

3<sup>rd</sup> Floor Waterloo House  
Waterloo Street  
Birmingham  
B2 5TB

kam.saini@carneysweeney.co.uk

19<sup>th</sup> May 2025

Planning Policy Team  
Erewash Borough Council  
Town Hall,  
Wharncliffe Road,  
Ilkeston, Derbyshire,  
DE7 5RP

Sent via email only: [planningpolicy@erewash.gov.uk](mailto:planningpolicy@erewash.gov.uk)

Dear Sir/Madam,

## **SUBMISSION OF REPRESENTATIONS TO THE EREWASH CORE STRATEGY REVIEW AMENDMENT CONSULTATION STAGE**

### **Introduction**

CarneySweeney are instructed by Peveril Homes Limited (referred to as 'our client' hereafter) to submit representations to the current Erewash Core Strategy Review Amendment consultation stage (referred to as the 'CSRA' hereafter).

The Council will be aware that our client has land interests in respect of the following land parcels which have been promoted to the Council's 2024 Call for Sites process and through previous rounds of consultation as part of this plan-making process:

- Land off Larch Drive, Cloudside, Sandiacre - please see enclosed Appendix A
- Land off Draycott Road, Breaston - please see enclosed Appendix B
- Land at Grange Farm, Breaston - please see enclosed Appendix C
- Land at Thacker Farm, North West of Kirk Hallam - please see enclosed Appendix D
- Land to the north of Croft Lane, Breadsall - please see enclosed Appendix E

In respect of the above promoted sites, we welcome the proposed allocation of our client's site at Cloudside, Sandiacre, referred to as 'West of Sandiacre' under Strategic Policy 1.7. Our client is supportive of the proposed allocation but does have comments in respect some of the policy requirements, which we set out in these representations.

We do also remain of the view that our client's other land interest and promoted sites set out at bullet points 2-5 above are sustainable locations, capable of supporting growth through the provision of additional land to address housing need within the plan period. These sites also align with the revised Spatial Strategy and Settlement Hierarchy forming part of the CSRA and therefore are promoted in the context of these representations.



## Representations

### Sustainability Appraisal

Having reviewed the evidence base available alongside the CSRA, we note that a Sustainability Appraisal Update (dated March 2025) (referred to as the 'SA Update' hereafter) has been undertaken, which seeks to incorporate all previous stages of SA and relevant updates (SA1, SA2 and SA3) into a single document.

The SA Update is noted to comprise the following:

- *“an appraisal of two additional focussed sub-options of Strategic Growth Option G originally tested within SA1, to provide a finer grain look at the sustainability of growth around villages, recognising likely disparity between villages with little or no service provision and villages with significant provision;*
- *an updated appraisal of the employment policy option originally tested within SA2, to take account of two additional potential employment sites; and*
- *appraisals of 44 potential housing sites which were submitted to the call for sites process carried out as part of the Examination into the Core Strategy Review in 2024 or identified as needing to be assessed. Some of those sites submitted were altered versions of sites already appraised earlier in the plan making process that were deemed to have altered enough to warrant a reappraisal. In these circumstances, the previous appraisals are superseded. This in effect represents an update to SA3.”*

[Source: Page 6 of SA Update]

With regards to the above updates, we only look to comment on bullet points 1 and 3. We have no comments in respect of the employment policy option and assessment of two additional potential employment sites.

In terms of the Strategic Growth Options, Sustainability Appraisal 1 (Strategic Growth Options) (SA1), tested eight potential growth options comprising as follows:

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

The SA Update identifies that two additional sub-options of Option G have now been tested to provide further analysis of extending villages, which comprise as follows:

*“G. Extension of the villages into the Green Belt*

*G(i) Extension of villages with a centre (Key Settlements) into the Green Belt*

*G(ii) Extension of villages without a centre (Other Settlements) into the Green Belt”*

[Source: Page 18 of SA Update]

The analysis of extending villages is understood to be undertaken on the basis of villages with little or no service provision (referred to as 'no proposed centre designation') and villages with significant provision (referred to as 'able to support the proposed village centre designations').



The SA Update reports that Option G was expanded to test the above sub-options “...in light of the sites submitted to the Call for Sites 2024 process being overwhelmingly located within Option G (being sites which would extend villages into the Green Belt), and all other reasonable alternative options which are identified as being more sustainable (Options A-F) having been exhausted...” (Paragraph 3.2.1, Page 18 of SA Update).

The overall findings of the appraised sub-options of Option G are reported to show Option G(i) scoring -17 and Option G(ii) scoring -30 (Appendix E1 of SA Update). Based on these scorings, the SA Update reports that prioritising “...development within Option G through the extension of villages within the Green Belt which contain a centre (Key Settlements) would be the most sustainable approach to delivering growth within Option G” (Paragraph 3.2.1, Page 18 of SA Update).

We have previously raised concerns that with limited brownfield opportunities available in the Borough growth adjoining the villages should be fully assessed to ensure that other opportunities are taken into consideration. The findings of the assessment undertaken as part of the SA Update reflect the comments made during the Hearing Sessions that if all opportunities have been exhausted, and with the Council unable to demonstrate a 5year housing land supply, growth adjoining the villages would need to be considered. The SA Update has now undertaken a further assessment of Strategic Growth Option G as part of testing reasonable alternatives, and on this basis, we do not look to disagree with this approach or the findings of this assessment.

With regards to the individual site assessments forming part of the SA Update, for ease of reference, we have commented on this further below in our representations to Strategic Policy 1.7 ‘West of Sandiacre’ and also, in respect of each of our client’s other land interest which are promoted as part of these representations.

## **Green Belt Review**

The Green Belt Review (dated January 2025 (referred to as ‘GBR’ hereafter) documents the process the authority have undertaken to review all the land which forms part of the Green Belt against the purposes of including land within the Green Belt as Paragraph 143 of the National Planning Policy Framework (December 2024). It is noted that the GBR has considered the following three of the five Green Belt purposes with the rationale set out in the accompany Green Belt Review Methodology document (Study approach’ section), with Purpose d) and Purpose e) not being assessed:

- Purpose a) to check the unrestricted sprawl of large built-up areas;
- Purpose b) to prevent neighbouring towns merging into one another;
- Purpose c) to assist in safeguarding the countryside from encroachment;

The overall methodology for the GBR is noted to comprise a mapping exercise to assess the role and function of the Green Belt in Erewash as a whole in the first instance, with a further assessment of specific areas to establish how they perform against all, some or none of the above Green Belt purposes (a, b and c).

Whilst we have no specific comments at this stage on the overall methodology and noting the reason for the assessment of three out of the five Green Belt purposes, we do have comments on the findings of the GBR in respect of our client’s land interests promoted as part of these representations. We have provided our comments in this regard further below as part of the individual site promotions, and in respect of proposed allocation under Strategic Policy 1.7.



## CSRA Consultation Document

In terms of the overall structure, it is helpful that the CSRA consultation document sets out the proposed changes to the document (both inserts and deletions), which allows respondents to see what is now proposed to form part of the amended document.

It would also be helpful if the CSRA set out the overall context of this plan making process. For example, this plan comprising a partial review of the adopted Core Strategy and how it relates to any existing development plan document/s, along with addressing the strategic matter of reviewing the Green Belt and the exceptional circumstances arising requiring the release of land from the Green Belt to deliver the development needs of the Borough for the plan period.

### Strategic Policy 0 – The Settlement Hierarchy

The introduction of Strategic Policy 0 is welcomed as it sets out the Settlement Hierarchy of where development is being directed. However, Strategic Policy 0 does not address land located outside of the listed settlements (i.e. the countryside). In contrast to this, Strategic Policy 1 does make reference to a proportion of housing within ‘Other Settlements and countryside’ as part of the housing provision.

Whilst reference to ‘countryside’ under Strategic Policy 1 is stated to be in the context of “...*consented supply in the remaining areas of the Borough outside of settlement boundaries*”, for clarity and consistency the settlement hierarchy should also look to make reference to countryside as development is being directed to these locations as part of the housing provision.

### Strategic Policy 1 – Housing

Strategic Policy 1 is noted to set out the housing requirement for the plan period and the distribution of housing across the Borough, which appears to align with the overall settlement hierarchy set out in Strategic Policy 0. We also welcome the Council’s changed approach of removing the cap on the scale of housing development proposed for allocation, which no longer seeks to solely rely on delivery from proposed allocations of large sites of 200 or more dwellings.

It is however noted that there is no policy guidance forming part of the CSRA consultation document to guide the decision-making process in respect of other sites which have not been allocated. The CSRA should look to include additional non-strategic allocations to further support small and medium sites to come forward through a policy compliant process.

In terms of the overall housing provision, from a review of the Housing Trajectory, this suggests that circa 960 homes arise from ‘safeguarded land’ in respect of several of the proposed allocations with anticipated delivery from these sites from Year 12 onwards, i.e. within the minimum 15 year plan period. The Housing Trajectory also indicates a windfall allowance of 100 dwellings per year from Year 3 to the end of the plan period.

With the anticipated delivery of safeguarded sites coming forward within the plan period, and a reliance on a large windfall allowance across the plan period, this indicates that there may be an opportunity for further site allocations within this plan period. Various sites have been promoted on behalf of our client, of which one forms proposed allocation under Strategic Policy 1.7 which is welcomed. Our client’s other land interests, promoted as part of these representations should also be reconsidered for allocation particularly in the context of the projected delivery shown in the Housing Trajectory. We comment on this further below as part of the site promotions.





## Strategic Policy 1.1 – Allocated Housing Sites

Strategic Policy 1.1 is noted to set out the criteria against which applications for housing development on sites “*allocated in this plan*” are required to meet. However, it is unclear whether the policy would also apply equally to land ‘safeguarded’ in the various Strategic Policies and/or proposals on windfall sites. The authority should look to clarify how Strategic Policy 1.1 would be applied in this regard.

There also remains reference to “*...new neighbourhood...*” in Part 1 of Strategic Policy 1.1 which requires housing development to “*Establish a coherent and quality design for the proposed new neighbourhood that respects its settlement context*”. With the overall premise of Strategic Policy 1.1 no longer making specific reference to ‘strategic’ housing development, and with the removal of the cap of 200 dwellings, both of which are welcomed deletions from the policy wording, the reference to “new neighbourhood” in Part 1 of the policy wording is misleading as it suggests a certain scale of development. As Strategic Policy 1.1 has been amended to act as an overarching policy criterion for proposed housing developments, and not strategic development, reference to new neighbourhood should be removed to ensure the policy wording will be effective as part of any decision-making process.

## Strategic Policy 1.7 West of Sandiacre

The proposed allocation of our client’s land interest west of Sandiacre under Strategic Policy 1.7 provides an opportunity to deliver housing in a sustainable location as an extension to the Long Eaton urban area. The proposed allocation is supported by several evidence base documents summarised as follows:

- The proposed allocation is consistent with the hierarchy based staged process of meeting plan wide housing requirements as detailed in the Site Selection Paper.
- SA Update the site is reference: CSR0011 West of Sandiacre, has a score of -5 and therefore, ranked 9 (out of 19), placing it within the top half of the SA site assessments.
- The Site Selection Paper outlines that the Green Belt Review finds that the site does not make an important contribution to the functioning of the Green Belt.

Overall, we are supportive of the proposed allocation under Strategic Policy 1.7 – West of Sandiacre but do have comments on some of the policy requirements which are set out below.

The opening paragraph of Strategic Policy 1.7 refers to development requirements of ‘around 180 homes’. Since the promotion of this site to the 2024 Call for Sites process, initial technical and design work has been undertaken and taking into account the requirements of Strategic Policy 1.7 and other site considerations, it has been established that the quantum of development for this parcel of land would be circa 100 dwellings. An indicative layout is included at Appendix A of these representation.

In terms of housing trajectory, the site is shown to start delivering housing in Year 2 2027/2028, with subsequent completions up to Year 6 2031/3032. Our client agrees with delivery on this site starting in Year 2 2027/2028 and has provided an amended trajectory below based on the revised quantum of development:

- Delivery of 35 dwellings in the year 2028
- Delivery of 50 dwellings in the year 2029
- Delivery of remaining 15 dwellings in the year 2030

Part 3 of Strategic Policy 1.7 seeks to safeguard the route of an existing public footpath running through the site and improvements to the access to Cloudside Road. Whilst our client would look to retain the existing footpath and make appropriate improvements, the policy should allow flexibility regarding the route of the footpath to not place undue constraint or burden on any master planning/design process. It would therefore be helpful if the wording of Part 3 of Strategic Policy 1.7 could look to allow for consideration of a suitable diversion of the footpath if found to be required.



Part 6 of Strategic Policy 1.7 is noted to address levels of affordable housing provision, and it is noted this is subject to viability in the policy wording, which is welcomed.

## Strategic Policy 5 – Green Infrastructure

The Inspector's Post Hearing Letter (Examination Document Reference: INS09) outlines that during the Hearing Sessions the Council identified that whilst this policy seeks to support a wider sub regional project, the policy is not substantiated by any evidence. The Council have subsequently prepared a Green Infrastructure Technical Paper, (dated April 2025 (referred to as 'GI Technical Paper' hereafter) as evidence base to support Strategic Policy 5.

Whilst the GI Technical Paper seeks to set out the context, reasoning and justification for the allocation of Green Infrastructure, the paper does not take into account land ownership and availability of the land parcels to deliver the policy objective for proposing Strategic Green Infrastructure (SGI) under Strategic Policy 5.

For example, part of our client's land interest at Thacker Farm, North West of Kirk Hallam, please see site location plan enclosed at Appendix D, is shown to form part of the Nutbrook Strategic Green Infrastructure Corridor in the GI Technical Paper, the proposed allocation of which extends to include part of our client's site on the Policies Map.

Strategic Policy 5 refers to the objectives of the SGI Corridors are to provide the following:

- Sustainable flood water management;
- Biodiversity improvement, including natural carbon capture;
- Active travel; and
- Open space recreational uses.

The policy wording also refers to proposals that further the above objectives would be supported. However, if any part of the land forming part of the proposed SGI Corridor's comprise private land, as per our client's land at Thacker Farm, there is no certainty that the objectives for allocating the SGI would be achieved as the delivery of such objectives is not in the Council's control. Therefore, the principle of such a proposed allocation is at risk of not being effective.

In respect of the Nutbrook Strategic Green Infrastructure Corridor the GI Technical Paper states the following:

*"The SGI corridor should prevent use of the land for potential incompatible or harmful uses. This includes major housing developments, which would not positively contribute to any the four key objectives set out in Strategic Policy 5."*

*[Source: Page 59 of GI Technical Paper]*

In the context of the above, the proposed allocation of the Nutbrook Strategic Green Infrastructure Corridor appears to be based on controlling the use of land, as opposed to achieving the objectives set out in Strategic Policy 5. As such, our client does not support the inclusion of their land interests as part of the SGI allocation. Furthermore, with our client's land interest at Thacker Farm being located in the Green Belt, any development proposals would be tested against the provisions of Green Belt policy in the first instance.



## Site Promotions

We welcome the proposed allocation of our client's site under Strategic Policy 1.7, which we have commented on above. As mentioned, through initial technical and design work undertaken since the 2024 Call for Sites submission, the capacity for proposed allocation under Strategic Policy 1.7 would be circa 100 dwellings. An indicative layout is included at Appendix A of these representation.

We acknowledge that this revised capacity is less than the circa 180 dwellings currently forming part of Strategic Policy 1.7. The capacity of the site has been tested through ongoing design work, which has taken into account the requirements of Strategic Policy 1.7 and also the following matters to bring forward an informed design layout:

- The provision of adequate noise mitigation in view of the site's juxtaposition with the M1 motorway.
- The provision of a buffer to the Local Nature Reserve and Conservation Area to the north
- To accommodate the public footpath which crosses the site
- To protect the amenity of existing properties
- Addressing other site considerations

We appreciate that the revised capacity for Strategic Policy 1.7 would see a reduction in the projected numbers forming part of the Housing Trajectory arising from this site. To address this matter, we do believe that our client's other land interests which have been promoted to the Council previously and continue to be promoted as part of these representations below, would be capable of addressing the shortfall. These sites are available and in sustainable locations, which would also align with the revised Spatial Strategy and Settlement Hierarchy and therefore, should be given further consideration for allocation.

### Land off Draycott Road, Breaston

Our client's site comprises circa 85.61 hectares (ha) of land off Draycott Road (A6005), west of Breaston and north of Draycott, the extent of which is shown on the Site Location Plan included at Appendix B of these representations.

As part of the Call for Sites in 2024, the site was submitted as a single combined site and separate parcels/phases (comprising four phases). The individual parcels/phases comprise as follows:

- Phase 1: Former school site (6.96ha (4.58ha net deliverable), delivering 110 (24 dwellings per hectare))
- Phase 2: Northeast parcel (29.79ha (14.38ha net deliverable), delivering 345 (24 dwellings per hectare))
- Phase 3: Central/Western parcel (30.13ha (14.58ha net deliverable), delivering 350 (24 dwellings per hectare))
- Phase 4: Western parcel (18.73ha (7.92ha net deliverable), delivering 190 (24 dwellings per hectare))

Our client has considered the capacity of the site taking account of the need to provide an appropriate and defensible Green Belt boundary and technical matters, which suggests an overall housing yield across a single combined site would be circa 995 dwellings with a developable area of circa 41ha.

Within the CSRA and associated evidence base documents, the site is referred to as follows, as shown on the Sustainability Appraisal 2025 Update Sites Assessed (Rejected) Borough South map:

- Phases 1 and 2 are considered together as CSR0046 ('Land North West of Breaston')
- Parts of Phases 3 and 4 are referred to as CSR0008a and CSR0008b, along with other parcels of land not promoted by our client through the call for sites process.



The Site Selection Paper published as part of this current CSRA consultation is noted to conclude the following in respect of the Council's assessment of our client's land promoted off Draycott Road, Breaston:

*"CSR-0008a was submitted to the council during the post hearings call for sites in 2024 forms a 462 home extension of Draycott. The entirety of land south of the former Derby & Sandiacre Canal has formed part of a wider submission site which appeared during 2014, 2019 and 2022 iterations of the SHLAA. Land to the north of the former canal has no SHLAA history. The site scores in the lower half of the SA and extends the settlement beyond the northern extent of the existing built form. As such it falls on land that makes an important contribution to the functioning of the Green Belt (fulfilling all 3 functions). In view of the SA and Green Belt findings the site is not considered suitable for allocation."*

*CSR-0008b was submitted to the council during the post hearings call for sites in 2024 and forms a north western extension to Draycott. Land south-east of the former Canal has formed part of a much larger SHLAA site across the last three SHLAAs in 2014, 2019 and 2022. It is partly a new site as Land south-east of formal Canal has been under consideration since the first call for sites, but the northwestern section has not been considered previously. The site, with an assessed capacity of 238 scores in the lower half of the SA and extends the settlement beyond the northern and western extents of the existing built form. As such it falls on land that makes an important contribution to the functioning of the Green Belt (fulfilling all 3 functions). In view of the SA and Green Belt findings the site is not considered suitable for allocation...*

*Land North West of Breaston (CSR0046) was submitted to the council during the call for sites in 2024. The site, which has an assessed capacity of 750 homes would form a northern extension to the settlement. It scores poorly in the SA and much of the site would be beyond the northern extent of the built form, on land that serves all three functions of the Green Belt. Due to both its SA score and Green Belt impacts the site is not considered suitable for allocation."*

The Council's assessment of this site appears to be on the basis of combining Phase 1 & 2 and then Phase 3 & 4. Our client's site does not appear to have been assessed as a combined site and individual parcels that could be delivered in a phased approach. It is also noted that the assessment of Phase 1 & 2 in the Site Selection Paper (CSR0046) is referred to as having a capacity of 750 homes – this does not align with the details submitted as part of the 2024 Call for Sites submission, which referred to a capacity of circa 455 dwellings across Phase 1 and 2. This should be reviewed by the authority for consistency.

In terms of the Green Belt Review supporting the CSRA consultation, the area of Green Belt covering our client's site at land off Draycott Road, Breaston is shown to be assessed as follows:

- Section 1: Purpose c) - The site (Phases 1-4) is part of Countryside Unit CU13, where the Green Belt Review concludes *"Development in this Countryside Unit could encroach on the countryside"*.
- Section 2: Purpose b) - The site (Phases 1-4) is within Corridor F but not within any of the identified Areas (A1-A7). In this part of Corridor F, the Green Belt Review concludes that the Green Belt *"remains important in order to maintain separation between the Derby and Long Eaton urban areas. This 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."*
- Section 3: Purpose a) - Phase 1 was assessed as *"making a limited contribution to checking the unrestricted sprawl of the Breaston built-up area"* (referred to as Area A in the Green Belt Review).

Through undertaking an assessment on the basis of individual parcels, we consider that the Council would establish that the area of land forming part of Phase 1, which has been found through the Green Belt Review to make a limited contribution to checking the unrestricted sprawl of the Breaston built-up area (Green Belt Purpose a), there is an opportunity for this parcel to come forward in this plan period. Further to this, Phase 1



and the wider parcels are located in a sustainable location and would align with the settlement hierarchy under Strategic Policy 0 where Breaston is identified as a Key Settlement where growth is being directed.

Breaston is a sustainable settlement within the Borough and sits in good proximity to both Nottingham to the east and Derby to the west and can accommodate a proportionate level of development, which our client's site offers and should be given further consideration for allocation.

## Land at Grange Farm, Breaston

Our client's site comprises 2.88 hectares (ha) of land, the extent of which is identified by the red line boundary on the Location Plan at Appendix C.

Through this CSRA, this Site is referred to as 'Land at Grange Farm', site reference CSR-0013 as shown in the Sustainability Appraisal 2025 Update Sites Assessed (Rejected) Borough South map). The Council's reasoning for the rejection of our client's site at Grange Farm in the Site Selection Paper is noted to state as follows:

*"Land at Grange Farm (CSR 0013) was submitted to the council during the call for sites in 2024. The site, which has an assessed capacity of 101 homes, scores within the top half of the SA and would form an eastern extension of the settlement. The Green Belt in this location plays an important role in relation to Preventing Neighbouring Towns from Merging, falling within Corridor F – Derby to Long Eaton. This is a sizeable area of Green Belt designation which extends between the Derby urban area (Derby City Council) and Long Eaton urban area. Removal of this section of Green Belt would extend the built form eastwards to the M1 Motorway, effectively joining Breaston to the Nottingham Conurbation (Long Eaton Urban Area). Development of the site would therefore contribute to the merging of towns, and as such is not considered suitable for allocation on Green Belt grounds."*

From a review of the SA Update, the Site is found to have achieved a SA Score of -3, giving it a rank of 7 (out of 19). The Council's above reason acknowledges that this site scores within the top half of the SA with there being no further commentary as to the SA scoring being a reason for the rejection of this site. The Council's reason for rejecting the site refers to the findings of the Green Belt Review, which refers to the following:

- Section 1: Purpose c) - The site is part of Countryside Unit CU12, where the Green Belt Review concludes "Development in this Countryside Unit could encroach on the countryside"
- Section 2: Purpose b) - The site is within Corridor F but not within any of the identified areas (A1-A7). In this part of Corridor F, the Green Belt Review concludes that the Green Belt "remains important in order to maintain separation between the Derby and Long Eaton urban areas. This 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."
- Section 3: Purpose a) - Our client's site is not specifically shown to be assessed as per the plan on Page 139 of the Green Belt Review, but the site is then subsequently shown as forming part of an area which fulfils 1 or 2 of the Green Belt purposes within the conclusions as indicated on the plan on Page 141 of the Green Belt Review.

We consider that the site makes a limited contribution to checking the unrestricted sprawl of the Breaston built-up area. Whilst the release of this land would extend the built form of Breaston, the M1 Motorway along the eastern boundary of the site acts as a defensible boundary that would prevent the joining of Breaston to the Long Eaton Urban Area. The release of this site would not therefore facilitate further development eastwards beyond the boundary of the site due to the presence of the M1 Motorway.



This site is in a sustainable location in close proximity to both existing services and transport linkages offering connectivity as it abuts Breaston, which is identified as a 'Key Settlement' in the CSRA. Breaston is a sustainable settlement within the Borough and sits in good proximity to both Nottingham to the east and Derby to the west and can accommodate a proportionate level of development, which our client's site offers. Overall, our client's site at Grange Farm continues to offer land available in a sustainable location, which is supported through the SA Update and is not viewed to fulfil all 3 assessed Green Belt purposes. Therefore, our client's site at Grange Farm should be given further consideration for allocation.

## Land at Thacker Farm, North West of Kirk Hallam

Our client's site comprises circa 63 hectares (ha) of land at Thacker Farm, North West of Kirk Hallam identified by the red line boundary on the Location Plan at Appendix D of these representations.

Within the CSRA and associated evidence base documents, the site is referred to as 'Land North West of Kirk Hallam', reference CSR-0014 (Sustainability Appraisal 2025 Update Sites Assessed (Rejected) Borough North map). The Council have previously rejected our client's site due to concerns that development would reduce the separation between Kirk Hallam and West Hallam Depot. We do not agree with this view as consideration should be given to the functionality of West Hallam Depot, which comprises an industrial estate.

The Site Selection Paper outlines the following reason for the Council's rejection of this site for allocation:

*"Land North West of Kirk Hallam was submitted during the call for sites in 2019 as a strategic housing site (SGA23) and again in 2024 on a larger scale (CSR0014). It scored within the top half of the SA, however due to its location, it cannot deliver the essential relief road. This can only be provided by developing land to the South West which is most able to mitigate traffic growth from proposals at Stanton. As with the SW site, the NW site falls partly within land that makes an important contribution to the Green Belt, however unlike the SW site, this is not counterbalanced by the provision of essential infrastructure such as the relief road. Delivery of both sites would not be achievable on viability grounds due to the saturation of a market with relatively low land values. For these reasons, the site is not considered suitable for allocation."*

The SA Update finds our client's site CSR0014 achieved an SA Score of 5, giving it a rank of 2 (out of 19) as shown in Table 10 of the sites assessed from the 2024 Call for Sites process. The SA Update states as follows on Page 25:

*"In relative terms, potential housing allocations that attract an overall score of -6 and upwards (the top half) can be said to fall comfortably within the most sustainable half of site options appraised by the Council as part of the SA3 update..."*

The overall conclusion on Page 35 of the SA Update also goes on to state the following:

*"Sites scoring -10 and upwards within Table 9 and -6 and above in Table 10 of this report represent the most sustainable options (top 50%) identified through the whole SA3 appraisal process."*

On the basis of the SA Scoring, our client's site at Thacker Farm is found to be a sustainable site against an assessment of the Sustainability Objectives as it is found to be ranked 2 of 19 sites assessed. The Council's reason for rejecting our client's site at Thacker Farm in the Site Selection Paper does not place an emphasis on the SA scoring, but rather that the site's location cannot deliver a relief road. With the delivery of the relief road noted to form part of Strategic Policy 1.5, the assessment of our client's site appears to be made on the basis of a comparative exercise against another parcel of land which should not be the case. The assessment should be on the basis of the site's merits and evidence base.





In terms of the Green Belt Review, the area of Green Belt covering our client's site at Thacker Farm is shown to be assessed as follows:

- Section 1: Purpose c) - The site appears to be part of Countryside Unit CU4/CU5, where the Green Belt Review concludes in both circumstances *"Development in this Countryside Unit could encroach on the countryside"*
- Section 2: Purpose b) - The site is within Corridor B, partly within Area 3 (A3). Overall, the Green Belt Review in respect of Purpose B outlines that *"Green Belt designation outside of the identified zones (A1 to A9) do not contribute towards the separation of the Derby and Ilkeston urban areas."*
- Section 3: Purpose a) - Our client's site is not specifically shown to be assessed as per the plan on Page 139 of the Green Belt Review, but it is subsequently shown as forming part of an area which fulfils 1 or 2 of the Green Belt purposes within the conclusions as indicated on the plan on Page 141 of the Green Belt Review.

Our client's site is in a sustainable location, abutting Kirk Hallam and therefore, is in close proximity to existing services and transport linkages offering connectivity. The authority has accepted through Strategic Policy 1 Housing that new growth is to be accommodated through an expansion to Kirk Hallam. Our client's site is located to the north of the proposed allocation (Strategic Policy 1.5 – South West of Kirk Hallam) and can accommodate additional growth but also offer the ability to extend the proposed relief road providing improved connectivity to the A609 in the north.

Overall, our client's site at Thacker Farm is supported by the assessment forming part of the SA Update. Also, with the findings of the Green Belt Review not being a determining factor in the Council's reasoning for rejecting this site, this parcel of land should be considered for allocation which would align with the settlement hierarchy set out in Strategic Policy 0 with Kirk Hallam referred to as forming part of the 'Town: The Ilkeston Urban Area'.

## Land to the north of Croft Lane, Breadsall

Our client's site comprises circa 4.1 hectares (ha) of land in close proximity to Breadsall, near the administrative boundary of Derby City Council. The extent of the site is identified by the red line boundary shown on the Location Plan enclosed at Appendix E of these representations.

As part of the CSRA and associated evidence base documents, there is no reference to our client's site in the Sustainability Appraisal 2025 Update Sites Assessed (Rejected) Borough North map and neither any reference to it being assessed within the SA 2025 Update (other than reference to the SGA24 assessment undertaken as part of SA2). There is also no reference to the site within the Site Selection Paper. This suggests that this site has not been considered and assessed as part of the CSRA process and we would welcome the Council's clarification on this matter.

In terms of the Green Belt Review, the area of Green Belt covering our client's site north of Croft Lane, Breadsall is shown to be assessed as follows:

- Section 1: Purpose c) - The site is part of Countryside Unit CU3, where the Green Belt Review concludes *"Development in this Countryside Unit could encroach on the countryside"*
- Section 2: Purpose b) - The site is within Corridor A and within identified Area 1 (A1) where the Green Belt Review concludes that *"it has been assessed that land here does not contribute to the continued separation of Derby and Belper. Development of land here would not result in the urban areas of Derby and Belper being brought any closer together."*



- Section 3: Purpose a) - Our client's is not specifically shown to be assessed as per the plan on Page 139 of the Green Belt Review but is then subsequently shown as forming part of an area which fulfils 1 or 2 of the Green Belt purposes within the conclusions as indicated on the plan on Page 141 of the Green Belt Review.

Breadsall is identified in the CSRA as an 'Other Settlement' under Strategic Policy 0 – The Settlement Hierarchy, which is subject to new growth through proposed allocation at Breadsall Hilltop (Strategic Policy 1.8 – North of Breadsall Hilltop) as an *"extension to the Oxwood neighbourhood which forms part of the Derby conurbation"*. We therefore presume the authority acknowledge the social and economic relationship between Breadsall and Derby. The position of our client's site, in close proximity to the administrative boundary of Derby but also to Breadsall, offers an available site in a sustainable location, and where growth is being directed as part of the CSRA via the release of land from the Green Belt, and should therefore be assessed for allocation.

We trust our representations will be taken into consideration as part of the ongoing preparation of the Core Strategy Review and are happy to discuss any aspect of our representations if this would be helpful to the authority.

Yours faithfully,



**Kam Saini**  
**Director**  
**CarneySweeney**

## Appendices

- Appendix A: Land off Larch Drive, Cloudside, Sandiacre – Site Location Plan and Indicative Site Plan
- Appendix B: Land off Draycott Road, Breaston – Site Location Plan
- Appendix C: Land at Grange Farm, Breaston – Site Location Plan
- Appendix D: Land at Thacker Farm, North West of Kirk Hallam – Site Location Plan
- Appendix E: Land to the north of Croft Lane, Breadsall – Site Location Plan





## **Appendices**



## **Appendix A**







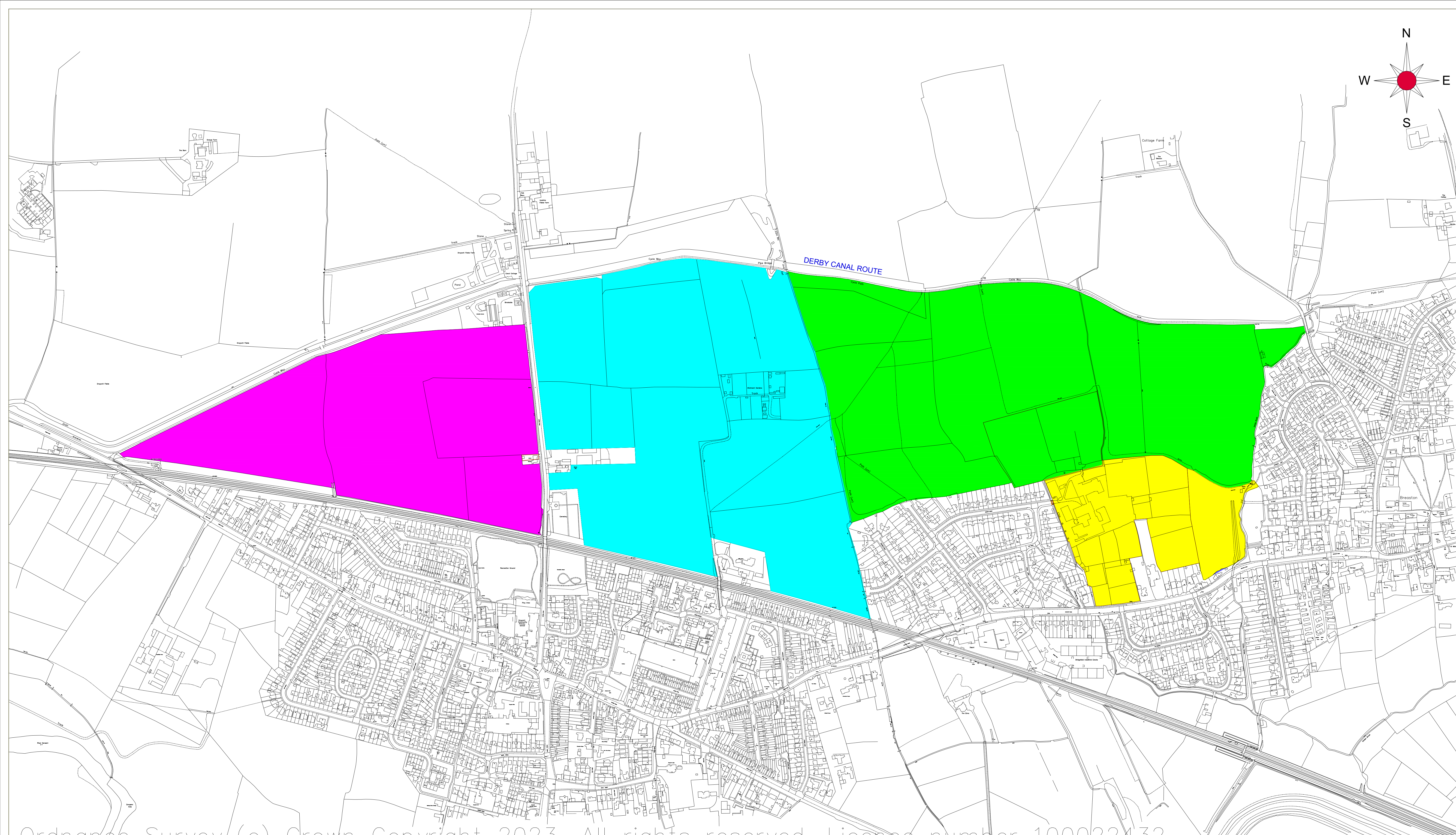
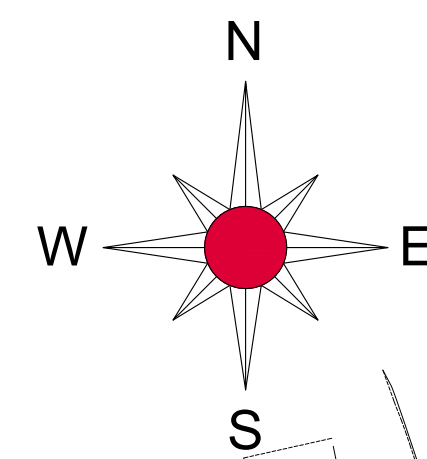




## **Appendix B**





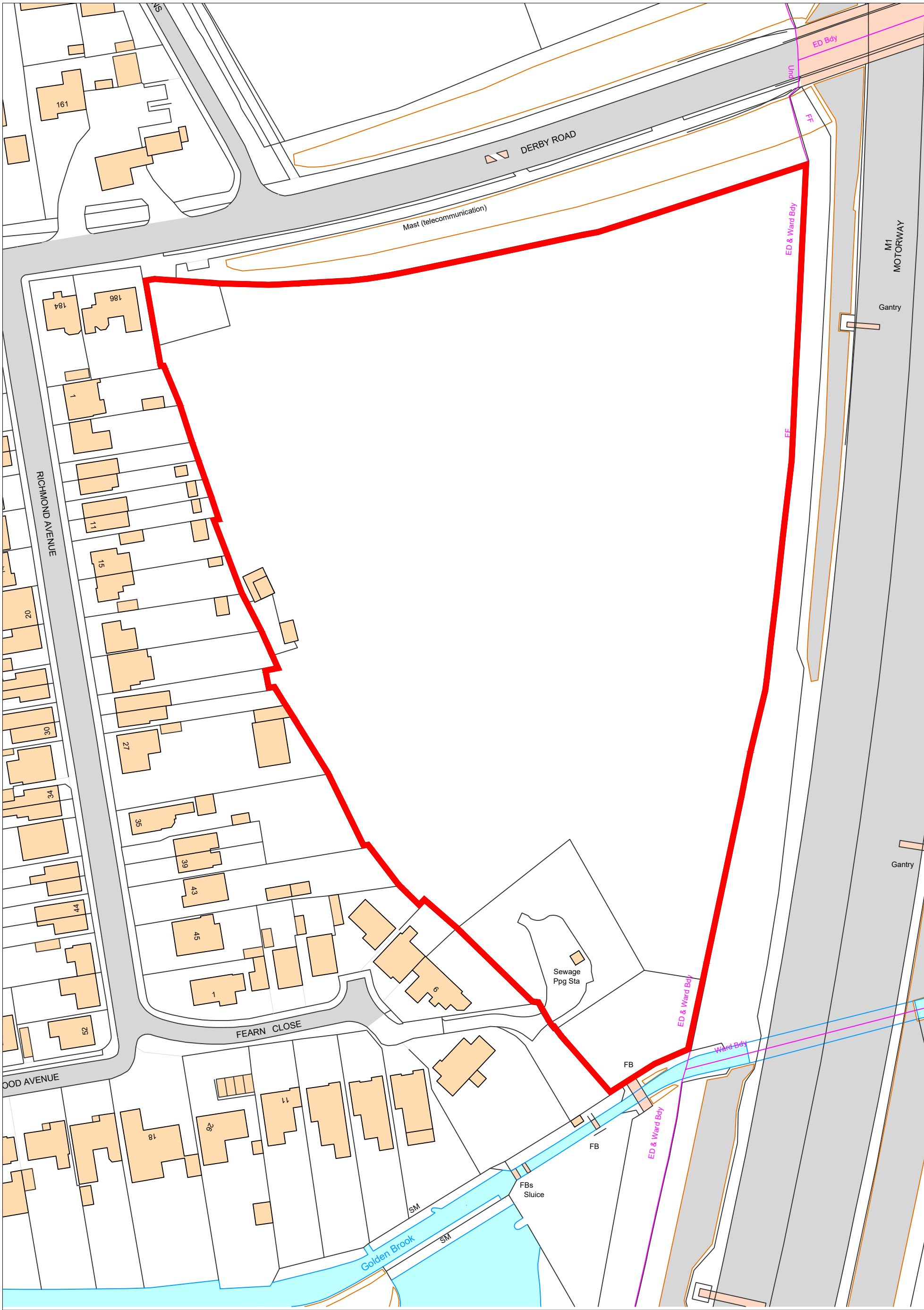


PHASE 1	Former School Site Location	6.96	Ha (approx)	17.2	Acres (approx)
PHASE 2		29.79	Ha (approx)	73.6	Acres (approx)
PHASE 3		30.13	Ha (approx)	74.4	Acres (approx)
PHASE 4		18.73	Ha (approx)	46.3	Acres (approx)



## **Appendix C**





LOCATION PLAN  
GRANGE FARM, BREASTON

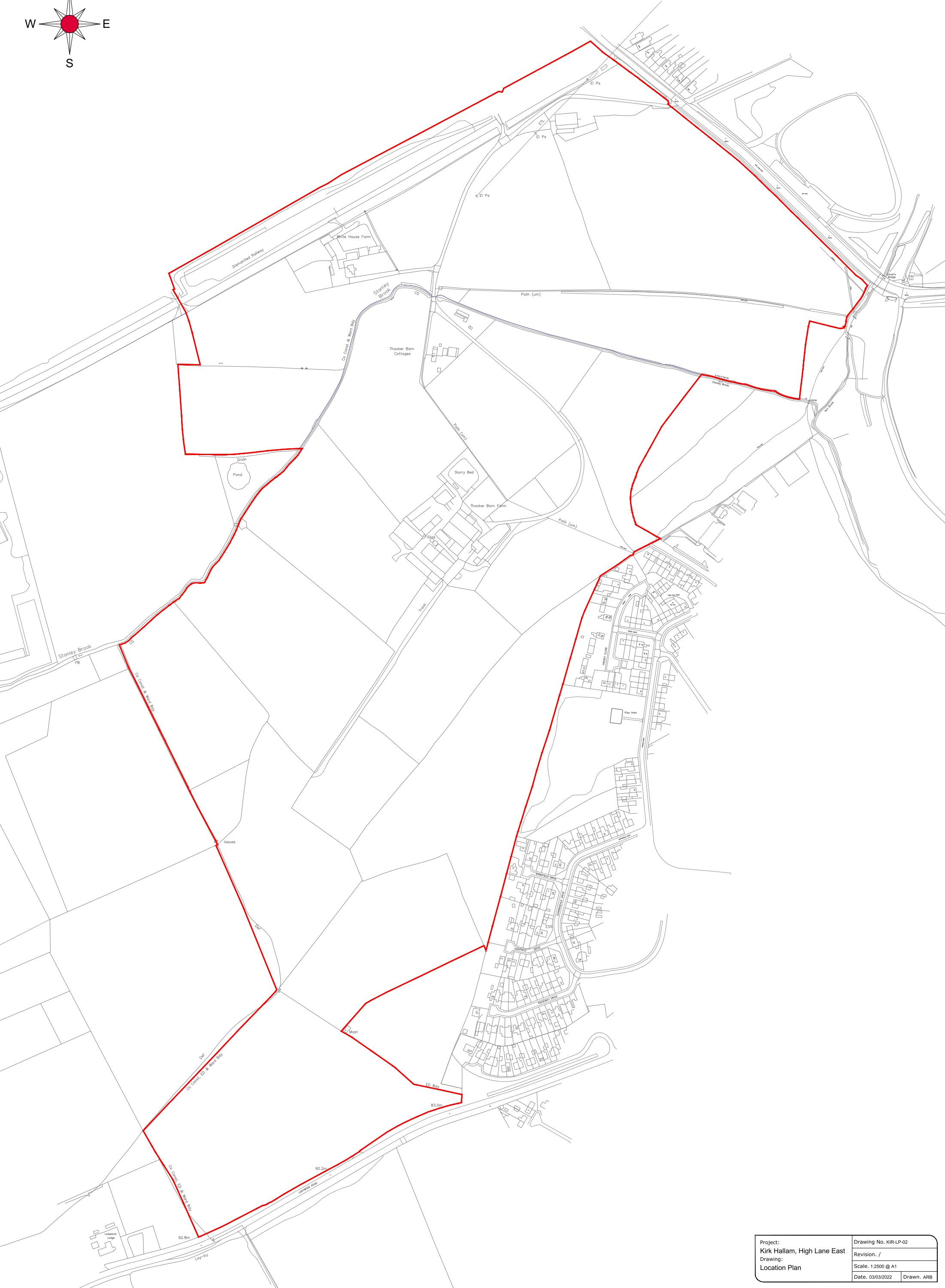
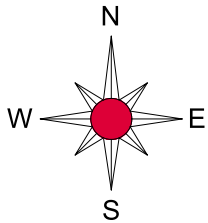
Scale 1:1000

Drwg GFB-SLP-01



## **Appendix D**

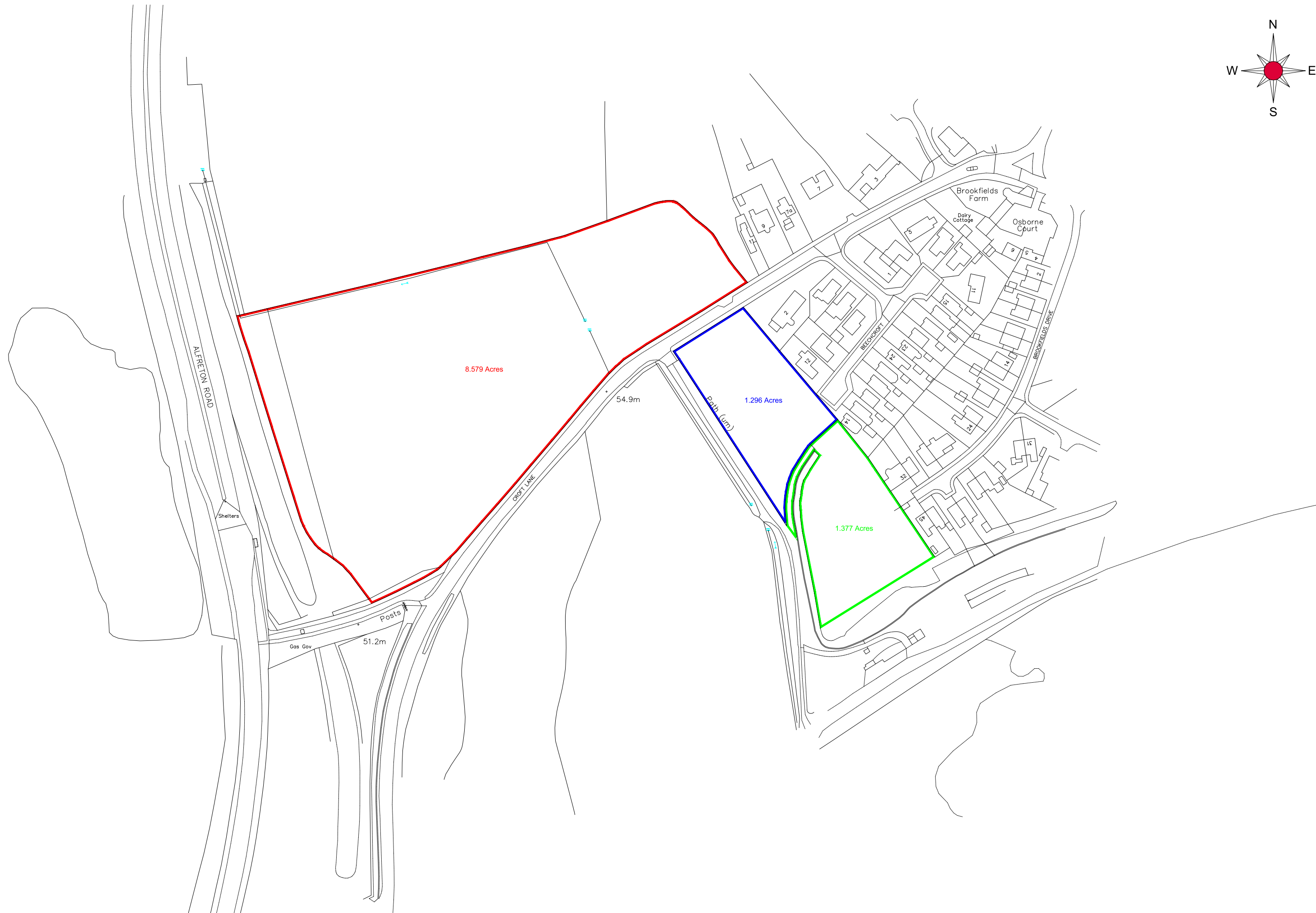
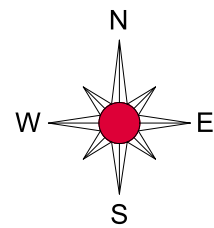




Project:	Kirk Hallam, High Lane East			Drawing No. KIR-LP-02
Drawing:	Location Plan			Revision. /
				Scale. 1:2500 @ A1
				Date. 03/03/2022
				Drawn. ARB

## **Appendix E**





Project:  
Breadsall, Croft Lane  
Drawing:  
Location Plan

C:\Tribal\Breadsall\AutoCAD\Final\Final\FINAL\_PENETR\_L0000\_for\_email.dwg

Drawing No. BRE-LP-01	
Revision. /	
Scale. 1:1000 @ A1 - 1:2500 @ A3	
Date. 10.12.2020	Drawn. TWB