

Consultation Statement

Core Strategy Review Amendment

Erewash Borough Council
June 2025

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1. Introduction

- 1.1 This Consultation Statement (CS) reports on a number of aspects concerning the public consultation undertaken by the Borough Council in respect of the amended Erewash Core Strategy Review (ECSR) carried out over April and May 2025.
- 1.2 The CS provides details of the purpose of consultation, the relevance to the current stage of the ongoing plan Examination, before going on to present a range of information regarding representations received during the consultation.
- 1.3 A requirement for a further stage of public consultation stems from the need for amendments to be made to the submitted ECSR document. At Hearing Sessions which took place during June 2024, the independent Planning Inspector appointed by the Secretary of State to examine the ECSR, raised several concerns in respect to the Council's submitted plan. One of the main issues was the Council's inability to identify a sufficient supply of deliverable housing land to meet the Borough's five-year land supply requirement. Additionally, the rebasing of the ECSR's plan period had resulted in a shortfall of housing land against the overall plan-wide requirement.
- 1.4 The issues around housing land supply prompted the Council to undertake a 'call for sites' exercise during September 2024. This had the purpose of identifying new development land around the Borough which had the potential to contribute towards addressing both the immediate and longer-term shortfalls described in 1.3. The call for sites was just one element of an extensive programme of work the Council committed to undertaking, responding to other concerns expressed by the Inspector. The work programme included the production of a Green Belt Review, a Site Selection paper justifying the allocation of new housing sites, amendments to the submitted ECSR to clarify the approach to devising a spatial strategy, revised viability evidence and the production of an updated housing trajectory and a Green Infrastructure technical paper.
- 1.5 The work referred to in 1.4 formed part of a detailed programme, presented as a Gantt chart. Progress towards milestones on key projects was subject to weekly review by Council Officers, with updates communicated regularly to the Planning Inspector examining the ECSR over the course of several months.
- 1.6 This Consultation Statement adds to previous Consultation Statements produced to report on engagement undertaken across the duration of the Core Strategy Review's production. These date back as far as the Council's Regulation 18 Part 1 consultation which commenced back in January 2020.

2. Consultation arrangements

- 2.1 A meeting of Extraordinary Council on Thursday 27 March 2025 at Long Eaton Town Hall saw Councillors approve a six-week public consultation over an amended Core Strategy Review (ACSR). The event was attended by many members of the public, with both the Council Chamber's public gallery and an adjoining Committee Room filled to capacity with those wishing to listen to the meeting. The Council subsequently uploaded a recording of the entirety of the meeting onto its YouTube channel.
- 2.2 A six-week public consultation on the amended Core Strategy Review commenced on **Monday 7 April 2025**. A total of **1,358 emails** and **1,356 letters** (the latter reaching **1,864 people** as a result of multiple contacts at a household) were sent to contacts already present on the Council's Local Plan database, or who alternatively had requested to be added to the database in the period between the Extraordinary Council meeting and the commencement of public consultation, keeping them aware of the consultation. In line with Local Planning Regulations 2012 (as amended), all specific (statutory) consultation bodies were also notified of the forthcoming consultation period, resulting in a further 52 emails being sent out.
- 2.3 The Council also followed the provisions set out within its Statement of Community Involvement (SCI) (2019). Relevant information connected to the consultation was placed at deposit points mentioned at Appendix 1 of the SCI. This included both Town Halls in Erewash (at Long Eaton and Ilkeston) in addition to all public libraries within the Borough. Because of proposed allocations around the Derby urban fringe area (Acorn Way and North of Breadsall Hilltop), consultation documents were also deposited at an additional deposit point at Springwood Library in the Oakwood area of neighbouring Derby City.
- 2.4 The Council also produced its own communications to publicise the six-week period of public consultation. A press release (**see Appendix A**) was issued by the Council to provide context and key information over the consultation. This was followed by posts on the Council's social media pages, helping to widen levels of publicity around the consultation. Screenshots of these can be viewed at **Appendix B**. For context, the Council's Facebook account currently has approximately 15k followers, whilst its X (formerly Twitter) account has around 5.5k followers. The sizeable number of followers help demonstrate the Council's commitment to publicising the consultation over the ACSR as far and wide amongst the Borough's communities as possible. Reminders were also issued about the consultation which provided notice of its forthcoming end ahead of the 19 May 2025 closure date.
- 2.5 To assist with the ease in which the public could engage with the consultation and make comments over the proposals in the ACSR, the Council created an electronic portal making the process of focusing a representation on a specific site allocation easier. Information from colleagues in the Council's Communications team show that in total, **6,971 views** (i.e. 'hits') were made to the main page on the Council's website where people were able to access

the online consultation portal across the six-week period of consultation. More detailed data showing the level of engagement with consultation material hosted on the Borough's website can be viewed at **Appendix C**. The effectiveness of the electronic portal was clear in that approximately three-quarters of all duly made representations originated from use of the online consultation form. This has enabled the Council to report the information presented in tables throughout Section 6 of this Consultation Statement.

- 2.6 As part of the Council's work to heighten knowledge of infrastructure requirements which may be necessary to support growth at various settlements around the Borough, the Council contacted main infrastructure providers several weeks in advance of the formal consultation to seek specialist input into developing its awareness of current infrastructure coverage.
- 2.7 Whilst informal in nature, the dialogue was particularly useful in helping obtain information from some of the infrastructure providers who were contacted to finalise its Infrastructure Delivery Plan. At the time of contact, the Council did not disclose the locations of the eight new site allocations that now form part of the amended Core Strategy Review. An opportunity for infrastructure providers to offer more focused site-specific comments would subsequently occur a few weeks later through the formal consultation. A list of providers who were contacted in order to seek a greater understanding of requirements likely to arise from new growth can be found below.
- 2.8 List of Infrastructure providers:
- Network Rail
 - Derbyshire County Council
 - Derby City Council
 - Severn Trent Water
 - Environment Agency
 - Highways England
 - Derby & Derbyshire Integrated Care Board
 - National Grid
 - Cadent
 - Trent Barton buses
- 2.9 Beyond the close of the formal consultation, the Council contacted all members of the public who had submitted a representation to make clear that a duly made representation would result in the representor's name being published on-line in accordance with how such personal data normally appears as part of the Local Plan examination process (guidance on this matter published by the Planning Inspectorate is available to view [here](#)). The Council felt it appropriate to clarify arrangements around the publication of personal data in order to offer representors an opportunity to opt-out should that be their preference. In response to the correspondence with the public, a small number of those contacted by the Council expressed their wishes to formally withdraw their representation as they did not want their name to be made publicly available on the Council's examination website.

- 2.10 Further contact was made with all remaining members of the public via either letter or email to ask whether the individual wished to appear at future Hearing Sessions. It was clearly explained in the Council's correspondence that an individual's right to appear was not assured, as this would be entirely at the discretion of the Planning Inspector.

3. Overall results of consultation

- 3.1 In total, the Council received **1,714** duly made representations in response to the formal six-week consultation.
- 3.2 In addition to the reported numbers, an e-Petition utilising the Change.org platform was submitted to the Council. This contained **1,527** electronic signatories and objected to all eight proposed housing allocation sites situated within the Erewash Green Belt. Since its submission, the petition continued to attract additional signatories – although the Council officially reports the number as 1,527 given that was the total when the petition was formally forwarded to the Council on the final day of the consultation period (May 17 2025). All names subsequently added have occurred after the close of consultation and cannot legitimately be said to have been added during the six-week period.
- 3.3 At the time of producing this Consultation Statement, the e-petition was still available to view on Change.org until the title ‘Erewash Green Belt’.
- 3.4 Of the ePortal representations, combining representations from the public received by email and written correspondence and inputted into the ePortal by Council staff, a wide disparity was evident between the allocation with the most representations, West of Sandiacre (4,649 individual comments), and that with the least, North of Borrowash (160 individual comments). More information on the level of response to each allocation is available to view in **Section 6**.

4. Reporting of responses

- 4.1 The Consultation Statement reports on responses made to the consultation by separating representations from the various respondents into different groups. This reflects the approach to engagement utilised by the Council, which saw the use of a consultation portal allow members of the public to focus specifically on any site(s) they wished to make comments on. Additionally, through utilising the knowledge of main planning issues raised in previous consultations across the Plan's production to date, further clarity was established by the portal through the identification of particular themes which the public would most likely be interested in commenting on. However, respondents were not bound by these themes, and any other matter(s) of interest were able to be brought to the Council's attention by replying to 'other'.
- 4.2 With the majority of representations submitted via the consultation portal, it is appropriate that this Statement bases its reporting structure on the different types of respondent. As has occurred historically, specific consultation bodies (i.e. statutory consultees) predominantly responded via email, as did a number of other professional consultees – including interest groups and those involved in the promotion of development sites.
- 4.3 It should be noted that this Consultation Statement includes the Council's responses to the matters raised by the public's representations rather than technical and professional stakeholders responses. This decision has been taken in light of the advanced stage of examination the Plan has reached and due to a comprehensive consultation not generally commonplace at this stage of a Plan's review. The Council does not wish to pre-empt how any individual matter identified through a representation should be addressed by the appointed Inspector prior to her issuing of Matters Issues and Questions (MIQs). Despite these arrangements, all representations submitted throughout the six-week consultation have been forwarded to the Inspector in full and will be uploaded to the Examination Library hosted on the Council's website.

5. Statutory Consultees

5.1 As mentioned at 2.2, all statutory (specific) consultee bodies set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) were contacted electronically in advance of the commencement of consultation in April 2025.

5.2 A list of statutory (specific) consultee bodies (SCBs) who responded to the consultation is below:

- Natural England
- The Coal Authority
- Network Rail
- National Highways
- Derbyshire County Council (Highways)
- Sport England*
- Breadsall Parish Council
- Breaston Parish Council
- Dale Abbey Parish Council
- Draycott Parish Council
- Ockbrook & Borrowash Parish Council
- Sandiacre Parish Council
- Stanley & Stanley Common Parish Council
- West Hallam Parish Council

*Plans announced by Government on March 10 2025 proposed the removal of statutory status from Sport England (and other consultee bodies). However, as proposals are yet to be introduced, the Council continues to recognise Sport England as a Specific Consultee Body.

5.3 In addition to the SCBs listed above, the Council deem it appropriate to include comments received as part of the Derbyshire Wildlife Trust (DWT) representation in the following section. Whilst not a SCB, DWT is a body representing an important source of biological information who advise on the conditions of wildlife and ecology across the Borough.

5.4 This statement now provides a summary of each specific consultee bodies response. These have been arranged in such a way that comments now fall under the individual policies within the ACSR, with this providing greater clarity on which site allocation comments specifically relate to.

Spatial Portrait:

No comments from SCBs.

The Spatial Strategy:

No comments from SCBs.

Strategic Policy 1: The Settlement Hierarchy

No comments from SCBs.

Strategic Policy 1.1: Allocated Housing Sites

No comments from SCBs.

Strategic Policy 1.2: South Stanton

No comments from SCBs.

Strategic Policy 1.3: Acorn Way

Sport England - Reference the playing field adjacent to the Acorn Way housing allocation and its association with the Lees Brook Academy. Development at Acorn Way ought to consider adjoining land uses and the 'agent of change' as per Para 200 of the NPPF. Acorn Way's development could prejudice use of the playing adjoining field and policy should ensure this does not occur, and if necessary, mitigation added to policy to protect the site from noise and ball strike. Sport England (SE) recognise the playing field land is included as 'safeguarded land', and the policy should make it clear any proposal needs to accord with the provisions of Para 104 of the NPPF.

Strategic Policy 1.4: North of Spondon

No comments from SCBs.

Strategic Policy 1.5: South West of Kirk Hallam

Dale Abbey Parish Council - Concerns were raised over the appropriateness of the proposed Local Centre being delivered at the site in a Green Belt countryside setting. The location relative to the wider development is isolated and inaccessible to the elderly and disabled being located beyond a busy relief road. The Local Centre is more accessible to motorists than residents. Its car-dominant location might result in anti-social behaviour with the relief road allowing easy escape. The Parish Council feel the Local Centre is unnecessary, with refurbishment of the existing centre and the nearby facilities at Ilkeston more suitable. If a Local Centre is necessary, it should be to the east of the relief road, preventing the loss of additional Green Belt. Concern that once the defensible boundary of the relief road is breached, development will spread towards Dale Abbey.

Strategic Policy 1.6: No policy

Strategic Policy 1.7: West of Sandiacre

Sandiacre Parish Council:

- Sandiacre Neighbourhood Plan (SNP):
The SNP appears to have been overlooked by the Borough Council when undertaking the requirement to meet increased Government housing targets.
- Sandiacre Neighbourhood Plan – Future Housing Developments:
Development of the allocation site would contradict the aims and objectives of the SNP to make the Parish more attractive as a place to live and work and protect existing open spaces and countryside for recreational use and wildlife.
- Impact on wildlife and the environment:
The proposal diminishes local green open spaces that benefits local wildlife and remains accessible for the enjoyment of local people and children to visit and enjoy through recreational use.
- Impact on community and well-being:
The proposal will not support recreational use and the well-being of local people and will have an adverse impact on the character of the area and nearby Stoney Cloud Local Nature Reserve.
- Site access / construction:
Concern that narrow roads around the allocation site, reduced further by parking habits, will have to absorb additional traffic, posing dangers to road users and pedestrians – particularly school children and the elderly. Construction traffic is likely to create noise and disturbance to those in the immediate vicinity of the allocation.
- Amenities and school places:
Fears that schools and healthcare facilities are already over-subscribed and will force people to have to travel out of area to access essential facilities and services.

Overall, the Parish Council see no benefit to the development of the allocation when other brownfield opportunities exist, whilst the proposal is clearly not in conformity with the policies of the SNP.

National Highways - Potential for highway improvements in the area should be considered to enable development to be implemented in Long Eaton, Sandiacre and Ilkeston.

DCC Highways - a continuation of vehicular and pedestrian access of Larch Drive is acceptable. An extended vehicular access would need to be constructed to adoptable standards.*

Derbyshire Wildlife Trust – The overall impact is assessed as High based on a desktop study and a field visit. This is primarily because the proposed development site is immediately adjacent to and includes a small part of the Stoney Clouds Local Wildlife Site and is also adjacent to the boundary of the

Local Nature Reserve (the boundaries of the LWS and the LNR are slightly different). The development would result in some loss of habitats adjacent to the reserve and possibly the loss of designated grassland habitat. Development would result in an increase in pressure on the nature reserve and whilst some of these can be mitigated or avoided it would require a sympathetic development design with sufficient buffering to the nature reserve boundaries. Most of the site is not designated and the habitats present are not irreplaceable or of very high or high nature conservation value. The grassland habitat present is likely to be low or medium distinctiveness and typically losses can be addressed through mitigation and compensation measures. However, development in such proximity to a Local Wildlife Site and Local Nature Reserve is a significant risk and adverse impacts could result in a decline in the functionality and integrity of the reserve. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

Strategic Policy 1.8: North of Breadsall Hilltop

Breadsall Parish Council - Concerns were expressed in relation to the allocation's impact on traffic congestion on local roads through the village, heightened fears over road safety due to the existing limitations of road junctions, the loss of Green Belt enabling the coalescence between Breadsall and the main urban area of Derby (and resulting damage to wildlife and GI links), a lack of supporting infrastructure and continued problems with flooding in the village – which would be exacerbated with the run-off caused by new housing at the allocation site. A subsequent representation raised concerns over inaccuracies in the supporting mapping within the material released alongside the amended Core Strategy Review. This included confusion over the status of Manor Farm in relation to the area of identified safeguarded land, the use of map base which fails to show both recently developed and approved housing schemes in the immediate vicinity of the site and an error over Hungerhill Close, which is incorrectly referred to as Hungerhill Crescent.

Natural England - Natural England proposes a modification to **Policy 1.8: North of Breadsall Hilltop**, recommending the addition of wording which recognises the proximity of the Breadsall Railway Cutting SSSI to the allocation and which requires the provision of evidence demonstrating that development would not damage or destroy the interest features for which the SSSI has been notified.

DCC Highways - extension of Dale Acre Way/Hungerhill Close appears acceptable in principle, but requires approval from Derby City, an adjacent highways authority. Pedestrian and cycling links between the site and A609 Hill Top would be beneficial and should be provided.*

Derbyshire Wildlife Trust – The overall impact is assessed as Medium - High based on a desktop study. Whilst there are no designated sites or irreplaceable habitats affected this is a relatively large site and the level of impact could vary from Medium (possibly Low) to High depending upon the extent to which the more valuable habitats on site can be retained and

mitigation and compensation measures can be implemented for indirect impacts on the adjacent LWS. The risk to deciduous woodland, scrub and a pond as well as potential indirect impacts on adjacent Local Wildlife Site (Breadsall Disused Railway ER005) are the main concerns. There would appear to be some scope to try and retain woodland, hedgerows and the pond but as these areas are included within the site boundary it is assumed they are at risk. The woodland in the north-east of the site adjacent to the LWS boundary and disused railway is potentially of high value and could be Lowland Mixed Deciduous Woodland. Equally in the south of the site there is a scrubby area with a small pond/wetland. If the woodland, scrub and pond habitats are retained the overall impact is likely to be significantly lower. The remainder of the site supports habitats of low nature conservation value, though arable land can support a variety of birds and mammals. However, impacts on species are probably on a local 15 scale and could be addressed by mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

Strategic Policy 1.9: South of West Hallam

West Hallam Parish Council – the following comments were made:

- **Traffic congestion:**
Concern at restricted width of Beech Lane. Congestion at peak times worsens conditions. Raised concerns with how a number of local junctions currently function which would be further impacted by additional homes.
- **Road safety:**
Cites the diverse range of community facilities which adjoin Beech Lane, which due to its narrowness and lack of pavement along one side can be dangerous for pedestrians.
- **Air quality:**
Concern that additional vehicles using local roads will worsen air quality.
- **Wildlife / Biodiversity:**
Development would have a negative effect on biodiversity both during and after the build, with buzzards and badgers cited within the area.
- **Bus services:**
Poor existing services, particularly during evenings (no buses). Greater car dependency will worsen localised congestion and lead to deterioration of air quality.
- **Healthcare facilities:**
Current waiting times at local GP can reach four weeks, with current capacity insufficient. Additional residents from new homes would only worsen this situation.
- **Number of houses:**
Numbers proposed will impact on ability of existing residents to move around the village and accessing local amenities. Reiterates how congested Beech Lane can get, whilst pointing out previous attempts to develop this site have been unsuccessful.
- **Green Belt:**

Development will reduce the greenbelt surrounding the village of West Hallam. The proposed site sits next to the West Hallam Conservation Area. People enjoy living with the countryside on their doorsteps. It is important for their health and wellbeing.

- **Landscape:**

Development would alter the landscape to the south of the village by building on precious green belt land. Wildlife will have their habitats reduced.

Sport England - recognises its location adjacent to a playing field. Para 200 of the NPPF would apply. Development could prejudice the use of the adjacent cricket playing field, so policy should ensure this does not occur. If necessary, any mitigation to protect the site should be included within the policy. For instance, a cricket ball strike risk impact assessment to be carried out and any necessary ball mitigation measures resulting from the assessment.

DCC Highways - a safe and suitable access between the site and Beech Lane will be necessary, and will need to show safe interactions with accesses to Scargill Primary School and the junction with Hallam Way. A footway along the length of the development's frontage and improvement of bus stop facility is considered essential.*

Stanley & Stanley Common Parish Council - commented on SP1.9. Whilst the allocation is not within the SSCPC area, as a neighbouring Parish, SSCPC recognise that impacts from the allocation sites would affect conditions within their area. Concerns are directed towards an increase in the volume of traffic through the two villages, with particular concern focused on:

- **Pedestrian safety:**

Existing issues of speeding traffic through the villages will not be helped by additional traffic generated by development.

- **Noise:**

Concern about the additional noise generated by the increase in traffic passing through the villages.

- **Existing road junctions:**

Millhouse and Cat & Fiddle junctions will be impacted by the developments. Both junctions are already operating at capacity. DCC Highways have raised concerns about both in response to historic plans to develop the South of West Hallam site. Seasonal landscaping around the Cat & Fiddle junction can obscure visibility and hamper access from it. Additional traffic at both junctions heightens risks of road traffic collisions.

SSCPC also cite concerns about the ability of parishioners to access facilities at the Dales Shopping Centre in West Hallam, the nearest facilities to the two villages. Road access is taken via Beech Lane, adjacent to the South of West Hallam allocation. Difficult access along this route will be worsened with the traffic from the two West Hallam allocations. With reductions to the local bus service which connects the two villages to the Shopping Centre, this is likely to result in greater reliance on the private car to access facilities. As a

consequence, parking provision at the Centre for shops and the medical facility will be further stretched which risks inappropriate parking along Beech Lane – worsening highway conditions along this section of road.

Derbyshire Wildlife Trust – The overall impact is assessed as Low based on a desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are likely to be low or medium distinctiveness. Impacts on species are probably on a local scale but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

Strategic Policy 1.10: North of West Hallam

DCC Highways - a safe and suitable access with High Lane West is required with sufficient visibility splays. Secondary access for cyclists and pedestrians on Park Hall Lane should be created to access Footpath No. 1, with the potential for access for emergency vehicles.

West Hallam Parish Council – the following comments were made:

- **Traffic congestion:**
Proposed road access adjacent to Millhouse crossroads enters A609 on dangerous bend with traffic passing at 40mph. Risks danger in exiting the allocation site.
- **Road safety:**
Reemphasises the points about unsuitability of access arrangements between the allocation site and the A609. A number of collisions have occurred at Millhouse crossroads.
- **Air quality:**
Increased traffic from the site would reduce air quality for existing residents and animals which live around the site.
- **Wildlife / Biodiversity:**
Badgers, buzzards and other wildlife reported as being sighted in the field. Several trees have TPOs along the Park Hall Lane boundary. The hedgerow running along the boundary with High Lane West is protected.
- **Bus services:**
Inadequate connectivity to Nottingham and Derby. Greater reliance on the private car will worsen local congestion on local roads, giving rise to poorer air quality.
- **School capacity:**
Despite some capacity at the local primary school, this is 0.5 miles away and would require crossing the busy A609, which has no safe crossing point near to the allocation site.
- **Healthcare facilities:**
Cites difficulties in obtaining appointments at the local medical centre.
- **Number of houses:**
Too many homes proposed for this allocation. Adjoining A609 already experiences speeding traffic, and this also impacts those living along Belper Road. Further vehicles entering and exiting the allocation site will

only increase risks of accidents. Noise levels are likely to increase, with adjacent homes already able to hear music from Oakfield Farm.

- **Green Belt:**
Green Belt plays an instrumental role in villagers way of life, with West Hallam surrounded by attractive countryside. The benefits of this on the doorsteps of households are significant for mental and physical wellbeing. Green Belt also contains elements of GI with trails linking West Hallam to surrounding villages, with trails also home to an assortment of wildlife. Proposing an access onto Park Hall Lane isn't suitable due to its reduced width which large vehicles struggle with.
- **Landscape:**
Reiterated the landscape features which immediately surround the site along its boundaries. Housing at this location would change the landscape of the village, whilst residents would also be at greater distance from key local amenities.
- **Flooding /Drainage:**
Reports of localised flooding on site which extends into neighbouring gardens and onto the A609. No technical solution to alleviate this has yet been found.

Stanley & Stanley Common Parish Council - commented on SP1.10. Whilst the allocation is not within the SSCPC area, as a neighbouring Parish, SSCPC recognise that impacts from the allocation sites would affect conditions within their area. Concerns are directed towards an increase in the volume of traffic through the two villages, with particular concern focused on:

- **Pedestrian safety:**
Existing issues of speeding traffic through the villages will not be helped by additional traffic generated by development.
- **Noise:**
Concern about the additional noise generated by the increase in traffic passing through the villages.
- **Existing road junctions:**
Millhouse and Cat & Fiddle junctions will be impacted by the developments. Both junctions are already operating at capacity. DCC Highways have raised concerns about both in response to historic plans to develop the South of West Hallam site. Seasonal landscaping around the Cat & Fiddle junction can obscure visibility and hamper access from it. Additional traffic at both junctions heightens risks of road traffic collisions.

SSCPC also cite concerns about the ability of Parishioners to access facilities at the Dales Shopping Centre in West Hallam, the nearest facilities to the two villages. Road access is taken via Beech Lane, adjacent to the South of West Hallam allocation. Difficult access along this route will be worsened with the traffic from the two West Hallam allocations. With reductions to the local bus service which connects the two villages to the Shopping Centre, this is likely to result in greater reliance on the private car to access facilities. As a consequence, parking provision at the Centre for shops and the medical facility will be further stretched which risks inappropriate parking along Beech Lane – worsening highway conditions along this section of road.

Derbyshire Wildlife Trust – The overall impact is assessed as Low based on a desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are likely to be low or medium distinctiveness. Impacts on species are probably on a local scale but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

Strategic Policy 1.11: North of Borrowash

Ockbrook & Borrowash Parish Council - A number of concerns were raised by the Parish Council. These centred on Green Belt and ongoing separation of Borrowash and Spondon. The heightened potential for the coalescence of these settlements was cited, with suggestions offered as to how openness could be maintained in the event that development took place. Two new housing allocations in Borrowash would also have a significant impact on the number of additional car journeys being made, with the Parish Council calling for a robust approach to traffic management around the two sites. Suggested mitigation measures were offered which relate to access points onto the strategic road network (the A52) and more localised action within the centre of Borrowash with traffic lights at the junction between Victoria Avenue and the B5010.

Concerns were raised relating to healthcare provision within the village. With the two General Practices operating at capacity, additional capacity at existing, or new facilities would be needed to cope with a growth in population. The proposed level of affordable housing (10%) was considered too low in light of the level of need which existed locally, with encouragement given to consider increasing this proportion. The Parish Council also highlighted surface flood events on the land allocated for housing. Concern at the prospect of further impermeable surfaces was raised, with calls made for an effective and robust flood prevention scheme.

DCC Highways - a safe and suitable access with Cole Lane is required with sufficient visibility splays. Footpath No. 1 should be safeguarded as it provides important access to bus stops and other facilities to the south.

National Highways – National Highways have received complaints over grade separated junctions with the A52 in the Borrowash area, so a road safety review should be included as part of Policy 1.11 (North of Borrowash) as well as junction capacity assessments for junctions between A52/Victoria Avenue and A52/Cole Lane.

Derbyshire Wildlife Trust – The overall impact is assessed as Low based on a desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are of low or medium distinctiveness. Impacts on species are probably on a local scale only but will need to be addressed through mitigation and compensation measures. If

development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

Strategic Policy 1.12: West of Borrowash

Ockbrook & Borrowash Parish Council - A number of concerns were raised by the Parish Council. These centred on Green Belt and ongoing separation of Borrowash and Spondon. The heightened potential for the coalescence of these settlements was cited, with suggestions offered as to how openness could be maintained in the event that development took place. Two new housing allocations in Borrowash would also have a significant impact on the number of additional car journeys being made, with the Parish Council calling for a robust approach to traffic management around the two sites. Suggested mitigation measures were offered which relate to access points onto the strategic road network (the A52) and more localised action within the centre of Borrowash with traffic lights at the junction between Victoria Avenue and the B5010.

DCC Highways - a safe and suitable access with A6005 Derby Road for pedestrians and cyclists is required. This will need to take into account Footpath No. 41 which crosses the site and should be safeguarded. Safe pedestrian crossing facilities must be provided to enable access to westbound bus stops on other facilities on the south side of the highway. Pedestrian links east are essential to provide sustainable alternatives to the use of the private car to access all local services within the centre of Borrowash.*

National Highways – National Highways have received complaints over grade separated junctions with the A52 in the Borrowash area, so a road safety review should be included as part of Policy 1.12 (West of Borrowash) as well as junction capacity assessments for junctions between A52/Victoria Avenue and A52/Cole Lane.

Network Rail - Network Rail (NR) have no objection to the proposal at West of Borrowash (Policy 1.12) but are keen to ensure that an appropriate drainage strategy evolves which takes into consideration the impact (if any) on downstream/nearby drainage and the Midland Main Line. Comments are made within the context of periodic flooding issues which affects the line between Long Eaton and Spondon. NR stress the strategic importance of the Midland Main Line. As such, they consider it is an important prerequisite for any future planning application to request a suitable drainage strategy which looks at the wider drainage impacts of this and the South West of Draycott allocation (Policy 1.14), and that NR is consulted at such time for their views on the effectiveness of such a strategy. Additional criterion is sought as part of Policy 1.12 to deliver a suitable drainage strategy and that any off-site drainage works will be implemented by the development. NR consider that although the existing saved policy DC7 addresses flood risk, there is no guarantee that a drainage strategy would consider the wider implications of increased drainage run-off arising from development and its effect on the catchment affecting the Midland Main Line.

Derbyshire Wildlife Trust – The overall impact is assessed as Low based on a desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are of low or medium distinctiveness. Impacts on species are probably on a local scale but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

Strategic Policy 1.13: East of Breaston

Breaston Parish Council - Concerns were expressed over the following matters. Loss of Green Belt land and the resulting environmental impact on the affected land, the strain on local services with village infrastructure deemed to be insufficient to cope with additional demand, the threat of Breaston's village character being eroded, the impact of development on flood and drainage conditions around the village and the conflict between national and local planning policy with a lack of exceptional circumstances for Green Belt development having been demonstrated. The Parish Council also feel that a lack of evidence exists in showing how all brownfield, non-Green Belt options have been identified, whilst the allocation also conflicts with legislation around climate change and the environment.

DCC Highways - a new vehicular and pedestrian access from Heath Gardens is considered acceptable in principle, although it will need to be demonstrated that the existing junction layout with the A6005 is satisfactory to accommodate the additional vehicle movements from the development. The requirement of a pedestrian crossing point close to the junction into the site to enable access to westbound bus services is welcomed.

Derbyshire Wildlife Trust – The overall impact is assessed as Low based on a desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are of low or medium distinctiveness. Impacts on species are probably on a local scale but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

Strategic Policy 1.14: South West of Draycott

Draycott Parish Council - A wide range of concerns were raised by the Parish Council. These are summarised as follows.

- **Borough Council procedures:**
Insufficient prior notification of proposals and consultation with Parish Council
- **Lack of transparency:**
Poor timing of consultation and insufficient length of time allowed for responses.
- **Deallocation of Green Belt status:**

Loss of agricultural land, the GB's link to the village's heritage and the threat of seeing openness between Derby and Nottingham (and Draycott and Borrowash) reduced.

- **Loss of habitats, damage to ecosystems and biodiversity net gain:**
Considerable evidence of the presence of a variety of animal species within this area, including some protected species.
- **Traffic:**
Cited the dangers of the section of highway where a vehicular access point to the development would be established. Widespread instances of speeding vehicles at the entrance point to the village on the A6005.
- **Lack of health, education and welfare infrastructure:**
No medical care facilities within the village, and whilst limited early years education capacity may exist, secondary-age pupils would have to travel outside the village to an educational establishment.
- **Sewerage capacity:**
Instances cited where foul water drainage system has failed on Lime Grove and surrounding area. Severn Trent Water have had to undertake emergency repairs to drainage pipes between Draycott and the sewage treatment works on Sawley Road.
- **Drainage of surface and fluvial water flooding:**
Scepticism of the flood risk status of the site allocation owing to recent changes in how the Environment Agency have modelled the hydrology of the wider area around the River Derwent catchment. The flat topography of the surrounding area makes Draycott prone to flooding, and construction upon undeveloped land would heighten flood risk.
- **Effects of major population increase on village life:**
Development would erode the feeling of village life, with many residents choosing to move to Draycott to experience a slower pace of life.
- **Inappropriate development in an inappropriate location**
The provision of 74 affordable homes (40%) would be out of character with the housing type evident in this part of Draycott. Concern that occupants of the development will not work locally, increasing commuting activity. New homes should be located in areas with more economic opportunities to reduce commuting. Also the scale in population increase arising from development would be far more acute than that seen in other villages where allocations are planned.
- **Choice of site:**
Arbitrary and subjective approach taken by Sustainability Appraisal. Highlighted a number of brownfield sites more sustainable than the allocation site. Queried Draycott's general level of sustainability as a settlement.
- **New high voltage transmission lines:**
The allocation site would be in close proximity to new 75m high voltage power lines, with other physical features in the adjacent landscape reducing options to divert these power lines further away from the development.

In addition to the Parish Council's representation, an independent Flood Risk & Drainage Review of the proposed housing allocation site has been

undertaken and should also be considered to form part of the representation.

DCC Highways - existing access arrangements into the site will need to be improved to provide an access to adopted standards. A new footway from the site access to the westbound bus stop on the A6005 is essential to encourage sustainable travel. Development should safeguard Footpath No. 4 and encourage links to the PROW to connect into the wider PROW network.*

Network Rail - Network Rail (NR) have no objection to the proposal at South West of Draycott (Policy 1.14) but are keen to ensure that an appropriate drainage strategy evolves which takes into consideration the impact (if any) on downstream/nearby drainage and the Midland Main Line. Comments are made within the context of periodic flooding issues which affects the line between Long Eaton and Spondon. NR stress the strategic importance of the Midland Main Line. As such, they consider it is an important prerequisite for any future planning application to request a suitable drainage strategy which looks at the wider drainage impacts of this and the West of Borrowash allocation (Policy 1.12), and that NR is consulted at such time for their views on the effectiveness of such a strategy. Additional criterion is sought as part of Policy 1.14 to deliver a suitable drainage strategy and that any off-site drainage works will be implemented by the development. NR consider that although the existing saved policy DC7 addresses flood risk, there is no guarantee that a drainage strategy would consider the wider implications of increased drainage run-off arising from development and its effect on the catchment affecting the Midland Main Line.

Derbyshire Wildlife Trust – The overall impact of potential development is assessed as Low to Medium based on a desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected. However, there is the potential for habitats of greater value to be present including woodland. Nonetheless most of the habitats will probably be low or medium distinctiveness. Impacts on species are probably at a local scale but the breeding bird assemblage could be more significant and require a bespoke compensation measure. For most other species the impacts can probably be addressed through general mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

Strategic Policy 2: Employment

No comments from SCBs.

Strategic Policy 2.1: Stanton North

No comments from SCBs.

Strategic Policy 3: Town, Village & Local Centres

No comments from SCBs.

Strategic Policy 4: Transport

No comments from SCBs.

Strategic Policy 5: Green Infrastructure

No comments from SCBs.

Comments which apply to all allocations:

National Highways - support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment and Travel Plan to understand impacts on the SRN. NH state the reliance on Junction 25 for access to the SRN, and therefore recommends that specific consideration is given to M1 Junction 25 and the Bostock's Lane corridor within transport assessment work. Support is given to implementing recharging points and reiterate their importance to futureproofing and helping mitigate against climate change.

For DCC Highways, any allocation with an (*) indicates that a Transport Assessment would be required.

Comments which apply to the whole Plan:

The Coal Authority - The Coal Authority has no specific comments to make on the amended Core Strategy Review.

National Highways - National Highways (NH) emphasise the importance of safeguarding the operation of the M1, A52 and A38 through the Borough. As a key stakeholder, NH welcomes the continued engagement to understand strategic transport infrastructure needs. NH also welcome the inclusion of a Transport Assessment supporting the Local Plan, although with an adjustment of the plan period, it is recommended that the assessment year of the TA shall be updated accordingly. Encouragement is given to collaboration with neighbouring authorities to understand the overall cumulative impact of growth on the transport infrastructure within the area to understand potential mitigation strategies.

NH's review of the CSR amendment concludes satisfaction with the overall document and policies. The review of the updated Transport Assessment is welcomed to reflect the changes in the plan period, and welcome continued engagement to support the update.

6. Responses from the public

- 6.1 Further to information at 4.1, the Council's use of a web-based consultation portal to allow greater ease for the public to submit comments in response to any site(s) of interest justifies this Statement's approach to reporting on representations on a site-by-site basis.
- 6.2 It is important to note that the summaries provided for each allocation reflect the main issues raised in response to the consultation with a focus on specific issues of localised relevance to the site in question. These help to identify the key themes raised by respondents, but will not be worded exactly as per any representation received by the Council. Summaries in some instances have addressed upwards of 500 separate comments on a single topic, emphasising the need for conciseness. This is also reflected throughout the responses provided by the Council. Notwithstanding this, copies of all representations in their original format whether submitted via the consultation portal, email or written letter, will be made available to the Planning Inspector examining the amended Core Strategy Review. These will also be available to view online at the Council's examination library.
- 6.3 Prior to the topic-based summaries, a table presents basic information providing details of the level of response received to a) each site allocation, and b) a more detailed breakdown of the number of comments made to each of the 13 topic options available to comment against within the consultation portal. The numbers reported against the 'total comment' row in all tables which appear between 6A and 6K shows the number of individual comments made against a specific reason. This should not be confused with the total number of respondents making comments about a particular site allocation – a number which is mentioned at the beginning of each sub-section.
- 6.4 For the avoidance of doubt, numbers which appear in the following tables prior to summaries of comments relate **only** to representations made by the public.

6A Acorn Way (Strategic Policy 1.3)

6.5 Number of respondents commenting on this allocation – **91** (91 object, 0 support).

6.6 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	78	-
Road safety	61	-
Air quality	44	-
Wildlife / Biodiversity	55	-
Bus services	30	-
School capacity	59	-
Healthcare facilities	71	-
Type of housing	21	-
Number of houses	36	-
Green Belt	40	-
Landscape	29	-
Flooding / Drainage	52	-
Other	33	-
Total comments	609	-

6.7 Summaries of the main issues raised in responses from the general public to the Acorn Way site allocation are as follows:

Traffic congestion:

Concern was raised as to the impact development would have on the ability of traffic to flow adequately across the local road network. The majority of concern was expressed at the current volume of traffic along Morley Road and Acorn Way, which was deemed to be excessive at peak times, making exiting Oakwood difficult. The presence of the Lees Brook Academy school was also a factor in slowing traffic down along Morley Road and creating localised congestion. Parking habits on Morley Road only serve to contribute to slow-moving traffic. A widespread feeling was that Acorn Way is simply too busy already, and would struggle to accommodate the vehicular movements from several hundred new homes. The addition of pedestrian crossings to Acorn Way would only exacerbate difficulties in traffic flow. Comments also questioned the appropriateness to serve the allocation site only from Morley Road, and not directly from Acorn Way. The worsening of congestion on roads around the allocation would have a knock-on impact on traffic flow around the east and north of the city (Derby).

EBC response:

No specific response concerning this allocation about traffic congestion was made by Statutory Consultation Bodies (SCBs), including Derby City Council whom the allocation directly adjoins. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the Strategic Road

Network (SRN). The Borough Council would also expect the production of a TA as part of any future planning application, showing how issues and concerns relating to traffic congestion at those locations mentioned would be adequately addressed.

Road safety:

Comments were made concerning inadequate road safety conditions on adjacent roads, but namely Morley Road and Acorn Way. For Morley Road, concern was expressed at the already busy nature of the road, particularly at the start and end of the school day around the Lees Brook Academy. Further traffic from additional vehicles would heighten the risks of collisions with a pedestrian with a lack of safe crossing places along Morley Road, and also due to the road's alignment and the pattern and behaviour of car parking which reduces carriageway width. A number of issues and concerns were raised regarding driving conditions Acorn Way. Some alluded to frequent speeding occurring along it, endangering other road users. The lack of pavement along a section of Acorn Way was also of concern, forcing pedestrians to cross a busy, fast-flowing road with a national speed limit of 60mph. The poor levels of visibility along its length, and isolated areas of poor drainage (causing spot flooding along the carriageway) also worsen Acorn Way's safety conditions for all users. Being unlit means the road is dangerous for pedestrians after dark.

EBC response:

No specific response concerning this allocation about road safety was made by Statutory Consultation Bodies (SCBs) with a highways focus. The Borough Council would expect the production of a TA as part of any future planning application, showing how any issues and concerns relating to road safety would be addressed.

Air quality:

Fears were raised at the additional traffic generated by a development, with a concern that local air quality levels would deteriorate as a result of emissions from a greater number of instances of stationary traffic on roads serving the allocation. Worsening air quality would impact on people's health, particularly school pupils and the elderly who living in nearby care homes. Concern at the loss of green space, with the role this land plays flagged as being important in capturing carbon and particulates from vehicle emissions.

EBC response:

The site is not subject to Air Quality Management Area (AQMA) designation. However, the production of a TA and Travel Plan would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. Housing construction is subject to legally enforceable conditions which limit the emission of dust and debris into the wider environment to an acceptable level. In terms of green space, the development will be expected to deliver this, as per the policy, to assist with biodiversity and design objectives.

Wildlife / biodiversity:

Comments related to the fear that development would see the loss of wildlife and important habitats supported at the allocated land. Concern was made that land supporting biodiversity was decreasing around the eastern side of the city (Derby)

with remaining undeveloped land being an important source of wildlife. The allocation site forms an important corridor for wildlife, allowing biodiversity to move around the wider area into Chaddesden Wood and the fields beyond. Concern was expressed at the loss of habitats development would bring, forcing wildlife further into more unnatural urban areas. A number of species have apparently been sighted either on, or within the neighbouring areas, with rabbits, hares, badgers and an abundance of bird life and butterflies present. Land also supports species of snake (adders) and lizards. An assumption regarding the removal established hedgerow around the perimeter of the allocation also prompted concerns, with removal of hedgerow and trees along a section of Acorn Way having occurred, and fears that further removal of tree belt along Morley Road may happen in order to create site accesses.

EBC response:

Sighting of species on or around the allocation site are noted. Derbyshire Wildlife Trust (DWT) surveyed the allocation around the commencement of the current review, but has not objected to the site's allocation at any stage of its progress. Natural England did not offer any views on environmental conditions at this site. It is now common practice for established hedgerows to be retained as part of new development - not only to maintain ecology/biodiversity assets, but also to help maintain a sense of place and good design. This is reaffirmed by **Strategic Policy 1.1: Allocation Sites** which as part of criterion 2 requests the maintaining and enhancing both of existing hedgerow and tree belt boundaries.

Bus services:

A number of concerns in relation to bus services were expressed. These ranged from limitations regarding the current frequency in which the allocation site is serviced, with no bus service on Sundays or during the evening along Morley Road. A recent reduction in the frequency of timetabled services was at odds with the encouragement of greater use of public transport, with scepticism expressed about future increases in frequency of bus services. It was suggested that a more frequent Black Cat or alternative service into Derby would make public transport a more viable option for residents of a new development, with more certainty called for to guarantee improvements to the local bus services which serve the allocation. Linked to congestion, comments suggested that extra buses on the Morley Road route would simply get caught up in local tailbacks caused by additional traffic originating from the development.

EBC response:

Section 106/developer contributions would be made wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis. Bus companies will look to provide services where it would be commercially desirable and financially profitable, and **Strategic Policy 1.3** makes provision for better services around the allocation site. As for bus services getting caught in localised congestion, it will be for Traffic Assessments and Travel Plans to show how any additional traffic generated by new development would be managed safely across the local road network.

School capacity:

The majority of comments made around this topic cited the two 11+ schools most closely situated to the allocation site (Lees Brook Academy and West Park) being over-subscribed. This was also consistent with comments made about other schools within the immediate catchment of the allocation at Parkview Primary School and Cavendish Infant & Junior School. There was concern that an assumed lack of capacity at local schools would force children to have to travel further to obtain a school place, resulting in unsustainable travel patterns. A number of comments referenced the relationship between the pressure to accommodate school pupils in Derby City, despite the allocation being located within Erewash. The removal of wording from **Strategic Policy 1.3** was of specific concern, giving the impression that the Borough Council would be abdicating its duties to direct developer contributions towards funding the creation of school places at places of education inside Derby City.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from other LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning.

Healthcare facilities:

Respondents were keen to point out the difficulties of obtaining appointments at nearby medical practices and dentist. In particular, Lister House (Oakwood) and Chaddesden Park medical centres were commonly cited as operating at or in excess of their maximum capacity, with some respondents having to seek appointments at centres in other nearby towns and villages. The walking distance from the allocation site to the nearest facilities is felt to be excessive and requires the use of public transport (or private car) in most circumstances. A general feeling that insufficient local healthcare provision existed already, with many fearful that a further major development of several hundred homes would see struggling services stretched even further.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of housing:

Comments here ranged from views that the site allocation policy made too little provision for affordable housing by requiring 10% of all units to be affordable, to those who wished that the development made no provision for affordable housing due to impacts on existing property prices and the threat of increased levels of crime/anti-social behaviour. Some respondents queried the quality of construction, believing that homes would be built to a poor level due to the need for a speedy build, whilst there was some confusion over where the off-site affordable housing would be provided.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents the highest proportion that the Council could justifiably ask for. It is unrealistic and inappropriate to avoid seeking affordable housing based around preconceptions of this tenure, when an evidenced need for affordable housing stock exists across the Borough.

Number of houses:

Most responses cited the high number of homes the policy made provision for, with this deemed excessive and representing over-development. Respondents stated that new homes were not needed in the area, which is already significantly built-up, but if development were to occur then bungalows should be considered to free up housing stock within Oakwood. It was felt that Oakwood had already accommodated a sizeable number of new homes already with the proposed development contributing to the sprawl of Derby, with the number of homes (550 homes) too many for local infrastructure to cope with.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be delivered. It is important for all housing allocations that they do not represent over-development and compromise on achieving a scheme in line with that set out by SP1.1. Comments which suggest that homes would stretch local services and infrastructure are dealt with in the responses made to other topics.

Green Belt:

Concern was raised over the Green Belt's threatened role in how it could continue to maintain separation of the distinct communities of Oakwood, Spondon and Chaddesden, with the open Green Belt important as a green wedge, whilst also supporting a diverse range of biodiversity. A general feeling from responses was that the Council had failed to sufficiently demonstrate the necessary exceptional circumstances to justify the alteration of Green Belt boundaries. Comments were made over the availability of brownfield land elsewhere which should be developed in preference to land located within the Green Belt, with the linked view that vacant homes should be occupied before any Green Belt development occurred.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. This is emphasised within the Council's Site Selection Paper. In terms of perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged the development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. All brownfield sites are included in the Council's housing land supply or assessed as not available.

Landscape:

It was stated that Acorn Way acts as a boundary between urban and rural land and this must be maintained. The construction of bungalows was suggested to reduce the height of new development and preserve current views across the site and into surrounding countryside. Concern was expressed that the hills and fields which contribute to the landscape around the allocation would be spoilt in the event of development, with the trees and hedgerows around the site adding to the landscape quality.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make.

Flooding / Drainage:

A number of comments referred to reports of flooding occurring frequently on Acorn Way (worsening in recent years), making highway conditions dangerous for road users. Run-off is likely to worsen if adjoining land is made less impervious through the development of greenfield land. Concern was also expressed at conditions along Morley Road, with reports of domestic gardens at properties along the road flooding in times of heavy rainfall. Flooding also affects the highway too with assumed poor road drainage infrastructure, with significant flows of rainwater passing down Morley Road due to the higher elevation of land at the allocation site above the highway, resulting in high levels of run-off.

EBC response:

The allocation falls within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. Major development would be expected, as part of a planning application, to provide a drainage strategy to demonstrate that new development would not worsen existing hydrology conditions. No SCB (EA, Severn Trent or Derbyshire County Council (as Local Lead Flood Authority)) responded to

the recent consultation to raise concerns over flooding or drainage in relation to the allocation.

Other:

Responses to this cited the general lack of overall infrastructure needed to integrate this development into the wider surroundings. The relationship between the allocation site and adjoining Derby City Council was cited, with dissatisfaction expressed that housing land within Erewash would add strain to services and amenities within Derby City. Comments also queried how Council Tax monies would be distributed, assuming services would be provided by the City Council. There was also displeasure as to the identification of land around the periphery of Derby City, with respondents instead wanting Erewash Council to locate development land further within their Borough. Concern was also raised over the loss of farmland at the allocation site, with such actions at odds with a need for securing greater food security.

EBC response:

Matters of infrastructure are addressed at various places within the responses to these summaries. The Council have pursued dialogue with Derby City Council throughout the Local Plan process to discuss impacts on infrastructure (but predominantly involving education and highways) outside of its administrative area under the umbrella of duty-to-cooperate. However, these have not provided the borough council with tangible solutions to the cross boundary issues identified. As mentioned under Green Belt, the Council have exhaustively searched for brownfield locations to develop in preference to requiring Green Belt land.

6B South West of Kirk Hallam (Strategic Policy 1.5)

6.8 Number of respondents commenting on this allocation – **49** (48 object, 1 support).

6.9 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	40	-
Road safety	28	-
Air quality	26	-
Wildlife / Biodiversity	32	-
Bus services	14	-
School capacity	23	-
Healthcare facilities	22	-
Type of housing	16	1
Number of houses	22	-
Green Belt	35	-
Landscape	20	-
Flooding / Drainage	20	-
Other	17	-
Total comments	315	1

6.10 Summaries of the main issues raised in responses from the general public to the South West of Kirk Hallam site allocation are as follows:

Traffic congestion:

Concern was expressed at the level of congestion local roads are already experiencing. Traffic tailbacks are often encountered along the entirety of the A6096 through Kirk Hallam during peak times. Traffic hotspots around the allocation site create delays, particularly at the Bulls Head roundabout which impacts on being able to reach Ilkeston with ease, and there are difficulties joining the A6096 from Abbot Road and Godfrey Drive. The junction adjoining Twelvehouses at the end of Sowbrook Lane also sees delays. Comments were made that local roads were simply not thought to be suitable to accommodate additional traffic flows created from the development. Again, calls were made for consideration for the creation of a Junction 25a on the M1 to provide relief to the local highway network. The impacts of the planned Relief Road were also questioned, with respondents feeling this would just recirculate traffic to already over-capacity junctions.

EBC response:

No specific response concerning this allocation about traffic congestion was made by Statutory Consultation Bodies (SCBs) with a highways focus. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the Strategic Road Network (SRN). Transport Modelling undertaken on behalf the Council in support of growth proposals in the Core Strategy Review has previously shown that the proposed relief road would have a positive impact on

traffic conditions across the wider road network around the allocation site. This position has not altered, despite a reduction in the allocation's capacity from 1,300 to 1,000 homes.

Road safety:

A number of responses pointed to the safety of using nearby junctions to the allocation site, with fears expressed that current conditions at junctions such as the Bulls Head roundabout and those which connect local roads to the A6096 at each end of Kirk Hallam (Godfrey Drive/St Norbert Drive) increasing the likelihood of accidents in the event of additional vehicular movements. Particular concern was attributed to school children who cross the Bulls Head roundabout in high volumes, and greater traffic along Dallimore Road/Sowbrook Lane would also subject pupils attending Dallimore Primary School to greater risks. The narrow profile of many local roads through Kirk Hallam also creates fears that additional traffic will struggle to pass safely around the local road network.

EBC response:

No specific response concerning this allocation about road safety has been made by Statutory Consultation Bodies (SCBs) with a highways focus. The Borough Council would expect the production of a TA as part of any future planning application, showing how any issues and concerns relating to road safety at notable local locations mentioned above would be addressed.

Air quality:

Comments primarily focused on fears that greater levels of congestion and standing/slow moving traffic at the locations mentioned in the two above topics would give rise to higher rates of emissions from vehicles. An ensuing deterioration in air quality would be of detriment to the local population, particularly those with underlying respiratory conditions. It was reported that air pollution levels were already in excess of recommended levels, particularly around the Bulls Head roundabout. More rigorous air quality monitoring was called for to help better understand the effects.

EBC response:

The site is not subject to Air Quality Management Area (AQMA) designation. However, the production of a TA and Travel Plan would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. In terms of green space, the development will be expected to deliver a significant amount of new green space centred on a green corridor, as per the policy, to assist with biodiversity and landscaping objectives.

Wildlife / biodiversity:

A number of respondents cited their concern at the significant scale of land that development proposals would impact upon, referencing the likely resulting damage to biodiversity and ecology. Fears were raised that the urban sprawl from the development would push wildlife further away from their natural habitats – this would be particularly damaging for nocturnal species with the additional light pollution created. The construction of a neighbouring relief road would also heighten the risk of harm to species already present in the area. Impact of development on the

adjacent Pioneer Meadows Local Nature Reserve was raised, with development thought to risk potentially enclosing wildlife, and preventing the free movement of species across a wider area of Green Belt land. The loss of diversity in habitat was a concern, with grasslands, hedgerows and wetland under threat of removal – with a subsequent loss of species which rely on this. Respondents reported the sightings of a wide range of animal and bird species present across the site. Foxes, badgers, hares, hedgehogs, bats and a range of bird species have been observed, whilst frogs, newts, butterflies and dragonflies depend on the nearby watercourses and wetlands. Concern was raised that the site's ability to act as a wildlife corridor would be compromised.

EBC response:

Sighting of species on or around the allocation site are noted. Derbyshire Wildlife Trust (DWT) surveyed the allocation earlier in the Plan's current review, but has not objected to the site's allocation as a major housing development at any subsequent stage of its progress. Natural England did not offer any views on environmental conditions at this site. The Council would expect the retainment of established hedgerows as part of new development - not only to maintain ecology/biodiversity assets, but also to help maintain a sense of place and good design as per Criterion 2 of Strategic Policy 1.1. The creation of a green corridor throughout the centre of the site will benefit conditions at Pioneer Meadows and over time help to provide complementary habitat to the Local Nature Reserve. This should enable the presence of a wildlife corridor linking the LNR to surrounding countryside.

Bus services:

Concern was expressed at the loss of the 21 Trent Barton service which offered direct access from Kirk Hallam to the Queens Medical Centre hospital and Nottingham city centre. This has worsened Kirk Hallam's public transport connectivity (particularly in parts away from the A6096) and pushed more people into making private car journeys. Delays at key local junctions alluded to elsewhere, prevent the remaining services from following their scheduled timetables, making bus provision unpredictable. Concerns that the new development won't be adequately connected to the local bus service network, leaving only the car as a viable option for new residents and creating an unsustainable dependency. The lack of a public transport strategy for the allocation was also of concern.

EBC response:

Section 106/developer contributions would be made wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis. Bus companies will look to provide services where it would be commercially desirable and financially profitable, and the expected significant concentration of population at the site should ensure that it is realistic for a new or modified bus service to serve the allocation. As for bus services getting caught in localised congestion, it will be for Traffic Assessments and Travel Plans to show how any additional traffic generated by new development would be managed safely across the local road network. A Travel Plan would also be expected to demonstrate how sustainable travel patterns, minimising the use of the private car, could be created.

School capacity:

Respondents expressed a view that all local schools, with the exception of Kirk Hallam Community Academy, are overcapacity in pupils. Concern was made over the lack of a strategy (or committed funding and investment plans) to show how an increased pupil-age population would be made provision for at local schools. Doubt was also expressed at how schools would be able to cater for a growing population around Ilkeston in general, particularly with two of the three senior schools in the wider town located in Kirk Hallam – a factor which has implications for associated travel for pupils to reach education facilities.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from the relevant LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated, although **Strategic Policy 1.5** continues to make provision for a new on-site Primary School. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning.

Healthcare facilities:

Similarly to school capacities, a number of representations highlighted capacity issues with local healthcare infrastructure (including Ilkeston Community Hospital), with reports of difficulties in obtaining appointments at GPs and dentists with wait times lengthening. Fears that this would be worsened in the event of the allocation's development were commonplace. There was also concern that no additional facilities appear to have been made provision for by the site allocation policy, risking overloading existing GPs and dentists.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of housing:

Comments in response to this topic mainly focused on the provision of affordable housing being inadequate as currently made provision for within the allocation policy. A higher proportion was favoured by some respondents. Another common theme expressed identified a lack of provision for elderly residents, pointing towards an aging demography locally and a lack of bungalows in particular – something which the allocation should address. Support was made for greater diversity in the housing

tenure of new stock. It was important that sufficient green space was also delivered as part of a new development, offsetting some of the impacts to biodiversity.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents the highest proportion that the Council could justifiably ask for. Another factor to be considered in the affordable housing provision for this allocation is the requirement for development to fund a relief road and primary school. This impacts on the allocation's ability to provide for a higher proportion of affordable housing. The composition of housing type (to provide for bungalows) will be a matter for the site developer, factoring in development viability, but encouragement for as diverse a mix of housing type as possible within viability parameters will be given by the Council.

Number of houses:

The arising population increase to Kirk Hallam (assumed 40%) resulting from the allocation's development is disproportionately and unreasonably large. This is accentuated through the identification of safeguarded land which would see an even larger increase. The long-term impacts on infrastructure, services and the character of the area arising from such a large development is of concern, with no plan evident for how local infrastructure will be able to cope. This is amplified through the cumulative developments taking place from the wider area. Comments on the distribution of the Borough's housing need suggested that the requirement should be more evenly dispersed around Erewash. It was also pointed out that no homes should be built at the allocation site due to the presence of toxins in the soil.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council and are based on landholdings in particular configurations. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be delivered. It is important for all housing allocations that they do not represent over-development and compromise on achieving a scheme in line with that set out by SP1.1. As **Strategic Policy 1.5** shows, the provision of local infrastructure such as a new Primary School and the creation of a new Local Centre will provide important facilities for a large new community. Comments which suggest that the development would stretch local services and infrastructure are dealt with in the responses made to other relevant topics.

Green Belt:

Respondents stressed the importance of Green Belt for a number of reasons. These spanned the designation's ecological value, significance in climate resilience, agricultural crop production, importance in preventing urban sprawl and the contribution Green Belt makes to the continued rural setting to Kirk Hallam. Within Green Belt south-west of Kirk Hallam, expansive views, mature trees, established hedgerows and wildlife corridors can be found. The Green Belt also serves a leisure and recreational purpose in enabling residents to interact well with surrounding countryside – of particular benefit during the Covid lockdowns. No exceptional circumstances have been demonstrated by the Council for the removal of the Green

Belt and fears were that development would lead to Kirk Hallam's gradual coalescence with West Hallam and Dale Abbey.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. In the case of this allocation, the role of the relief road is key in providing a strong, defensible boundary preventing sprawl towards West Hallam & Dale Abbey. The exceptional circumstances which justify the need to use Green Belt land are explained within the GBR and the Site Selection Paper. The agricultural land south west of Ilkeston is generally Grade 4 (poor) in its quality, and the development will create a number of open spaces and a green corridor that new and existing residents will be able to benefit from for leisure and recreational purposes.

Landscape:

Concerns were raised that development would fundamentally alter the landscape of the area around the allocation. Development was considered to bring a drastic and irreversible negative impact on landscape around Kirk Hallam. The natural boundaries which help define the current extent of Kirk Hallam with surrounding countryside would be weakened, or lost altogether. Development also risks the identity of Kirk Hallam being eroded, with its current setting characterised by open fields. High density new development would remove this with visual intrusion caused by new homes, roads, street lighting and additional traffic. The present landscape also supports a diverse range of biodiversity which would be threatened by new development. The slag heap for Stanton Ironworks, a notable part of the local landscape, is only 100m away from the edge of the development.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make. This is the largest allocation in the Core Strategy Review, but the provisions of **Strategic Policy 1.1 and 1.5** would, when taken together, ensure the development creates a suitable transition to the wider countryside through the need for preserving existing landscape features whilst creating complimenting green/open spaces which link into the Nutbrook Green Infrastructure corridor.

Flooding / Drainage:

The development of Green Belt at the Sowbrook Lane end of the allocation risks disturbance of the former Stanton Ironworks slag heap with run-off rainwaters coming into contact with the heap before transferring contaminants into local watercourses.

EBC response:

Ensuring construction is carried out in a safe manner is a priority for the Council. Major development is routinely subject to ground stability and geological survey work prior to the commencement of any construction which would disturb the ground. Such surveys will be carried out at the planning application stage to identify any sources of potential harm which would require mitigation prior to construction or engineering works.

Other:

Concern was raised over the toxicity of land close to the allocation where waste was deposited from industrial operations at Stanton Ironworks, with assessment of ground conditions and local watercourses urged. Several comments expressed disappointment at the loss of agricultural land at the allocation.

EBC response:

As discussed under Flooding / Drainage above, ground surveys would be necessary as part of the planning application stage to identify any ground contaminants/toxins which would require remediation or control. Works could then be controlled in the event that survey work identified sources of concern.

6C West of Sandiacre (Strategic Policy 1.7)

6.11 Number of respondents commenting on this allocation – **542** (541 object, 1 support).

6.12 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	514	1
Road safety	437	1
Air quality	442	1
Wildlife / Biodiversity	466	1
Bus services	370	1
School capacity	191	1
Healthcare facilities	433	1
Type of housing	322	-
Number of houses	379	-
Green Belt	446	1
Landscape	347	-
Flooding / Drainage	174	1
Other	128	-
Total comments	4,649	9

6.13 Summaries of the main issues raised in responses from the general public to the West of Sandiacre site allocation are as follows:

Traffic congestion:

Several instances of existing localised congestion were raised by respondents. On a general point, many representations wished to point out that roads throughout Sandiacre were already gridlocked during the morning and afternoon peak times making movement throughout the area difficult. Several estimates of how many additional cars would be added to the local road network as a result of the development were made, with the highest estimation being 20,000 additional vehicles a year on roads in and around Sandiacre. There was widespread concern that the additional number of cars using the roads in the vicinity of the allocation site would create an inappropriate level of traffic on quiet residential streets which already struggled to allow for the current volumes of vehicle movements (see **Road safety**). Specific areas of Sandiacre which were raised in responses feared worsening of congestion of Rushy Lane (accessing J25 of the M1), Stanton Road (already bad due to activity connected to Cloudside Academy) and exiting Church Street onto Town Street or Lenton Street. A number of respondents also cited the crossroads in the centre of Sandiacre as contributing towards the ability of traffic to flow adequately around the wider area. A fear existing that, combined with the traffic generated by employment development at Stanton, the local road network would become overburdened. The narrow highway widths and parking arrangements evident on local roads (Beech Avenue, Coronation Avenue) were also seen as contributing to local hotspots of congestion.

EBC response:

No specific response concerning this allocation about traffic congestion was made by Statutory Consultation Bodies (SCBs) with a highways focus. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the Strategic Road Network (SRN), and this would be encouraged by the Council – particularly given the close proximity of the site to M1 Junction 25 and the A52. Owing to the mention of several junctions within the immediate vicinity of the allocation, the TA would be encouraged to focus on how traffic movements from the development would integrate safely with the local road network.

Road safety:

A number of matters were raised in response to this issue. There was widespread concern about the limited width of nearly all roads on approach to the allocation site. On-street car parking on these roads (Cloudside Rd, Larch Dr, Chestnut Grove, Sycamore Crescent & Coronation Avenue) further narrows carriageway, leading to dangers in crossing roads for pedestrians. Road junctions within the immediate surrounds of the allocation site are seen to be insufficient, with their safety compromised by inappropriate parking which restricts the visibility of motorists when exiting roads. The steepness of roads around the allocation were also cited in responses, with mentions of challenging driving conditions in cold and icy weather making highway conditions dangerous. Many comments were expressed by those fearing a significant increase in traffic on already congested roads would put children in danger, particularly around the Cloudside Academy. The ability to form a safe vehicular access into the site was also raised, with doubt expressed that this could be achieved given the limited road width along Larch Drive. Particular concern was expressed at how construction traffic would access the allocation site, having to navigate narrow highways and creating further risk in road safety.

EBC response:

No specific response concerning this allocation about road safety has been made by Statutory Consultation Bodies (SCBs) with a highway's focus. The Borough Council would expect the production of a TA as part of any future planning application, showing how any issues and concerns relating to road safety at notable local locations mentioned above would be addressed as not to worsen conditions.

Air Quality:

Concerns were raised over a deterioration of air quality within the wider neighbourhood surrounding the allocation, which is already impacted as a result of the adjacent M1. Other sources of air pollution within and nearby to Sandiacre were cited (woodyard operations at Pear Tree Yard and industrial activities at the Stanton employment site), with a fear that new development would worsen air quality conditions due to dust generated from the on-site construction, emissions from additional vehicles and the higher volumes of traffic using the local roads in the vicinity of the site. Collectively, the sources of air pollution mentioned have led to concerns from those with respiratory conditions that their health may deteriorate. The land is perceived to function as an important buffer from the M1, serving as an urban green 'lung' which helps to offset the emissions from the high volume of passing vehicles using the motorway.

EBC response:

The site, nor any of the surrounding area, is not subject to Air Quality Management Area (AQMA) designation. However, the production of a TA and Travel Plan would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. Housing construction is subject to legally enforceable conditions which limit the release of dust and debris into the wider environment to an acceptable and safe level. In terms of the land acting as a 'green lung', the improvement of air quality along the adjoining M1 (as demonstrated through the removal of a long-term AQMA) demonstrates that air quality across the site is acceptable. Established areas of residential development further south along the eastern side of the M1 (west of Petersham Road) demonstrates that housing can co-exist in close proximity to the motorway with appropriate safeguards in place.

Wildlife / Biodiversity:

Respondents reported sightings of a wide and diverse range of animal and bird species on or around the site. These include grass snakes, adders, foxes, badgers, hedgehogs, voles, red kites, shrew, bats, weasels, owls, buzzards, woodpecker, kestrels, butterflies, field mice and brown rat. Additionally, a number of wildflowers (bluebells and blossom) have reportedly grown across the site. Widespread concern was raised about the impact development would have on the current condition of the land, with many respondents concerned that construction would do irreversible damage to existing flora and fauna and see the loss of wildlife, to the overall detriment of biodiversity – either through the direct removal of habitat supporting species, or the disruption to wildlife corridors. A large number of people cited the importance of the area for their mental health and wellbeing, stating how the land allows nature to exist so close to urban areas. Many representations demonstrated concern about conditions at the adjoining Stoney Clouds Local Nature Reserve (LNR), with its long-standing importance to the community raised. Fears that development would harm the LNR, through encroachment of the urban area and the higher frequency of habitation from humans and domestic animals were expressed.

EBC response:

Sightings of species on or around the allocation site are noted. In its response to the recent consultation, Derbyshire Wildlife Trust (DWT) assessed that, without mitigation measures, development at the allocation site is likely to have a high level of impact, primarily as a result of the proposal being immediately adjacent to (and including a small part of the) Stoney Clouds Local Wildlife Site - whilst the allocation also is adjacent to the boundary of the Local Nature Reserve. DWT advise that to mitigate this, a sympathetic development design with sufficient buffering to the nature reserve (something Criterion 4 of Strategic Policy 1.7 requires) is necessary. DWT also correctly point out that most of the allocation is not part of the designation and the habitats present are not irreplaceable or of very high nature conservation value. Should development proposals progress, detailed ecological surveys and assessments for Biodiversity Net Gain will be required at the planning application stage, something the Council would insist upon as part of its considerations. The importance of land across the allocation to local residents is recognised, although whilst the land includes a public right of way, it is currently in private ownership which limits its contribution for wider recreational and leisure usage. However, the importance of Stoney Clouds as a Local Nature Reserve is acknowledged,

emphasising the importance of an appropriate buffer existing between development and an area of land recognised for its value to nature, biodiversity and recreation. It should also be noted that Natural England, the Government's statutory advisor on the natural environment, did not comment on this site in their representation to the consultation.

Bus Services:

The bus service that serves the built-up area closest to the allocation (i4) is regularly obstructed in navigating through the neighbourhood north of Sandiacre local centre owing to badly parked cars, tightly constrained road junctions, narrow highways and during winter months, icy roads on steep inclines. Fears were raised that additional traffic generated by the development would further hamper the bus service's ability to run to timetable, and ultimately force the operator to redivert or end the route altogether, disadvantaging many local passengers. The local roads leading to the allocation are on the whole felt to be deeply unsuitable for bus access, and the inability of a bus to directly serve the site would see new residents rely heavily on private motor vehicles for movement, adding congestion to the local road network - whilst anyone wishing to use the service would be faced with a challenging walk on steep pavements.

EBC response:

The Council note the comments relating to the difficulties existing bus services on the i4 route encounter when using roads in the local area. It would not be the responsibility of the developer of the allocation to remedy this, although given the limited width of highways along the i4's route, it is thought impractical that any additional width in the carriageway could be created. There is no expectation that the i4 service would directly serve the allocation by entering it, with the short distance between the allocation and the nearest stops on the i4 route providing sufficient encouragement for those living at the development to be able to access the closest bus service with relative ease in normal conditions.

School Capacity:

Many concerns were expressed about the capacities of the local schools which would be expected to enrol additional pupil numbers. A substantial number of respondents considered Ladycross Infant School (3 to 7 year olds), Cloudside Academy (7 to 11 year olds) and Friesland School (11+ years) to already be operating at or in excess of their capacities. This has given rise to fears that a notable increase in children arising from potential development of the allocation would make enrolment difficult for the existing children in the local catchment areas (contrary to NPPF Para 95 which calls for a sufficient choice of school places to be available to meet the needs of existing and new communities) as well as raising classroom sizes to unsustainably high levels – resulting in a worsening of teaching standards.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from the relevant LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates

understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated to allow flexibility in approach. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning.

Healthcare Facilities:

A large number of comments indicated that the current capacity at local healthcare facilities in Sandiacre was extremely limited, with services struggling to cope with meeting demand. Respondents provided a wide range of personal experiences which cited difficulties in obtaining GP appointments, made more acute due to their being just a single Doctor's Surgery within Sandiacre at the Adam House Practice located on Derby Road. This has resulted in some respondents being required to seek treatment at other GP practices further afield in Stapleford, Long Eaton and Sawley. Other comments related to the difficulties in obtaining an appointment at the single Dentist Practice operating in Sandiacre, also located on Derby Road. The recent closure, and resulting lack of a pharmacy within Sandiacre was also of concern to respondents. Overall, the growth in local population generated from the West of Sandiacre allocation was held as a significant problem due to how stretched current healthcare facilities and services are.

EBC comments:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of Housing:

Many comments focused on what type of housing was to be developed at the location. Comments called for more detail on the housing mix which was being proposed. The conflict between the proposed affordable housing provision made in the site allocation policy (10%) and that made by the Sandiacre Neighbourhood Plan (SNP) was highlighted, with the intention of the SNP to encourage a greater proportion of 1-2 bedroomed units to diverse housing mix in the Parish also appearing to be at odds with the amended CSR. A lower density was also called for, enabling a better designed development with each property having greater space, but particularly garden area, that would better reflect the character of the surrounding neighbourhood. A number of responses feared the new homes would be unaffordable to those who most needed them, with the construction of large, executive housing likely to prevail. A number of representations called for a greater number of affordable homes to be delivered at the site, whilst some concern was expressed over the occupants who would likely live within the new homes.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents

the highest proportion that the Council could justifiably ask for based on existing viability factors and the strength of the local housing market. In terms of the conflict in approach between the Sandiacre Neighbourhood Plan (SNP) and the site allocation policy, the Core Strategy Review has a Borough-wide remit in planning to meet Erewash's growth needs. At this stage, no decisions have been made about any mix of housing type at the allocation. Therefore, dwellings with fewer bedrooms could still form part of any future scheme brought forwards to contribute towards the SNP's intentions in diversify the housing mix in the Parish.

Number of Houses:

Most respondents felt that if new housing was to be developed at this location, the number of homes currently proposed at the site was simply too excessive. Plans for 180 homes were considered too high for the current level of infrastructure available within the wider neighbourhood and the size of the site, particularly how approach roads would cope and how sewerage would be managed through existing drainage systems. Comments were made about the scale of the proposed density being significantly out of proportion and character with the density of neighbouring housing, with a high density (the highest of all proposed allocations) likely to result in a loss of amenity to existing homes which adjoin the site, largely through overlooking. It was also noted how a development of such scale would undermine the policies contained within the Sandiacre Neighbourhood Plan, and many respondents felt that no new homes were justified.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council and are based on landholdings in particular configurations. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be achieved. It is important for all housing allocations that they do not represent over-development and compromise on delivering a scheme in line with that set out by SP1.1. The Council will consider the suitability of a proposed scheme's density at the planning application stage. Comments which suggest that the development would stretch local services and infrastructure (such as existing drainage systems) are dealt with in the responses made to other relevant topics.

Green Belt:

Many respondents were upset that Green Belt land was being lost in their neighbourhood, with comments suggesting the allocation site was one of the last areas of Green Belt in Sandiacre. A number of comments took the view that the Exceptional Circumstances set out in national planning guidance which justified the loss of Green Belt had not been adequately met. References were also made to the lack of conformity between the Sandiacre Neighbourhood Plan and the CSR amendment in how Green Belt was to be managed and protected. Many representations cited more suitable brownfield land elsewhere within the area, with the Stanton regeneration site and vacant land to the rear of Lidl near to the centre of Sandiacre both mentioned as locations where new housing would be more appropriate. The numbers of vacant homes in the Borough was also cited as a factor, which if filled, might negate the need for Green Belt development.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review (GBR) which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the identified housing allocations. This is emphasised within the Council's Site Selection Paper, and together with the GBR, sets out the exceptional circumstances for development within the Green Belt. In terms of perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged the development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. A frequently suggested alternative site to the rear of Lidl in the centre of Sandiacre is at a higher risk of flooding given that it sits within Flood Zone 2, whilst Stanton South is allocated to deliver a thousand new homes. All brownfield sites are included in the Council's housing land supply or assessed as not available.

Landscape:

The allocation site sits prominently at the top of higher ground in Sandiacre, ensuring its development would be visible within a changed localised landscape. Many respondents felt the urbanising of the land would be detrimental to the character and visual quality of the local landscape, with vistas of and from it negatively impacted and the land no longer able to attract walkers and those who enjoy the fields for leisure and recreational purposes. The land is seen to be a natural sanctuary for residents of Sandiacre, promoting well-being and serving as a safe haven for those who wish to escape everyday life. It serves as a vital buffer between urban settlements and thus helps contribute to the rural identity of Sandiacre. The present landscape supports a wide range of biological life with the diverse ecology greatly valued by local residents.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make. In the case of this allocation, a narrow band of land sits between established housing and the M1 motorway which is largely obscured from view from the west of the motorway. This diminishes the allocation's contribution to a high-quality landscape, although it does emphasise the need for introducing an effective buffer with neighbouring land at Stoney Clouds to the north and north-east – a sensitive area which makes a notable contribution to the setting of the northern part of Sandiacre.

Flooding / Drainage:

Some responses expressed concern that development of the site would impact on the natural drainage across the area, with the building of homes and other

impermeable structures and surfacing on a green field forcing rainwater to run-off into lower lying adjacent residential areas. A number of respondents reported that episodes of heavy rain saw rainwaters flow down from the Stoney Clouds nature reserve onto surrounding roads such as Larch Drive and Cloudside Road and the gardens of properties along them. The site itself has been the subject of localised flooding, particularly in winter, with water pooling close to the path leading down to Cloudside Road. Many of these representations point towards the local drainage system throughout the area being insufficient and already operating at capacity, with further pressure likely to see a failure of drainage infrastructure. It is suggested that a number of artesian springs appear beneath the allocated land in wetter weather.

EBC response:

The allocation falls within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. Major development would be expected, as part of a planning application, to provide a drainage strategy to demonstrate that new development at the location would not worsen the existing hydrology of the site or immediate surroundings. No SCB (EA, Severn Trent or Derbyshire County Council (as Local Lead Flood Authority)) responded to the recent consultation to raise concerns over flooding or drainage in relation to the allocation.

Other:

Other comments made in relation to the proposed allocation were the manner in which consultation had occurred with respondents indicating more could've been done to notify local residents. Also, the ability for emergency services to be able to access the allocation site was of concern to a number of people.

EBC:

The Council undertook all consultation in line with provisions within its Statement of Community Involvement. A six-week consultation period is normal and is sufficient in adequately publicising the consultation topic and allowing members of public adequate time in which to express any views about the proposals. Regarding access to the site by emergency vehicles, this is currently achievable to properties along Larch Drive, so with the creation of a safe vehicular access into the site, then it is not anticipated that emergency vehicles would struggle to attend any particular incident which required their presence.

6D North of Breadsall Hilltop (Strategic Policy 1.8)

6.14 Number of respondents commenting on this allocation – **221** (220 object, 1 support).

6.15 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	188	-
Road safety	120	-
Air quality	93	-
Wildlife / Biodiversity	143	-
Bus services	40	-
School capacity	112	-
Healthcare facilities	130	-
Type of housing	40	-
Number of houses	61	-
Green Belt	134	-
Landscape	68	-
Flooding / Drainage	148	-
Other	67	1
Total comments	1,344	1

6.16 Summaries of the main issues raised in responses from the general public to the North of Breadsall Hilltop site allocation are as follows:

Traffic congestion:

Several instances of existing localised congestion were raised by respondents. On a general point, many representations wished to point out that roads throughout Breadsall were already gridlocked during the morning and afternoon peak times making movement throughout the area difficult. Specific junctions were highlighted as problem areas (see also Road Safety) including, A608, Croft Lane, Brookside Road, Church Lane, Bishops Drive, Elmwood Drive, Rectory Lane. Damage to cars on Hungerhill Crescent was also mentioned. There were some suggestions relating to the need for a by-pass road and improving key transit routes to improve traffic flow.

EBC response:

No specific response concerning this allocation about traffic congestion was made by Statutory Consultation Bodies (SCBs), including Derby City Council whom the allocation directly adjoins its administrative area. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the Strategic Road Network (SRN). The Borough Council would also expect the production of a TA as part of any future planning application, showing how issues and concerns relating to traffic congestion at those locations mentioned would be adequately addressed.

Road safety:

A number of concerns were raised about the capacity of roads within Breadsall and the likelihood that traffic will increase due to cars using Breadsall as a short-cut to bypass congestion on main roads. A number of junctions were cited as being of particular concern, some having seen traffic related accidents, including Lime Lane, A608, Brookside Road, Bishops Drive, Croft Lane, Dale Acre Way, Bandy Lane, Elmwood Drive and Pektron roundabout. Some respondents also expressed concern about emergency vehicles being impacted by congestion in the area and that utility vehicles such as waste collection already cause congestion due to narrow roads. There is also concern around the quality and availability of footpaths along some roads used by school aged children and the safety of some crossing points, especially to/from the Great Northern Greenway and near Binscombe Lane.

EBC response:

No specific response concerning this allocation about road safety was made by any of the Statutory Consultation Bodies (SCBs) who maintain responsibility for highway safety. The Borough Council would expect the production of a TA as part of any future planning application, showing how any issues and concerns relating to road safety would be addressed at locations mentioned in responses from the public. It is unlikely that any road widening would be possible to facilitate being able to pass utility vehicles. However, it is worth noting that vehicular access to the road would be taken to link with the A609 Hill Top, and not existing village roads within Breadsall.

Air quality:

Concerns were raised over a deterioration of air quality due to increased traffic along Acorn Way, Croft Lane, A61, A38 and through Oakwood and potential increase of traffic navigating through Breadsall due to the new housing development, particularly along school walking routes and at peak times. Some concern over the impact of air quality on vulnerable people and specific mention of concerns over possible increases in NO₂ and particulates and reference to a Derbyshire Air Quality Report 2024. Concerns were also raised around pollution due to construction traffic citing previous housing estate construction sites. The reduction of green space and natural spaces is also thought to have a detrimental impact on air quality.

EBC response:

The site, nor any of the surrounding area, is not subject to Air Quality Management Area (AQMA) designation. Whilst areas of Derby City are subject to this designation, none are geographically close to the allocation site with the nearest around 2.7km away. Notwithstanding this, the production of a TA and Travel Plan as part of the planning application process would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. Housing construction is subject to legally enforceable conditions which limit the release of dust and debris into the wider environment to an acceptable and safe level.

Wildlife / biodiversity:

Respondents reported sightings of a wide and diverse range of animal and bird species on or around the site and the closeness to the local nature reserve, Great Northern Greenway and Breadsall Cutting (Site of Special Scientific Interest). These include Badgers, Deer, Foxes, Hedgehogs, Hares, Rabbits, Squirrels, Moles, Stoats,

various birds of prey (Kestrels, Red Kites, Buzzards, Peregrine Falcon, Tawny Owls, Barn Owls), other birds (Partridges, Song Thrushes, Cuckoos, Martins, Wood Peckers), Bats (Brown Eared Bats, Pipistrelle Bats), various amphibious and fish (Common Toad, Trout, Smooth Lizards, White Clawed Crayfish, Water Vole), insects and flora (Bees, Orchids, Bluebells, large trees and mature hedgerows). Respondents also cited the importance of the area for their mental health and wellbeing.

EBC response:

Sightings of species on or around the allocation site are noted. In its response to the recent consultation, Derbyshire Wildlife Trust (DWT) assessed that, without mitigation measures, development at the allocation site is likely to have a medium-to-high level of impact, primarily as a result of the allocation incorporating woodland, hedgerows and a pond. DWT advise that if these habitats are retained, the impact from development is likely to be lower. As much of the land is arable, this reflects a lower level of nature conservation value – although this still supports a variety of bird and mammals. Mitigation advised by DWT comes in the form of a buffer between the development and the Great Northern Greenway, which itself is a local wildlife site. Together, Criterion 4 and 5 of **Strategic Policy 1.8** is expected to be able to achieve this, although detailed ecological surveys will be required together with assessments for Biodiversity Net Gain in the event that development at the allocation comes forward. Natural England, the Government's statutory advisor on the natural environment, suggested that SP1.8 should do more to recognise the proximity of the Breadsall Railway Cutting SSSI to the allocation, requiring evidence to demonstrate that development would not damage or destroy the interest features for which the SSSI has been notified. It is thought that this could be sufficiently addressed through the planning application process.

Bus services:

Responses provide a contradictory view of bus services (such as H1 and Arriva 22) with some indicating an infrequent service outside of peak times, low capacity and poor access and others indicating the frequency is adequate. There is also concern that additional bus services to support additional housing developments would not be able to access the proposed site and may also impact traffic congestion and increase danger to cyclists and pedestrians along the route.

EBC response:

Section 106/developer contributions would be sought wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis. Companies will look to provide services where it would be commercially desirable and financially profitable. As for bus services getting caught in localised congestion, it will be for Traffic Assessments and Travel Plans to show how any additional traffic generated by new development would be managed safely across the local road network, allowing current services to operate to a similar level as they currently do. There would be no expectation that any current services would be re-routed to directly serve the allocation due to the relatively short distance between the allocation and the A609 Hill Top where services currently route along whilst travelling between Derby and Heanor/Alfreton.

School capacity:

Many concerns were expressed about the capacities of the local schools which would be expected to enrol additional pupil numbers and that existing class sizes were large. Respondents also indicated that some had to travel by car to schools in other areas such as Little Eaton, Smalley, Spondon, Chaddesden and Morley due to lack of local capacity. Some also expressed concern that there was already a lack of early years and specialist schools including SEND (Special educational needs and disabilities).

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from other relevant LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning, although the allocation's location may result in school-age children being educated at education facilities within Derby City.

Healthcare facilities:

A large number of comments indicated that the current capacity at local healthcare facilities was extremely limited, with services struggling to cope with meeting demand (Breadsall Hill, Morley House, Lister House, Park Lane, Oakwood doctors, Derby Royal hospital). Respondents provided a wide range of personal experiences which cited difficulties in obtaining GP and Dentist appointments and the need to travel to facilities in Derby where facilities are also over-subscribed. Some respondents mention the need to improve facilities via the use of S106 funding.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of housing:

Concerns were raised around the mix and type of housing, especially the size of homes and gardens being out of character with the rest of Breadsall. A mixed response relating to Affordable Housing with some suggesting this may increase anti-social behaviour but others indicating more affordable housing is needed.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents

the highest proportion that the Council could justifiably ask for. It is unrealistic and inappropriate to avoid seeking affordable housing based around preconceptions of this tenure, when an evidenced need for affordable housing stock exists right across the Borough. The size of homes and gardens would be an issue addressed through the planning application stage should development at the allocation progress. In terms of the homes relationship to that evident within Breadsall village, it is worth noting that development would not physically link to the settlement of Breadsall, with the Great Northern Greenway and any separation incorporated into the site's development (see Criterion 4 & 5 of **SP1.8**). This demonstrates a clear separation, which limits a strong requirement which calls for conformity between the size and style of home at the allocation site and that evident within Breadsall village.

Number of houses:

Many respondents were concerned that cumulative impact of developments around the edge of Derby and near Breadsall (Windmill Garage, Lime Tree estate, Redrow estate, Acorn Way and Oakwood) and the number of homes for this site and the safeguarded land would be too much for the local road network and have a detrimental impact on local services and infrastructure. Some respondents felt that if new housing was to be developed at this location it should be for a lower number and at the proposed density would be out of character for Breadsall.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council based on the configuration of land parcel(s) in common ownership. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** are able to be achieved. It is important for all housing allocations that they do not represent over-development and compromise on delivering a scheme in line with that set out by SP1.1. Comments which suggest that homes would stretch and overburden local services and infrastructure, but particularly concerns over the ability of local roads to adequately cope, are dealt with in the responses made to the other relevant topics which address different forms of infrastructure.

Green Belt:

Many respondents were upset that Green Belt land was being lost in their neighbourhood closing the gap between developments at the edge of Derby and turning Breadsall in to a suburb of Derby, with comments suggesting that use of Brown belt sites in Derby and Erewash (such as Stanton) be used instead. A number of comments took the view that the Exceptional Circumstances set out in national planning guidance which justified the loss of Green Belt had not been adequately met and this site directly contradicts previous SHLAA recommendations that the site is not developable. References were also made to the lack of conformity between the Breadsall Neighbourhood Plan and the CSR amendment in how Green Belt was to be managed and protected.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. This is

emphasised within the Council's Site Selection Paper, which also provides justification for the exceptional circumstances of Green Belt development. Conclusions made in the Green Belt Review do not consider this allocation (and the area of Safeguarded Land situated to its east) to contribute to the purposes of Green Belt. The lack of conformity between the outcomes in how Green Belt is viewed between the CSR and the Breadsall Neighbourhood Plan is largely due to the work being carried out for the former having a Borough-wide geography. In terms of the perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged the development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. The Stanton South allocation is still anticipated to bring forward 1,000 new homes, demonstrating the Council's strong focus and commitment to redeveloping brownfield land. All brownfield sites are included in the Council's housing land supply, or alternatively assessed as not available.

Landscape:

The allocation site sits at the top of Breadsall and is adjacent to the Great Northern Greenway and footpath 24. Respondents were concerned that the development during and post-construction would impact the nature of Breadsall as a village, particularly from the Great Northern Greenway as well as Dale Acre Way and would also be visible from Derwent Valley Heritage site. There is mention of a nearby Bronze Age site. Many respondents felt the urbanising of the land would be detrimental to the character and visual quality of the local landscape, with vistas of and from it negatively impacted and the land no longer able to attract walkers and those who enjoy the area for leisure and recreational purposes. The land is seen to be a natural sanctuary, promoting well-being and serving as a safe haven for those who wish to escape everyday life. It serves as a vital buffer between urban settlements and thus helps contribute to the identity of Breadsall as a village. The present landscape supports a wide range of biological life with the diverse ecology greatly valued by local residents.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make. Regarding the possible presence of a Bronze Age site, the Council's information does not include this area as one of archaeological importance – although survey work to assess ground conditions would be anticipated as part of any future planning application. Comments concerning the contribution of the site to biological life are addressed in response to Wildlife / Biodiversity above.

Flooding / drainage:

Many responses demonstrated concern that development of the site would impact on the natural drainage across the area, with the building of homes and other

impermeable structures and surfacing on a green field forcing rainwater to run-off into lower lying adjacent residential areas. Concern was also expressed at the cumulative effect of other developments around Breadsall such as those in Oakwood and adjacent to Chaddesden Woods indicating that local brooks around Croft Lane already flood. Several respondents reported that during 2019 and 2023 some homes had been flooded and were concerned that this would worsen impacting home value and cost of insurance premiums. Many representations point towards the aging local drainage system throughout the area being unable to cope with additional demand and that this may lead to contamination with foul sewage.

EBC response:

The allocation falls within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. Major development would be expected, as part of any future planning application, to provide a comprehensive drainage strategy to demonstrate that new development at the location would not worsen the existing hydrological conditions, either at the allocation or within its immediate surroundings. No SCB (EA, Severn Trent or Derbyshire County Council (as Local Lead Flood Authority)) responded to the recent consultation to raise concerns over flooding or drainage in relation to this allocation.

Other:

Some respondents noted that the map used in the Consultation documentation did not show all existing housing developments around this part of Derby and considered that this was misrepresenting the cumulative impact of the development and safeguarded land. There is also mention of empty homes in Derby and Erewash that would indicate a reduced need for new housing developments. Several respondents were concerned about the status of six dwellings already sited within the boundaries of the proposed site for safeguarded land and concerns that these might be demolished or subject to encroachment. Some respondents felt that the proposed site is does not support sustainable transport options, contrary to Derbyshire County Council policy goals. One response mentions a violent assault taking place near the Great Northern Greenway. Other comments made in relation to the proposed allocation were the manner in which consultation had occurred with respondents indicating more could've been done to notify local residents.

EBC response:

The mapping presented to support the recent consultation reflects the software and basemap that were available to Council Officers in the GIS applications it runs. Addressing the criticisms around empty homes, the number of vacant units present at any one time within the Borough's wider housing stock is subject to a wide range of factors, many of which exist outside the direct control of the Council. The homes located at the Manor Farm complex would not be demolished in the event that Safeguarded Land comes forward for development at some point in the future. Consultation for the amendments to the Core Strategy Review was carried out in full conformity with the Council's Statement of Community Involvement (SCI).

6E South of West Hallam (Strategic Policy 1.9)

6.17 Number of respondents commenting on this allocation – **256** (251 object, 5 support).

6.18 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	219	2
Road safety	194	3
Air quality	71	-
Wildlife / Biodiversity	131	-
Bus services	85	1
School capacity	94	2
Healthcare facilities	127	2
Type of housing	48	1
Number of houses	83	1
Green Belt	113	1
Landscape	74	1
Flooding / Drainage	53	1
Other	50	2
Total comments	1,342	17

6.19 Summaries of the main issues raised in responses from the general public to the South of West Hallam site allocation are as follows:

Traffic congestion:

Heavy traffic on Beech Lane, especially around school times and at weekends, was the main concern of respondents. Additional vehicles would cause unacceptable levels of congestion, it was commented, with construction vehicle movements compounding this. The poor visibility due to pavement parking, and lack of safe pedestrian crossing outside the school were of particular concern, with some respondents pointing out that often the road was down to a single lane of traffic due to parking. It was suggested that a car park for parents could be included in the development, along with consideration of alternative entrance/exits that were not opposite a school.

EBC response:

No specific response concerning this allocation about traffic congestion was made by Statutory Consultation Bodies (SCBs) with a highway's focus. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the Strategic Road Network (SRN). The Borough Council would also expect the production of a TA as part of any future planning application, showing how issues and concerns relating to traffic congestion at the locations mentioned would be adequately addressed.

Road safety:

There was a high volume of responses that expressed concern over the site's location opposite Scargill Primary School. At school drop-off and pick-up times Beech Lane becomes extremely congested, say respondents, with inappropriate parking making the road difficult to navigate and dangerous for pedestrians. Beech Lane is a narrow road, described by some as 'more like a country lane' where there are no crossings for pedestrians nor any traffic calming measures. There were reports of near misses and minor accidents outside the school, with respondents emphasising that additional vehicles would most likely increase the risk of accidents. Beech Lane was deemed inadequate for current volumes of traffic, with it being a bus route and main road to the Dales Shopping Centre, as well as the location of the village school and playing fields. Questions were raised over where a junction would be placed due to the school's 'Keep Clear' markings on Beech Lane, opposite the site.

EBC response:

No specific response concerning this allocation about road safety was made by Statutory Consultation Bodies (SCBs) with a highway's focus. Derbyshire County Council noted the need for a satisfactory safe and suitable access regarding the school and junction with Hallam Way, alongside a footway along the site frontage on Beech Lane. **Strategic Policy 1.9** states that the development should provide for a new section of pavement extending along the southern side of Beech Lane where it adjoins the development. The Borough Council would expect the production of a TA as part of any future planning application, showing how any issues and concerns relating to road safety would be addressed.

Air quality:

Emissions from construction work were of concern to respondents, alongside an increase in traffic generated by the new houses. There was an assumption that most households on the development would have at least one car, increasing pollution levels in the area, and that this would have a detrimental effect on residents' health, particularly that of children at the school opposite the site. There were many concerns raised over school children's health and increased numbers of asthma cases. The destruction of the green space to make way for the new development would also contribute to poorer air quality, it was thought.

EBC response:

The site is not subject to Air Quality Management Area (AQMA) designation. However, the production of a TA and Travel Plan would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. Housing construction is subject to legally enforceable conditions which limit the release of dust and debris into the wider environment to a safe level. In terms of green space, the development will be expected to deliver this, as per the policy, to assist with biodiversity and design/landscape objectives.

Wildlife / biodiversity:

Loss of wildlife and habitat was of greatest concern to respondents. A wide variety of species had been spotted in the field by people who use it for dog walking and recreation, these included: badgers, rabbits, foxes, pheasants, hedgehogs, deer,

hares, woodpeckers, buzzards, kites, owls, kestrels, newts, and insects. This is alongside several mature trees and hedgerows. The site is a haven for wildlife and should be protected, say respondents, with many asking where the wildlife would go if the site were developed. Other responses pointed to the site's use as an area for people to walk and that its loss would be damaging to people's mental and physical wellbeing.

EBC response:

Sightings of species on or around the allocation site are noted. Derbyshire Wildlife Trust (DWT) assessed the site as having low potential impact on features of ecological importance or value. Natural England did not offer any views on conditions at this site. It is now common practice for established hedgerows to be retained as part of new development - not only to maintain ecology/biodiversity assets, but also to help maintain a sense of place and good design. This is reaffirmed by **Strategic Policy 1.1: Allocation Sites** which as part of criterion 2 requests the maintaining and enhancing both of existing hedgerow and tree belt boundaries.

Bus services:

Many respondents said that the route adjacent to the site has a limited bus service, with no evening service available. It was suggested that the poor public transport offer would force new residents to drive, with negative consequences for congestion and pollution in the village. Any bus services that operate along Beech Lane are hampered by the narrow road and hazardous parking also. An improved bus service would be necessary if the site were to be developed, responses indicated.

EBC response:

Section 106/developer contributions would be made wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis. Companies will look to provide services where it would be commercially desirable and financially profitable. As for bus services getting caught in localised congestion, it will be for Traffic Assessments and Travel Plans to show how any additional traffic generated by new development would be managed safely across the local road network, allowing current services to operate to a similar level as they currently do.

School capacity:

Scargill Primary School was thought to be at capacity by some respondents and they raised concerns that new residents in the area would put additional pressure on the school's limited resources. Some indicated that there was capacity, but not for a development of the size proposed. The school was thought to be popular with a large catchment which, it was thought, would need to be reduced in the event of a new housing development. There are limited childcare and youth services in the area and all secondary schools are a car drive away.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from other relevant LEAs. An

absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning.

Healthcare facilities:

Current residents have difficulty accessing appointments at the village's two surgeries, with many reporting a wait of around 4 weeks to see a GP. Several residents reported travelling to nearby villages or into Ilkeston to see a doctor, with respondents describing the healthcare facilities in West Hallam as insufficient and overwhelmed. Concerns were raised that the proposed site would put additional strain on these facilities, putting lives at risk and reducing the services further for existing residents. It was pointed out that there are currently no NHS dentists taking on adult patients in the area, forcing many residents to travel (some up to 40 minutes away) for dental care.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision and availability of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of housing:

Questions were asked about whether affordable housing would be truly affordable, there were conflicting opinions about whether affordable housing was needed. Several comments registered their concern that social housing in this location would see an increase in crime in the village. Many respondents were concerned that sub-standard and architecturally inappropriate houses would be built that were not in-keeping with the style and character of the village. Several who accepted housing would be built were keen that the builds should be attractive and have environmentally sustainable features such as solar panels, heat pumps and swift boxes.

EBC response:

The level of affordable homes (in % terms) has been tested and set through an independent viability assessment. The percentage of affordable homes represents the highest proportion that the Council could justifiably ask for. It is unrealistic and inappropriate to avoid seeking affordable housing based around preconceptions of this tenure, when an evidenced need for affordable housing stock exists across the Borough. All aspects of a new development's design, including the homes, will be influenced by the Council, with encouragement made through the planning application process for new properties to be of a high standard which contribute to an attractive site in general.

Number of houses:

Several responses indicated that the proposed allocation was too many houses for this site and that this could mean that houses would be small with little or no garden, not in-keeping with the current housing in the village. Whilst comments showed there was some support for single-occupier homes (such as bungalows), it was felt that larger family homes were not needed. Respondents pointed to nearby unsold new builds in the area as evidence of this. If homes were to be built, said some, then there should be fewer, and green spaces should be included as part of the development, alongside much-needed improvements to local infrastructure.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be achieved. It is important for all housing allocations that they do not represent over-development and compromise on delivering a scheme in line with that set out by SP1.1. Criterion 4 of **Strategic Policy 1.9** states that development should preserve the setting of the adjoining West Hallam Conservation Area through establishing a suitable layout on the east of the site. Comments which suggest that homes would stretch and overburden local services and infrastructure are dealt with in the responses made to the other relevant topics which address different forms of infrastructure.

Green Belt:

The majority of responses showed strong opposition to building on the Green Belt. The loss of Green Belt was thought to be a threat to the village's character and appeal, with many concerns raised over the removal setting a precedent for the future. Questions were asked about the rejection of previous applications for development here due to its Green Belt status and why this had changed. Several respondents asked why the site was being considered before brownfield sites both within the village and beyond, in areas such as Ilkeston. It was thought that it was the Council's subjective opinion that the land did not make an important contribution to the Green Belt, with some responses pointing to the sites use by both the community and local wildlife as evidence of its importance.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. This is emphasised within the Council's Site Selection Paper which sets out the justification for the exceptional circumstances in developing Green Belt land. In terms of perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. All brownfield sites are included in the Council's housing land supply or assessed as unavailable.

Landscape:

Respondents indicated that the open field and views were an important part of why they and their fellow residents chose to live in West Hallam and that this would be ruined by development of this site. Many felt that the village would be less desirable, and this would have a negative impact on house prices and compromise the conservation area adjacent. Some respondents expressed concerns over the architectural quality and sustainability of any possible development on the site, worried that poorly built/designed homes would further spoil the landscape and village character. The loss of the landscape would affect people's mental health it was said.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make. Additionally, **Strategic Policy 1.9** emphasises that the layout of any development should 'retain corridors of south-facing vistas from Beech Lane enabling views of the countryside beyond'.

Flooding / drainage:

No specific incidences of flooding were reported but many respondents expressed concern that the fields covered by the allocation provided natural drainage for the village in times of high rainfall, and that its loss may lead to flooding in that area after development. The village of West Hallam has experienced flooding in recent years, but the site itself is only described as occasionally boggy or waterlogged by respondents. Questions were raised, however, about where the run-off would go post development.

EBC response:

The allocation falls within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. As part of a planning application, major development would be expected to provide a drainage strategy to demonstrate that new development would not worsen existing hydrological conditions. No SCB (EA, Severn Trent or Derbyshire County Council (as the Local Lead Flood Authority)) responded to the recent consultation to raise concerns over flooding or drainage in relation to this allocation.

Other:

Several commenters wished to draw attention to water supply issues in the area, with concerns that additional homes would put more pressure on a struggling system. The need for upgrading existing infrastructure and facilities prior to any development was underlined. Questions around the choice of the site over brownfield alternatives and empty houses were raised again here, with some asking for further explanation over the scoring of sites in the Core Strategy Review. A handful of responses indicated support for affordable housing in the village for young people but not at the expense of the Green Belt. The need for access through the

site to the cricket pavilion was registered, alongside a further request for parking to alleviate congestion issues on Beech Lane.

EBC response:

Matters of infrastructure are addressed at various places within the responses to these summaries. As mentioned under Green Belt, the Council have exhaustively searched for brownfield locations to develop in preference to requiring Green Belt land. All other issues will be addressed through any future planning application for the site and S106 contributions.

6F North of West Hallam (Strategic Policy 1.10)

6.20 Number of respondents commenting on this allocation – **115** (111 object, 4 support).

6.21 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	91	-
Road safety	80	-
Air quality	32	-
Wildlife / Biodiversity	66	1
Bus services	39	-
School capacity	33	-
Healthcare facilities	52	-
Type of housing	23	1
Number of houses	30	-
Green Belt	54	1
Landscape	25	-
Flooding / Drainage	54	-
Other	23	2
Total comments	602	5

6.22 Summaries of the main issues raised in responses from the general public to the North of West Hallam site allocation are as follows:

Traffic Congestion:

Comments here mirrored the road safety concerns in that they centred around current speeding problems, congestion at the High Lane West, Park Hall Lane, and Station Road junction, and the lack of safe crossing points on the roads adjacent to the site. Traffic calming measures in this area were proposed by some respondents, including a reduction in the speed limit. It was reiterated that High Lane West is an extremely busy road and that the proximity of the site to the aforementioned junction would make any access points dangerous.

EBC response:

No specific response concerning this allocation about traffic congestion was made by Statutory Consultation Bodies (SCBs) with a highway's focus. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the Strategic Road Network (SRN). The Borough Council would also expect the production of a TA as part of any future planning application, showing how issues and concerns relating to traffic congestion at those locations mentioned would be adequately addressed.

Road Safety:

The 40mph speed limit on High Lane West makes the road dangerous to cross as a pedestrian, say respondents. There are no crossings here and no pavement on High

Lane West where the development site is located, or on Park Hall Lane. High Lane West currently struggles both with congestion at the crossroads with Station Road and Park Hall Lane, and with drivers exceeding the 40mph limit. Additionally, responses point to a blind spot as drivers approach High Lane West from Belper Road. The risk of accident, especially to children travelling to school or the park, was of particular concern among respondents.

EBC response:

No specific response concerning this allocation about road safety was made by Statutory Consultation Bodies (SCBs). Derbyshire County Council have commented that the new vehicular and pedestrian access on High Lane West would need to take visibility into consideration. The Borough Council would expect the production of a TA as part of any future planning application, showing how any issues and concerns relating to road safety would be addressed.

Air Quality:

Responses indicated that air quality in the village of West Hallam was already poor, especially around the proposed site due to the heavy traffic on High Lane West. Concerns related to the additional congestion and therefore pollution from construction machinery and from additional vehicles. There was an assumption that most households on the development would have more than one car, thus increasing pollution, and that this would have a detrimental effect on wildlife and residents' health.

EBC response:

The site is not subject to Air Quality Management Area (AQMA) designation. However, the production of a TA and Travel Plan would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. Housing construction is subject to legally enforceable conditions which limit the release of dust and debris into the wider environment to a safe and acceptable level.

Wildlife/Biodiversity:

The potential loss of wildlife and habitats was of great importance to most respondents. There were a number of species that had been spotted in the field or in the trees surrounding, these included badgers, rabbits, stoats, hares, frogs, newts, mice, butterflies, bees, buzzards, Red Kites, Barn Owls, Jays and Sparrowhawks. This is alongside the horse that resides in the field currently. Bats have also been spotted*. Concerns were raised over the threat to wildlife that development of the site might pose.

EBC response:

Sightings of species on or around the allocation site are noted. Derbyshire Wildlife Trust (DWT). assessed the site as having low potential impact on features of ecological importance or value. Natural England did not offer any views on conditions at this site. It is now common practice for established hedgerows to be retained as part of new development - not only to maintain ecology/biodiversity assets, but also to help maintain a sense of place and good design. This is reaffirmed by **Strategic Policy 1.1: Allocation Sites** which as part of Criterion 2

requests the maintaining and enhancing both of existing hedgerow and tree belt boundaries.

Bus Services:

Most respondents reported that the village of West Hallam has a limited bus service, with weekend and evening services being particularly unreliable. There were concerns that residents of the proposed affordable housing would not own cars and would be reliant on a declining bus service. Also of concern was that the poor bus service would force people to purchase/use cars and therefore this would lead to increased traffic and pollution.

EBC response:

Section 106/developer contributions would be made wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis. Companies will look to provide services where it would be commercially desirable and financially profitable. It will be for Traffic Assessments and Travel Plans to show how any additional traffic generated by new development would be managed safely across the local road network, allowing current services to operate to a similar level as they currently do.

School Capacity:

Several responses pointed to the local Primary School (Scargill) being at capacity and raised concerns that new residents in the area would exacerbate this. However, several other responses indicated that there is space for additional pupils as the school was extended a few years ago, and that issues may be more about additional pressures put on teaching staff. It was a concern that the site was half a mile from the school and across a busy road, which could mean more children would be driven to school, increasing traffic and causing parking issues in the village centre. All secondary schools in the area are a drive away.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from all relevant LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning. Traffic and road safety issues are addressed elsewhere in the responses.

Healthcare Facilities:

Healthcare facilities, and especially GP surgeries, are already at full capacity say the majority of respondents. Currently it is difficult for residents to get an appointment at the village surgeries, and many are having to travel to neighbouring villages or into Ilkeston to see a doctor. A knock-on effect of this is that Pharmacists are now also

overstretched and struggling to cope with demand. Concerns were raised that the proposed site would put additional strain on these facilities.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of Housing:

Concerns were raised over the inclusion of affordable housing on the site having a negative impact on house prices and the community in general. Several respondents have assumed that affordable housing would mean social housing and were concerned about anti-social behaviour and neglect of properties. Whilst some responses questioned the need for affordable homes there was some support for genuinely affordable housing so that young people could get on the housing ladder.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents the highest proportion that the Council could justifiably ask for. It is unrealistic and inappropriate to avoid seeking affordable housing based around preconceptions of this tenure, when an evidenced need for affordable housing stock exists across the Borough.

Number of Houses:

Many respondents feel that the proposed number of houses is too high for the size of the site. This would lead to too many people and too many cars putting pressure on already struggling infrastructure. It was thought that infrastructure needed addressing first. There were calls for affordable housing to be located closer to towns or areas with better public transport.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be delivered. It is important for all housing allocations that they do not represent over-development and compromise on achieving a scheme in line with that set out by SP1.1. Local services and infrastructure comments are dealt with in the responses made to other topics.

Green Belt:

Concerns were raised about building on the Green Belt and that these areas should be protected. Questions were asked about the Green Belt designation being altered to accommodate the proposed site. Several respondents asked why the site was being considered before Brownfield sites and more urbanised areas such as

Ilkeston. The existence of badger setts on Park Hall Lane were mentioned alongside concerns over the erasure of Green Belt in this area.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. This is emphasised within the Council's Site Selection Paper which sets out the justification for the exceptional circumstances in developing Green Belt land. In terms of perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. All brownfield sites are included in the Council's housing land supply or assessed as unavailable.

Landscape:

Responses indicated that the site would ruin the landscape and the views for surrounding homes would be spoiled. The 'countryside feel' of the village would be compromised and house prices would decline say many of the respondents. Mention is made of listed trees on Park Hall Lane and hedgerows on High Lane West.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make.

Flooding / Drainage:

It was reported by multiple respondents that the field which forms the proposed site is subject to frequent flooding. Flood waters often overflow into surrounding properties and onto High Lane West itself as there are possible drainage issues in the field. Severn Trent Water are apparently aware of the issues but have taken no action to date. Reports indicate that the flooding happens after heavy rainfall and mostly in winter months.

EBC response:

The allocation falls within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. As part of a planning application, any major development would be expected to provide a drainage strategy to demonstrate that new development would not worsen existing hydrology conditions. No SCB (EA, Severn Trent or Derbyshire County Council (as Local Lead Flood Authority)) responded to the recent consultation to raise concerns over flooding or drainage in relation to the allocation.

Other:

Many responses under 'Other' were repetitions of comments in other fields. It was reiterated that: Brownfield sites should be considered first; that the existing infrastructure could not handle more homes and more people; the site would cause surrounding houses to lose value; and social housing would create problems. A standout suggestion was that the Council should buy the 'Punchbowl' pub in the village to create a community hub instead of building more houses.

EBC response:

Most comments are dealt with in responses to other topics. As mentioned under Green Belt, the Council have exhaustively searched for brownfield locations to develop in preference to requiring Green Belt land.

6G North of Borrowash (Strategic Policy 1.11)

6.23 Number of respondents commenting on this allocation – **43** (38 object, 5 support).

6.24 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	24	1
Road safety	16	2
Air quality	14	-
Wildlife / Biodiversity	13	2
Bus services	3	1
School capacity	14	2
Healthcare facilities	24	1
Type of housing	5	1
Number of houses	8	-
Green Belt	16	1
Landscape	4	-
Flooding / Drainage	15	-
Other	4	3
Total comments	160	14

6.25 Summaries of the main issues raised in responses from the general public to the North of Borrowash site allocation are as follows:

Traffic congestion:

Concerns were raised in regard to the increase in traffic congestion and parking issues that would be experienced in and around Borrowash, as well as in Spondon, as a result of this development, especially regarding key junctions. Key concerns are centred around the junction between Cole Lane and the A52, at which traffic entering and exiting would potentially create a chokepoint. Cole Lane was also noted to be busy, as well as the Station Road and Victoria Avenue crossroads. Many concerns here also overlapped in response road safety issues. **See road safety.**

EBC response:

The Council is open to entering into dialogue with National Highways prior to future Hearing Sessions in order to better understand their requirements regarding this allocation. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the SRN. The Borough Council would also expect the production of a TA as part of any future planning application, showing how issues and concerns relating to traffic congestion would be addressed.

Road safety:

The junction between Cole Lane and the A52 was flagged consistently as unsafe and dangerous, and associated with frequent accidents. Key issues contributing to safety issues in regard to this junction include the inadequacy of the slip road, which

provides limited opportunity to build or reduce speed when entering or exiting the A52, and the proximity of a footbridge to the junction. It is suggested that 50mph speed restrictions are extended outwards from the Derby urban area to cover junctions in Borrowash.

EBC response:

Similarly as mentioned in response to **Traffic Congestion**, the Council would be open to discussing matters flagged by National Highways with them prior to future Hearing Sessions to better understand their requirements regarding this allocation. Generally, the Borough Council would expect the production of a TA as part of any future planning application, showing how issues and concerns relating to road safety would be addressed.

Air quality:

Concerns are focused on the site's relationship with the A52, which sits directly adjacent to the site. The A52 runs parallel with the A6005, and so the potential negative cumulative effects on air quality for new residents are highlighted. This, alongside a general increase in traffic and emissions, could have significant adverse health effects.

EBC response:

Despite its proximity to the A52, the allocation site is not subject to Air Quality Management Area (AQMA) designation. However, the production of a TA and Travel Plan would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. Housing construction is subject to lawful conditions which limit the release of dust and debris into the wider environment, keeping this to safe levels.

Wildlife / biodiversity:

A high level of biodiversity is reported by respondents to be associated with this site, including foxes, squirrels, hedgehogs, wild birds, buzzards, kestrels, sparrowhawks, pheasants, bullfinches, jays, and green woodpeckers. Concerns have been raised that development of this site would result in the destruction of habitats, such as hedgerows, dispersal of wildlife and reduced viability of red book species.

EBC response:

Sightings of species on or around the allocation site are noted. Derbyshire Wildlife Trust (DWT). assessed the site as having low potential impact on features of ecological importance or value. Natural England did not offer any views on conditions at this site. It is now common practice for any established hedgerows to be retained as part of new development - not only to maintain ecology/biodiversity assets, but also to help maintain a sense of place and good design. This is reaffirmed by **Strategic Policy 1.1: Allocation Sites** which as part of Criterion 2 requests the maintaining and enhancing both of existing hedgerow and tree belt boundaries.

Bus services:

The existing bus services i4 and 9a have been identified as serving the site effectively, although bus stops are reported to be a significant walking distance from

it. Concerns have been raised however regarding service capacity and the need for additional bus services, adding to localised traffic congestion.

EBC response:

Section 106/developer contributions would be made wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis, therefore companies will look to provide services where it would be commercially desirable and financially profitable. As for bus services getting caught in localised congestion, it will be for Traffic Assessments and Travel Plans to show how any additional traffic generated by new development would be managed safely across the local road network.

School capacity:

General concern was raised about the current capacity of local schools in Borrowash, Spondon and Sandiacre, and the availability of school places. Some responses indicate the need for a new school and further contributions to support housing development in Borrowash. Conversely, supportive comments reported that Ashbrook Nursery, Infant & Junior Schools are currently undersubscribed and have sufficient capacity to accommodate school-aged children who would be resident in the new housing. Redhill Primary School in Ockbrook is also readily accessible from the site by foot.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from other relevant LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning.

Healthcare facilities:

Responses raise concerns that current healthcare capacity would not support increased demand arising from the development of new homes, as the two GP surgeries and the dentist in Borrowash are already oversubscribed. Residents have significant difficulty in getting doctor's appointments, and pharmacy stock levels will not support an increase in population from new housing.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having

been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of housing:

Concerns were raised regarding the potential negative impact on the character of the locality. New housing should be sympathetic to Borrowash, which respondents say consists of traditional style housing with generously sized gardens. Affordability was also raised as a concern, with a greater percentage of affordable and starter homes deemed more desirable. Other respondents stated that a development of larger family homes would be more appropriate, in order to free up existing properties for younger prospective homeowners.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents the highest proportion that the Council could justifiably ask for. Plans for the mix of house types and tenure will be provided by the applicant at the planning application stage, whereby the Council will decide on the suitability of that mix.

Number of houses:

Respondents are concerned that Borrowash, a small village, cannot accommodate 60 new homes. Development on this site would lead to a reduction in green space, and current services would be unable to cope with an influx of new residents. The Council's position with regards to empty homes was also raised. Empty homes should be brought back into occupancy, as well as offering incentives such as lower rent to encourage single people to move from larger to smaller council-owned/housing association properties, to free up larger properties.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be delivered. It is important for all housing allocations that they do not represent over-development and compromise on achieving a scheme in line with that set out by SP1.1. Comments which suggest that homes would stretch local services and infrastructure are dealt with in the responses made to other topics. Addressing the criticisms around empty homes, the number of vacant units present at any one time within the Borough's wider housing stock is subject to a wide range of factors, many of which exist outside the direct control of the Council.

Green Belt:

There were criticisms of the process of evaluating and assessing land for release from the Green Belt, and that NPPF criteria, including the definition of grey belt, have not been met. Changes to the Green Belt should be clearly justified through the availability of evidence produced in line with the relevant provisions of the NPPF. Many responses point towards the volume of brownfield sites that exist in the Borough which are more suitable for the delivery of housing than the site in question. Concerns were also raised that development of this site would reduce the separation of Nottingham and Derby, and on a more local level the separation of Ockbrook and Borrowash. Other responses were concerned that the inclusion of the area of

safeguarded land, would threaten to reduce the availability of allotment gardens, and lead to the eviction of the Erewash Valley Model Engineering Society.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. This is emphasised within the Council's Site Selection Paper which sets out the justification for the exceptional circumstances in developing Green Belt land. Conclusions made in the Green Belt Review do not consider this allocation to contribute to reduced separation of Ockbrook and Borrowash, with the A52 acting as an important defensible boundary. In terms of perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. All brownfield sites are included in the Council's housing land supply or assessed as unavailable. The Engineering Society is located on Safeguarded Land and faces no immediate pressure to relocate.

Landscape:

General concern was raised that the openness of the landscape, as well as village green space will be lost if new housing is built on this site. Respondents say that this should be preserved, and if it is not then Borrowash's village status will be challenged, as it is increasingly merged with surrounding villages and urban areas, including Spondon.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make. The issue of merging of Borrowash and Ockbrook was addressed in the **Green Belt** section.

Flooding / drainage:

Respondents expressed concerns with regards to an increase in surface water on the A52 and A6005 roads, and removal of greenfield land will reduce capacity for natural water drainage. Respondents report that the Ock Brook has contributed to incidents of flooding in Borrowash. Increased run-off from the allocation's development would increase the risk of flooding and threaten neighbouring residential areas.

EBC response:

The allocation falls within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. Major development would be expected, as part

of a planning application, to provide a drainage strategy to demonstrate that new development would not worsen existing hydrology conditions. No SCB (EA, Severn Trent or Derbyshire County Council (as Local Lead Flood Authority)) responded to the recent consultation to raise concerns over flooding or drainage in relation to the allocation.

Other:

Many responses under 'Other' saw repetition of comments made in other topics. It was reiterated that a greater percentage of homes should be affordable; more suitable sites on brownfield land are available elsewhere in the Borough and that situating new housing in close proximity to the A52 would lead to adverse health and life outcomes. National Grid upgrades were referenced as already having a negative effect on Borrowash, effects which would be worsened by development of new housing.

EBC response:

Concerns raised in this topic's summary have been addressed across a number of other responses under other topics. Work to improve the strength and reliability of National Grid's coverage as part of the Chesterfield to Willington upgrade project are subject to their own statutory infrastructure-led process.

6H West of Borrowash (Strategic Policy 1.12)

6.26 Number of respondents commenting on this allocation – **138** (130 object, 8 support).

6.27 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	117	5
Road safety	71	2
Air quality	56	1
Wildlife / Biodiversity	71	2
Bus services	25	-
School capacity	53	5
Healthcare facilities	101	4
Type of housing	40	2
Number of houses	47	1
Green Belt	91	2
Landscape	38	2
Flooding / Drainage	65	1
Other	34	2
Total comments	809	29

6.28 Summaries of the main issues raised in responses from the general public to the West of Borrowash site allocation are as follows:

Traffic congestion:

Concerns were raised in regard to the significant increase in traffic congestion and parking issues that would be experienced in and around Borrowash, as well as in neighbouring Spondon. Borrowash, but particularly along Victoria Avenue, is reported to be gridlocked at peak times, with cars diverting through the village to access the A52. Without direct access to the A52, development of homes here would only add to heavy congestion on local roads, which respondents cite as being in poor condition and significantly blighted by potholes. Derby Road (A6005) is identified as a traffic bottleneck, and the junction at Spondon Lane End is reported to be at capacity. The junction of Victoria Avenue and Derby Road is also congested. Without significant improvements to infrastructure, existing traffic issues would worsen further with the introduction of approximately 560 cars onto the road network (with respondents assuming two cars per household). Many concerns here were also made in response to road safety issues. **See road safety.**

EBC response:

The Council is open to entering into dialogue with National Highways prior to future Hearing Sessions in order to better understand their requirements regarding this allocation. **Strategic Policy 1.12** already makes provision for contributions towards the improvement of off-site junctions that would be directly impacted by the allocation's development. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport

Assessment (TA) and Travel Plan to understand impacts on the SRN. The Borough Council would also expect the production of a TA as part of any future planning application, showing how issues and concerns relating to traffic congestion at locations mentioned by the public in their responses would be addressed.

Road safety:

Responses cite various problematic junctions in and around Borrowash. The Station Road (B5010) and Victoria Avenue junction is flagged, and many accidents are reported to have occurred at the Kimberley Road/Victoria Avenue junction. The proposed new entrance to the site from Derby Road (A6005) is criticised as poorly placed, and the addition of a new pedestrian crossing would compound safety concerns due to poor highway visibility. There are other visibility concerns along Derby Road, due to the brow of a hill. Illegal parking at the top of Ladysmith Road is also highlighted as a safety concern. Speeding is another issue, with drivers regularly exceeding 30mph along Victoria Avenue and Derby Road. The development would further compromise the safety of pedestrians in Borrowash, especially schoolchildren. A lack of traffic management around Ashbrook Infants School is raised, as well as a lack of pavement between Borrowash and Spondon, particularly west of Borrowash House, and need to cross busy road junctions. These issues compromise the safety of children walking from West Park School in Spondon, and additional traffic would worsen this. Comments suggested it would be difficult to deliver improvements in active travel infrastructure within Borrowash owing to a lack of highway space. Additional road crossings are needed on Victoria Avenue, and speed limit enforcements to 20mph should also be considered, to alleviate concerns.

EBC response:

Similarly as mentioned in response to **Traffic Congestion**, the Council would be open to discussing matters flagged by National Highways with them prior to future Hearing Sessions to better understand their requirements regarding this allocation.

Strategic Policy 1.12 makes provision for enhanced pedestrian facilities on Derby Road and Victoria Avenue. No specific concerns are raised by SCBs in relation to the junctions identified in this summary. The Borough Council would expect the production of a TA as part of any future planning application, showing how issues and concerns relating to road safety would be addressed.

Air quality:

There was general concern that air quality would drastically worsen, because of the significant volume of additional cars that a new development would input to the road network. Existing levels of air pollution are reported to already be high, due to the site's nearby relationship with the A52. An increase in emissions and overall particulate matter would have significant negative health effects, worsening the environment for those suffering from various health conditions. Concern was raised regarding the effects of air pollution around local schools and nurseries, as daily commuter routes pass these facilities.

EBC response:

The site is not subject to Air Quality Management Area (AQMA) designation. However, the production of a TA and Travel Plan would demonstrate how traffic

generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions.

Wildlife / Biodiversity:

Responses highlight that the site, including the fields and wider area, support a high level of biodiversity. Reports have been made of the presence of a wide range of species, including protected species, being observed here, and in the immediate area. These include smooth newts, frogs, hedgehogs, bats, including pipistrelles, little owls, buzzards, red kites, kestrels, water voles, foxes, sparrow hawks, skylarks, storks, parakeets, and yellowhammers. A large pond is located on the site, which provides habitat to amphibians and nesting species. It is felt that development of this site would result in the destruction and fragmentation of habitats, which form part of an essential wildlife corridor. One response reports the need for a bee road, to maintain habitat whilst risks to animal movements around Meynell Farm were also noted.

EBC response:

Sightings of species on or around the allocation site are noted. Derbyshire Wildlife Trust (DWT) assessed the site as having low potential impact on features of ecological importance or value. Natural England did not offer any views on conditions at this site. It is now common practice for established hedgerows and tree belts to be retained as part of new development - not only to maintain ecology/biodiversity assets, but also to help maintain a sense of place and good design. This is reaffirmed by **Strategic Policy 1.1: Allocation Sites** which as part of criterion 2 requests the maintaining and enhancing both of existing hedgerow and tree belt boundaries. The creation of a sizeable area of parkland west of the housing element of the allocation offers significant potential to create a large new area for biodiversity to thrive.

Bus services:

Existing bus services, including the i4 and Indigo Trent Barton services, are reported to be of poor quality. Greater use of these services would result in increased pressure on bus capacity and availability, with a further reduction in the quality of services. Local school buses to West Park Comprehensive School in Spondon are reported to be at capacity, and respondents are further concerned that new residents will opt to access key services, including schools, by private car. Additional buses would need to be provided to alleviate potential issues and provide access to key facilities and services.

EBC response:

Section 106/developer contributions would be made wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis; therefore companies will look to provide services where it would be commercially desirable and financially profitable. The frequency of services which would pass the allocation along its southern boundary is high, offering excellent accessibility to Derby, Nottingham and towns and villages which lay in-between. The presence of a Local Centre containing a variety of services and amenities a short walk from the allocation should offset the need for widespread use of the private car to access

such facilities. The capacities of school-run bus services would be a matter for the individual schools and the LEA to address.

School capacity:

General concern was raised about the current capacity of local schools in Borrowash, Spondon and Sandiacre, and the availability of school places. West Park Comprehensive School (Spondon) and Redhill Primary School (Ockbrook) are thought to be oversubscribed. Responses referencing Ashbrook Nursery, Infant & Junior Schools (all Borrowash) point to these schools operating under their capacities, although their teaching capacity and overall capacity is reported to be low. Classroom sizes, and overall school capacity would not support an influx of new school-age population in Borrowash, which would lead to overcrowded classes and a decline in the quality of education provided by local schools. Contributions towards facilities, including additional classroom capacity, extensions to current schools, and potentially a new school, are thought to be necessary to cope with the likely growth in pupil numbers.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from other relevant LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning.

Healthcare facilities:

Respondents report that GP surgeries in Borrowash are currently overcapacity, and the local dental practice is currently not taking on any NHS patients. Responses raise concerns that current healthcare capacity would not support the increased demand arising from occupants of new homes. Residents have significant difficulty in getting doctor's appointments at Park Medical Practice and Overdale Medical Practice (both Borrowash), and pharmacy stock levels will not support an increase in population with these issues being exacerbated by the new population arising from this site.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of housing:

Concerns were raised regarding the potential negative impacts of the high proportion of affordable homes proposed for the site on the locality. Such a proportion is likely to lower the value of neighbouring properties, and is not necessary when a sizeable number of houses valued at approximately £200,000 are already listed for sale in the area. Other responses, in favour of the allocation, indicated that a higher percentage of proposed units should be affordable, with prioritisation of smaller homes for first time buyers, as well as considering shared ownership. Conversely, questions arose about whether homes would be truly affordable, and whom they would be for. Responses also indicated that these homes are likely to be low in quality and energy inefficient. There was also concern that new homes would not reflect the character of surrounding properties and heritage assets. It was claimed that this development would be damaging to the setting of the Victorian cottages located along Victoria Road.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents the highest proportion that the Council could justifiably ask for. Development would have the opportunity to reflect the surrounding village character, although it is worth noting that Borrowash has no Conservation Area, to minimise impacts of individual heritage assets through a considered design process. The Council would expect greater detail over the development design, layout, preferred house types and tenure as part of a future planning application.

Number of houses:

Respondents are concerned that Borrowash, a small village, cannot accommodate 280 new homes. The number of homes would not be in proportion with the size of Borrowash and would alter the identity of the settlement. Current services would be unable to cope with such an increase in new residents. The Council's position with regards to empty homes was also raised, and reports of an adequate number of homes listed for sale and rent were again raised. Empty homes should be brought back into occupancy, and this would provide accommodation in a shorter time than building new houses.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council based on land ownership arrangements. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be delivered. It is important for all housing allocations that they do not represent over-development and compromise on achieving a scheme in line with that set out by SP1.1. Comments which suggest that homes would stretch local services and infrastructure are dealt with in the responses made to other topics. Addressing the criticisms around empty homes, the number of vacant units present at any one time within the Borough's wider housing stock is subject to a wide range of factors, many of which exist outside the control of the Council.

Green Belt:

There were criticisms of the process in how the release of Green Belt was evaluated. It was stated that the allocation proposals contradict the NPPF, as the land in question contributes strongly to the five purposes of Green Belt. The area is identified as an important part of the Green Belt between Derby and Borrowash, and concerns are raised that development would reduce the separation between these areas, and other settlements within this part of the Nottingham-Derby Green Belt. Questions were raised as to why this site is proposed, when a previous planning application was rejected on the grounds of its proximity to Derby City. It was pointed out that changes to the Green Belt should be clearly justified through the availability of evidence produced in line with the relevant provisions of the NPPF. Many responses point towards the volume of brownfield sites that exist in the Borough more suitable for the delivery of housing than the site in question. Other responses were concerned development of Green Belt would reduce capacity for farming and crop production, with the site being reported as Grade 3a agricultural land. Concerns that wildlife would be impacted by development of this site were also reiterated in this category.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. This is emphasised within the Council's Site Selection Paper, which also provides justification for the exceptional circumstances of Green Belt development. Conclusions made in the Green Belt Review do not consider this allocation to contribute to a reduced separation between Borrowash and Spondon, due to the existing pattern of development west of Borrowash (south of the A6005 at Manor Road) which ensures that the housing component of this allocation would not bring the settlements any closer together. In terms of perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged the development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. All brownfield sites are included in the Council's housing land supply or assessed as not available. The loss of average quality agricultural land is not considered to be detrimental to the availability of farmland, with better quality agricultural land existing elsewhere in the Borough.

Landscape:

The open fields across the allocation site were identified as an important part of the local landscape, and the loss of these would damage landscape character, and reduce the landscape value of the area. This would alter Borrowash's status as a village with a strong rural character and open spaces, by prompting an increasingly close relationship with Spondon, risking Borrowash becoming part of the City of Derby.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that each of the allocations would make. The issue of Borrowash's relationship with Spondon in Derby was addressed in response to the Green Belt topic section.

Flooding / Drainage:

The fields which form the site are often waterlogged, and often flood in winter, while acting as a floodplain. Properties adjacent to the site have however reportedly become increasingly susceptible to flooding, including along Field Close, because of marshy and boggy land on the site. The field south of Covent Garden Close also reportedly floods. Removal of the land's natural drainage capacity would increase flood risk to adjacent properties through increased run-off activity. Respondents also have concerns about the proximity of the Ock Brook to the site and the additional rainwater feeding into this watercourse, something which is causing flooding to properties further along the Brook. The limited capacity of outdated sewage and drainage systems was also highlighted as a concern.

EBC response:

The allocation falls within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. Major development would be expected, as part of a planning application, to provide an appropriate drainage strategy to demonstrate that new development would not worsen existing hydrological conditions either on-site or in the vicinity of the allocation. No other concerns were raised by SCBs (EA, Severn Trent or Derbyshire County Council (as Local Lead Flood Authority)) regarding flooding, drainage or sewage issues in relation to the allocation.

Other:

Many responses made under 'Other' were repetitions of comments submitted to other fields. It was reiterated that air pollution would be high due to the site's proximity to the A52; landscape and village character would be harmed; the development is of an inappropriate scale with respect to the size of Borrowash and levels of services and amenities; impacts on traffic congestion and road safety; and lack of consideration of brownfield options. The Council's consultation itself was criticised as having not been transparent enough and felt rushed. A lack of identified provision in housing and accessibility to bus stops within the policy for the elderly was also identified as a concern, as well as lack of mention of provision for additional cultural or sporting facilities.

EBC response:

Responses to these points raised in responses can be found elsewhere within this section. The length of consultation was approved by an extraordinary meeting of Council and was in accordance with local planning regulations. Consultation in general was in accordance with EBC's Statement of Community Involvement (SCI) which saw information made available to the public at deposit points and on the Council's website. In terms of elderly housing provision, it will be for the developer at

a future application stage to specify whether sheltered or specialised housing is suitable, and if so, what provision will be made as part of the development. The site is located on a major bus corridor on Derby Road with a bus stop within easy walking distance of the site. A range of existing cultural and sporting facilities exist within Derby and Nottingham, and these are highly accessible by bus. Finally, a significantly-sized new area of parkland will be created within the west of the allocation as explained within **Strategic Policy 1.12**.

6J East of Breaston (Strategic Policy 1.13)

6.29 Number of respondents commenting on this allocation – **69** (69 object, 0 support).

6.30 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	52	-
Road safety	30	-
Air quality	24	-
Wildlife / Biodiversity	50	-
Bus services	12	-
School capacity	42	-
Healthcare facilities	43	-
Type of housing	16	-
Number of houses	29	-
Green Belt	53	-
Landscape	17	-
Flooding / Drainage	54	-
Other	24	-
Total comments	446	0

6.31 Summaries of the main issues raised in responses from the general public to the East of Breaston site allocation are as follows:

Traffic Congestion:

There were multiple comments indicating that traffic travelling east along the A6005 is heavy, with regular congestion on roads into Long Eaton. It was concerning to respondents that the site would bring more traffic which would exacerbate existing bottlenecks and have severe impacts on the wider road network. Points were raised about Heath Gardens and the road's inability to accommodate excess or heavy vehicles. Similar concerns were raised about Holly Avenue and the cul-de-sac not being suitable for large volumes of traffic.

EBC response:

No specific response concerning this allocation about traffic congestion was made by Statutory Consultation Bodies (SCBs) with a highway's focus. National Highways support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the Strategic Road Network (SRN). **Strategic Policy 1.13** states that development shall provide for an upgrade of the vehicular junction between Heath Gardens and the A6005. The Borough Council would also expect the production of a TA as part of any future planning application, showing how issues and concerns relating to traffic congestion at those locations mentioned would be adequately addressed.

Road Safety:

Concerns were focussed on an increase in traffic that a new development would bring. Respondents highlighted the 40mph speed limit as the A6005 crosses the M1, and the difficulty turning into and out of the petrol station and Heath Gardens. The junction of Heath Gardens is located at the point where the speed limit decreases from 40mph to 30mph when driving into Breaston, and increases from 30mph to 40mph when travelling towards Long Eaton. There were concerns raised for pedestrians and cyclists in this location because of the varying speeds of traffic. Some comments pointed to the road network itself not being equipped to handle the high volumes of traffic an increase in vehicles from a new housing development would bring.

EBC response:

No specific response concerning this allocation about road safety was made by Statutory Consultation Bodies (SCBs). **Strategic Policy 1.13** criterion 2 stipulates that development should provide for the installation of a pedestrian crossing point crossing the A6005 adjacent to the site. DCC Highways is in agreement with this requirement. The Borough Council would expect the production of a TA as part of any future planning application, showing how any issues and concerns relating to road safety would be addressed.

Air Quality:

Existing air quality is poor due to the recently widened M1, say respondents. Concerns were raised that residents of the prospective development would be closer to the M1 and would suffer adverse effects of the poor air quality. It was also felt that more homes would lead to more traffic and congestion, which would worsen air quality in Breaston. There were further concerns that the removal of trees on the site would lower air quality and raise the risks of associated health issues. The temporary construction traffic was also mentioned as a contributor to emissions.

EBC response:

The site is not subject to Air Quality Management Area (AQMA) designation. AQMAs which previously existed north and south of M1 Junction 25 have been removed for several years. However, the production of a TA and Travel Plan would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. Housing construction is subject to legally enforceable conditions which limit the release of dust and debris into the wider environment to a safe and acceptable level. In terms of green space and the loss of trees, the development will be expected to maintain on-site habitats, as per the policy, to assist with biodiversity and design/landscape objectives.

Wildlife/Biodiversity:

The potential loss of habitat was of greatest concern to respondents. Wildlife spotted on the site includes foxes, rabbits, hedgehogs, badgers, birds, butterflies, and bats. Alongside this, hedgerows and many mature trees of varied species are present in the field. The permanent loss of or damage to biodiversity through any development of the site is an issue raised by many respondents. In addition, the potential for disturbance or harm to the nearby Golden Brook Storage Lagoon (used for water

run-off) was a concern for some. Many more again emphasised the role of the site as a buffer to the M1 for the village, both for noise and air pollution.

EBC response:

Sightings of species on or around the allocation site are noted. Derbyshire Wildlife Trust (DWT) assessed the site as having low potential impact on features of ecological importance or value. Natural England did not offer any views on conditions at this site. It is now common practice for established hedgerows and trees to be retained as part of new development - not only to maintain ecology/biodiversity assets, but also to help maintain a sense of place and good design. This is reaffirmed by **Strategic Policy 1.1: Allocation Sites** which as part of criterion 2 requests the maintaining and enhancing both of existing hedgerow and tree belt boundaries. The Council would require a drainage strategy to show how rainfall is to be managed, showing the relationship between the site and existing drainage infrastructure.

Bus Services:

There is a reliable and frequent bus service that travels East-West and West-East along the A6005 (Derby Road) between Nottingham and Derby. The A6005 is the main road through Breaston. It was pointed out that there are no routes North-South nor between villages, and some respondents highlighted that there are no direct buses to either East Midlands Airport or Long Eaton train station.

EBC response:

Section 106/developer contributions would be made wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis. Companies will look to provide services where it would be commercially desirable and financially profitable. Bus services serving EMA and Long Eaton railway station can both be easily accessed by changing within Long Eaton town centre.

School Capacity:

There were some responses indicating that the village Primary School and Pre-School (Firfield) are at capacity and over-subscribed, with some current residents unable to find local places for their children. There were worries that additional homes would add to the pressure on the schools with the possibility of additional pupils undermining the quality of education provided. The current number of children driven to school also creates congestion at school pick-up and drop-off times. A few responses pointed to the cumulative impact on secondary schools in the area, as all children in the village must travel to Sandiacre or Long Eaton for secondary education, and that other proposed sites (Sandiacre and Draycott) could lead to over-subscription at these schools also.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from other relevant LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings,

the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning.

Healthcare Facilities:

Local Doctor's surgeries and Dentists are at capacity say respondents. There are difficulties for existing residents in getting appointments, especially with a GP. Additional residents of new housing would put more pressure on these already stretched services was the main issue raised, and guarantees were sought that this would be addressed should the site go ahead. It was also pointed out that the surgery and pharmacy are located at the opposite end of the village to the proposed site, so would not be convenient for new residents, especially if they were elderly or had mobility issues. Respondents were concerned there may be a cumulative effect from other proposed development sites (in Draycott and Borrowash) as the village surgeries share GPs.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintain responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. The ICB did not respond to the most recent consultation that this Statement summarises. However, in response to an earlier request from the ICB, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to the providers of local healthcare by the ICB.

Type of Housing:

It was thought by several respondents that the proposed mix of housing did not meet local need. Truly affordable 1-2 bed homes were necessary commented some, although many others believed that affordable housing was not in-keeping with the village. Many impressed that the houses should be similar to existing homes in the area to maintain the character of the village, this would include keeping any buildings to one or two storeys, and ensuring they were not too densely packed on the site. Energy efficiency and off-street parking were also thought to be priorities for any new housing development.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents the highest proportion that the Council could justifiably ask for. It is unrealistic and inappropriate to avoid seeking affordable housing based around preconceptions of this tenure, when an evidenced need for affordable housing stock exists across the Borough. The density and preferred tenure mix of housing proposed at the allocation site would be discussed and agreed at the planning application stage.

Number of Houses:

As with the Green Belt responses, there are worries that, with the development of the site, Breaston could be absorbed into Long Eaton town. Many comments indicated that there were too many houses planned for the site and questioned the

need for that number in this location. Too many houses would alter the scale and character of the village, it was felt. There were additional concerns raised over Heath Gardens being used as a through-road to the site, this was universally thought to be inappropriate.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be delivered. It is important for all housing allocations that they do not represent over-development and compromise on achieving a scheme in line with that set out by SP1.1. The matter of the appropriateness of forming vehicular access to the site has been commented on in response to other topics, particularly those concerning highway arrangements.

Green Belt:

The majority of responses were concerned with the removal of Green Belt, which many felt was unjustified. Concerns were raised around the precedent this might set for further Green Belt removal in the future, and around the merging the village of Breaston with the neighbouring town of Long Eaton. There were some questions about why grey and brownfield sites had not been utilised first, and whether 'exceptional circumstances' for the use of this Green Belt site had been met (referring to NPPF paragraph 140).

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. This is emphasised within the Council's Site Selection Paper which sets out the justification for the exceptional circumstances in developing Green Belt land. In terms of perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. Green Belt cannot be considered by the Core Strategy Review as it is being progressed under transitional arrangements when mean it is being examined against a previous iteration of the NPPF.

Landscape:

The role of the land as a buffer between the village and the M1 was highly valued by respondents. The permanence of the loss of landscape was a concern raised in some responses, as well as the possibility of further impacts on wildlife through increased light pollution. Other concerns raised were that views across the fields, for some residents, would be destroyed, and that there would be a loss of habitat for some wildlife species (see Wildlife/Biodiversity). The screening of the cemetery was thought to be of great importance also.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make. The screening of the cemetery with an 'appropriately landscaped buffer' is required by Criterion 3 of **Strategic Policy 1.13**.

Flooding / Drainage:

There were several comments about the insufficient drainage of the site and concerns about flooding in extreme weather. These concerns were based on the current alleviation measures, which were deemed to be insufficient. There were pleas for developers of the site to commit to dealing with the drainage issues and ensuring there would be no negative impact on surrounding areas.

EBC response:

The allocation falls within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. Major development would be expected, as part of a planning application, to provide a drainage strategy to demonstrate that new development would not worsen existing hydrological conditions on or immediately off-site. No SCB (EA, Severn Trent or Derbyshire County Council (as Local Lead Flood Authority)) responded to the recent consultation to raise concerns over flooding or drainage in relation to the allocation.

Other:

Several questions were asked of the Council, including whether brownfield options had been exhausted, and what new jobs were being brought to the area. There were also requests made for proof of housing need in Erewash. Some warnings were given around the development curtailing the ability to expand the cemetery, and that noise mitigation measures might be needed due to proximity to the M1. Others pointed out that often new housing estates can 'stand-alone' and that integration with the village would be essential for the site to be a successful addition to Breaston.

EBC response:

Matters of infrastructure are addressed at various places within the responses to these summaries. As mentioned under Green Belt, the Council have exhaustively searched for brownfield locations to develop in preference to requiring Green Belt land. **Strategic Policy 2 – Employment** outlines the intention of the Council to continue to support and protect employment land in the Borough, including a new allocation of 40 hectares of new employment space at Stanton North, strengthening local employment opportunities.

6K South West of Draycott (Strategic Policy 1.14)

6.32 Number of respondents commenting on this allocation – **154** (152 object, 2 support).

6.33 Breakdown of objections and support per reason:

Reason	Objection	Support
Traffic congestion	117	1
Road safety	109	2
Air quality	60	1
Wildlife / Biodiversity	129	1
Bus services	40	2
School capacity	62	2
Healthcare facilities	101	2
Type of housing	84	2
Number of houses	99	1
Green Belt	134	1
Landscape	82	1
Flooding / Drainage	133	1
Other	94	2
Total comments	1,244	19

6.34 Summaries of the main issues raised in responses from the general public to the South West of Draycott site allocation are as follows:

Traffic congestion:

Concerns have been raised in regard to the increase in traffic that would be experienced in and around Draycott as a result of this development. Surrounding roads, notably Derby Road (A6005) which on average experiences 3,861 cars per day, are noted to be narrow and heavily congested. The wider road network, including Gypsy Lane and Hopwell Road, which are small country lanes, are also highlighted by respondents to be unsuitable for an increase in heavy traffic. The anticipated additional 380 cars on this road network would be unacceptable and damaging. Major concern is raised in relation to the lack of a traffic impact assessment or survey for Draycott. The SYSTRA Road Traffic Assessment (March 2025) did not include Draycott and the surrounding land. Relevant NPPF paragraphs related to traffic and new development, have also not been adhered to.

EBC response:

No specific response concerning this allocation about traffic congestion was made by Statutory Consultation Bodies (SCBs) with a highway focus. National Highways generally support the notion that all major employment and housing allocations are expected to be supported by Transport Assessment (TA) and Travel Plan to understand impacts on the Strategic Road Network (SRN). The Borough Council would also expect the production of a TA as part of any future planning application, showing how issues and concerns relating to traffic congestion at those locations

mentioned would be adequately addressed. SYSTRA modelling carried out in support of the Core Strategy Review has been Borough-wide in its scope.

Road safety:

Speeding is raised as a significant concern for residents of Draycott, with speeds of 70mph reported to regularly be exceeded in the village. Major safety concerns are raised in regard to visibility, due to the presence of hump bridges throughout the village, including a blind double bridge when approaching the site from the west. Visibility of the access to the site is also obscured by the railway bridge. The planned access to the site at the junction between Bankfields Farm and Derby Road is highlighted as a safety concern, due to its proximity to the railway bridge, and inappropriate entrance design. This junction is viewed to be an accident hotspot, associated with multiple fatalities, including as recent as May 13 2025. Inadequate road widths surround the site, as well as a lack of pedestrian crossings and cycleways, are also identified as contributors to the unsafe road environment in Draycott, especially around Draycott Community Primary School.

EBC response:

DCC Highways agree with the highway safety measures that are made provision for within **Strategic Policy 1.14**, yet make no further comments regarding other road safety issues for this allocation. The Borough Council would expect the production of a TA as part of any future planning application, showing how any issues and concerns relating to road safety at locations mentioned within the public's representation would be addressed.

Air quality:

The existing level of air pollution is reported to currently be very poor as a result of the large amount of traffic using the main road through the village, the A6005 Derby Road. Development of new homes would increase car use further in the locality subsequently increasing emissions and worsening air quality. The loss of Green Belt land and green space would also increase air pollution. Levels of other forms of pollution are also expected to rise significantly, including noise pollution. Calls for Environmental Noise Assessment, as well as vibration consultation have been made to assess potential impacts on nearby properties and Grade 2 listed buildings, including Nooning Lane Bridge and Hopwell Road Bridge.

EBC response:

The site is not subject to Air Quality Management Area (AQMA) designation. However, the production of a TA and Travel Plan would demonstrate how traffic generated by the development would integrate with the existing road network to minimise instances of stationary traffic on local roads and at nearby junctions. In terms of green space, the development will be expected to deliver new publicly accessible areas, as per the policy, to assist with biodiversity and design/landscape objectives. The Coal Authority have no concerns over the stability of land, and therefore normal construction techniques involved in housebuilding are unlikely to be harmful to nearby properties.

Wildlife / biodiversity:

High levels of biodiversity are reported to be associated with this site, and the wider land. This includes badger setts, foxes, barn owls, little owls, rabbits, deer (including

a Muntjac deer), hedgehogs, voles, mice, green and greater spotted woodpeckers, buzzards, endangered swallows, sparrows, sparrowhawks, hawks, blue tits, great tits, gold finches, skylarks, house sparrows, bats, pipistrel bats, frogs, bees, butterflies, and a little egret when the field is waterlogged. Red List Species are reported to be active within the area. Concerns are raised that development of this site would result in loss of annual nesting sites for red list bird species. Additionally, a group of TPO trees are situated on the site, with fears these would be lost upon development of the safeguarded land. The site is felt to form part of a wildlife corridor, and so concern is raised about a potential loss of connectivity between important habitats.

EBC response:

Sightings of species on or around the allocation site are noted. Derbyshire Wildlife Trust (DWT) assessed the site as having a low to medium potential impact on features of ecological importance or value. Natural England did not offer any views on conditions at this site. It is now common practice for established trees and hedgerows to be retained as part of new development - not only to maintain ecology/biodiversity assets (with TPO trees subject to protection), but also to help maintain a sense of place and good design. This is reaffirmed by **Strategic Policy 1.1: Allocation Sites** which as part of Criterion 2 requests the maintaining and enhancing both of existing hedgerow and tree belt boundaries. TPO trees would ordinarily be expected to be covered by such a provision.

Bus services:

Concern was raised regarding the availability of buses and frequency of services, as well as the apparent lack of contributions from the proposed development towards the improvement of services. While some responses were positive about existing bus services, more local buses were identified as being required to support the travel requirements of a new population, particularly school age children, to local schools and other key local services. The need for improved bus stop infrastructure was raised. The current bus stop associated with the proposed site has no shelter. A lay-by type stop, to allow traffic to pass a stationary bus, would also be needed.

EBC response:

Section 106/developer contributions would be made wherever necessary where new or additional bus services are required. This would be negotiated at the planning application stage. Most bus services locally are largely run on a commercial basis. Companies will look to provide services where it would be commercially desirable and financially profitable. The bus stop associated with the site does currently have a shelter, and necessary improvements would be subject to developer contributions. Whilst the requirement for a bus lay-by here is noted, this is not specified by DCC Highways in their response. A Travel Plan/Transport Assessment submitted as part of a future application could explore a need for this in more detail.

School capacity:

Responses expressed concerns about the current capacities and quality of local schools, and that an influx of new families would lead to overcrowding. The lack of detail in the policy regarding contributions to educational facilities was also flagged, although Section 106 contributions are identified as being able to alleviate potential capacity problems. Draycott Community Primary School is identified as having

capacity, although this is attributed to the poor standard of the school, and other factors. Firfield Primary School (Breaston) is operating at capacity. As a result, children would be forced to travel elsewhere to access educational opportunities, which would likely increase reliance on car travel. Children in secondary education would be required to travel to Long Eaton, Sandiacre and Spondon to access secondary schools in these locations.

EBC response:

The Council takes its lead in school-place planning from Derbyshire County Council (DCC) as the Local Education Authority (LEA). Efforts to understand the capacities of local schools that would likely accommodate pupils from this site have historically been complicated through delays in receiving this data from other relevant LEAs. An absence of input from DtC LEA partners to the most recent consultation complicates understanding the current position. At the LEAs request during the 2024 Hearings, the Council withdrew any reference in its submitted policies to where school-age residents at certain allocations should be educated. DCC have advised that their Developer Contributions Protocol can provide certainty around the issue of school-place planning.

Healthcare facilities:

The nearest GP surgeries to Draycott are the Overdale Medical Practices in the nearby villages of Breaston and Borrowash, and so new population would be more reliant on the private car to access nearby healthcare services. Responses report they have great difficulty in obtaining a doctor's appointment, and that the named practices are currently operating at or over capacity. Respondents express concern that the GP practices would be unable to accommodate an influx of new residents. Draycott is reported to also have no dentists or veterinarians, and no contributions to rectify this are mentioned in the proposals as a way of improving current service levels. The loss of green spaces would compound the lack of healthcare facilities in the village.

EBC response:

The Derbyshire Integrated Care Board (ICB) maintains responsibility for coordinating the provision of local healthcare infrastructure to meet the needs of a growing population. In response to an ICB request, the Council has now agreed to collect £1,000 per dwelling across all the housing allocation sites (to be managed through the Section 106 process), with this having been costed into development viability. The monies will be allocated/distributed to recipients by the ICB.

Type of housing:

The proposed development of 190 homes, of which 40% would be affordable, will not reflect the character of adjoining properties which typically consist of 4 to 5 bedroom detached houses. New 2-bedroom terrace house types would not be in-keeping. Responses cite existing social housing developments, such as Cowslip Meadow elsewhere within the village as examples of poor-quality housing, which does not reflect the historic character of Draycott. Together with Victoria Mills, these developments reflect a pre-existing strong supply of council/social/affordable housing in Draycott, that respondents advise negates the need to provide 40% affordable housing on this site. Other comments identified national policy requirement for 50% affordable housing when developing in Green Belt locations, an amount which

should be attained in the event that development occurs. Concerns were also raised regarding the viability of such a proportion of affordable housing, as local property values are said to start at £300,000 for new build properties. Existing vacant 2-bedroom properties, which reportedly start at £155,000 should be better utilised instead. Other concerns included the lack of starter homes, and absence of provision for elderly people.

EBC response:

The level of affordable homes (in % terms) has been tested and set through independent viability assessment. The percentage of affordable homes represents the highest proportion that the Council could justifiably ask for. It is unrealistic and inappropriate to avoid seeking affordable housing based around preconceptions of this tenure, when an evidenced need for affordable housing stock exists across the Borough. Furthermore, due to transitional arrangements, the CSR should not be assessed against the provisions of the latest NPPF for plan-making purposes - therefore 50% affordable housing in Green Belt locations is not appropriate. In terms of elderly housing provision, it will be for the developer at a future application stage to specify a preferred mix of house types, including the amount of sheltered or specialised housing that may be provided on the site.

Number of houses:

General concerns were raised that the number of houses proposed on this site was simply too high in quantity and proposed that smaller developments would be more acceptable. 190 homes and the associated rise in population would place unacceptable pressure on Draycott's existing infrastructure and services, which do not have the capacity to currently cope. The scale of development would also not reflect the character and setting of Draycott village and would erode its rural identity. The availability of brownfield sites in Erewash Borough was identified, with reference to the Brownfield Register 2024, which detailed 109 sites - 103 of which have planning permission. These types of sites were proposed as being would be more suitable for new housing than the allocation site, where Grade 2 agricultural land would also be lost.

EBC response:

The capacities of allocation sites have typically arisen from a site promoter/developer who have promoted a particular number of homes to the Council based on land in common ownership. Such a figure must be realistic and demonstrate that the objectives of **Strategic Policy 1.1: Allocated Housing Sites** can be delivered. It is important for all housing allocations that they do not represent over-development and compromise on achieving a scheme in line with that set out by SP1.1. Comments which suggest that homes would stretch local services and infrastructure are dealt with in responses provided to other topics. Thorough assessment of brownfield land opportunities within Erewash have been undertaken. All brownfield sites are included in the Council's housing land supply or alternatively assessed as not available. See **Green Belt** for more information. Regarding loss of agricultural land, whilst this would be set to occur, the ongoing diversification of uses at Banksfield Farm demonstrate that farming is no longer the sole focus of operations based from here.

Green Belt:

Significant concern was raised about the lack of evidence showing non-Green Belt options have been comprehensively assessed. Responses reiterated the availability of brownfield land and grey belt sites in Erewash Borough, with reference to the Brownfield Register 2024. Responses also asked for clarification in regard to 8 large brownfield sites, including Stanton, and their impact on the Green Belt review. Responses criticise the process that has identified this site as grey belt land, as the land in question is seen to contribute to the five purposes of Green Belt set out in the NPPF. The Sustainability Appraisal was also challenged, with responses deeming some of the scoring flawed. Concerns also related to the potential loss of separation between Derby and Nottingham, and more locally Draycott and Borrowash, upon development of this site, with increased urban sprawl. Some concerns relevant to landscape were submitted under Green Belt. Views across to Risley and Kings Mills would be affected, and a Landscape Quality Assessment should be undertaken. Negative impacts on footpath amenity were a repeated concern. Development of this site would also be harmful to crop production.

EBC response:

In response to the Inspector's request, the Council has now produced a Green Belt Review which assesses the Borough's designation in a systematic manner. This identifies a strong level of compatibility between parts of the Green Belt which do not meet the purposes of the designation and the housing allocations. This is emphasised within the Council's Site Selection Paper which sets out the justification for the exceptional circumstances in developing Green Belt land. The Sustainability Appraisal supporting the latest amendments to the Core Strategy Review was completed against a SA objectives framework, helping the process to achieve as high a level of consistency as possible in the production of a wide number of site-based scores. In terms of perceived shortcomings in how the Council have identified sites, it should be noted that a thorough assessment of brownfield land opportunities within Erewash has been undertaken. Recent examples of where the Council have encouraged development of brownfield land can be found at Oakleys Mill, Britannia Mills (both Long Eaton), the former Oakwell Brickworks site, and did originally allocate West Hallam Storage Depot for housing until site owners decided to commit to its current use in the long-term. Grey Belt cannot be considered by the Core Strategy Review as it is being progressed under transitional arrangements when mean it is being examined against a previous iteration of the NPPF.

Landscape:

The dramatic change and impact to the landscape in Draycott due to the site's development was a concern for respondents. There were fears that overall views and openness, as well as other visually important features including TPO trees, would be lost, with an overbearing development disrupting the landscape. Major concerns are raised regarding the amenity of footpaths and other rights of way, and if this site is developed, these paths which form part of the landscape will lose their recreational value. The setting of Grade 1 and Grade 2 listed buildings in and around Draycott would also be threatened by heavy goods traffic generated by this development. This includes: Victoria Mill (Grade 2), Church of St Chads (Grade 1), Cart Shed and Stable at Draycott Mills, (Grade 2), Cedars Farm House (Grade 2), The Cotton Processing and Storage Building at Draycott Mills (Grade 2), Doubling Mill at Draycott Mills (Grade 2), Draycott Hall and Outbuildings (Grade 2), Front

Range Draycott Mills, (Grade 2), Levers Machine Shed, Draycott Mills (Grade 2), Cotton warehouse, chimney and outbuilding Draycott Mills (Grade 2), Cotton spinning mill and office block Draycott Mills (Grade 2), Potter Lane Bridge (Grade 2), Nooning Lane Bridge (Grade 2) and Hopwell Road Bridge (Grade 2). Responses report that the site has been identified incorrectly as a small industrial estate. The site is identified as being part of a transitional landscape between Draycott and Borrowash. Development of this site would see the two villages brought closer together, with a greater risk of merging in future. The impacts on the wider landscape in and around Draycott, when considering the Chesterfield to Willington pylon project alongside this proposal, would be significant.

EBC response:

The Council are of the view that no landscape of exceptional quality exists around the fringes of the Borough's towns and villages. This negates the need for Landscape Visual Impact Assessments as part of plan-making. The Council reiterates that **Strategic Policy 1.1: Allocation Sites** Criterion 2 insists on the maintaining and enhancing both of existing hedgerow and tree belt boundaries. All allocations represent modest examples of growth into surrounding countryside, whilst the Green Belt Review also assesses this under the heading of urban sprawl out into defined countryside units to draw conclusions around the level of impact that the allocations would make. The Council did not receive a representation from Historic England over the proposals, therefore the Council view the impact on heritage assets (including listed buildings) to be minimal at most. Development at the allocation would have every opportunity to show how identified impacts could be minimised through appropriate design at application stage. The Chesterfield to Willington pylon project being undertaken by the National Grid is subject to its own statutory process.

Flooding / Drainage:

The land in question is reported to flood often, particularly in autumn and winter. Residents have documented flooding during late 2023 and early 2024, and the site is often waterlogged for several months of the year. Responses question the Environment Agency's decision to remove the land out of Flood Zone 2, when the land lies within the River Derwent's floodplain, has a gravel base and remains at risk of flooding. Scoring in the Sustainability Appraisal in relation to questions surrounding flooding was also criticised, as well as the lack of reference to Flood Risk Assessments and SuDS. The topography of the site is also likely to further increase flood risk. Flood events at residential gardens along Lime Grove in past years have been reported, as well as frequent flooding of the railway line. Flooding has closed several roads in the village, including Gypsy Lane and Shacklecross. Residents also report that in homes along Lime Grove, sewage is backing up, and water pipes are bursting. A combined sewer overflow spill occurred on May 8 2025, raising questions about drainage and sewage infrastructure and capacity.

EBC response:

The allocation sits within Flood Zone 1 in the Environment Agency's most recent flood risk mapping available online. The Council has no input into the extent of flood zones which are published and used by the EA. Major development would be expected, as part of a future planning application, to provide a comprehensive drainage strategy to demonstrate that new development would not worsen existing

hydrological conditions, both on and immediately off-site. Concerns over the SA are explained and responded to under **Green Belt**. No other concerns were raised by SCBs (EA, Severn Trent or Derbyshire County Council (as Local Lead Flood Authority) regarding flooding, drainage or sewage issues in relation to this allocation.

Other:

There was a general lack of satisfaction with the consultation process. The 6-week consultation period was perceived to be inadequate in order to allow all residents to develop their objections and voice views. Responses also criticised a lack of transparency and information, as well as a lack of inclusivity for non-internet users. Many responses under 'Other' were repetitions of comments made in other fields. It was reiterated that the scoring in the Sustainability Appraisal was inaccurate: harmful levels of noise pollution would be generated by the development; risk to Grade II listed buildings. More unique comments were the loss of caravan and motorhome storage facilities, which would reduce business diversity in Erewash. The provision of a potential LEAP was welcomed, although if not at an effective scale, increased investment in the existing park in Draycott was deemed more beneficial. Questions were also raised about funding and contributions to emergency service capacity.

EBC response:

The length of consultation was approved by an extraordinary meeting of Council and was in accordance with local planning regulations. Consultation in general was in accordance with EBC's Statement of Community Involvement (SCI) which saw information made available to the public at deposit points and on the Council's website. Other employment land is available elsewhere within the Borough which could reasonably help relocate the caravan and motorhome storage business at Banksfields Farm. Section 106 agreements will be negotiated to contribute to any improvements in play or recreational facilities. Monies towards healthcare provision are set out in the response to Healthcare Facilities above.

7. Responses from Other Consultees

- 7.1 In addition to comments made by members of the general public and specific (statutory) consultee bodies as presented above, a number of other consultation bodies from technical and professional sources submitted representations to the consultation.
- 7.2 The representations typically span a range of site-based development interests, with responses from site promoters of allocations identified within the ACSR and sites which the Council have chosen to not include. A schedule of those submitting representations, indicating which site(s) the contents make reference to, is presented below:

Respondent	Site(s) of interest
Housing sites	
Carney Sweeney (on behalf of Peveril Homes)	West of Sandiacre* Land off Draycott Road, Breaston Land at Grange Farm, Breaston Land at Thacker Barn, NW of Kirk Hallam Land to north of Croft Lane, Breadsall
Boyer Planning (on behalf of Barratt David Wilson Homes)	South West of Kirk Hallam*
Advance Land & Planning Ltd	South West of Draycott*
Harris Lamb (on behalf of Wulff Asset Management)	Land at Sowbrook Lane, west of Stanton Regeneration Site
Turley (on behalf of Tata Steel)	Two parcels of land at the former Oakwell Brickworks site, Ilkeston)
PlanningDesign (on behalf of Nurton Residential Ltd)	Land north of Cotmanhay, Ilkeston
PlanningDesign (on behalf of the landowner)	North of Borrowash*
Mair Land & Property Consultants (on behalf of client)	Land west of Hopwell Road, Draycott
Marrons (on behalf of William Davis Homes)	Land west of Rushy Lane, Risley
Green 4 Planning (on behalf of Green 4 Developments)	Land around Hopwell Hall Ockbrook Cricket Club Maywood Golf Club Land off Alfreton Road, Little Eaton
Green 4 Planning (on behalf of Bellway Strategic Land)	Land west of Cole Lane, Borrowash
Fisher German	Land east of Acorn Way, Oakwood Dale Road, Spondon Land east of Morley Road, Oakwood
Fisher German	East of Breaston*

Planning & Design Group (on behalf of Wheeldon Bros Developers)	Land north of Breadsall Hilltop* Land west of Borrowash*
JMI Planning	Land south of Croft Lane, Breadsall
Planning & Design Group (on behalf of Redrow Homes Ltd)	Acorn Way*
Tracey McFadden	Land to rear of 244 Victoria Ave, Ockbrook
Employment site	
Iceni (on behalf of GLP)	Land SW of M1 Junction 25

* Denotes an allocated site

- 7.3 Additional to the above, The Countryside Charity (formerly CPRE) Derbyshire also submitted a representation offering views on the approach taken by the amended Core Strategy Review, with a particular focus on Green Belt issues.
- 7.4 As explained at 5.3, Derbyshire Wildlife Trust (DWT) have, through submitting a representation, provided a range of site-based information helping to advise on ecological and known biodiversity conditions at each of the amended Core Strategy Review allocation sites. The comments received in the submission are summarised under each of the allocations from 5.4 and are presented on a site-by-site basis. Despite the information being presented elsewhere within the Consultation Statement, it is still appropriate to provide further details of DWT's approach to responding to the consultation.
- 7.5 DWT have undertaken ecological desktop assessments of the eight new housing allocations across the Borough, with one of the allocations, West of Sandiacre, visited to due to its proximity to a designated Local Wildlife Site (LWS) and Local Nature Reserve at Stoney Clouds.
- 7.6 Allocations have been assessed against the Derbyshire Biodiversity Alert Map (BAP), maintained by DWT as part of their role as the Biological Records Centre for Derbyshire. Other mapping resources have been utilised in order to identity habitat types and land-uses. The BAP incorporates a wide range of ecological datasets to advise assessments.
- 7.7 Outcomes of site assessments have been categorised based on the potential impact of development on the species and habitats and nature conservation designations. The size of allocations has also been considered, as the significance of impacts are typically higher for larger sites. The categories used are High, Medium and Low – although in some instances, assessments have combined categories where there is no clear distinction from the work to assess a site. The table below presents the conclusions from DWT's assessments, although the original assessments can be found from DWT's representation.

Site allocation	Potential impact on ecology
West of Sandiacre	High
North of Breadsall Hilltop	Medium to High
South of West Hallam	Low
North of West Hallam	Low
North of Borrowash	Low
West of Borrowash	Low
East of Breaston	Low
South West of Draycott	Low to Medium

Appendices

Date: 07 April 2025
Release date: Immediate
Ref: EBC 25.042

Chance to have say on Core Strategy Review Amendment

The council has launched its public consultation on the Core Strategy Review Amendment, which proposes eight new housing sites in the Green Belt.

More information on the proposals and how to comment can be found on the council's website: www.erewash.gov.uk/localplan

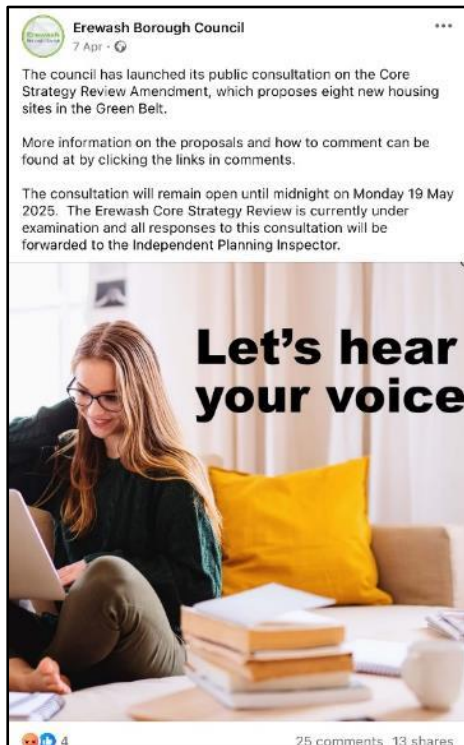
The consultation will remain open until midnight on Monday 19 May 2025. The Erewash Core Strategy Review is currently under examination and all responses to this consultation will be forwarded to the Independent Planning Inspector.

ENDS

For further information or to arrange an interview please email the media team: communications@erewash.gov.uk or call 0115 907 1040.

Appendix B - Erewash Borough Council social media posts

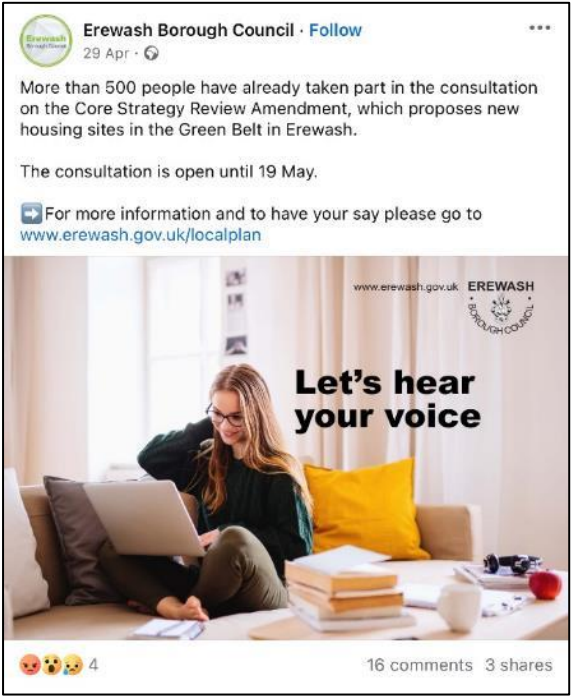
Commencement of consultation (Facebook) – Posted on April 7 2025.



Commencement of consultation (X – formerly Twitter) – Posted on April 7 2025.



Update on levels of participation (Facebook) – Posted on April 29 2025.



Final week reminder (X – formerly Twitter) – Posted on May 12 2025.



Final week reminder (Facebook) – Posted on May 12 2025.



Erewash Borough Council · Follow

12 May · 🌐

There is a still week left to take part in the public consultation on an amended Core Strategy Review for Erewash.

Provide feedback before 19 May by clicking the link in the comments.



www.erewash.gov.uk 

Let's hear your voice

 2

1 comment 6 shares

Appendix C – Website data from public consultation

