



Our Ref: NH/25/10716

Your Ref: N/A

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Via Email: planningpolicy@erewash.gov.uk

Dear Steve,

Erewash Core Strategy Review Amendment – Public Consultation

National Highways welcomes the opportunity to comment on the Erewash Core Strategy Review Amendment prepared by Erewash Borough Council. This consultation seeks comments on the amended documents with the identified additional housing allocations in the Borough's Green Belt, in response to the Erewash Core Strategy Review at Hearing Sessions in June 2024.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner for national economic growth. The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In relation to this consultation, our principal interest is in safeguarding the operation of the M1, A52, and A38 which route through Erewash.

Policy context

In responding to this consultation, we consider to the Department for Transport's (DfT) Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the SRN should be considered in the making of Local Plans. Paragraph 28 of the Circular sets out that:

The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.

Previous engagement

We have been consulted on a previous version of the TA in 2023. NH have already expressed their no objection for application ERE/1221/0002 which forms part of the future development at the Stanton Strategic Employment Allocation in the Local Plan.

Consultation Comments

Having considered the Erewash Core Strategy Review Amendment, we can provide the following comments:

As a key stakeholder, National Highways welcomes continued engagement to understand strategic transport infrastructure needs.

Strategic Policy 1 – Housing Housing allocations

The borough proposes to increase the number of net new homes from 5,800 to 6,948 homes over a plan period of 2025-2043 (previously 2022-2037), as a result of the new NPPF.

In the amendment Plan, Strategic Policy 1.6 will be removed but Strategic Policy 1.7 to 1.14 will be added. The proposed amendments at the Strategic Policy Housing Sites are summarised as follows :

<i>Strategic Policy Housing (Dwellings)</i>	<i>Submission Version November 2022</i>	<i>Proposed Amendment</i>
Strategic Policy 1.2 – South Stanton	1,000	1,000
Strategic Policy 1.3 – Acorn Way	600	550
Strategic Policy 1.4 – North of Spondon	200	200
Strategic Policy 1.5 – South West of Kirk Hallam	1,300	1,000
Strategic Policy 1.6 – North of Cotmanhay	250	-

Strategic Policy 1.7 – West of Sandiacre	-	180
Strategic Policy 1.8 – North of Breadsall Hilltop	-	160
Strategic Policy 1.9 – South of West Hallam	-	90
Strategic Policy 1.10 – North of West Hallam	-	35
Strategic Policy 1.11 – North of Borrowash	-	60
Strategic Policy 1.12 – West of Borrowash	-	280
Strategic Policy 1.13 – East of Breaston	-	50
Strategic Policy 1.14 – South-West of Draycott	-	190

We welcome the inclusion of a Transport Assessment to support the Local Plan proposals, which includes the additional Strategic Policy sites, however with the plan period amended from 2022-2037 to 2025-2043, we recommend the assessment year of the TA shall be updated accordingly.

The transport demand generated by new developments should be accommodated through the existing network or through sustainable, non-motorised transport options. Where necessary, new highway schemes should be identified to maintain the safe and efficient operation of the SRN.

We encourage collaboration with neighbouring authorities to understand the overall cumulative impact of growth on the transport infrastructure within the area to understand potential mitigation strategies.

With National Highways receiving complaints related to the existing at grade junctions with the A52 in the Borrowash area, we require a road safety review to be included as part of Strategic Policy 1.11 – North of Borrowash and Strategic Policy 1.12 – West of Borrowash, as well as junction capacity assessments for junction A52 / Victoria Avenue and A52 / Cole Lane.

There is significant reliance of Erewash on Junction 25 of the M1 for access to the SRN. This junction is currently subject to peak period congestion, primarily due to capacity constraints on the local road network, particularly at the Bostocks Lane / Longmoor Road junction. Given the strategic importance of this junction to the surrounding area, it is recommended that Junction 25 of the M1 and the Bostocks Lane corridor are given specific consideration within the transport assessment work

supporting the plan. Furthermore, the potential need for highway improvements in this area should be evaluated, particularly in relation to enabling the delivery of proposed development sites in Long Eaton, Sandiacre, and Ilkeston.

Overall, we support the notion that all major employment and housing allocations are expected to be supported by a Transport Assessment and Travel Plan to understand the impacts on the SRN. Where appropriate, the proposals should consider cumulative impacts and prioritise active travel, incorporate electric vehicle charging infrastructure, and enhance public transport, all aimed at reducing the need for car travel.

Climate change

We understand that housing allocations will include suitable greenspace that takes into account local context, improve biodiversity and adapt to climate change.

We also support implementing recharging ports and agree it will be necessary to future proof new homes and help mitigate against climate change.

National Highways is committed to contributing to the government's target of achieving Net Zero by 2050, delivering the DfT's De-Carbonisation Plan, as set out in our Net Zero Highways: our 2030 / 2040 / 2050 plan. In particular, we aim by 2040 to have in place Net Zero for maintenance and construction works. This aligns with the Committee on Climate Change's call for the construction industry to be largely decarbonised by 2040.

Conclusion

From our review of the Erewash Core Strategy Review Amendment, we are satisfied with the overall document and policies. We welcome the review of the updated Transport Assessment to reflect the changes in the plan period, and welcome continued engagement to support the update.

Yours sincerely,

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