

Option 6: Allocation of strategic employment zones in Erewash, plus the allocation of new employment land south of West Way (off Low's Lane)

Performance: Sustainability Appraisal Objective	Question	Performance: Policy Criteria Questions	Ratings: Criteria Question	Ratings: Objective
1. Housing To ensure that the housing stock meets the housing needs of the population, including gypsies, travellers and travelling showpeople.	1. Will it increase the range and affordability of housing for all social groups?	There are limited demonstrable linkages between the range and affordability of housing across social groups and the Local Plan's protection of strategic employment zones supplemented by the allocation of an employment site at West Way. It is not expected that an allocation here would have any impact on this specific question.	Neutral 0	Neutral 0
1. Housing To ensure that the housing stock meets the housing needs of the population, including gypsies, travellers and travelling showpeople.	2. Will it provide sufficient pitches and plots for gypsies and travellers and travelling showpeople?	The Local Plan's identification of existing strategic employment zones, supplemented with the allocation of an employment site at West Way would not be a mechanism to provide the single pitch required to meet the Borough's assessed accommodation needs of gypsies, travellers and travelling showpeople. In any case, employment sites, either existing or new, are not normally suitable locations for locating any form of residential accommodation given the poor amenity and remoteness to key services.	Neutral 0	
1. Housing To ensure that the housing stock meets the housing needs of the population, including gypsies, travellers and travelling	3. Will it reduce homelessness?	The identification of strategic employment zones plus the allocation of new employment space in the Local Plan for a site at West Way would not help, nor be expected to, reduce homelessness in Erewash.	Neutral 0	

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showpeople.				
1. Housing To ensure that the housing stock meets the housing needs of the population, including gypsies, travellers and travelling showpeople.	4. Will it reduce the number of unfit/vacant homes?	There are limited, if any, demonstrable connections that show the identification of strategic employment zones plus the allocation of new employment space at West Way would contribute to any reduction of unfit/vacant homes in the Borough.	Neutral 0	
1. Housing To ensure that the housing stock meets the housing needs of the population, including gypsies, travellers and travelling showpeople.	5. Will it provide the required infrastructure?	The allocation of a range of strategic employment zones plus the allocation of a new employment location at West Way would not be expected to provide infrastructure which would also help to support the provision of new homes. The identification of existing employment sites is to largely ensure their continuation in that use, whereas the West Way site is located in an area predominantly surrounded by employment and industrial uses, and is also of a size which would not be expected to support improvements in any form of off-site infrastructure.	Neutral 0	
2. Employment and Jobs To create employment Opportunities.	1. Will it improve the diversity and quality of jobs?	The combination of identifying existing strategic employment zones with the allocation of an employment site at West Way would make a modest contribution to increasing the diversity and quality of jobs in the Borough. The addition of approximately 2.4ha of employment land at this location offers a limited opportunity to attract new businesses to the site,	Neutral 0	Neutral 0

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		creating employment opportunities and allowing for modest levels of inward investment. The scale of the site, whilst large enough to welcome a reasonable range of new businesses, is still only a minor addition to the identified employment land across the Borough supplementing that which exists at the strategic employment zones – resulting in only a negligible effect.		
2. Employment and Jobs To create employment Opportunities.	2. Will it reduce unemployment?	The scale of employment opportunities available through the protection of existing strategic employment zones and the allocation of approximately 2.4ha of new employment land at West Way will create a small number of new jobs in an area which has historically provided for high level of employment. Whilst there is no guarantee that those currently unemployed would find work at a site which will be a modest source of new employment, the generation of a small number of jobs (although linked to logistics operations) at an allocated site at West Way - in addition to the safeguarded jobs at existing strategic employment sites, would help to provide a minimal increase in job availability in general and provide a wider number of routes back into employment for those currently out of work.	Neutral 0	
2. Employment and Jobs To create employment Opportunities.	3. Will it improve rural productivity in terms of employment opportunities?	The identification of strategic employment zones and the addition of an employment allocation in a historically industrial area will not automatically improve rural productivity in terms of employment opportunities. Only a small proportion of the Borough's strategic	Neutral 0	

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		employment sites are located within the rural areas of Erewash. Protecting these locations, whilst promoting a new source of employment at West Way, will only serve to maintain the current levels of rural productivity. Changes in rural productivity (e.g. agricultural diversification of existing facilities) is more likely to drive a broadening of employment opportunities than the safeguarding of strategic employment areas in the Borough's rural locations.		
3. Economic Structure and Innovation To provide the physical conditions for a high quality modern economic structure including infrastructure to support the use of new technologies.	1. Will it provide land and buildings of a type required by businesses?	Safeguarding strategic employment zones will make only a limited impact in providing land and buildings required by businesses due to the lack of growth available at most of the locations. However, the addition of an employment allocation at West Way offers an opportunity to deliver a modest range of buildings at a general location with strong links to established industrial operations. The potential to deliver new development at West Way could enable the provision of a limited range of modern, functional and flexible employment premises. With the HS2 project north of East Midlands Parkway now formally scrapped, the need to relocate businesses who were both directly and indirectly impacted by the line's construction is now not as acute. At 2.4ha, the size of the site at the potential allocation is limited. Whilst offering some scope to make available a small amount of new land and buildings for those who occupy some of the Borough's many older, aging employment premises, it is also important to consider that the extent of new	Major negative -2	Major negative -2

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		employment land that would be delivered through this policy option falls substantially short of the amount of new employment space required advised by up-to-date evidence on employment land needs, strongly impacting on the Borough's ability to oversee economic growth.		
3. Economic Structure and Innovation To provide the physical conditions for a high quality modern economic structure including infrastructure to support the use of new technologies.	2. Will it provide business/university clusters?	Whilst unlikely that university-based clusters will form either on any of the existing strategic employment zones or on an allocated employment site at West Way, largely owing to the distance away from established university's in the neighbouring cities of Nottingham and Derby, there is limited scope for business clusters to take advantage of new employment premises provided at the allocation. The modest size of the site, and its location amongst wider industrial uses also restricts potential. With many existing premises in the Borough incapable of physical expansion, the provision of new employment units on an approximately 2.4ha site does offer a small amount of potential for the clustering of new or relocating businesses.	Neutral 0	
3. Economic Structure and Innovation To provide the physical conditions for a high quality modern economic structure including	3. Will it create jobs in high knowledge sectors?	It is unlikely that the allocation of strategic employment zones by itself will create jobs in high knowledge sectors, but the allocation of an employment site at West Way may have limited scope in attracting businesses operating either partially or fully in high knowledge. This is restricted however by the small site size, and whilst logistics operations are moving towards	Neutral 0	

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infrastructure to support the use of new technologies.		high knowledge sectors, development itself would not guarantee the delivery of jobs against this objective. The existing economic profile of Erewash suggests a market demand for more traditional industrial operations and premises as opposed to sectors such as education, finance, insurance, communications and health - which typically are based in office accommodation. This also contributes to the assessed level of impact against this objective.		
3. Economic Structure and Innovation To provide the physical conditions for a high quality modern economic structure including infrastructure to support the use of new technologies.	4. Will it encourage graduates to live and work within the Plan area?	Merely identifying strategic employment zones across the Borough will not in its own right encourage graduates to live and work within the plan area. The Borough is not home to large concentrations of graduates studying at university institutions, although the Broomfield Campus near Breadsall does provide a satellite campus for Derby University. Naturally, some graduates from universities will find jobs within Erewash (including graduates who live with their families in Erewash but attend universities elsewhere), but there is no connection between this activity and the identification of strategic employment zones. The addition of an employment allocation at West Way may improve the prospects of some graduates living and working in the plan area, but the modestly sized site diminishes the impact land here could potential have.	Neutral 0	
3. Economic Structure and Innovation	5. Will it provide the required infrastructure?	A combination of recognising the importance of strategic employment zones and the allocation of a new source of employment land at West Way will in	Neutral 0	

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To provide the physical conditions for a high quality modern economic structure including infrastructure to support the use of new technologies.		combination help go a small way towards providing the availability of infrastructure allowing for the Borough's economic growth. The provision of an employment location at West Way would contribute towards meeting the Borough's general employment needs. However, the limited size of the potential allocation will not fully help the Borough in terms of providing for a wide range of businesses who may wish to relocate due to the condition of current premises or upscaling/expansion.		
4. Shopping Centres Increase the vitality and viability of existing shopping centres.	1. Will it encourage the vitality of the city centre, town centre, district centre or local centre?	It is unlikely that this policy option individually would encourage greater vitality within Erewash's existing hierarchy of shopping centres. However, the identification of strategic employment zones would play a part in safeguarding such areas from pressures to locate main town centre uses upon them. This would help to retain main town centre uses in sequentially-preferable locations. The potential to allocate an employment site at West Way would have a negligible impact in supporting any nearby centre, due to the limited size of site and modest creation of new premises, whilst the nearest centre (Sandiacre Local Centre) being approximately 2.3km away also confirms a lack of any direct linkage to trade.	Neutral 0	Neutral 0
5. Health and Wellbeing To improve health and wellbeing and reduce health inequalities.	1. Will it reduce health inequalities?	It is unlikely that the combination of identifying strategic employment zones and the allocation of an employment allocation at West Way will on its own make any contribution towards reducing health inequalities for the Borough's population.	Neutral 0	Neutral 0

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5. Health and Wellbeing To improve health and wellbeing and reduce health inequalities.	2. Will it improve access to health services?	This potential policy approach would have little, if any, impact on improving an individual's access to local health services. However, the option would not in any way help prejudice the ability to meet the objective/question either.	Neutral 0	
5. Health and Wellbeing To improve health and wellbeing and reduce health inequalities.	3. Will it increase the opportunities for recreational physical activity?	It is unlikely that this potential policy option would have much impact on increasing opportunities for recreational physical activity. Employment sites identified by the policy are recognised for their contribution to the Borough's economy, and with limited scope to reconfigure these locations, opportunities against this objective are minimal. Allocation of a site at West Way potentially has some ability to form links to the route of the Nutbrook Trail, accessed through the Stanton Regeneration Site – which would offer future workers an opportunity to utilise the route to access the employment facilities and thus help individuals to link their commuting needs with a recreational pursuit.	Neutral 0	
5. Health and Wellbeing To improve health and wellbeing and reduce health inequalities.	4. Will it provide new open space or improve the quality of existing open space?	This policy approach would not secure any new forms of open space or improve the quality of open space which currently exists in Erewash solely as a result of identifying strategic employment zones. The existing open space network is remote to this potential employment allocation. A small employment allocation at West Way is therefore unlikely to result in delivering open space within the extent of the site, with the likely	Neutral 0	

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		outcome being the provision of incidental open space to improve the layout and setting of the allocation.		
5. Health and Wellbeing To improve health and wellbeing and reduce health inequalities.	5. Will it improve access to local food growing opportunities?	This policy option would not realistically be expected to improve access to local food growing opportunities. The land is fragmented from surrounding agricultural areas being situated between the M1 motorway and an industrial area, Therefore this has been assessed as having no impact on the objective.	Neutral 0	
6. Community Safety To improve community safety, reduce crime and the fear of crime.	1. Will it reduce crime and the fear of crime?	The identification of strategically important employment zones across Erewash is unlikely to have any bearing on influencing any reductions of crime and the fear of crime. The allocation of an employment site at West Way would utilise land sandwiched between the M1 motorway and existing industrial premises that is presently undeveloped. The possible development of employment premises at the site will potentially create facilities that are more of a target for crime (theft, criminal damage etc.) than criminal activity presently across the site, so it is likely that the policy would lead to a slight increase in crime and the fear of crime.	Minor negative -1	Major negative -2
6. Community Safety To improve community safety, reduce crime and the fear of crime.	2. Will it contribute to a safe and secure built environment?	The identification of strategic employment zones around Erewash may be able to serve as a basis for existing (or future) occupants to make investments in the modernisation of facilities. Part of which may improve the safety and security of individual premises or wider employment areas more generally. The addition of new employment stock as part of a	Minor negative -1	

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		modestly-sized employment allocation at West Way provides an opportunity to secure the creation of a safe and secure built environment. Although as stated in Q1, the change from a greenfield site to one accommodating a range of employment units will create a location which may, through its urbanising, become a target of criminal (theft of fleet vehicles, equipment, damage to property etc.) and anti-social behaviour – although the latter is more unlikely due to the lack of nearby resident population.		
7. Social Inclusion To promote and support the development and growth of social capital and to improve social inclusion and to close the gap between the most deprived areas within the plan area.	1. Will it protect and enhance existing cultural assets?	This course of policy action is unlikely to have much by way of an impact on the protection and enhancement of cultural assets on the strategic employment zones around Erewash. Most areas likely to be protected by the policy are fairly unexceptional in the diversity of uses – which typically consist of functional, utilitarian industrial premises. An employment allocation at West Way would utilise an area of undeveloped land, so there would be no loss of existing cultural assets, but nor would there be any greater reliance upon nearby cultural assets close to the allocation.	Neutral 0	Neutral 0
7. Social Inclusion To promote and support the development and growth of social capital and to improve social inclusion and to close the gap between the	2. Will it improve access to, encourage engagement with and residents' satisfaction in community	A combination of allocating strategic employment zones and an allocation site at West Way will not improve access to, encourage greater engagement with and residents' satisfaction in community facilities. This outcome is mainly driven by the site's remoteness from any nearby concentrated residential population.	Neutral 0	

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most deprived areas within the plan area.	activities?			
7. Social Inclusion To promote and support the development and growth of social capital and to improve social inclusion and to close the gap between the most deprived areas within the plan area.	3. Will it increase the number of facilities e.g. shops, community centres?	This is unlikely. The protection of strategic employment zones will first and foremost safeguard identified areas from non-employment uses. It is expected that existing areas of industry will support local facilities with workers using nearby retail, but the lack of space on protected sites limits scope for expansion to the extent that sizeable increases in employees would support, or require, increases in shops or community centres. The addition of employment facilities at an allocation at West Way would help provide only minimal, if any, support for shops (particular those selling convenience-based goods) given the remoteness of the allocation from nearby shopping centres. The allocation itself would not be expected to act as a catalyst for additional community facilities such as new shops, public houses etc.	Neutral 0	
7. Social Inclusion To promote and support the development and growth of social capital and to improve social inclusion and to close the gap between the most deprived areas within the plan area.	4. Will it provide for the educational needs of the population?	The provision of an employment allocation at West Way is unlikely to play any more of a role in providing for the Borough's educational needs than the other element of the policy option which involves allocating strategic employment zones around Erewash. The delivery of a modest number of new jobs at the employment allocation would be expected to provide jobs for those with varying skills, experience and qualifications, from low-skilled labour to more specialised forms of knowledge – although the limited	Neutral 0	

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		size of site does temper the level of opportunity.		
8. Transport To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to improve travel choice and accessibility.	1. Will it use and enhance existing transport infrastructure?	An approach which protects strategic employment zones around Erewash will continue to rely on the existing transport infrastructure in place to support the movement of employees and goods/supplies to and from major areas of employment, resulting in status quo. A new employment allocation at West Way will continue to use roads, but largely Low's Lane, for employees and trade-related traffic to access industrial facilities. The Stanton regeneration area which is broadly north-west of the possible allocation has a long history of traffic connected to the historic industrial operations. Whilst issues with local roads have been accentuated by HGV travel, restriction measures have been introduced to prevent inappropriate journeys along local country lanes. At 2.4ha, it is unlikely that potential development would create the critical mass required to enhance existing transport infrastructure. However, the location of the site within what may be a considered a greater Stanton functional employment area would not result in significant strain on existing roads.	Neutral 0	Minor negative -1
8. Transport To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve	2. Will it help to develop a transport network that minimises the impact on the environment?	Similarly to the above, it is unlikely that the safeguarding of strategic employment zones around the Borough would help develop a network which minimises impacts on the environment – particularly with embedded trip behaviour. However, the allocation of an employment site at West Way might make a	Neutral 0	

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accessibility to jobs and services for all and to improve travel choice and accessibility.		modest improvement to very localised aspects of the transport network (junction improvement between West Way and Low's Lane for example). But the limited scale of the potential allocation means that impacts on the wider transport network would be minimal, with contributions to the transport network of a minor scale. The formation of legible links between the site and the Nutbrook Trail (enabling non-motorised access) would represent a positive step – although the indirectness of route to achieve access presents issues which limits this possibility.		
8. Transport To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to improve travel choice and accessibility.	3. Will it reduce journeys undertaken by private car by encouraging alternative modes of transport?	The option when taken as a whole will likely give rise to a modest net increase of trips owing to the potential creation of approximately 2.4ha of new employment land. Access to public transport is rather limited with no bus routes passing the site and a current indirect route required to reach the Nutbrook Trail. The potential development of the site would not see a reduction in private car journeys, with the site's relative isolation from the public transport network likely to see additional car journeys from employees needing to access their place of work. In terms of the other element of this policy option, scope is limited as existing businesses are likely to be outside the remit of a policy which aims to foster more sustainable travel through alternative transport – although a shift to more sustainable travel practices amongst staff may be economically desirable to the individual companies based here.	Minor negative -1	

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8. Transport To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to improve travel choice and accessibility.	4. Will it increase accessibility to services and facilities?	The option would not see any increase in accessibility to existing services and facilities. The safeguarding of strategic employment zones will not in itself achieve this, nor would the provision of a new employment allocation at land at West Way. The objective/question would not be achieved owing to the locality of the site, existing relatively remotely from nearby concentrations of resident populations.	Neutral 0	
9. Brownfield Land To make efficient use of brownfield land and recognise biodiversity value where appropriate.	1. Will it make efficient use of brownfield land?	The identification of key strategic employment zones continues to make efficient use of brownfield land. The majority of land within such locations is brownfield, so the limited scope for further development – either via estate modification/modernisation of stock, or the modest grow-on expansion that may be possible, will help to continue the maximisation of brownfield land. However, the positive impact of this element of the option is negated somewhat by a potential employment allocation at West Way. This would incorporate around 2.4ha of greenfield land adjacent to Low's Lane and M1 motorway. Whilst built forms of development surround the potential allocation, the land remains greenfield/undeveloped, meaning new employment uses fail to meet the objective.	Minor negative -1	Major negative -2
9. Brownfield Land To make efficient use of brownfield land and	2. Will it minimise impact on the biodiversity	The impact of identifying existing strategic employment zones on biodiversity is limited. The other element of the option which sees the potential allocation of an	Minor negative -1	

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recognise biodiversity value where appropriate.	interests of land?	employment site at West Way could have more impact on biodiversity assets and ecological interests. There are no statutory or non-statutory environmental designations at the site of the potential employment location, although this represents one of the few areas of undeveloped land on the northern side of Low's Lane before an extensive area of redevelopment is reached. Its undeveloped status is likely to see minor impacts on low-level habitat evident across the site.		
10. Energy and Climate Change To minimise energy usage and to develop low-carbon energy resource, reducing dependency on non-renewable sources.	1. Will it result in additional energy use?	Yes. Whilst identifying strategic employment zones around Erewash wouldn't individually result in any abnormal alterations in the use of energy, the allocation of land to allow for the development of an employment site at West Way would undoubtedly lead to additional energy being used to serve the new business premises to be constructed at a possible allocation.	Minor negative -1	Minor positive +1
10. Energy and Climate Change To minimise energy usage and to develop low-carbon energy resource, reducing dependency on non-renewable sources.	2. Will it improve energy efficiency of the building stock within the Plan area?	The policy option of identifying strategic employment zones will not directly improve or impact upon the energy efficiency of new buildings. As other council evidence demonstrates (2018 Erewash Employment Land Survey (EELS)), minimal space exists for the construction of new facilities at virtually all major employment locations throughout the Borough. Only the replacement of stock, either small or at a large-scale, will bring about better standards of energy efficiency – and this policy option cannot guarantee individual premise owners will commit to such	Minor positive +1	

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		investment. The development of new employment premises as part of an allocation at West Way would no doubt result in the delivery of more energy efficient units. The scale of the potential development would add a modest number of new buildings to those already present in Erewash. As such, an allocation would be contributing to a small, yet positive move towards creating a more energy efficient stock of employment premises in the Borough.		
10. Energy and Climate Change To minimise energy usage and to develop low-carbon energy resource, reducing dependency on non-renewable sources.	3. Will it support the generation and use of renewable energy?	At those locations identified by this option, it may prove economically unviable to retrofit technology which would allow businesses to increase their reliance on and use of renewable energy – either as a result of their direct production or by utilising it from other nearby sources. This is due to the aging profile of employment stock at Erewash’s strategic employment zones. However, there is some scope for new business and industrial premises delivered as part of an allocation at West Way to support the generation and use of renewable energy – largely due the potential to deliver a number of new employment premises. However, the scale of development would only be negligible when compared to the existing industrial stock across the Borough – limiting the extent to which the allocation could support this objective.	Neutral 0	
10. Energy and Climate Change To minimise energy	4. Will it support the development of community energy	This is unlikely to be the case at those strategic employment locations allocated around the Borough due to the established relationship they would have	Neutral 0	

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usage and to develop low-carbon energy resource, reducing dependency on non-renewable sources.	systems?	with where their energy is sourced from. The relatively small size of potential allocation at West Way limits the extent of scope to utilise energy from community systems. Without forming part of a larger, wider area of development that draws energy from a system, it is unlikely a modestly sized development could provide sufficient support. The initial costs of developing and introducing a network could however be costly and possibly impact on the viability of an employment development. No information in regard to this has been provided by the site promoter.		
10. Energy and Climate Change To minimise energy usage and to develop low-carbon energy resource, reducing dependency on non-renewable sources.	5. Will it ensure that buildings are able to deal with future changes in climate change?	The majority of existing industrial and business stock on sites likely to be identified as allocations are dated, yet largely operationally sound. It will be down to individual occupants, along with the owners of buildings/units to consider whether their facilities can cope with future climatic changes, resulting in investment decisions being required to commit to retrofitting for building resilience to climate change being a business-by-business matter outside the scope of such a policy approach. The potential construction of a number of new employment units as part of a West Way employment allocation will present an opportunity for this element of the Borough's stock to be built to modern construction standards that would be expected to demonstrate better resilience to future alterations in climatic conditions.	Minor positive +1	

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11. Pollution and Air Quality To manage air quality and minimise the risk posed by air, noise and other types of pollution.	1. Will it increase levels of air, noise and other types of pollution?	It is unlikely that the allocating of existing strategic employment areas in Erewash will lead to any increases of pollution given it only protects the employment uses. Any future development resulting from allocating an employment site at West Way has some scope to increase pollution levels given it is creating new buildings and generating additional vehicular trips to that destination from employees and trade-related uses. However, it is important that both the future construction phases and ongoing existence of the employment facilities when built demonstrate as high an environmental performance as possible.	Minor negative -1	Minor negative -1
12. Flooding and Water Quality To minimise the risk of flooding and to conserve and improve water quality.	1. Will it minimise or mitigate flood risk?	Identifying strategic employment zones won't by itself help minimise or mitigate flood risk. The formal recognition of essential business clusters through the Local Plan may however help to make a stronger case for obtaining external funding to finance mitigation/flood defence measures and ease the risks/dangers of flooding to businesses. The impact of allocating an employment allocation at West Way is not believed to have any significant impacts on existing flood risk outlines. Data from the most recently produced SFRA covering the Greater Nottingham area shows the area at low risk of flooding with all land located within Flood Zone 1. However, development of a greenfield location, particularly at a reasonable scale which incorporates 2.4ha of undeveloped land, may impact local drainage conditions and affect ground permeability (particularly in close vicinity to the River Erewash/Erewash Canal),	Neutral 0	Minor negative -1

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		raising the importance of soakaway and other sustainable drainage features as part of a controlled discharge of surface water.		
12. Flooding and Water Quality To minimise the risk of flooding and to conserve and improve water quality.	2. Will it improve water quality?	The policy option is unlikely to have any impacts on water quality. The identifying of key concentrations of industrial and business uses in Erewash won't by itself help to achieve improvements to water quality. The possible allocation of an employment site at West Way wouldn't by itself be expected to improve water quality – but more importantly should not result in any deterioration in water quality standards. The discharge of water from employment areas should occur into the existing, or in the event of development, an improved drainage system, - so wastewaters are extremely unlikely to flow directly off-site into existing watercourses in an unregulated, uncontrolled manner.	Neutral 0	
12. Flooding and Water Quality To minimise the risk of flooding and to conserve and improve water quality.	3. Will it conserve water?	This is unlikely. Any steps which concern the conservation of water at strategic employment locations allocated by the policy are more likely to arise from investments leading to the modernisation of individual industrial operations that as a consequence help to use water resources more efficiently. But the policy cannot influence reductions in water usage in isolation, and the allocation of an employment site at West Way which would likely involve the construction of several new units is inevitably going to result in greater water usage than current volumes. Even if new industrial/business stock is built to advanced building standards which	Minor negative -1	

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		results in a more efficient use of water resources, the supply of water to a larger number of premises will see a notable increase in demand.		
12. Flooding and Water Quality To minimise the risk of flooding and to conserve and improve water quality.	4. Will it improve or help to promote water efficiency?	This is unlikely. To reiterate commentary for 12(3) above, matters of modernising to promote water efficiency would be taken on a business-by-business basis in conjunction with any operational/cost requirement to reduce reliance on water resources – helping to benefit economic and environmental conditions. Merely identifying key employment zones around the Borough won't in its own right help with delivering this objective, although the allocation of an employment site at West Way business and industrial premises constructed against higher building standards than the vast majority of existing facilities around the Borough. This additional new stock, albeit of a modest scale, will help promote better water efficiency, but is unlikely to result in wholesale improvements across all employment areas covered by this policy option.	Neutral 0	
12. Flooding and Water Quality To minimise the risk of flooding and to conserve and improve water quality.	5. Will it cause a deterioration of Water Framework Directive status or potential of on-site watercourses?	This is unlikely. Discharges from premises located within Erewash's strategic employment zones being identified by this policy approach are likely to be subject to licencing arrangements with the Environment Agency. With the policy identifying zones to protect them from future pressure for non-employment uses, the objective would be outside the scope of what the policy aims to achieve. An employment site at West Way would not be expected to result in deterioration of	Neutral 0	

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		WFD status or any on-site watercourse – particularly as there are no watercourses which pass through the site. A potential allocation would expect to deliver a scheme which carefully controls waste discharges into the existing sewerage system. As such, it is unlikely a future development would utilise any existing watercourses around the periphery of the allocation to discharge wastewater into.		
12. Flooding and Water Quality To minimise the risk of flooding and to conserve and improve water quality.	6. Will it cause any harm to a Source Protection Zone or the water environment?	None of the proposed strategic employment designations, plus the addition of an employment allocation at West Way sit within any of the three main areas associated with SPZs. With all existing employment locations well-established and some inevitably subject to regulatory requirements over industrial discharges as a result of their operations, then it is unlikely any impacts would arise on the water environment as a whole. A new industrial location at West Way would necessitate a need for fairly major and comprehensive drainage infrastructure – although given industry exists directly adjoining the site, connections to the drainage network are thought to be entirely possible to achieve.	Neutral 0	
13. Natural Environment, Biodiversity, Green & Blue Infrastructure To increase biodiversity levels and protect and	1. Will it help protect and improve biodiversity and avoid harm to protected species?	A combination of identifying strategic employment zones in Erewash and allocating a new employment allocation at West Way has limited scope to improve biodiversity. The character of the existing zones are industrial in nature, and whilst biodiversity and industry can, and often does co-exist, identifying strategic	Neutral 0	Minor negative -1

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enhance Green and Blue Infrastructure and the natural environment.		locations isn't by itself a policy approach which can achieve these objectives around biodiversity gain. The development of an employment allocation at West Way would utilise a modest amount of greenfield land (approximately 2.4ha). The land, isolated from other open areas as a result of modern development and with recent evidence of being farmed, does not display any particularly strong links to biodiversity and ecology. A combination of hedgerow and hedgerow trees border the site, and will support low-level biodiversity – particularly birds. The development of this land, regardless of the absence of statutory or non-statutory designations, would impact on the ecological cycle. Development will also be subject to the lawful requirement for BNG, and this could be a driver for a general improvement of ecological conditions and enhanced biodiversity. Without detailed survey, it is unknown whether protected species reside on land at West Way.		
13. Natural Environment, Biodiversity, Green & Blue Infrastructure To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	2. Will it allow for biodiversity net gains?	A combination of identifying strategic employment zones in Erewash and allocating a new employment allocation at land at West Way displays limitations in how biodiversity net gains may be potentially achieved. With BNG now a legal requirement, development of land at the potential allocation would be required to support a 10% increase in net biodiversity. Opportunities to deliver gains at the existing employment areas are limited, and the modest size of land at West Way adds slight complications to the	Minor negative -1	

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		ability to achieve this on-site. The creation of new employment has some scope to introduce as part of its design conditions throughout an allocated area where biodiversity can co-exist with the various buildings and employment uses. However, the development itself would in all likelihood struggle to demonstrate the sufficient gain necessary to meet emerging requirements around this planning objective. Whilst the allocation itself would find it difficult to deliver net gain due to the modest area under assessment, there is scope to consider how nearby areas can benefit with any gain secured off-site to meet obligations now required by BNG.		
13. Natural Environment, Biodiversity, Green & Blue Infrastructure To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	3. Will it conserve and enhance the geological environment?	A combined policy approach allocating existing strategic employment sites and allocating a new strategic employment allocation at West Way has limited scope to enhance the geological environment. Existing and established employment zones protected by this policy would be expected to continue operating upon the land they are sited upon. The geological conditions around the centre of the Borough where the potential strategic allocation is sited show known legacy mining activity as well as existing reserves of coal. Information from The Coal Authority show development in mid-Erewash may raise concerns about their structural safety resulting from a potentially unstable geology. However, future development at land at West Way would only be subject to standard conditions from TCA, indicating that no adverse	Neutral 0	

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		impacts would be likely from possible development.		
13. Natural Environment, Biodiversity, Green & Blue Infrastructure To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	4. Will it maintain and enhance woodland cover and management?	Neither the allocation of existing strategic employment sites nor the allocation of a new employment allocation at West Way would have any impact on woodland cover and management owing to an absence of existing coverage. Whilst some trees are found around the periphery of the site, none are covered by preservation orders. In the event of future development, it is expected these would be retained as part of surrounding hedgerow, meaning little effect would result against this objective/question.	Neutral 0	
13. Natural Environment, Biodiversity, Green & Blue Infrastructure To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	5. Will it provide new open space or green space?	An approach which seeks to allocate existing areas of strategic employment land would not be expected to provide new open/green space owing to space limitations at the vast majority of these locations. However, an allocation of new employment land at West Way may have some limited scope to incorporate new open/green spaces as part of any future development. As already explained, the appropriate introduction of green space can significantly benefit the setting of a new employment facility, offering opportunities for workers to enjoy such assets and encourage biodiversity at locations across the allocation. The role and purpose of any new open/green space would realistically be limited to that which helps provide appropriate landscaping for on-site facilities (given the lack of nearby resident population), so there would be doubt as to how inclusive and	Neutral 0	

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		useable these areas might be to nearby residential populations - limiting the potential to deliver such assets.		
13. Natural Environment, Biodiversity, Green & Blue Infrastructure To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	6. Will it improve the quality of existing open space?	Neither the allocating of existing employment sites nor the allocating of land at West Way is likely to improve the quality of existing open space. Little, if any, open space can be found at Erewash's existing employment sites other than incidental areas of landscaping and buffers separating facilities from adjacent residential areas. No open space currently exists at the land at West Way, with the land currently in private ownership.	Neutral 0	
13. Natural Environment, Biodiversity, Green & Blue Infrastructure To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	7. Will it encourage and protect or improve Green and/or Blue Infrastructure networks?	The allocation of existing employment sites of a strategic scale would not be expected to encourage the protection or improvement of green and/or blue infrastructure networks. The allocation at land at West Way does however offer limited scope to strengthen connections to the nearby Nutbrook Trail multi-user recreational trail which runs between the Erewash Canal and Heanor – although linkages would be indirect. An employment allocation may provide a catalyst for increased usership of the Trail, which at its eastern end links to the Erewash Valley Trail. Any future development of employment facilities at West Way would benefit from the establishment of stronger sustainable non-motorised travel links which the enhancement of a section of GI would bring – giving greater choice of access to employees.	Neutral 0	

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14. Landscape and Built Environment To protect and enhance the landscape and townscape character, including heritage and its setting and enhancing the place through good design.	1. Does it respect or preserve identified landscape character?	The identification of strategic employment zones has only a loose connection to respecting and preserving identified landscape character. Much of the stock within these zones are of functional, utilitarian appearance that contributes little towards any identified landscape character. Some zones display an industrialised landscape character, but the protection of these, and other, strategic sites has little bearing by itself on protecting valued landscape. This is recognised by the Derbyshire Landscape Character Assessment identifying these areas as 'Urban'. An allocation at land at West Way would be located within the defined Coalfield Village Farmlands character type, forming part of a wider Notts, Derbys & Yorkshire Coalfield character area. The potential allocation site is isolated from surrounding land which fulfils the character type and area far more strongly. Recent industrial development north and east of the site, combined with the surrounding road pattern which sees land bordered by Low's Lane, West Way and the M1 motorway, results in the site making little contribution to the assessed landscape characteristics. As such, a potential allocation would not impact greatly with the identified landscape character.	Neutral 0	Minor negative -1
14. Landscape and Built Environment To protect and enhance	2. Does it have a positive impact on visual amenity?	Similarly to the commentary immediately above, the allocation of existing areas of strategically important employment would not affect visual amenity other than	Minor negative -1	

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the landscape and townscape character, including heritage and its setting and enhancing the place through good design.		to largely safeguard the industrial character evident at and around these locations. The possible addition of employment units at West Way would have some minor impacts on visual amenity, with the land representing the last remaining undeveloped area of land between the wider Stanton regeneration area and the M1 motorway. This does provide a more open approach to a much wider zone of employment when travelling north, so the development of land would have some detrimental impact on visual amenity by further intensifying the built environment immediately north/north-west of the M1.		
14. Landscape and Built Environment To protect and enhance the landscape and townscape character, including heritage and its setting and enhancing the place through good design.	3. Will it maintain and/or enhance the local distinctiveness of the townscape or settlement character?	The policy option looks to protect the employment characteristics of strategic sites around the Borough whilst allocating new employment land at West Way. The first element of the option will help manage the continued presence of industry and business in established locations around the Borough. The approach being tested does not have any direct impact on local distinctiveness other than to preserve a largely industrial character, but its objective to protect areas of employment might indirectly help to maintain the current appearance of these locations. As indicated by 14(1) and 14(2), the allocation and development of an employment site at West Way would result in only limited visual changes in the character of the immediate area around the site. Similarly to most other modern employment areas, these facilities do not generally enhance any existing local distinctiveness – and with	Neutral 0	

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		relatively new employment adjoining the site, development would not serve to maintain any distinctiveness either. The predominant townscape at this general location encompasses functional industrial premises, with development at the site unlikely to influence any material change to this.		
14. Landscape and Built Environment To protect and enhance the landscape and townscape character, including heritage and its setting and enhancing the place through good design.	4. Will it conserve or enhance the interrelationship between the landscape and the built environment?	As a policy option, it's unlikely that the protection of strategic employment sites will by itself conserve or enhance the interrelationship between the landscape and the built environment. As explained at 14(3), the policy intends to protect important areas of employment. This should safeguard the overall industrial character of such areas, but it is expected that as time progresses, older stock may be subject to modernisation or replacement – both of which are not an integral element of part of this option. An employment allocation at West Way would in all likelihood not alter the current interrelationship. Previous answers elsewhere within 14 have stressed the largely unexceptional appearance of modern business and industrial premises. With surrounding modern industrial development on two sides of the site, and a motorway bordering on another, development would not act in any negative manner to alter any interrelationship between landscape and built environment.	Neutral 0	
15. Heritage To conserve the area's	1. Will it conserve and enhance the	The split in focus of this option between safeguarding existing employment sites of strategic importance and	Neutral 0	Neutral 0

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heritage and provide better opportunities for people to enjoy culture and heritage.	historic environment, designated and non-designated heritage assets and their settings?	the allocation of new land to meet employment needs makes commentary regarding this element of the SA objective slightly complex due to often contrasting conditions. In terms of the safeguarding of existing areas of employment, few, if any of the buildings within these largely functional estates demonstrate any significance to the historic environment or designated/non-designated heritage assets and settings. Council records and mapping identify no heritage assets on-site at West Way. Immediately south of the adjoining M1 is Sandiacre Cloudside Conservation Area. However, this is strongly separated from land north of the M1 due to the elevated level of road and steep embankments – this visually and physically separates the site from the nearby CA and reduces the impact that development would have.		
15. Heritage To conserve the area's heritage and provide better opportunities for people to enjoy culture and heritage.	2. Will it respect, maintain and strengthen the local character and distinctiveness e.g. landscape/townscape character?	A combination of allocating existing strategic areas of employment and the allocation of a new employment site at West Way would not strongly impact on this objective. The first element of the option would help to retain the general business and industrial character of areas covered by such a policy. As previously discussed, many areas of strategic employment importance in Erewash are rather nondescript in appearance, contributing to a functional scale of distinctiveness. An allocation for new employment site at West Way would continue that trend, seeing the construction of new units within a wider area which has	Neutral 0	

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		historically played host to heavy forms of industrial operations. Positioned in-between the M1 motorway and more recent employment uses which have extended outwards from the core of Stanton Ironworks, the site makes little visual contribution to an already altered local townscape character.		
15. Heritage To conserve the area's heritage and provide better opportunities for people to enjoy culture and heritage.	3. Will it provide better opportunities for people to access and understand local heritage and to participate in cultural activities?	The policy option is unlikely to achieve this in respect to the allocation of existing strategic areas of employment. As described elsewhere within this assessment, the overall lack of heritage assets in relation to the potential allocation makes it difficult for development to provide better opportunities for people to access and understand local heritage and to participate in cultural activities.	Neutral 0	
15. Heritage To conserve the area's heritage and provide better opportunities for people to enjoy culture and heritage.	4. Will it protect or improve access and enjoyment of the historic environment?	Similarly to above at Q3, it is unlikely that this policy option would protect or improve access and enjoyment of the historic environment. As explained elsewhere within SA15, many of the existing strategic employment areas demonstrate only weak links to the historic environment. Therefore a policy would not be expected to address this owing to the absence of heritage assets either on or around these locations. An allocation at West Way would not be expected to protect or improve access and enjoyment of the historic environment due to the relative absence of nearby heritage assets and designations in the wider area, with this area much impacted by legacy industrial uses and activities.	Neutral 0	

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15. Heritage To conserve the area's heritage and provide better opportunities for people to enjoy culture and heritage.	5. Will it conserve and enhance the archaeological environment?	Unlikely. Whilst it is acknowledged that the archaeological environment is diverse and assets can routinely be uncovered through development/redevelopment of land, the more modern industrial characteristics of the areas the policy option would apply to would not be expected to have any link to a need to conserve and enhance the archaeological environment. Archaeological conditions at land at West Way are unknown, although records show no scheduled ancient monuments, nor does the land fall within an archaeological alert zone.	Neutral 0	
16. Natural Resources and Waste Management To prudently manage the natural resources of the area including soils, safeguarding minerals and waste.	1. Will it lead to reduced consumption of raw materials?	The identification of strategic employment zones will have little, if any, impact on the use/reduction of raw materials. The use and consumption of raw materials will be a matter for each individual business located within the extent of the identified areas. Allocating an employment site at West Way will likely add modestly to the consumption of raw materials, although it would be expected that future building stock would be constructed in such a way as to minimise their usage.	Minor negative -1	Major negative -3
16. Natural Resources and Waste Management To prudently manage the natural resources of the area including soils, safeguarding minerals	2. Will it promote the use of sustainable design, materials and construction techniques?	This will be of limited relevance at existing employment sites covered by this policy option as the primary purpose will be to protect employment uses. Such decisions to invest in sustainable design, materials and construction techniques would only be relevant where comprehensive modernisation/replacement of stock was set to occur. However, an employment allocation at West Way and the possible subsequent provision of	Minor positive +1	

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and waste.		new business and industrial stock can play a positive role in promoting better design and construction standards. In the event of an allocation, the construction of a reasonably modest number of new units would, if carried out to higher standards, still help to diversify employment premises in Erewash.		
16. Natural Resources and Waste Management To prudently manage the natural resources of the area including soils, safeguarding minerals and waste.	3. Will it result in additional waste?	The option which allocates existing employment sites across Erewash would not have any impact on the amount of waste produced as it is expected that this would maintain broadly the same number of businesses in the Borough. Allocating employment land at West Way would typically result in the construction of a number of more modern industrial units. Even if each individual future occupants planned to use minimal waste as a result of their activities and operations, the concentration of new activity at an allocated site would see a net increase of additional waste produced.	Minor negative -1	
16. Natural Resources and Waste Management To prudently manage the natural resources of the area including soils, safeguarding minerals and waste.	4. Will it reduce hazardous waste?	This issue would fall outside the scope of the policy option insofar as existing employment areas are concerned. The handling of hazardous waste is normally carried out under operating licence arrangements with relevant bodies, but decisions on the amount of hazardous waste resulting from industrial processes is a matter for individual businesses rather than something a policy to safeguard strategic employment sites can address. An allocation at West Way would accommodate a small number of new occupants and in turn, could see a rise in hazardous	Neutral 0	

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		waste generated, but the location of land likely means such uses would be discouraged.		
16. Natural Resources and Waste Management To prudently manage the natural resources of the area including soils, safeguarding minerals and waste.	5. Will it protect the best and most versatile (BMV) agricultural land?	No strategic employment area in Erewash will threaten the protection of best and most versatile land given all employment sites currently exist and are located away from areas of BMV agricultural land. The West Way potential allocation is situated on land, which despite being undeveloped, is defined as 'urban' in the Agricultural Land Classification. This results in the site's possible development not impacting on the need to protect the best and most versatile agricultural land.	Neutral 0	
16. Natural Resources and Waste Management To prudently manage the natural resources of the area including soils, safeguarding minerals and waste.	6. Will it prevent the loss of greenfield land to development?	No. Whilst the protection of existing strategic employment sites would not see any loss of greenfield land to development, this would not be the case by allocating a new employment site at West Way. Development at this location would see the loss of around 2.4ha of greenfield land, and whilst the parcel of land is located in-between the motorway and an existing area of industrial development, potential development would still be utilising greenfield land.	Major negative -2	
16. Natural Resources and Waste Management To prudently manage the natural resources of the area including soils, safeguarding minerals	7. Will it sterilise mineral resources?	None of the four potential strategic allocations plus the development of employment uses at West Way would impact on the ability to obtain minerals by prejudicing a Minerals Plan policy. Three of the four proposed employment allocations are located within an area of the Borough where coal resources are capable of being extracted by surface mining methods (open cast).	Neutral 0	

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and waste.		However, with all three of the Ilkeston sites well-established sources of employment, it is unlikely that these represent viable locations in which to commence extraction operations. The site at West Way is located within an area of the Borough where standing advice from the Coal Authority is applicable. This suggests that ground stability is acceptable, and the adjacent M1 motorway and established areas of developed industry would indicate that mineral reserves that may be in the ground beneath the site are realistically left in-situ, as its extraction would greatly impact the wider area.		