



Erewash Core Strategy Review Amendment Consultation

Representations on behalf of
Bellway Strategic Land

Reference Cole Lane CSR-0028

May 2025

1.0 Introduction

- 1.1 These representations have been prepared by Green 4 Planning on behalf of Bellway Strategic Land (Bellway) in response to the Core Strategy Review Amendment Consultation.
- 1.2 Bellway's interest is with site ref CSR0028, land to the East of Cole Lane. This site has been promoted throughout the Local Plan process by Green 4 Developments, initially as part of a wider site area (in conjunction with site CSR0027) but more recently through the call for sites as a standalone parcel.
- 1.3 Bellway have an interest in the land and in demonstrating their commitment to its delivery are making these representations.
- 1.4 These representations are made in the context of seeking to work with the Council to ensure that an effective and deliverable Plan for the area is achieved.
- 1.5 To note Site reference CSR-0028 has not been included within this consultation as a new draft allocation.
- 1.6 Our representations relate to the background evidence prepared by the Council to support their choice of new allocations and highlights the inherent risk of the approach taken to the housing numbers required both over the next five years and the plan period.

2.0 Erewash Site Selection Process

- 2.1 In understanding the process of site selection, which is the basis of this current consultation, we look to the Site Selection Paper included as part of the new evidence. This sets out that the process was firstly underpinned by the Sustainability Appraisal (March 2025) which in turn is based upon an identified settlement hierarchy including a new category G ii. This new category is supported by a key settlements paper (also March 2025). Sites were then considered against the Green Belt Review (January 2025).
- 2.2 Suitable, available, deliverable and economically viable site allocations are exhausted at each level of the hierarchy before moving onto the next until the Council considers it has adequate allocations to meet its 5-year and plan wide supply.
- 2.3 We therefore structure our representations as follows;
- Key Settlement Review
 - Sustainability Appraisal
 - Green Belt Review
 - Site Selection Paper
 - Housing numbers and Trajectory
- 2.4 We note that the new evidence also includes a viability assessment which we provide no comment on and a transport assessment which models the original allocations and mitigation measures as opposed to any commentary on the proposed new allocations.

3.0 Erewash Key Settlements Paper March 2025

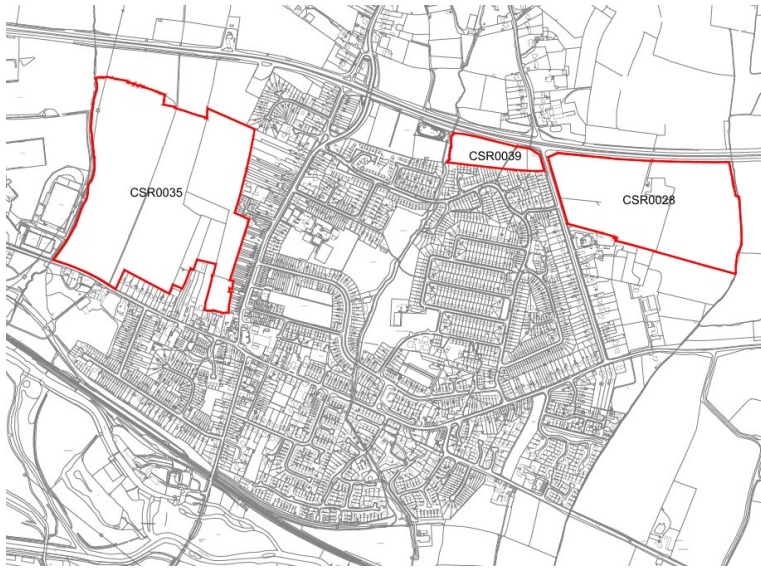
3.0 The Key Settlements Paper supports the settlement hierarchy set out in the proposed new Strategic Policy 0, and specifically a newly defined group of key settlements.

3.1 Whilst welcoming growth being directed towards Borrowash it is clear that this settlement is capable of a higher level of growth than many of the other settlements such as Draycott or Long Eaton. It is evident that it having a local centre as opposed to a village centre (see Strategic Policy 3), alongside the frequency of bus services and its proximity to Derby, places Borrowash more akin to Sandiacre in terms of being able to accommodate growth.

3.2 However, we welcome the recognition that this settlement can accommodate growth and the focus and clarity that Strategic Policy 0 provides in respect of this settlement.

4.0 Sustainability Appraisal

- 4.1 Our comments within this representation relate solely to the latest Sustainability Appraisal (Appraisal) March 2025 which seeks to assess the 44 sites submitted as part of the 2024 call for sites exercise. Bellway now have an interest in Land East of Cole Lane CSR0028, and our assessment is predominantly focused on the Council's Sustainability Appraisal of this site both in terms of how we believe the site should score, and the benefits it could offer, and in comparison to the appraisal and scoring of similar sites.
- 4.2 Whilst acknowledging that the report identifies that site CSR0028 (Cole Lane) is within the top half of the assessment, there are a number of factors which would lead to the site scoring higher and sitting significantly higher in the table.
- 4.3 Whilst focusing on CSR0028 this representation highlights the inconsistencies within the Appraisal which then questions how robust this process has been and how much weight can be applied to it in terms of site selection.
- 4.4 In seeking to understand the scoring and assessment applied to CSR0028 we have compared it to CSR0035 land to the west of Borrowash and CSR0039 land to the North of Borrowash. Both of these sites have been included as draft allocations. CSR0035 is a similar size and CSR0039 sits almost adjacent to the site we are promoting.
- 4.5 We include our own plan below to place these sites in context. Despite evaluating each submitted site by reference number, only the rejected sites are shown on the attached plans. We have therefore had to take a view as to where the boundary of CSR0035 and CSR0039 sit, based on the draft allocations. Nowhere in the evidence base have the Council provided a plan showing all the sites assessed.



- 4.6 Whilst not seeking to undermine the conclusions on CSR0035 or CSR0039 a comparison between these sites highlight some of the discrepancies that have occurred when scoring and subsequently ranking the sites. Given these two sites are located on the edge of the same settlement with access to the same services, facilities and transport network, their ranking should have some similarities and perhaps be closer than the current +11 for CSR0035 and +2 for CSR0039 as compared to the -1 for CSR0028.
- 4.7 It is also evident from the detailed site assessments that much of the scoring relates to ‘how’ the site could be developed and ‘what’ it could provide as much as where it is located. It is on this basis that Bellway Strategic Land are now in a position to provide an illustrative masterplan, attached as Appendix 1, which more accurately reflects how this site could be developed and the benefits this site could deliver. If assessed against this masterplan the site would score much higher and be elevated within the Appraisal ranking.
- 4.8 However even without the benefit of this masterplan there are discrepancies in how the scoring has been applied which we highlight below;

Objective 2 Employment and Jobs

- 4.9 Looking at Question 1 in relation to job creation, as one would expect, this site has exactly the same commentary as CSR0035 that job creation would be linked to the construction phase, yet CSR0035 gets a +1 score and CSR0028 a 0 neutral score. Whilst this may seem a small oversight, an additional one point would elevate CSR0028 to rank higher than 4 other sites.

Objective 5 Health and Wellbeing

- 4.10 The attached masterplan sets out how CSR0028 could score much higher in regard to Objective 5. There is space within the development site for a community facility which could take the form of a medical centre. We note there is no current need for this, but land could be safeguarded for future needs.
- 4.11 The masterplan clearly shows that open space linked by footpaths and play areas could be provided via a 1.2km circular route around the site, linking to and from Cole Lane and to the footbridge to the north over the A52. This route would be accessible to the whole of Borrowash, but particularly those located in the east who currently have limited access to local walks and are not in close proximity to the canal walk to the south. This route would create a valuable resource for dog walkers and children and local residents.
- 4.12 We therefore strongly believe that the site should score far higher in respect of opportunities for recreational and physical activity, and the provision of new accessible open space.

Objective 8 Transport

- 4.13 In querying the scoring under Objective 8, we make the comparison with site CSR0035 a site of a similar scale.
- 4.14 Within the commentary for both sites under question 1 it is identified that that there are issues with

junctions in the area, however CSR0035 exits directly onto the A6005, adding additional traffic onto the main bus network route, potentially slowing up the main public transport route through Borrowash. Drivers would then need to travel through Borrowash to reach the A52, the main east west trunk road. From CSR0028 they would have almost direct access onto the A52 without adding further congestion to the village. Again a difference of one point, as CSR0035 scores 0 neutral on this and CSR0028 -1. We contend the scoring should be reversed if not equal.

- 4.15 This is further borne out by the scoring for site CSR0039 a site almost directly adjacent to CSR0028. Within the commentary for this site the close proximity to the A52 is seen as a positive in question 1, and in respect of question 4, in respect of good access to services and facilities, the site scores a +1 as opposed to CSR0028 which scores 0. It is not clear how two adjacent sites can score differently on this criterion.

Objective 9 Brownfield Land

- 4.16 Another area we would contend that CSR0028 should score higher is Objective 9, which although referring to Brownfield Land includes a question on biodiversity. The site can deliver improvements over and above the 10% BNG requirement, particularly through the use of additional tree planting along three of the boundaries which would also help create a defensible boundary to the Green Belt. Although showing as a minor positive this is based on information submitted to date which did not include the extensive tree planting and open space now included. We therefore suggest that this could score as a major positive.

Objective 11 Air and Noise Pollution

- 4.17 As demonstrated by the masterplan the built development can be set back from the A52 to be no closer than the existing housing on Cole Lane. Again both other draft allocations have a higher/better score on this criterion despite being of a similar size in the case of CSR0039, and being significantly closer to the A52 in terms of CSR0039. The reasoned text even recognizes there remains a risk of significant impact to future residents of site CSR0039 in terms of air and noise pollution but still

scores the site as ‘better’ in this regard than CSR0028.

Objective 13 The Natural Environment.

- 4.18 CSR0039 scores higher than CSR0028 in this respect despite the reasoned text recognising that it is a small site which would have more difficulty securing on-site gains. The text in CSR0028 recognises that on site gains could be achieved yet this site is only given a minor positive of +1 whilst CSR0039 receives a major positive score in this regard of +2. This makes little sense.
- 4.19 Considering the now attached masterplan there is scope for the site to score positively (rather than the current neutral score) in terms of enhancing woodland cover and management with a significant amount of new tree planting shown around the boundaries. The site can provide new open space and play areas and a recreational trail and so should score positively rather than as neutral in this provision.
- 4.20 We therefore disagree with the overall rating for this objective which scores this site lower than the adjacent CSR0039 which offers none of the same benefits in terms of open space and biodiversity net gain.

Objective 15 Heritage

- 4.21 We also do not understand how the adjacent site CSR0039 can score as a minor positive in terms of Heritage, when CSR0028 and CSR0035 both score as neutral. All the reasoning identifies there are no heritage assets in the vicinity of these sites and despite the text being exactly the same in response to question 3 for all three sites, CSR0039 gets a +1 score, seemingly because of its proximity to the A52, and the other two sites a 0 neutral. This makes no discernable sense.

Summary

- 4.22 Although we focus our attention on site CSR0028 to highlight how this site could have a much higher score within the Sustainability Appraisal, in doing so we highlight a number of discrepancies with the

overall approach and ratings given.

- 4.23 We have only looked at three out of the forty-four sites and in doing so found unexplainable discrepancies in the scoring. We believe there could be issues in relying on this appraisal when choosing the most appropriate sites to bring forward within this plan period.

5.0 The Green Belt Review

- 5.1 We welcome the Council undertaking a Green Belt Review. The need for this review has been highlighted since the start of the Local Plan Review process, in order to fully and robustly evaluate where new housing should be located.
- 5.2 However we do have concerns in respect of the methodology and the resultant conclusions drawn from this.
- 5.3 National Guidance on the role of Green Belt is set out in the NPPF and within the Government Guidance Note specifically relating to Green Belt.
- 5.4 The PPG confirms that where necessary, the review should;
- to ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes.
 - A small number of large areas will not be appropriate in most cases.
 - In certain locations, smaller parcels might be more appropriate - e.g. around existing settlements or public transport hubs/corridors.
 - Applies rankings of Strong / Moderate / Weak / None
- 5.5 Whilst we appreciate the recent PPG has been updated post the Green Belt Assessment undertaken by the Council, it is helpful to compare the assessment undertaken to the latest information available.
- 5.6 We agree with the Councils approach to focus on criteria;
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another
 - c) to assist in safeguarding the countryside from encroachment

- 5.7 The Review starts with evaluating purpose c) then b) and then a), and when seeking to assess each purpose, a different method and form of assessment area is used. This does make comparison and overall contribution of parcels of land, to the purposes of the Green Belt, difficult to evaluate.
- 5.8 In terms of the approach, as we set out below the review does not use any standard form of ranking for evaluating land against each purpose, and the parcels of land being assessed are hugely different in terms of scale. Only when considering sprawl does the Council look in any granular detail at parcels of land and their contribution.
- 5.9 Given that the Council have a Sustainability Appraisal which sets out the hierarchy for the site search and this only looks at sites adjoining settlements, it would have been a more useful and robust review if parcels of land adjoining settlements were looked at in more detail against all three purposes of Green Belt land identified above, as opposed to huge swathes of land being considered and no real conclusions drawn from this.
- 5.10 We review each section below in the format as presented by the Council.

Purpose c) Safeguarding the Countryside from Encroachment.

- 5.11 This section uses areas called 'Countryside Units' and a small point to note is that firstly the maps provided are incredibly hard to read, using a green line along boundaries of green areas, makes it incredibly hard to decipher what is included in the unit and what is a different unit. In some cases you have to read the text to understand what is in the unit and what is not.
- 5.12 Firstly, conclusions are reached in respect of the extent to which the unit is assessed as contributing to a role in safeguarding the countryside from encroachment.
- 5.13 Then secondly, a conclusion is drawn as to whether development within the unit of Green Belt, could or would not be likely to encroach into the countryside.
- 5.14 The assessment uses 'Could' and 'Would not' as the only two conclusions reached. There is no scoring

or range of assessment. Could does not mean 'definitely would' and is a very loose term open to interpretation, whereas to conclude 'Would Not' is far more clear cut. This does not seem a robust or clear and transparent way of assessing the development potential of these parcels.

- 5.15 The units' range in size from 52 hectares (CU14) up to 2229 hectares (CU15) and a significant number of parcels are over 1000 hectares in size. Unsurprisingly given the size of area they cover, the conclusion reached is that every larger countryside unit, does contribute to safeguarding the countryside from encroachment and therefore any development 'could' encroach on the countryside.
- 5.16 This seems a pointless exercise. Absolutely no consideration is given to the settlements these units adjoin, they are huge swathes of land that stretch in some cases from Derby to Nottingham. Therefore when taken as a whole, of course the conclusion reached is that they contribute to safeguarding the countryside from encroachment.
- 5.17 The units with a 'would not' encroach conclusion, are all smaller such as CU2 which is a small 36ha parcel of land not directly connected to any settlement a small island of land that has been singled out for its own assessment. The conclusion of 'would not encroach' for this parcel becomes meaningless, as if this parcel were developed it would sit as an island of isolated development surrounded by green space so it obviously would appear as encroaching on the countryside.
- 5.18 When looking in more detail at site CSR0028 this falls into Unit CU13 a parcel of 662ha stretching from the boundary of Borrowash to the M1 a distance of over 2.6miles. To conclude that development in this parcel could encroach on the countryside does not provide a meaningful basis for site selection for the Local Plan period.
- 5.19 This is such a generalised approach to this form of review and the conclusion of 'could' encroach particularly when applied to a parcel of land that is over 2000ha becomes meaningless and not something that should be relied upon for site selection.

Purpose b) Preventing Neighbouring Towns from Merging

- 5.20 In evaluating the contribution to this purpose a usual starting point would be to identify the 'towns

and then to make judgement as to the extent to which development of a parcel would result in settlements merging (both physically and perceptually) with each other.

- 5.21 Whilst the towns have been identified, as with the assessment into encroachment, large parcels of land have then been used to evaluate the contribution they make to this purpose, and the impact of development on them.
- 5.22 The site in questions (CSR0028) sits within two corridors, B and F. These are wide corridors of around 3-4miles, separating Derby from Ilkeston and Long Eaton respectively.
- 5.23 Within the conclusions for both corridors it states that the importance of this corridor *'is subject to further study around the status of Green Belt between the villages of **Borrowash** and Ockbrook, and Stanley, Stanley Common, West Hallam and West Hallam Storage Depot to ensure that land between these inset settlements does not cumulatively contribute to a lessening of separation within the identified zone'* and *'is subject to further study around the status of Green Belt between the villages of **Borrowash**, Draycott and Breaston in the south of the Borough to ensure that land between these inset settlements does not cumulatively contribute to a lessening of separation within the identified zone.'*
- 5.24 However no further study is forthcoming, and no definitive conclusions reached in the text or ranking or scoring given and no attempt is made to determine if any land between or adjoining the inset villages could be released without harming the purpose of preventing the merging of settlements.
- 5.25 It is also relevant to note that the conclusions to Corridor F includes a recognition *that 'narrow sections of Green Belt which currently provide separation between the Derby urban area and Borrowash... are equally as important in preventing the merging of towns through outward growth of the urban areas.'*
- 5.26 The conclusion for both these corridors is that they remain important to separate Derby from Ilkeston and Long Eaton, which we would agree with, but there is no analysis as to how small development parcels adjoining existing settlements would impact on that function.
- 5.27 It is clear for example that development which would narrow a gap to under 300m between settlement boundaries, would have more of an impact than development that narrows a gap from

4.5km to 4km. However this level of analysis has not been undertaken.

a) to check the unrestricted sprawl of large built-up areas

- 5.28 It is only when considering Sprawl do the Council look at smaller parcels around the settlements. Despite this section only dealing with sprawl, the Council in its analysis brings in further commentary on encroachment and separation issues, that is not backed up by actual evidence from the previous sections of the report.
- 5.29 The conclusions are again brief only identifying which parcels of land make limited contribution to checking sprawl. No ranking or scoring is provided.
- 5.30 In addition, part way through the assessment the colour key changes whereby land highlighted with a blue boundary on the plans have so far been parcels that make a limited contribution, when we get to Little Eaton, one parcel shown red and one blue are considered to have a limited contribution and when we get to Ockbrook, both parcels, evaluated as making a limited contribution are shown in red.
- 5.31 This may seem a minor point, but this leads to confusion when examining the plan on page 139 as despite having no key an assumption is made that the black areas make a limited contribution to preventing sprawl and the red a more significant contribution. This just does not match up with the plans that proceed it or the conclusions from the text and more pertinently, this plan is then used to create the plan on page 141 which sets out the conclusions of the study.
- 5.32 The anomalies can be seen when looking at Ockbrook and Little Eaton as the land surrounding these settlements is shown as contributing to all three purposes of the Green Belt Review,, when the commentary and plans prior to this would indicate that they do not.
- 5.33 This plan is evidence that is then relied on in site selection, so it is important that it is accurate and also legible.
- 5.34 Looking in more detail at Borrowash, which is where our interest lies, the Council forms the following opinion that Area C which forms part of draft allocation CSR0035;

Firstly, Green Belt land within the identified boundaries of Area C would not result in a reduction of gap between the inset area of Borrowash and the closest point of the Derby urban area. So despite Green Belt here falling within Corridors B & F of the separation analysis, the remaining designation between Borrowash and Spondon would not be lessened from current levels. Green Belt within Area C has also been assessed as limited in its ability to safeguarding the countryside from encroachment. and in particular the sites being promoted.

In terms of urban sprawl, similar rationale to that regarding Green Belt performance around separation exists. With linear development having taken place west of the centre of Borrowash, the extending built form, which is reflected by the current inseting boundary, would indicate that Green Belt to east of the residential properties located at the end of Manor Road makes a limited contribution to checking the sprawl of the village.

- 5.35 So the conclusion reached on sprawl is in part based on conclusions made on Encroachment and Separation distances rather than just providing an assessment against this purpose.
- 5.36 We strongly contest the separation point made regarding this parcel. Within the previous section the analysis identified that more work needed to be undertaken on the land around Borrowash to understand the impact of settlements merging. This work has not been undertaken or at least is not presented in evidence.
- 5.37 The merging of settlements has both a physical and perceived component and we would strongly argue that developing Parcel C (draft allocation CSR0035) would completely change the perception of any form of separation between Spondon and Borrowash with a gap of only 150m between settlement boundaries and of circa 300m between built forms.
- 5.38 Checking the unrestricted sprawl of settlements should have been assessed independently and scored accordingly without the added commentary of separation and encroachment.

Summary

- 5.39 The conclusion of the Green Belt Review is a map showing dark green and light green areas. No real granular analysis of parcels of land and no rankings.
- 5.40 In addition we question whether this map is even accurate.
- 5.41 All three purposes should have been consistently and clearly dealt with in the relevant sections of the Green Belt Review. Followed by an overall assessment of parcels of land which considered all three indicators and provided detailed assessment and rankings.
- 5.42 We have serious concerns about the size of parcels and level of analysis provided on two of the three purposes and this approach seems contrary to all recent guidance on how a Green Belt review should be undertaken.

6.0 Site Selection

- 6.1 The site selection is underpinned by the Sustainability Appraisal and the assessments undertaken for each submitted site. The sites are then considered against the Green Belt Review.
- 6.2 This is why the preceding two sections of these representations are crucial in determining if the sites now selected as draft allocations represent the most appropriate way to plan for development over the plan period.
- 6.3 If we look at the conclusions to the sites in Borrowash it is clear how important these assessments, particularly the Green Belt Review are, to site selection. The conclusions state;
- Land West of Borrowash (CSR0035) scored within the top half of the SA and is located on land that does not make an important contribution to the functioning of the Green Belt.
 - Land North of Borrowash (CSR0039) scored within the top half of the SA and falls on land that does not make an important contribution to the functioning of the Green Belt.
 - Land off Cole Lane (CSR 0028) would form an extension to the East of Borrowash and scores within the top half of the SA, however it falls on land that makes an important contribution to the functioning of the Green Belt (fulfilling all 3 functions). On this basis the site is not considered suitable for allocation
- 6.4 The conclusion drawn from this is that Site CSR0028 has not been allocated because of the Green Belt Review
- 6.5 A Green Belt Review that did not look at encroachment or the merging of settlements in any meaningful way, only looking in detail at sprawl, thereby one could argue giving sprawl a greater weight than the other two purposes but with no justification to do so.
- 6.6 A Green Belt Review that concluded that CSR0035 would not narrow the gap between Borrowash and Spondon despite the boundaries between the two now only being 150m for an extended length (520m as opposed to the length of a single dwelling). The result of this conclusion being that CSR0035 does

not impact on the merging of settlements yet the development of CSR0028, which would extend 500m closer to the M1, which is over 2.5 miles away, does have an impact on the merging of settlements.

- 6.7 If the Council are to base their site selection predominantly on a Green Belt Review then this review needs to be undertaken in a clear robust manner that allows all parcels of land to be evaluated in a consistent manner against a similar set of criteria and the results presented clearly and accurately.
- 6.8 It is also not clear what the status of the safeguarded land is. We have no plan showing all the sites that have been promoted and so it is not clear if the safeguarded land is actually available, or as is stated in some of the reasoning, would in the Councils opinion, just form an obvious extension to an allocation that is shown. This needs to be rectified so that everyone can properly understand if the safeguarded land is actually available for development, and is a genuine alternative to some of the promoted sites that have been rejected.

7.0 Housing Trajectory

- 7.1 The emerging plan falls under the transitional arrangements of the NPPF however from the outset it is pertinent to note that Erewash have failed to deliver against their housing targets for over the last 10 years. They do not have a 5-year HLS and they are at 67% on the Housing Delivery Test.
- 7.2 This plan review is an opportunity to rectify their poor performance and plan positively for housing delivery going forward.
- 7.3 However, the Council continue to plan to under-deliver against targets. The previous standard housing delivery method identified 386p.a. which is what the Draft Plan is currently planning for.
- 7.4 The new standard method as per December 2024, is 515p.a, a 33% increase.
- 7.5 Overall, using the pre 2024 methodology, the Council need to plan for 6948 new homes over the plan period, their projected completions (included safeguarded land as well as allocations) are at 7124. Given that some of the allocations are questionable (such South Stanton, 1000 new homes allocated since 2014 never delivered). The Council are very unlikely to reach that target without allocating or permitting development on more sites.
- 7.6 Given this Partial Review, even with the new draft allocations, is not within 80% of the new Standard methodology, (which would require 9,270 new homes over the same time period), if adopted, the Council will need to start an immediate review of the Plan.
- 7.7 We ask the question why not plan now to at least meet the 80%? And to provide some form of flexibility if, as predicted some of the larger allocations (such as South Stanton) do not come forward.
- 7.8 In terms of the published Housing Trajectory we have the following specific comments;
- 7.9 We are not clear on the evidence for the safeguarded land. It is not clear if these parcels of land have been promoted and are available, or if it is just the Council's opinion that they form a logical extension to the sites allocated. This is a significant point, as these sites account for 960 homes over the Local

Plan period.

- 7.10 We are not clear on the evidence for the assumptions around windfall numbers, and especially how and where these might be accommodated in a Borough with a significant Green Belt and very tightly drawn settlement boundaries.
- 7.11 Although there has been a reasonable provision of housing on windfall sites in Erewash in the past, there needs to be evidence that this will continue in the future, and that the Council has undertaken appropriate work to show that this will be the case.
- 7.12 It is clear that the historic provision of windfall sites across the Borough has included a large number of units on larger sites of 50 or more dwellings. Given the recent call for sites we would envisage that if a site is capable of accommodating 50+ dwellings it would have been promoted and included within this assessment.
- 7.13 Overall, we would need to see some evidence that this level of windfall provision is a realistic assumption, over and above the newly allocated sites, given the tight constraints of the Green Belt.
- 7.14 Every new allocation is shown as not only commencing development in 2026/2027 but having some level of completion in this timeframe. This seems optimistic given the current status of the Plan and the need for each site to have been released from the Green Belt via this plan process, and to have gone through the process of a planning application and discharge of conditions application.
- 7.15 Despite no agreement from the landowners and no site promotion or representation to the Local Plan process, the Council continue to use the figure of 1000 dwellings for the South Stanton site to meet their housing need over the Local Plan period. It is not appropriate to continue to include and rely on this site as a strategic allocation.
- 7.16 The housing trajectory provides only a surplus/cushion of 158 dwellings over the plan period. Given our concerns over South Stanton, and as set out above, the requirement for Erewash to have to begin an immediate plan review once this plan is adopted. We strongly consider that now is the opportunity to allocate additional sites to provide certainty and flexibility for the Local Plan to deliver. We see this

lack of ambition as another missed opportunity and does not represent a positively prepared plan.

8.0 Conclusion

- 8.1 These representations look in some detail at the scoring and ranking applied through the Sustainability Appraisal and Green Belt Review and although some points may appear minor, they are important, as the site selection for this Borough, which will effectively direct development for the next fifteen years, is based on these reviews and assessments.
- 8.2 It is clear from just considering three of the forty-four assessed sites that there are discrepancies in the sustainability appraisal scoring. Site with exactly the same text and experiencing the same access to infrastructure and facilities are being given different scores and sites able to offer more in terms of improved facilities or BNG being scored lower than their counterparts.
- 8.3 The Green Belt review appear to follow no established methodology. Huge parcels of land are assessed and then compared to much smaller parcels, no granular assessment, no rankings given or methods of comparison available, resulting in a plan with only two outcomes.
- 8.4 The site selection is then solely based on these two assessments.
- 8.5 The Council then continue to plan to under-deliver against targets, there is no positive plan making happening, no in-built flexibility for the Local Plan to deliver. We see this continued lack of ambition as another missed opportunity and does not represent a positively prepared plan

Appendix 1



NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

This drawing is issued for the sole and exclusive use of the named recipient. Distribution to any third party is on the strict understanding that no liability is accepted by Green 4 Architects for any discrepancies, errors or omissions that may be present, and no guarantee is offered as to the accuracy of information shown

THIS DRAWING IS TO BE READ IN COLOUR PRINT

CDM - RESIDUAL RISKS

The following are considered to be significant risks relevant to this drawing, which could not be fully mitigated or removed through design. Further possible control measures have been identified within the Design Risk Assessments which may help to mitigate these and other identified risks further during the construction / maintenance process.

GENERAL

All dimensions to be checked on site. No responsibility is accepted for works by building contractor and sub-contractors. All works to be carried out in accordance with current Codes of Practice and British Standards.

STRUCTURAL

All Structural Design and Calculations to be provided by Structural Engineer

NOTES:



- LEGEND**
- Development area
 - Community use
 - Roads
 - Pathways
 - Open grass land
 - Green buffer tree planting
 - Informal play area
 - Meadows
 - Suds
 - Woodland play area
 - Wetland rest area
 - New hedge planting
 - New trees
 - New trees
 - Existing trees

REVISION NOTES		
Rev	Date	Description
<div><div></div><div>The Barn Hopwell Hall Ockbrook Derbyshire DE72 3RW</div></div>		
PROJECT NAME		
G40080 Cole Lane		
TYPOLOGY		
PROJECT ADDRESS		
CLIENT / USER NAME		
Bellway Homes Ltd.		
DRAWING NAME		
DEVELOPMENT FRAMEWORK PLAN		
FULL DOCUMENT REFERENCE		
Project Number	Series	Drawing No
G40080	---	A001
		Issue Date
		06/05/25
STATUS		
FOR INFO		
Sheet size	Scale	Revision
A1	1 : 1250	

