative purposes and represent a best estimate at this early stage of plan-making as to where access to the sites might be gained. As proposals for individual sites are advanced, more technical input from colleagues involved in highway planning will help to locate access points to the most optimal location(s).
Traffic within the vicinity of Lock Lane (Sawley) and Heanor Road (Ilkeston) is already a serious problem and is often gridlocked.	The Council acknowledges that new development will lead to an increase in the number of vehicles requiring the use of roads nearby. However, new development also provides opportunity for improvement to existing infrastructure such as that at key road junctions. There may be the possibility to therefore improve traffic flows. In any case, the Council will work with the Highways Authority to ensure impact from new development on local roads is minimised and policy compliant.
Lack of evidence showing the 'in combination/cumulative' impacts of development on local junctions and road network.	The role of the Growth Options stage was to identify individual development opportunities around Erewash. The evidence on traffic impacts presented within the SGA assessments represents a starting point in understanding impacts on local roads and junctions. Whilst the evidence does not look at the 'in combination/cumulative' impacts arising

Issue/Question:	Response:
	from potential developments, the earliest stage of a Local Plan review would not typically be expected to go into such level of detail on this matter, especially as decisions on which of the preferred sites may go on to become formal allocations have not yet been taken. As the plan develops, the benefit of engagement with highways stakeholders will advance knowledge of cumulative impacts arising from identified SGA sites, with the addition of independent traffic modelling being key in fully understanding the impacts placed on the road network.
Method used to assess traffic impacts from development is flawed, resulting in over-estimation of impacts.	The approach to assessing potential traffic impacts from development was intentionally basic and represents a simple starting point. The evidence base supporting the Local Plan Review continues to expand and will need to incorporate assessment of highways impacts within it; however this stage of plan development is too early as such work will require the Council to have established its intended spatial strategy for it to add value to the process.

Loss of countryside:

Issue/Question:	Response:
Sites have not been considered carefully. The easier greenfield options have been prioritised.	The Growth Options document is based on a sequential approach to the identification of land to accommodate growth requirements. It clearly demonstrates that Green Belt sites have not been prioritised and in fact have only been identified after development opportunities within existing urban areas and on brownfield sites (including at West Hallam Storage Depot and Stanton), as well as within rural villages, have been exhausted (Options A-D).
The proposals would lead to a loss of an important asset for the community; a place to walk, cycle, run and dog walk. The proposals would undermine the movement to encourage more exercise, health and mental wellbeing by removing land used for these purposes.	Whilst development on land which so far has not been developed will of course lead to local changes, it does not mean the loss of access to land which is able to accommodate such activities nearby. All of the sites identified within the Green Belt are immediately adjacent to other land which is able to accommodate the continuation of these activities. All of

Issue/Question:	Response:
...Proposals would take away space for people to 'escape'.	the proposed sites are of a scale which means the countryside located beyond will see better accessibility to new and existing residents. Furthermore, it is very possible that specific routes through a development site will be established through the development process and, as such, will aid in improving permeability for existing residents into the neighbouring countryside.
Cotmanhay lacks green spaces already.	The development of SGA7 would not result in the loss of any formal public green space. It would instead see the re-purposing of private land which currently is not for public access and thus does not represent a public asset. Development of the private land would result in better permeability into the existing Woodland – which is to be retained – and countryside beyond. Existing Public Rights of Way would be retained even if diverted.
Far better to have shared countryside for the wider population than to have individual gardens for the few who can afford them.	Much of the countryside referred to in its present form is private land and is at best, only partially accessible to the public. There are opportunities as part of new development to introduce assets – such as green corridors – which would be of significant value to the existing and future population, helping to improve public access to green assets and the countryside beyond.
Countryside next to urban areas is particularly valuable.	The identification of SGA sites which adjoin existing towns and urban areas will invariably result in a need to develop land that contributes to the wider countryside. However, much of this land is private and unable to be accessed by the general public. Any SGA sites currently within designated Green Belt which become Local Plan allocations will be required to demonstrate how they will contribute towards the opening up of access to the wider surrounding countryside in order for the general public to benefit from improved recreational links that also offer the ability to enjoy areas of biodiversity. From a sustainability perspective, it is also preferable for strategically-sized housing sites to be located adjoining existing urban areas which have access to local facilities and public

Issue/Question:	Response:
	transport routes rather than support isolated growth where residents would have to predominantly rely on the private car in order to access services, shopping facilities and places of employment.

Use of agricultural land:

Issue/Question:	Response:
Continuing to build on agricultural fields will impact on food production. Concern around where all the food will come from, particularly when considering the context of potential limited supply from outside our own country in the future.	A significant portion of the Green Belt land in question has never been, or is no longer farmed for crops. Even where farming continues, development of the proposed sites would result in loss of only Grade 3 quality agricultural land and lower; the majority of it being Grade 4 (relatively poor quality) in classification.

Flood risk:

Issue/Question:	Response:
SGA17 is a Greenfield site which acts as a valuable soakaway which can delay excessive flood waters being discharged into the River Trent. Building on this land will take away this ability. Concern for a repeat of the flooding witnessed at Lock Land in 2000 as a result of developing SGA17.	New developments must be designed in a way which ensures they do not increase the risk of flooding elsewhere; they will be required to incorporate new drainage and this can in fact reduce the level of surface water run-off compared to land which in its current, natural form is unable to adequately discharge rainfall.
Risk of flooding will increase as a result of development.	New developments must be designed in a way which ensures they do not increase the risk of flooding to existing communities.
Concern that Erewash Borough Council is proposing to build on a flood plain in reference to SGA17.	The vast majority of SGA17 does not fall within a floodplain according to evidence from the council's Strategic Flood Risk Assessment (SFRA).

Issue/Question:	Response:
The dispersal of surface water and adequate removal of sewage will be a problem as a result of development.	New developments must be designed in a way which ensures they do not increase the risk of flooding to existing communities. In terms of surface water management, new developments will be required to incorporate new drainage and this can in fact reduce the level of surface water run off compared to land which is unable to adequately discharge in its natural form. In terms of sewage, the sewage undertaker (Severn Trent) has a statutory obligation to service any new site and the Council will continue to consult with them as plans and policies advance.
SGA17 would need to be significantly excavated due to its filled nature, back down to potential flooding levels.	At this stage, site design and assembly details are unknown but would be confirmed as a result of intrusive ground investigations and evidence gathering at a later stage. In any case, the presence of material underground does not necessitate any harmful fill's complete removal; a range of potential remediation options, including capping layers, are available for consideration which could avert the need for extensive excavation.
Surface run-off presents a serious problem.	New developments must be designed in a way which ensures they do not increase the risk of flooding to existing communities. Major developments will be required to incorporate new forms of drainage and this can in fact reduce the level of surface water run-off compared to land which is unable to adequately discharge rainfall in its natural form.
Why did Erewash Borough Council reject SGA13 on ground of flood risk but retained SGA17 as a preferred site?	The vast majority of SGA17 is located within Flood Zone 1 (lowest risk of flooding) as a result of flood defences introduced along the northern bank of the River Trent. The entirety of SGA13 is within Flood Zone 2 and a large portion of it falls within Flood Zone 3. SGA13 therefore acts as functional floodplain and SGA17 does not.

Contamination:

Issue/Question:	Response:
Concern for increase in air and noise pollution as a result of increased traffic associated with developments.	Accommodating growth at the scale required within the Borough will lead to an increase in vehicles on the road network, however any increase will be dispersed across the Borough rather than concentrated as a result of the proposed strategy and this will help to ensure any increases in air or noise pollution within any single locality are limited. Development does also present opportunities to improve the existing road network such as by way of further dispersing traffic away from residential areas (such as onto a new relief road at Kirk Hallam) or improving flows in general through junction and layout improvements.
Concern that land is being used for development that is classed as 'high risk' by the Coal Authority.	Development proposals on high risk land will need to demonstrate – through a coal mining risk assessment – how risk will be mitigated. The Coal Authority will advise on any required mitigation measures deemed to be necessary to ensure development remains safe across its lifetime.
SGA17 is a toxic ash tip and its redevelopment could lead to health issues. No one knows precisely what is in the land; there has been unauthorised dumping for years.	SGA17, and any other potential development site where contamination is suspected, will be the subject of extensive ground testing to identify precisely the type and extent of contamination present. Specific development proposals will then be required to demonstrate how the land will be remediated so as to be able to accommodate residential development in a safe manner. Only if this can be demonstrated will redevelopment of such land be considered acceptable in this regard and at this stage of plan-making, such details are not readily available.
SGA7 is very close to the railway and this will cause noise pollution (for future residents).	The eastern extent of SGA7 is located further away from the active railway line than many existing residential properties in Ilkeston and is therefore not considered as a matter of concern. In any case, any impacts identified can often be mitigated such as through the careful planning of site layout and introduction of soundproofing insulation.

Pressure on neighbouring LA services:

Issue/Question:	Response:
Proposals at SGA1 give no thought to the effects it could have on the neighbouring council (Derby City) and community. The value of SGA1 to Erewash is minimal, but impact upon Derby City and its residents significant.	The identification of SGA1 is based on the sequential approach adopted for the entire Growth Options strategy and is part of what evidence indicates is the most sustainable approach. Where extensions to settlements are required, evidence is clear that the enlargement of conurbations is the most sustainable way of achieving this. The same factors were responsible for identifying the proposed extension to Long Eaton (also part of a conurbation) at SGA17.
Development at the former American Adventure site must be taken into account when considering potential development at Cotmanhay.	The emerging Local Plan will take account of cumulative impacts resulting from development and, where necessary, identify where mitigation is required to minimise such impacts. This will involve working with infrastructure providers who have a 'larger than local' operational remit allowing for planned growth in different administrative areas to be adequately accounted for.

Health and wellbeing:

Issue/Question:	Response:
Air quality will be further diminished as a result of increased traffic levels associated with new development.	Accommodating growth at the scale required within the Borough will lead to an increase in vehicles on the road network. However any increase will be dispersed across the Borough rather than concentrated as a result of the proposed strategy and this will help to ensure any increases in air or noise pollution within any single locality are minimised. Development does also present opportunities to improve the existing road network such as by way of further dispersing traffic away from residential areas (such as on a new relief road at Kirk Hallam) or improving flows in general through junction and layout improvements.

Issue/Question:	Response:
<p>Concern that the loss of green land upon which people exercise and get fresh air will lead to a diminishing of people's health and wellbeing, including mental health.</p>	<p>Whilst development on land which so far has not been developed will lead to local change, it does not mean the loss of access to land which is able to accommodate such activities nearby. All of the sites identified within Green Belt are immediately adjacent to other land which is able to accommodate the continuation of these activities. All of the proposed sites are of a scale which means the countryside beyond will be more accessible to new and future residents. Furthermore, it is very possible that specific routes through a development site will be established through the development process and, as such, will aid in improving permeability for existing residents into the wider countryside.</p>

National policy:

Issue/Question:	Response:
<p>Development in the Green Belt as proposed is inappropriate development and contradicts Government requirements as a result. Sites in the Green Belt should be removed.</p> <p>...There are not very special circumstances justifying release of Green Belt land as required by the NPPF.</p>	<p>National policy requires the Council to demonstrate exceptional circumstances in the event that it alters its Green Belt boundaries. It considers that the exhausting of all other options to deliver the number of new homes required over the next plan period (Options A-D of the Growth Options document) and despite this, being left with a significant residual amount of housing growth to deliver constitutes exceptional circumstances.</p>
<p>Housing need has not yet been established by Government, so Erewash Borough Council has pre-empted this. The same can be said for the Greater Nottingham Housing Market Area. There can be no reasonable method by which Erewash Borough Council have determined their housing need.</p>	<p>The Government's Standard Method has calculated the level of housing need for Erewash which has led to the scale of land being identified within the Growth Options document.</p>
<p>No higher growth options have been identified and this is contrary to guidance.</p>	<p>The Council is planning for delivery of its housing needs as calculated by the Government's Standard Method. There are no exceptional</p>

Issue/Question:	Response:
	circumstances which at this time the Council is aware of which justifies a move away from this approach.
There is no consideration of housing needs associated with Gypsy and Traveller provision.	The Growth Options consultation has been focused entirely on the broad location of future residential development. Additional policy areas will be considered as part of future iterations of the emerging Local Plan as evidence (e.g. a Gypsy & Traveller Accommodation Assessment) is updated so as to appropriately inform the Councils approach.
Insufficient links between economic growth and new housing.	The Growth Options stage only identifies locations which may be suitable for strategic housing development. Consideration of economic growth in Erewash is an issue which the next stage of the Local Plan (completing Regulation 18) will address. The provisions covering economic growth in the next iteration will incorporate evidence from an updated employment land study and will provide information on what scale of land & floorspace is required to support the forecasted levels of growth across sectors. This will then enable the Local Plan to begin to show the relationship between economic growth and new housing.
Should be planning for more than SM figure owing to poor historic rates of delivery to ensure greater flexibility in growth options.	Guidance advising on the calculation of an annual local housing needs figure already incorporates an allowance for past under-provision of housing so this should not be cited as a factor which influences the setting of a standard methodology figure. Regarding the greater flexibility of growth options, the Council is of the view that the identification of four Green Belt, greenfield sites as preferred locations for housing growth offers a suitable range of development sites in different parts of the Borough that heighten the prospect of earlier housing delivery to help positively address the Council's current weak five-year housing land supply position.
Accusation that the emerging growth strategy is not ambitious and simply repeats the mistakes of the current Local Plan.	The strategy set out within the Growth Options document represents the most radical ever formulated within Erewash Borough. The Erewash Core Strategy was formulated on a strategy of urban concentration with

Issue/Question:	Response:
	<p>regeneration and sought to use only land contained within existing urban areas. Only one strategic allocation was identified – the Stanton Regeneration Site – and the strategy did not seek to implement any notable infrastructure interventions relating to this growth aside from the re-instatement of the Ilkeston Railway Station to which was subsequently achieved. Conversely, the Growth Options Strategy acknowledges the role that Green Belt land needs to play in delivering growth and identifies four strategic allocations in extension to the existing town and conurbations within it. It identifies a further two allocations on existing brownfield sites and also identifies significant growth within urban areas. To help deliver this, a new relief road is proposed representing what would be a significant infrastructure project with wide and far reaching implications. The Growth Options strategy represents a highly diverse and ambitious approach to growth.</p>
<p>Windfall dwellings should only provide for flexibility and not provide for delivering actual need within a Local Plan. Such an approach is unsound.</p>	<p>The inclusion of a suitably-calculated windfall provision within a council's five-year housing land supply (which also contributes to a plan-wide housing requirement) is an established and permissible approach. Given the Council's five-year land supply is based on the Government's Standard Method calculating a local housing need figure (due to the Erewash Core Strategy's housing policies being older than five years), it is legitimate for any council to demonstrate how expected windfall will reliably contribute towards short, medium and long-term housing targets. Nowhere in national guidance, either in the National Planning Policy Framework (NPPF) or National Planning Practice Guidance (NPPG) is it expressed that the role of windfall development is merely included to show flexibility in a council's housing supply. Additionally, the lack of housing allocations in the now out-of-date local plan has resulted in a significant level of windfall development occurring in Erewash over recent years. To restrict the councils ability to reflect on high levels of historic and current windfall activity runs counter to the provisions of national policy guidance.</p>

Duty to Co-Operate:

Issue/Question:	Response:
<p>Concern around the lack of engagement with both HMAs prior to consulting on the Options for Growth document.</p>	<p>The Council continues to enjoy a good working relationship with fellow Nottingham Core HMA councils. It attends weekly Core HMA officer meetings and continues to play a full role in the joint commissioning of work to develop a shared evidence base around housing supply, gypsies & traveller accommodation, employment needs and green/blue infrastructure - amongst other topics. Involvement at a political level continues with the Council's involvement in Joint Planning Advisory Board (JPAB). The Council's participation in both of these forums allows ongoing dialogue to occur on approaches to plan-making. Consultation on the Growth Options document has given all councils from both neighbouring HMAs an opportunity to comment upon the approach the Council is taking, with the Council encouraging views to be expressed at this early stage of the overall process.</p>
<p>The Options for Growth work has not taken a strategic approach to considering Green Belt release such as in terms of considering existing Green Belt studies across the strategic area (across both HMAs).</p>	<p>The approach taken to the Council's identification of Green Belt land to assist with meeting its short and longer term housing requirements is based upon the identification of a spatial distribution hierarchy which aims to locate housing growth of strategic scale to the most sustainable areas of the Borough. The Council's approach to identifying suitable locations for housing growth reflects the findings of the accompanying Sustainability Appraisal (SA), clearly showing where the most sustainable locations are to accommodate new development, whilst fully reflecting the need to firstly identify and maximise brownfield opportunities in non-GB areas.</p>
<p>Unsure as to why Erewash Borough Council need to be part of the Greater Nottingham Joint Planning Partnership if they have acted within due process, yet separate from the group.</p>	<p>It is important to recognise the multiple roles JPAB plays in providing opportunities for discussions over wide-ranging matters connected to strategic planning. As such, the Council continues to play an active role in JPAB's work to progress the development of a common conurbation-wide evidence base spanning a number of spatial planning matters. JPAB was made aware of the Council's need for timely progress in</p>

Issue/Question:	Response:
	<p>replacing its local plan owing to its own circumstances of having an out-of-date plan and a weak five-year housing land supply. JPAB agreed to a common Local Development Scheme which recognised the urgency of commencing a plan review, although other Core HMA councils subsequently struggled to maintain momentum towards meeting the LDS's early key milestones in plan production.</p>
<p>Unclear to what extent sites within the Growth Options document are responding to the strategic growth needs of the Nottingham HMA and whether there is likely to be unmet need within the area.</p>	<p>The strategic housing sites identified within the Growth Options consultation responds to Erewash's calculated housing need as set out by the Standard Method. As other evidence emerges around economic development and future employment trends, this will indicate whether any need exists to plan for greater housing provision. Future draft stages of the Local Plan can, if necessary, take this into account. The Growth Options consultation provided other Core HMA councils with an opportunity to state whether they felt there were likely to be unmet needs within the HMA which Erewash, or any other Core HMA council, may have been required to accommodate.</p>
<p>No evidence of joint working with Derby City or Derby HMA with regards to dealing with any unmet need or consequences of development on the fringe of the area which may be present.</p>	<p>The Derby HMA councils of Derby City, Amber Valley and South Derbyshire have been presented with an opportunity to submit evidence at this early stage of Local Plan consultation as to what is felt to represent an appropriate housing requirement for Erewash, including the identification of what scale of unmet need may exist and how the Council could assist with accommodating this figure. The Council has enjoyed a positive long-term relationship with Derby City and the two other Derby HMA councils; something that has extended to the production of joint evidence covering a range of planning matters. We therefore welcome their comments to the Growth Options consultation. Where proposed development is planned inside Erewash, but adjacent to the boundaries of neighbouring Derby HMA councils, the Council will work positively with these authorities, statutory stakeholders and key service providers to ensure the necessary infrastructure is provided for in order to create sustainable developments.</p>

Issue/Question:	Response:
<p>Acorn Way (SGA1) should contribute to the unmet housing needs of Derby City.</p>	<p>It is the responsibility of the Council to identify land within its jurisdiction which is able to contribute to satisfying its own identified housing needs. It is not up to the Council to provide land to satisfy the needs of other authorities. In any case, the land at Acorn Way represents an important component in helping to ensure new development in the west of the Borough – recognising need and demand in that area – whilst representing a sustainable approach to growth through the expansion of an existing conurbation.</p>
<p>Concern EBC have failed to ask other authorities to accommodate some part of other councils housing needs.</p>	<p>The Council has been open in asking, both in meetings of the Joint Planning Advisory Board (JPAB) and also formally in writing, other Nottingham Core Housing Market Area (HMA) councils whether they are in a position to assist in meeting Erewash's assessed housing needs. These requests have occurred during the consultation period for the Council's Growth Options stage. As yet, the councils asked have not yet been able to confirm their ability or willingness to accommodate any of the growth identified by the Council in its draft Local Plan.</p>
<p>Action taken by the Borough Council risks undermining the wider process of plan making across Greater Nottingham and places other Core HMA councils at risks of unsoundness. Advocates formal realignment.</p>	<p>Through the Growth Options consultation, the Council have demonstrated why it is urgent to progress at pace the replacement of housing policies contained within its now out-of-date Local Plan. The identification of preferred strategic housing sites adds much-needed certainty to where sustainable housing growth should occur in Erewash, whilst beginning to address notable shortcomings over the Council's five-year housing land supply figure. The Council does not share the view that its actions undermine the wider process of plan-making across Greater Nottingham. The development of a spatial hierarchy, underpinned by a draft sustainability appraisal (SA), has enabled the Council to identify sufficient land to meet its local housing needs figure.</p>
<p>The Borough Council's rigid approach to strategic site selections makes it more difficult for realignment to occur.</p>	<p>Strategic sites have been identified in conjunction with the development of a spatial hierarchy to guide housing growth towards the most</p>

Issue/Question:	Response:
	<p>sustainable locations across the Borough. It should be noted that all preferred sites identified by the Erewash Growth Options consultation conform to conclusions reached by the Greater Nottingham Growth Options study undertaken by consultants AECOM on behalf of Nottingham Core HMA councils. With the Council's identified sites assessed positively by AECOM's work this demonstrates that Erewash's preferred sites were justified in their selections (reaffirming the validity of the spatial hierarchy), and this would not prevent other councils from promoting positively assessed sites within their own areas. Whilst the Council do not currently advocate realignment of plans, the way it has arrived at its preferred sites is not thought to act as a barrier to a harmonisation of plans should this path be sought.</p>
<p>Erewash should be more integral to Derby due to social, housing and economic links.</p>	<p>The Council and, indeed, the Growth Options strategy recognises the strong relationship between the Borough and Derby City. This relationship has in part informed the identification of land for strategic growth at Acorn Way, adjacent to the existing Derby main urban area.</p>
<p>Relevance of HMAs now much weaker and lacking in providence with a Nottingham-orientated focus now flawed.</p>	<p>Regardless of any perceived change in policy emphasis away from Housing Market Area distinctions, the fact remains that the majority of Erewash's population continue to travel to Nottingham for work and indeed continue to experience strong connections with Nottingham in social and wider economic terms. The vast majority of the Borough's population are to its east – either physically connected to the Greater Nottingham extent (at Long Eaton and Sandiacre) or in very close proximity (at Ilkeston). Thus, the housing need of the Borough and the Greater Nottingham HMA remain intrinsically linked. The inclusion of land at Acorn Way adjacent to the Derby main urban area as part of the Growth Options strategy is evidence that the Council recognises the relationship between the Erewash and Derby City.</p>
<p>Other authorities should be asked to take some Erewash Housing Need.</p>	<p>The Council has approached neighbouring and other HMA authorities to formally ask whether they are able to accommodate any of Erewash's</p>

Issue/Question:	Response:
	housing need; this is a requirement of national planning guidance where growth is planned for Green Belt locations. As yet, neighbouring councils have yet to confirm whether they are able to accommodate any of Erewash's housing need.

Climate change:

Issue/Question:	Response:
Any new dwellings should have sustainability credentials over and above any existing statutory requirements.	Planning policy does not have the ability to require construction standards in excess of those prescribed within relevant national Building Regulations. However, the new Local Plan does provide an opportunity for policy to be incorporated which encourages – and potentially incentivises - sustainable design and this is a policy area which will be considered as part of future iterations of the emerging Local Plan, particularly with the necessity of transitioning to carbon neutrality by 2050. It is hoped that national standards of construction (including housebuilding) will 'raise the bar' in energy efficiency, and the Council would welcome the ability to develop progressive policies on this matter whilst operating within a national framework.
Use of Green Belt land for development will ultimately contribute to the higher costs associated with climate change including flooding and the failure of crops.	New development on areas at risk of flooding will be avoided. The sites proposed within the Green Belt are all identified as being at low risk of flooding. Despite the low risk levels, new development will be required to demonstrate that in flood risk terms it will remain safe for its lifetime and will not increase flood risk elsewhere. One way of achieving this is by incorporating appropriate drainage systems. A significant portion of the identified Green Belt land has never been, or is no longer farmed for crops. Even where farming continues, development of the proposed sites would result in loss of only Grade 3 quality agricultural land and lower; the majority being of Grade 4 (relatively poor quality) classification.

Issue/Question:	Response:
<p>Given current emphasis on climate change of protection of the environment, Erewash Borough Council should be protecting green land for future generations.</p>	<p>Much of the countryside referred to in its present form is private land and at best is only partially accessible to the public. There are opportunities as part of development to introduce green infrastructure assets – such as green corridors – which would be of significant value to the existing and future populations, helping to improve public access to green assets and the countryside beyond. The vast majority of Erewash Green Belt and the Borough’s countryside will remain intact, potentially with improved access to it for future generations to benefit from.</p>
<p>Air pollution will increase as a result of traffic implications from new development.</p>	<p>At a macro level, air pollution will not be impacted upon as those who would move into new developments within the Borough are very likely to be already driving vehicles and contributing to omissions. The sustainable choice of growth locations means there is an opportunity for a reduction in vehicle usage as services and facilities provided by existing settlements will be within close proximity. At a local level, there will be an increase in vehicles on the road network as a result of proposals; however any increase will be dispersed across the Borough rather than concentrated as a result of the proposed strategy and this will help to ensure any increases in air pollution within any single locality are minimised.</p>
<p>Flood risk is a significant concern particularly as a result of developing on existing green land.</p>	<p>New development on areas at risk of flooding will be avoided. The sites proposed within the Green Belt are all identified as being at low risk of flooding. New development on those sites will be required to demonstrate that in flood risk terms, it will be safe across its lifetime and will not increase flood risk elsewhere. This can be achieved by incorporating appropriate drainage systems.</p>

Due process:

Issue/Question:	Response:
The Options for Growth consultation is narrowly focused on housing.	The Options for Growth consultation has been specifically designed to focus only on considering the location and quantity of strategic housing sites within Erewash. It represents the first stage of a two-part approach to meeting Regulation 18. The second part will consider a range of other policy issues such as those relating to economic development, town centres and green infrastructure for example.
There is no consideration for employment growth, despite the Local Development Scheme stating this would be a facet.	The Options for Growth consultation has specifically been structured to focus only on considering the future location and quantity of strategic housing sites within Erewash. It represents the first stage of a two-part approach to meeting Regulation 18. The second part will consider a range of other policy issues such as those relating to economic development, town centres and green infrastructure for example. The Local Development Scheme considers these two sub-parts within the first stage of Local Plan production listed within it.
SA1 – SA presents incorrect spatial growth hierarchy and other approaches to delivering growth are more appropriate and sustainable.	Sustainability Appraisal is a subjective process. There are many ways to interpret evidence to inform its outcomes. The Council considers, that the spatial growth hierarchy presented is the most sustainable for the reasons outlined within the Sustainability Appraisal itself.
SA2 – SA too broad in its analysis and its resulting judgements are therefore failing to provide sufficient detail to properly engage with the Growth Options consultation.	The purpose of the Sustainability Appraisal at this first stage of plan-making was to consider the various concepts of growth options, not specific sites. It will be for further iterations of the Sustainability Appraisal to consider individual sites as their specific extents and characteristics emerge.
Failure of process in not incorporating HMA-wide evidence ahead of consulting on Growth Options.	The development of an evidence base is an iterative process and the current stage of the new Local Plan represents the very beginning of its evolution. The Council is engaged with the HMA in commissioning, delivering and incorporating evidence as it develops. The Council relied on its robust and in-house evidence to inform the broad spatial concepts presented in the Growth Options document and sees no reason why it

Issue/Question:	Response:
	should not have engaged with a Regulation 18 (Part 1) consultation on this basis.
Length of plan to 2037 queried. Shouldn't end-date be extended to help realignment with GNSP and assemble a more comprehensive evidence base?	The current length of plan corresponds to the anticipated date of adoption (December 2021) as per the council's Local Development Scheme. The Council currently has no plans to realign its draft Local Plan with the Greater Nottingham Strategic Plan (GNSP), so whilst it is inevitable that a revision to the LDS will be necessary to account for delays to the programme caused by the Covid pandemic, any change in the Erewash plan's period of coverage would not be influenced by the corresponding progress of the GNSP. Despite pursuing separate plans, the Council continues to work positively with its Core HMA partners on the commissioning and production of evidence base studies, and any small difference in the coverage of respective plans is not thought sufficient to undermine the comprehensiveness of a shared library of evidence.
Scope of consultation more aligned to Regulation 19 (Publication) than Regulation 18 (Issues & Options).	The identification of preferred strategic housing sites at this stage of the Local Plan does indeed bear similarities with a Regulation 19 document. However, for reasons explained elsewhere within this document, there was a clear need for the Council to demonstrate where its preferred locations for growth were right at the outset of the process in order to provide certainty in light of an out-of-date Local Plan and a significant deficiency in its five-year housing land supply. The Growth Options consultation was intended to 'start a conversation' about suitable locations for housing growth, with non-housing spatial planning matters to be addressed in a follow-up document to be separately consulted upon. Together, these two consultations would demonstrate compliance with Regulation 18 of the local planning regulations.
Why is there no Green Belt Review to justify growth options?	It should be noted that no explicit reference is made within national planning policy or guidance which commits a council to undertaking a Green Belt review as part of work to review a Local Plan. Whilst it has become common practice for authorities to undertake such work in

Issue/Question:	Response:
	<p>support of any development proposed for Green Belt locations, no direct requirement exists. The main justification of growth options in Erewash is based upon the development of a spatial hierarchy which provides a robust justification for the identification of strategic housing locations. The spatial hierarchy has been rigorously tested throughout the early stages of Sustainability Appraisal production and reaffirms an approach which sees the Council encourage as high a proportion of its local housing needs within non-Green Belt locations. Despite the absence of a formal Green Belt review, the Council has assessed the impacts both of preferred and rejected growth option sites as part of its suite of SGA assessments. In combination with the spatial hierarchy, the thorough site-based Green Belt appraisals are felt to represent sufficient justification for the de-allocation of GB to facilitate strategic housing development.</p>

Lack of evidence:

Issue/Question:	Response:
<p>The Options for Growth consultation does not provide any assessment of why the Borough Council has concluded that there are no exceptional circumstances that might justify an alternative approach (to the Standard Method calculation) in determining scale of housing provision. This concern is relevant also to where needs in other authorities might not be met. The Standard Method should be considered a starting point only.</p>	<p>The issue of whether or not exceptional circumstances exist which mean that the Borough is required to plan for additional dwellings will become apparent as evidence – both carried out independently and also in coordination with Housing Market Area partners – is developed through the process of developing the new Local Plan. The Growth Options consultation represents the very outset of this process and the Council is open to the possibility that exceptional circumstances may emerge as policy is further developed and refined based on the emergence of a wider evidence base.</p>
<p>The approach overall is based on a paucity of evidence.</p>	<p>The Council has produced a wide range of evidence which has helped form the Growth Options being considered within this initial stage of consultation. Clearly, the process of reviewing the Local Plan is a long one and this represents the very start. In the case of identifying preferred</p>

Issue/Question:	Response:
	<p>locations for growth in the Green Belt, for example, the Council considers there are very few options when considering the sustainability merits of the options as outlined within the Sustainability Appraisal. Whether or not the sites identified are eventually considered appropriate and thus form part of a new Local Plan will depend largely on the development of further evidence moving forward as the emerging Local Plan evolves. Other policy issues will be considered on an initial basis in a Part 2 Regulation 18 consultation and this will result from further evidence development which continues to become available in the interim.</p>
<p>Lack of any evidence regarding Statement of Common Ground (SoCG) made available as per Para 27 of the NPPF.</p>	<p>A SoCG is an iterative process which evolves over the duration of a Local Plan's production as priorities shift and new evidence emerges. There is no explicit need for the SoCG to be finalised and published at the Regulation 18 stage of Local Plan's development. The Council will engage with the SoCG process proactively over the period of time in which it produces its replacement Local Plan..</p>
<p>Growth Options documents is not based on any housing needs assessment/SHMAA.</p>	<p>The preferred sites identified by the Growth Options document are not based on or chosen in response to any assessment of specialised housing needs across the Borough. The production of policies which are expected to address various housing needs in Erewash is not generally carried out such an early stage of a Local Plan's production as these are not deemed to be locational in nature. The scale of housing numbers the Growth Options plans for responds instead to the local housing need figure calculated by the Government's standard methodology. As the plan evolves at later stages, its content will begin to reflect evidence from a Housing Needs Assessment carried out for the Nottingham Core HMA councils by consultants and published during 2020.</p>
<p>Criticism of conclusions of the deliverability over some of the sites in the 0-5 year tranche of SHLAA.</p>	<p>The Council maintains full confidence in the conclusions reached by the 2018 SHLAA in respect of each site's deliverability and their subsequent contribution to the overall distribution of housing growth as part of the spatial hierarchy of development. It is acknowledged that circumstances</p>

Issue/Question:	Response:
	can change in respect to individual sites over a period of time, with such changes managed through regular reviews of the SHLAA.
AECOM differences with the outcomes of the SA.	It is key to recognise that Sustainability Appraisal is a subjective process. There are many ways to interpret evidence to inform its outcomes. The Council considers that the spatial growth hierarchy presented is the most sustainable for the reasons outlined within the Sustainability Appraisal itself. Any differences in outcomes identified by those engaged with the process is for those individuals or organisations to justify; however, such differences in perceived outcomes does not necessarily determine that a spatial approach is less sustainable than another. Notwithstanding the Council's firm view that the approach presented represents the most sustainable, there is no requirement for a local planning authority to adopt <i>the</i> most sustainable approach, only that the approach adopted <i>is</i> sustainable.
The Growth Options document does not consider cumulative effects of all proposed sites being delivered.	Cumulative effects resulting from Local Plan proposals will be properly considered at a later stage of Local Plan production when site preferences become clear. These preferences will emerge in part in response to engagement at this stage of Local Plan consultation and will be led by further stages of Sustainability Appraisal which will be able to consider more detailed implications (including potential cumulative effects) from the preferred sites being taken forward in various combinations.

Utilities:

Issue/Question:	Response:
Concerns that utility network around SGA17 would not have capacity to cope with additional demands from the extra 300	A level of disturbance is always inevitable whenever large-scale development take place, although the Council will require any necessary

Issue/Question:	Response:
homes whilst work to expand the various networks would create sizeable disruption on local roads.	works to be programmed in such a way which results in the least possible inconvenience to local residents. The site of SGA17 sits in-between the urbanised area of Sawley and a notable cluster of built development at Trent Lock. As such, utility connections will already pass very close to, or directly under land north of Lock Lane allowing for its expansion should this be necessary.
Delays in upgrading sewage pipes to create more capacity around SGA7 would be compounded by additional homes in the area.	The Council will work closely with sewage and sewerage infrastructure providers over the course of the Local Plan's production to ensure that new large-scale development wherever this occurs does not exacerbate any existing deficiencies in the current network provision.
Important to ensure continuous engagement & dialogue with all utility providers.	The Council agrees with these comments and has built up good channels of ongoing dialogue with various utility providers.

Land ownership:

Issue/Question:	Response:
Concerns that the golf course is encroaching onto the neighbouring local wildlife site.	The Council recognise the close relationship between the golf course and the neighbouring local wildlife site. Development of SGA17 offers an opportunity through appropriate and creative landscaping measures to provide greater legibility between adjoining land-uses, which will help to safeguard the ecological value of the wildlife site.
Questions why current landowner can profit from the sale of the land and why the Council are facilitating this.	Land within the boundaries of SGA17 is privately-owned. As such, it is not for the Council to prevent any landowner from seeking to profit from land within their private ownership. Instead, it is the role of the planning system to determine what forms of land-use and development are suitable and sustainable rather than whether an individual should be able to profit, and to what degree, from their land.

Consultation:

Issue/Question:	Response:
Concern at consultation for Growth Options restarting during the pandemic.	In total, the Council consulted on its Growth Options consultation for six months, despite the original length of consultation scheduled to cover a 12 weeks/3 months period. At the point of the first national lockdown announced at the end of March, the consultation had already run for approx. 2 months and the Council had carried out a series of face-to-face community events across Erewash throughout January 2020 to publicise the proposals. Throughout lockdown, all materials were available to view online and the Council continued to encourage submissions to be made. Once reception areas in the Council's two Town Halls reopened to the public and restrictions on wider mobility through town centres were eased, the Council then allowed submissions to be submitted for a further month. It is felt the approach taken to engagement in light of COVID was flexible and enabled everyone who wished to formally comment on proposals the opportunity to safely do so.
Make filling in e-representation form easier.	The Council will look at simplifying the e-representation form in time for its next consultation concerning the Local Plan review and it welcomes suggestions from any stakeholder as to how this can be achieved. The Council does have to capture some key information however in order for a representation to meet a standard in which it can be accepted.