

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 B**) 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 C**. 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 D**. 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 through the use of a 'other' option.
- 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 specific development sites.
- 4.3 This Consultation Statement includes the Council's responses to the matters raised by public representations, as well as those made by technical and professional stakeholders (including statutory consultees). This format has been employed previously to report back on earlier stages of consultation in the Plan's production, and is arranged in policy order to allow for ease of cross-referencing to the Core Strategy Review amendment document. Summaries and responses to the public's comments can be found at **Section 6** of this Statement, whilst the summaries and responses to all other representations is presented at **Appendix A**. All representations submitted throughout the six-week consultation have been forwarded to the Inspector in full and are available to view as part of the Council's on-line Examination Library.

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 All comments made by statutory consultees can be found within the schedule presented at Appendix A of this document.

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. Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this consultation suggests that the ability to accommodate additional pupils cannot be achieved. No response was received from Derby City Council LEA. 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. Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this consultation suggests that the ability to accommodate additional pupils cannot be achieved. 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 – a requirement of DCC LEA. 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. Whilst the current capacities of schools most local to this site allocation remain

unknown, no information provided by DCC LEA as part of its response to this consultation suggests that the ability to accommodate additional pupils cannot be achieved. 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 response:

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. Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this consultation suggests (no response was made by the Derby City LEA) that the ability to accommodate additional pupils cannot be achieved. 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 Vally 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 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.

Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this consultation suggests that the ability to accommodate additional pupils cannot be achieved. 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. Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this consultation suggests that the ability to accommodate additional pupils cannot be achieved. 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. Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this consultation suggests that the ability to accommodate additional pupils cannot be achieved. 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. Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this consultation suggests that the ability to accommodate additional pupils cannot be achieved. 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. Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this

consultation suggests that the ability to accommodate additional pupils cannot be achieved. 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 the town of Long Eaton. 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. 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 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. Whilst the current capacities of schools most local to this site allocation remain unknown, no information provided by DCC LEA as part of its response to this consultation suggests that the ability to accommodate additional pupils cannot be achieved. 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 Derbyshire Wildlife Trust (DWT) have, through submitting a representation, helpfully 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.
- 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

- 7.8 Both the Derbyshire Wildlife Trust and CPRE representations have been summarised and responded to within the schedule that is presented at **Appendix A**.
- 7.9 Several Councillors (both County and Borough) also responded to the six-week consultation. Again, details of these representations and responses to them can also be found within the same schedule as that referred to at **7.8**.

Appendices

Appendix A - Summary of Technical Representations

Plan-wide comments

Representing bodies with an * denotes a statutory consultation body.

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council - Education*	Support	The amendments that have been made to the education provisions within the Plan are much appreciated.	Support noted.
National Highways*	Comment	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 Strategic Road Network (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.	Comments noted and supported in respect of the need for Transport Assessment and Travel Plan for all major allocations.
National Highways*	Comment	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	Comments noted. Slight contradiction in representation as NH recommend that an adjustment of the TA assessment year is also made. However, the comments then go on to suggest that NH are satisfied with the overall policies and document, with a review of the updated TA (which does adjust the assessment year) to consider changes made within the CSR welcomed. Council is keen to engage with NH to

Representing body	Support Object Comment	Summary of representation	EBC Response
		<p>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.</p> <p>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.</p>	seek clarity on their position in respect to the comments above.
Coal Authority*	Comment	The Coal Authority has no specific comments to make on the amended Core Strategy Review.	Comment noted.
Planning & Design Group (Redrow Homes)	Support	Stresses the importance of a plan being adopted in Erewash to help address major housing shortage issues, whilst offering the development sector the certainty it needs. The comprehensive evidence submitted since the last Hearing Sessions adequately addresses and overcomes the soundness concerns raised by the Planning Inspector examining the Core Strategy Review. Any remaining concerns (none are identified by the representation) should be dealt with through an early Plan review rather than derailing the current Plan.	Support noted.
Planning & Design Group (Wheeldon Brothers)	Support	The significance of the Plan-led system is heavily supported. Further information is provided setting out some of the risks faced by the Borough should	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		the Plan not be found sound and subsequently adopted. It is emphasised that any further issues with the Plan should be addressed in an early Plan-review, not further delay in implementing a planning framework through the CSR.	
Planning & Design Group (Wheeldon Brothers)	Support	Commends the Site Selection Paper (SSP). It provides a clear and robust methodology of how the new additional sites have been identified by the Council. The SSP has clearly been informed by a Green Belt Review. Both sites in the control of Wheeldon Brothers are located within Green Belt found not to be performing to purposes of the designation.	Support noted.
Planning & Design Group (Wheeldon Brothers)	Support	Housing allocations have been identified using a comprehensive and transport process that is based on a robust evidence base. The approach taken is logical and justified, and the reasoning behind allocating the additional sites in the CSR amendment is sound.	Support noted.
Carney Sweeney (Peveril Homes)	Comment	Welcomes the CSR amendment document setting out inserts and deletions to allow respondents to see what is now proposed to form part of the amended document. Would also be helpful if CSRA set out the context of this plan making process, clarifying that this is a partial review of the adopted Core Strategy and how it relates to and how it relates to any existing DPDs, whilst addressing the strategic matter of how of reviewing GB and the exceptional circumstances	Comment noted. The Council acknowledge the absence of contextual information referenced in the representation. However, the schedule of Development Plan Policies to be replaced by the Proposed Core Strategy does give a steer as to how the proposals in the amended Core Strategy Review will integrate and relate to existing Development Plan Policies.

Representing body	Support Object Comment	Summary of representation	EBC Response
		arising requiring the release of land from the GB to deliver development needs of the Borough.	
CPRE	Object	Contests that the public consultation did not demonstrate a high level of inclusivity for non-internet users.	The Council is of the view that the consultation carried out across April and May 2025 was highly inclusive. Residents had every opportunity to respond to the consultation, either via the online form, written letter and email, and did so. All information was freely available on the council's website and was distributed to libraries inside and outside the Borough. Consultation fulfilled expectations set out in the Council's Statement of Community Involvement.
CPRE	Object	Contests the Council's conclusions that land included as housing allocations is grey belt.	The Core Strategy Review is not assessed against the latest NPPF (Dec 2024), and as such Grey Belt is not referred to. Allocations have been selected independent of any Grey Belt designation as this is not a factor in the current Examination.
CPRE	Object	Contests conclusions made in the Green Belt Review that the housing allocations make only limited contribution to the purposes of Green Belt. The representation stresses other important benefits Green Belt provides to local communities as set out in the NPPF.	The Council has comprehensively assessed the contribution of Green Belt in Erewash against three of the five purposes held to be relevant through a Green Belt Review. Findings found that the sites allocated fall within areas of Green Belt deemed to only make a limited contribution to the role and function of designation.
CPRE	Object	Refers to sections of the NPPF that emphasise the need for LPAs to prioritise development of brownfield land for housing over Green Belt land. The Council displays insufficient evidence that all brownfield sites, of which there are 109 of	The Council have considered all available and deliverable brownfield sites that may come forward as allocations. As a result of lack of available brownfield sites, the Council have alternatively had to look to Green Belt land in order to meet housing

Representing body	Support Object Comment	Summary of representation	EBC Response
		according to the council's own Brownfield Land Register, have been considered and assessed.	requirements. All sites have been subject to consistent and proportionate assessment, set out in the approach to site selection in Site Selection Paper. Allocated Green Belt sites have been tested to ensure they represent sustainable options owing to their location adjacent to settlements with a centre, and location within areas associated with limited contribution to Green Belt purposes. Selection of non-Green Belt sites would risk allocations failing, with little or no assurance that they could demonstrate their deliverability and/or developability.
CPRE	Object	Council has provided no proof that they have worked with neighbouring authorities about whether they could accommodate some of Erewash's identified need.	The Council can confirm that it has previously engaged with neighbouring authorities in terms of accommodating Erewash's identified housing needs elsewhere. This is made clear in Matter 2 Duty to Cooperate Hearing Statement 2.1 from the June 2024 sessions.
Iceni Projects (GLP)	Comment	Additional and updated evidence base documents included in this consultation seek to retrospectively justify the proposed approach originally set out in the submitted Plan.	The updated evidence base as it relates to the promoter's site was undertaken in response to requests made by the Planning Inspector examining the plan after the June 2024 Hearings. As such, the implied criticism of the Council's retrospective work and justification regarding the promoted land is unfair.
Cllr Robert Mee Erewash Borough Councillor for West Hallam & Dale Abbey	Object	Objection across all sections of the document that the council has not demonstrated the exceptional circumstances required under the NPPF to allocate housing sites in the Green Belt.	All available and deliverable brownfield sites in Erewash have been considered, as first set out in the 2020 Options for Growth Consultation and at all subsequent stages of the plan's preparation.

Representing body	Support Object Comment	Summary of representation	EBC Response
		Land does not meet definition of Grey Belt.	<p>The council cannot meet its objectively assessed housing need using brownfield land and permitted sites alone. This constitutes the exceptional circumstances required for the release of Green Belt land. Sites were allocated in accordance with the Spatial Strategy. More information can be found in the Site Selection paper which forms part of the Evidence Base Library. For clarity, it should also be noted that the Grey Belt principle is not being applied to the Core Strategy Review as it was introduced by the 2024 NPPF, after the plan was submitted for examination.</p>

Strategic Policy 0 (SP0) – The Settlement Hierarchy

Representing body	Support Object Comment	Summary of representation	EBC Response
Marrons (William Davis Homes)	Comment	Welcomes the clarity of a strategic policy in relation to the settlement hierarchy. This reaffirms the most sustainable locations for growth in the Borough are the Nottingham and Derby conurbations (the latter adjoining Erewash). Express recognition within SP0 that the Long Eaton urban area includes Sandiacre.	Comment noted.
Boyer Planning (on behalf of Barratt David Wilson Homes North Midlands)	Support	Policy commentary: Welcomes separation of Spatial Strategy Policy to have standalone Strategic Policy 0 that clearly sets out settlement hierarchy. Supports the inclusion of Ilkeston (with Kirk Hallam) as second most sustainable location for growth. Agree it accords with NPPF to focus growth at most sustainable locations.	Support noted.
Carney Sweeney (Peveril Homes)	Comment	The introduction of SP0 is welcomed as it sets out the Settlement Hierarchy of where development is being directed. However, SP0 does not address land located outside of the listed settlements (i.e. the countryside). In contrast, SP1 does make reference to a proportion of housing within 'Other Settlements and countryside' as part of the housing provision. Whilst reference to 'countryside' under SP1 is stated to be in the context of "...consented supply in the remaining areas of the Borough outside of settlement boundaries", for clarity and consistency, the settlement hierarchy should also make reference to countryside as development is being directed to these locations as part of the housing provision.	Comments noted. A key point to note here is that the reference to 'Other Settlements and countryside' in SP1 is merely to reflect the number of existing dwellings which benefit from planning consent at the time the policy was drafted. This cohort of planning permissions was identified as a specific line within SP1 due to the homes from these consents contributing to the minimum 7,000 dwellings the policy states are to be delivered across the plan period. Reference to 230 homes does not in any way indicate that this figure is dependent on future, unplanned permissions coming forwards in order to meet this part of the policy's requirement, nor that the Council would support proposals for new housing in Other

Representing body	Support Object Comment	Summary of representation	EBC Response
			Settlements (unless these met the provisions of Saved Policy H3), but more so proposals within the countryside. New development is not therefore being directed to the countryside, merely there is acknowledgement of existing consented supply in this spatial location.
Tracy McFadden	Object	Ockbrook has also not been considered as a settlement capable of accommodating some small new development. Paragraph 69 of the NPPF supports the use of small/medium sites for housing, which could apply here.	The Council's Spatial Strategy reflects the settlement hierarchy in showing appropriate and sustainable locations for growth. Ockbrook forms part of a group of settlements set out in Option G(ii) which confirms that extensions of villages without a centre (Other Settlements) into the green belt are not required to meet the councils housing requirement.
Green 4 Planning (Green 4 Developments)	Object	The representation questions the lack of consideration of other settlements i.e. Ockbrook, that may accommodate some small growth, and why no amendments are proposed to settlement boundaries.	The Council accepts that some small-scale development inside Ockbrook's defined village boundary is acceptable (subject to proposals conforming with Saved Policy H3). Revisiting the role of villages in the Borough, the Council through its Sustainability Appraisal examined the sustainability of accommodating growth outside of current boundaries. This work demonstrated that Ockbrook's role is more minor due to the level of amenities and facilities (including public transport) precluding it from accommodating higher levels of growth. This finding is supported by the Erewash Key Settlements Paper.
Advance Land and Planning on behalf Seabridge Developments Ltd (SDL)	Support	Supports the inclusion of Draycott as a key settlement. Questions rationale for "Other Settlements"	Support noted re Draycott. Rationale for Other settlements is derived from Sustainability

Representing body	Support Object Comment	Summary of representation	EBC Response
			Appraisal and then further justified through the Erewash Settlement Study.

Strategic Policy 1 (SP1) – Housing

Representing body	Support Object Comment	Summary of representation	EBC Response
Boyer Planning (on behalf of Barratt David Wilson Homes North Midlands)	Support	Supports Strategic Policy 1 in allocating a minimum of 7,000 new homes over plan period and in recognises that not all growth can be accommodated in the conurbations. Updating of plan period to begin in 2025 correctly takes account of delays to examination and is a robust and sound approach. Supported by NPPF para 22 (2023).	Support noted.
Marrons (William Davis Homes)	Object	Objectively Assessed Need (OAN) or Local Housing Need (LHN) are different from a housing requirement. As such, SP1 should be reworded to clearly reflect that 6,948 homes is the CSR's minimum housing requirement figure.	SP1 states prior to showing the apportionment of growth around the Borough that the Plan plans for the delivery of a minimum of 7,000 new homes over the plan period.
Marrons (William Davis Homes)	Object	Comments on the tight relationship between the 7,000 figure in SP1 and the trajectory total of 6,948 homes. There is no slippage. The Council has not enacted the advice of the Inspector (para 4.6) in her post-Hearings letter to create flexibility around the supply of housing.	The Council has undertaken extensive work since the 2024 Hearing Sessions to identify and then allocate a range of housing sites around the Borough. The increased number of allocations, with a specific focus on enabling the Council to demonstrate a 5YLS, has helped to build in greater flexibility to the Plan by increasing the sources where new housebuilding will occur in Erewash.
Marrons (William Davis Homes)	Object	Concern remains over the apportionment of housing as part of SP1. It does not reflect Nottingham Conurbation's position in the settlement hierarchy. Housing is consequently filtered down to less sustainable locations. The	The focus of growth at allocations around the Borough is not solely set from the spatial strategy as set out by SP0. This is explained in the Site Selection Paper which also cites the findings of the Green Belt Review as another factor in determining the suitability of locations for growth.

Representing body	Support Object Comment	Summary of representation	EBC Response
		Council's updated evidence completely overlooks SGA28 (Land at Rushy Lane).	In terms of the evidence in relation to the promoter's site, the SA did not look at this because no factors had fundamentally changed insofar as the site's capacity since SGA28 was originally assessed prior the Council submitted its Local Plan.
Marrons (William Davis Homes)	Object	Comment on the balance of apportionment. Almost double the number of homes set for the in Nottingham Conurbation directed towards both the Ilkeston Urban Area and rural area. This does not represent a sustainable pattern of growth.	Similar to above. The balance in where housing growth is directed to is influenced by a number of planning constraints the Nottingham Conurbation is subject to. This includes an extensive area of flood risk to its south and the M1 motorway with Green Belt assessed as important to its west (north of Breaston).
Marrons (William Davis Homes)	Object	SA update (March 2025) does not test either the housing requirement or the apportionment of growth across the settlement hierarchy against SA objectives, nor does it consider reasonable alternatives to the scale and amount of housing growth. Given the scale of difference between the requirement at submission and amended CSR, would have expected a more comprehensive revision of SA work to underpin ACSR spatial strategy and site selection process.	The Council are firmly of the view that further work to the SA (as detailed) is unnecessary. The scale of housing growth being planned for has been tightly defined because of the advanced stage of progress the Plan has reached. It would be disingenuous to test a lower level of growth as the Council are committed to planning to meet its assessed housing need figure in full, taking the necessary steps to fill a shortfall of supply identified during the 2024 Hearing Sessions. Given the scale of housing allocations already identified within the Green Belt, the Council also feel it is inappropriate to test a hypothetical higher figure. The underlining sustainability of how growth impacts on various parts of the Borough tested across all tiers (Options A to H) has not altered. Although in response to the need to allocate housing sites in Green Belt adjoining village

Representing body	Support Object Comment	Summary of representation	EBC Response
			settlements, the Council felt it was necessary and justifiable to subdivide into two tiers (Option G(i) and G(ii)) to reflect the differing levels of service and amenity provision present within each.
Marrons (William Davis Homes)	Object	Remain of the view that the ACSR housing requirement and its spatial apportionment of growth is not justified – it has not been subject to a sufficiently robust and comprehensive SA process. The differences in spatial strategy policies must be subject to SA.	See response to the above answer. The Council in developing SP0 has merely reflected the principle of its spatial strategy from its submitted plan. With the exception of subdividing Option G which reviewed the sustainability of growth of villages, it was not necessary to reappraise the underlying sustainability of the spatial growth options as no changes exist to factors which determine how suitable growth is at different spatial levels.
Marrons (William Davis Homes)	Object	No objective analysis or explanation behind the scores awarded and accordingly, they have clearly not been subject to a sufficiently robust or objective SA process.	The Council have continued to utilise a SA Framework throughout the course of the Plan's review in testing new sites brought to the Council's attention in the autumn 2024 Call for Sites exercise. The SA Framework was deemed appropriate by the three statutory environmental consultees when consulted at the outset of the Plan's review. The scoring applied to site and policy assessment is explained within the SA summary document at Pages 15 and 16, with commentary of all objectives clear and consistent.
Marrons (William Davis Homes)	Object	Focuses on Inspector's concerns set out in post-Hearings letter. The GB Review (GBR) does not address these concerns. No robust analysis of individual sites proposed for allocation against GB purposes and focuses on high-level geographical land parcels. It does not contain analysis or	The Green Belt Review is a systematic review of the Green Belt's performance against the three purposes held to be of relevance in the Borough. The methodology used to conduct the GBR was accepted by Derbyshire County Council as suitable in which to undertake assessment work

Representing body	Support Object Comment	Summary of representation	EBC Response
		judgement about how GBR has informed site selection, nor does this exist in the Site Selection Paper. Respondent is of view that several sites identified as allocations threaten coalescence between settlements.	against. The GBR deliberately avoids the identification of individual sites which relate to the Core Strategy Review amendment, instead focusing in greater detail on the three GB purposes. The systematic nature of the GBR has enabled the Council to take a more rounded view of the strength of designation across the whole of Erewash. The mapping produced has enabled allocation sites to be viewed within the context of the level of impact future development may have at these locations.
Marrons (William Davis Homes)	Object	Approach to site selection is criticised. Focuses on a comment in the SSP which discusses the spatial constraints the Nottingham conurbation is subject to. SSP mentions two possible options and outlines the constraints, but SGA28 (Land at Rushy Lane) is not subject to these constraints, yet is omitted from consideration. This shows the Council aren't following their own site selection process of prioritising growth at the most sustainable locations. This results in cascading too much growth down to those settlements of lesser sustainability.	<p>The Site Selection Paper (SSP) explains that once the existing capacity has been exhausted, extensions to settlements are then considered. Site selections were made at each stage of the hierarchy against the SA findings followed by the Green Belt Review and the Viability Appraisal.</p> <p>The housing target has been met without needing to consider extensions to the other Settlements or new settlements in the Green Belt. Land at Rushy Lane is considered to represent an extension to a lower order village settlement (Risley), hence why the Council has not included the site in its site selection evidence in support of the Core Strategy Review amendment.</p>
Carney Sweeney (Peeveril Homes)	Comment	Sets out the role of SP1 and notes that it appears to align with the settlement hierarchy established in SP0. The Council's changed approach of removing the cap on the scale of housing proposed for allocation, removing sole reliance	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		from proposed allocations of 200 or more homes, is welcomed.	
Carney Sweeney (Peveril Homes)	Comment	Document contains no policy guidance on guiding the decision-making process in respect of non-allocated sites. The amended CSR should look to include additional non-strategic allocations to further support small & medium sites to come forward through a policy compliant process.	Whilst the amended CSR does not contain specific mention giving guidance to non-allocated sites, saved policies, but namely H1 and H3 within the Saved Policies document, provide continued support to housing development in policy-compliant spatial locations around the Borough. The continued existence of these saved policies helps to demonstrate the Council's continue desire to see housing growth come forward within non-Green Belt locations within urban and villages. A number of medium-sized housing developments have come forward over the duration of the CSR review, demonstrating that not allocating land does not prejudice the abilities of sites to come forward for re/development.
Carney Sweeney (Peveril Homes)	Comment	References the scale of homes arising from safeguarded land and a large windfall allowance as contributing to the overall plan requirement. This circumstance indicates that there may be an opportunity for further site allocations within this plan period, several of which involved land promoted by Carney Sweeney on behalf of Peveril Homes. These are commented on at specific sites elsewhere within this table.	Noted. However, the Council are of the view that SP1 adequately provides for the Plan's required housing growth.
Harris Lamb (Wulf Asset Management)	Object	The Council continues to plan for an insufficient and inflexible supply of housing, which amounts to only 176 homes surplus to the minimum requirement. Some allocations will inevitably not	The Council has undertaken extensive work since the 2024 Hearing Sessions to identify and then allocate a range of housing sites around the Borough. The increased number of allocations,

Representing body	Support Object Comment	Summary of representation	EBC Response
		come forward so supply should exceed minimum requirement by 10-20%.	with a specific focus on enabling the Council to demonstrate a 5YLS, has helped to build in greater flexibility to the Plan by increasing the geographic range from where new housebuilding will occur in Erewash. It should be noted that site promoters have responded positively to the consultation, providing the Council with information that demonstrates the deliverability of site allocations.
Green 4 Planning (Bellway)	Object	Status or availability of Safeguarded Land not clear. No plan of all promoted sites provided. These sites account for 960 homes over the plan period. Lack of clarity on whether Safeguarded Land is a genuine alternative to rejected promoted sites or otherwise logical extensions to allocations.	The Council can confirm that Safeguarded Land is intended to form extensions to allocated sites in the Plan, not to act as an alternative to rejected promoted sites. The areas of Safeguarded Land shown on the Policies Map and referred in each policy represent suitable and appropriate areas for further development in order to meet longer term housing needs.
Green 4 Planning (Bellway)	Object	Refers to the Council's lack of a 5YHLS and claim that the plan will under-deliver against targets. The representation displays a lack of confidence that every allocation, as stated in the trajectory, will be started in 2026/27, and show some level of completion in this timeframe. It is no longer appropriate for the Council to rely on South Stanton as a strategic allocation.	The Council has undertaken extensive work since the 2024 Hearing Sessions to identify and then allocate a range of housing sites around the borough. The increased number of allocations, with a specific focus on enabling the Council to demonstrate a 5YLS, has helped to build in greater flexibility to the Plan by increasing the sources where new housebuilding will occur in Erewash. From information provided by site promoters, the council are confident that details of delivery are accurate. South Stanton is seen as representing a longer-term development site and has been placed appropriately within the latter

Representing body	Support Object Comment	Summary of representation	EBC Response
			stages of the 6-10 year tranche in the housing trajectory.
Green 4 Planning (Bellway)	Object	The Plan is not within 80% of the new Standard methodology and 515 per annum requirements. An immediate review of the Plan would be required if it is adopted, so allocating additional sites would provide more certainty and flexibility.	The Plan is not subject to the latest NPPF (Dec 2024), and as such is not being examined in line with the requirements of the standard methodology which associated to the version of the NPPF which the Plan is being examined under transitional arrangements. An increased number of allocations, with a specific focus on enabling the Council to demonstrate a 5YLS, has helped to build in greater flexibility to the Plan by increasing the sources where new housebuilding will occur in Erewash. The Council, through the update to the Core Strategy Review, has taken steps to plan positively to meet its housing requirement.
Green 4 Planning (Bellway)	Object	Historic provision of windfall sites and a lack of clarity also prompts questions around the probability of larger windfall sites coming forward as any larger sites (50+ dwellings) would have been expected to be promoted and assessed. Only a surplus of 158 dwellings is expected over the plan period.	The Council maintains up-to-date data on windfall activity and will publish its housing supply position ahead of Hearings Sessions. It should be noted that the council have approved a number of larger sites (50+ dwellings) through the Development Management process without need for allocation within the Local Plan. Examples include schemes Bennett Street, Long Eaton & Welbeck House, Gas Street, Sandiacre.
Advance Land and Planning Ltd on behalf of Seabridge Developments Ltd (SDL)	Support	Welcomes proposal to provide a minimum of 7,000 new homes, including around 1,000 in key settlements - including land to be removed from Green Belt.	Support noted.

Strategic Policy 1.1 (SP1.1) Allocated Housing Sites

Representing body	Support Object Comment	Summary of representation	EBC Response
Carney Sweeney (Peveril Homes)	Comment	Whilst SP1.1 sets out criteria against which applications for housing development on sites allocated in the plan are required to meet. However, it is unclear whether the policy would also apply to safeguarded land and/or proposals on windfall sites. The Council should look to clarify how SP1.1 would be applied in this regard.	Each area of safeguarded land shown on the Policies Map is clearly associated with a housing allocation within the Plan. The linkage is demonstrated within each site allocation policy with a criterion advising on the size of land being safeguarded. With a clear association in place, it naturally follows that future development of safeguarded land will be expected to meet the criterion at SP1.1 that a neighbouring allocation would have been previously subject to. The criterion identified by the policy reflects the edge of urban area or village settlement that allocations spatially associate with. For example, a large windfall proposal which came forward on industrial land within the town would not be expected to conform to Criterion 2 of SP1.1.
Carney Sweeney (Peveril Homes)	Comment	Reference to “....new neighbourhood” remains in SP1.1. With the overall premise of SP1.1 no longer making specific reference to ‘strategy’ housing development and with the removal of the 200 homes cap (both welcomed), reference to “new neighbourhood” is misleading as it suggests a certain scale of development. In line with the amendments made to SP1.1, reference to “new neighbourhood” should be removed to ensure policy wording will be effective as part of any decision-making process.	The concept of neighbourhood is, by definition, a rather flexible and fluid entity which has different meanings and interpretations to different people. At its core, it can represent a localised community which is characterised by a strong social component and a sense of shared identity amongst residents. This would still endure within the new developments, even with the amendments which omit reference to “new neighbourhood”.

Representing body	Support Object Comment	Summary of representation	EBC Response
Advance Land and Planning Ltd on behalf of Seabridge Developments Ltd (SDL)	Support	Supports Strategic Policy 1.1.	Support noted.

Strategic Policy 1.2 (SP1.2) South Stanton

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should provide a new primary school 'with nursery'. Financial contribution to secondary education infrastructure to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	The provision of a nursery as part of a new primary school will need to be discussed with DCC Education to establish what impact this has on the viability of the allocation's policy. Contribution to secondary education infrastructure is noted.
Derbyshire County Council – Highways*	Comment	No comments on highway matters in the amendments.	Comment noted.

Strategic Policy 1.3 (SP1.3) Acorn Way

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted.
Derbyshire County Council – Highways*	Comment	No comments on highway matters in the amendments. Requirements for increased public transport services and infrastructure are welcomed.	Comment noted.
Sport England*	Object	Housing allocation adjacent to a playing field. Bringing site forward for development should consider adjoining land use and 'agent of change' in accordance with Para 200 of the NPPF. New housing could prejudice the use of the adjacent playing field, so the policy must ensure this is avoided, and if necessary, should reference mitigation to protect the site such as the need for a noise and ball strike assessment.	A noise and ball strike assessment would be expected to be undertaken at the planning application stage, with its findings influencing the layout of development and any physical forms of protection/mitigation.
Sport England*	Object	Notes that playing field land included as 'safeguarded land', although unsure as for what development use. Therefore, requires policy should make it clear that any proposal would need to accord with Para 104 of NPPF which provides conditional protection for existing open space, sports and recreational buildings and land, including playing fields and formal play spaces.	Policy is clear that the safeguarded land is required to meet longer-term housing needs. Council would expect such an assessment of how development can conform to Para 104 to be carried out via the planning application process.
Planning & Design Group (Redrow Homes)	Support	Overall, it is considered that the proposed amendments to the allocation of Land at Acorn	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		Way, Derby are appropriate. Moreover, that the additional evidence prepared by the Council, and the subsequent amendments to the Core Strategy Review is sufficient to ensure that the plan is positively prepared, justified, effective and consistent with national policy, as required by the NPPF. As such, the review is sound and can now proceed to adoption by the Council.	
Planning & Design Group (Redrow Homes)	Support	Promoter is supportive of the amendments made to Policy SP1.3 by the Council in response to concerns outlined post-Hearings by the Inspector. This results in a slight reduction in both capacity (550 homes) and site size (24ha). All amendments are considered relatively minor and necessary to make the allocation positively prepared and justified. The reduction in capacity demonstrates an efficient use of land, able to provide a high-quality residential development whilst delivering the necessary landscape and environmental infrastructure.	Support noted.
Planning & Design Group (Redrow Homes)	Support	Confirms there are no insurmountable technical constraints that would prejudice its development that cannot be appropriately mitigated. State that delivery could occur immediately subject to the Plan's adoption. All amendments to SP1.3 by the Council are supported.	Support noted.
Planning & Design Group (Redrow Homes)	Support	Site performs well in terms of spatial strategy with it located within the most sustainable part of the Borough and top of the settlement hierarchy. Therefore, an appropriate location for delivering	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		new housing which is in accordance with the spatial strategy that has been robustly justified and evidenced as part of the Core Strategy Review process.	
Planning & Design Group (Redrow Homes)	Support	Site promoter agrees with Council's view of housing delivery expectations (as shown in the consulted trajectory) on the proviso that the Local Plan is adopted in a timely manner. There are no landowner or marketability constraints precluding the residential development of the site, nor is there any significant infrastructure required to deliver the site.	Support noted.
Planning & Design Group (Redrow Homes)	Support	A Transport Assessment (TA) for the allocation has been undertaken to address the Inspector's concerns about highway matters and to demonstrate the allocation's soundness. The TA, undertaken on the basis of 600 homes, has been shared with EBC and Derby City with the TA's scope agreed by both authorities. It concludes that highway impacts arising from the allocation can be appropriately mitigated and that residual cumulative impact on the highway network would not be severe. Proposed off-site mitigation at Acorn Way/Raynesway junction is shown to be sufficient. The representation then goes on to set out the main results of the TA, concluding no transport or highways issues precluding development.	Support and conclusions of TA undertaken for the site allocation noted.
Planning & Design Group (Redrow Homes)	Support	The removal of references to financial contribution in the policy is supported, recognising that the	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		Local Education Authority (LEA) are the primary provider of educational plans. It should be the LEA who identify the current capacity and then seek the appropriate amount of developer contribution to address the arising need.	
Cllr Robert Mee Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Highways safety. In particular danger of crossing Acorn Way to get to the local facilities. If it was developed then 10% affordable housing provision is inadequate.	Acorn Way forms the eastern boundary between the site and open countryside. There would be no need to cross this to reach local facilities. On a general level, none of the Statutory Consultation Bodies for Highways have raised any highway safety concerns. The affordable housing requirement is 30% of which 10% is for on-site provision and the other 20% as a commuted sum to be used elsewhere in the Borough, subject to viability.
Cllrs Eyre, Mulhall and Trehwella, Derby City Councillors for Oakwood	Object	Traffic Congestion on A608 (which is incorrectly referred to as A609). Road safety. Air Quality will be impacted. Improvements to bus halts are not enough frequency of services needs improving.	Derby City Highways have not provided any comments re. congestion/ road safety or need for more bus services. Re air quality, the area is not subject to an air quality management area (AQMA), and it is unlikely that additional vehicular movements would necessitate concerns over worsening air quality to a level where an AQMA is deemed necessary.
Cllrs Eyre, Mulhall and Trehwella, Derby City Councillors for Oakwood	Object	Wildlife/ biodiversity. Would like to see conclusions of a full study. Lack of information on school place provision and healthcare. Removal of financial contribution to Derby school places will make the development car dependant.	The education criterion in the policy was removed at the request of Derby city and Derbyshire County Council Education departments. Further information on school place provision and healthcare can be found in the Infrastructure Delivery Plan which forms part of the Evidence Base Library.

Representing body	Support Object Comment	Summary of representation	EBC Response
Cllrs Eyre, Mulhall and Trehwella, Derby City Councillors for Oakwood	Object	Lack of evidence regarding Green Belt impacts, flooding/ drainage concerns, incorrect labelling on map. Number of houses is not suitable for the local area.	Green Belt impacts are set out in the Green Belt review and reiterated in the site selection paper which can be found in the Evidence Base library. Please see response above re flooding and drainage. Map labelling issue previously noted above. The quantum of housing is considered suitable in this location, as set out in the Sustainability Appraisal and reiterated in the site selection paper. These documents can be found in the Evidence Base Library.
Cllrs Eyre, Mulhall and Trehwella, Derby City Councillors for Oakwood	Object	Development of this site, which is a bolt on to Derby city should count towards Derby's housing figures.	No agreement to share housing growth has been established between Erewash Borough Council and the Derby Housing Market Area.

Strategic Policy 1.4 (SP1.4) North of Spondon

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted. Council has already entered into a S106 agreement between DCC and the developer over the necessary and assessed education contribution given the site now has planning consent.
Derbyshire County Council – Highways*	Comment	No comments on highway matters in the amendments.	Comment noted.

Strategic Policy 1.5 (SP1.5) SW of Kirk Hallam

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should provide a new primary school 'with nursery'. Financial contribution to secondary education infrastructure to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	The provision of a nursery as part of a new primary school will need to be discussed with DCC Education to establish how this impacts on the viability of the allocation. Contribution to secondary education infrastructure is noted.
Derbyshire County Council – Highways*	Comment	No comments on highway matters in the amendments.	Comment noted.
Dale Abbey Parish Council	Object	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.	The proposed Local Centre at SW of Kirk Hallam would be well connected to the remainder of the allocated site to its east as required by Criterion 6 of SP1.5. This should ensure safe access to the new facilities is possible for pedestrians and cyclists. Whilst the proposed Local Centre is set west of the line of the proposed relief road, the establishment of a defensible boundary along its western edge is still possible. The Council sees any further linear expansion of Kirk Hallam south-west along the A6096 as inappropriate given this route extends outwards into the open countryside where an important area of Green Belt designation exists as shown by the conclusions of the GB Review.
Inovo Consulting (Mr Chris Waumsley)	Support	General: Confirmation that site will provide 1,000 homes with a wide range of housing types and tenures. Proposed relief road will remove HGV	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		through traffic from the residential streets of Kirk Hallam, improving air quality, congestion and environmental quality. The development will fund or provide additional school places as required. The development will make contributions to extending healthcare provision through planning obligations. Flood risk and drainage have been extensively assessed. Development can incorporate suitable landscaping to minimise its impact on the wider landscape. It will the extent and connectivity to the existing nature reserve.	
Inovo Consulting (Mr Chris Waumsley)	Support	Green Belt: Given the need for housing in Erewash, the site is considered an appropriate and necessary release from the Green Belt. Site is currently subject to formal Pre Application assessment of environmental impacts. The Environmental Impact Assessment (EIA) will consider wider Green Belt issues as part of the consideration of reasonable alternatives. This will be made available to the Local Plan Inspector as soon as possible. The inclusion of safeguarded land within the line of proposed relief road will ensure future housing needs can be met without needing to further review Green Belt boundaries in the vicinity.	Support noted
Inovo Consulting (Mr Chris Waumsley)	Clarification requested	Seeking clarification regarding extent of allocation boundary to ensure construction of relief road is contained inside.	Maps at the appropriate scale of detail for these considerations will be provided.

Representing body	Support Object Comment	Summary of representation	EBC Response
Boyer Planning (on behalf of Barratt David Wilson Homes North Midlands)	Support	Support the allocation and relief road which will help mitigate traffic from Stanton proposals. It considers relief road to provide a new defensible Green Belt Boundary. Since EiP Hearing sessions, BDW have worked with site promoters and council to bring site forward. Site is economically viable and free of any major impediments to development. It can make a meaningful contribution to meeting housing shortfall identified by the Inspector.	Support noted.
Boyer Planning (on behalf of Barratt David Wilson Homes North Midlands)	Comment	Boyer Planning carried out its own Green Belt assessment in accordance with the Greater Nottingham Strategic Plan (GNSP). This includes a matrix with numerical scores against each of the five NPPF defined function of the Green Belt, both in terms of the broad area and the site boundary itself. Overall, it concludes that the site does not contribute strongly to the five purposes of the Green Belt and releasing land in this location would not cause significant harm to the strategic function of the wider Green Belt.	Findings noted.
Cllr Robert Mee Erewash Borough Councillor for West Hallam & Dale Abbey	Object	Loss of Green Belt and landscape unacceptable. Should not be considered as Grey Belt. Impact on biodiversity, loss of amenity to residents.	The rationale for removing this site from the Green Belt is set out in the Site Selection Paper which can be found in the Evidence Base Library. When considered against the findings of the Green Belt Review, part of the site is located on land that fulfils all three functions of the Green Belt whereas the section nearest the existing settlement is not important to the functioning of the Green Belt. The partial Green Belt impacts are weighed against the wider positive impacts of delivering key

Representing body	Support Object Comment	Summary of representation	EBC Response
			infrastructure such as the relief road, which also provides the defensible boundary, and the Local Centre.
Cllr Robert Mee Erewash Borough Councillor for West Hallam & Dale Abbey	Object	10% affordable housing requirement is inadequate.	This policy requirement was based on an independent viability report – see Evidence Base library.
Cllr Robert Mee Erewash Borough Councillor for West Hallam & Dale Abbey	Object	Relief road will create more congestion at either end- Ladywood Road and at Twelve Houses, as well as in Spondon and West Hallam. Impact on air quality. Local centre on wrong side of the road, adding to safety concerns.	The benefits of the relief road are set out in the traffic modelling work carried out by Systra (report in Evidence Base Library). None of the statutory consultation bodies for highways have raised any issues with regard to highways safety of congestion. The proposed Local Centre at SW of Kirk Hallam would be well connected to the remainder of the allocated site to its east as required by Criterion 6 of SP1.5. This should ensure safe access to the new facilities is possible for pedestrians and cyclists. No Air Quality Management Area (AQMA) exists here, and this has not been raised as an issue by any consultation bodies. However, the production of a Transport Assessment 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.

Representing body	Support Object Comment	Summary of representation	EBC Response
Cllr Simon Mabbott Derbyshire County Councillor for Ilkeston South and Kirk Hallam Division	Object	Relief road will only divert congestion not reduce it. Kirk Hallam residents will have a limited and worsening access to Ilkeston. Raises concerns around congestion and road safety on several specific routes/ junctions within Kirk Hallam/ Ilkeston area and beyond. Air Quality will be impacted.	Please see comments directly above on highways issues and air quality.
Cllr Simon Mabbott Derbyshire County Councillor for Ilkeston South and Kirk Hallam Division	Object	Removal of Green Belt, landscape and semi-rural character	See answer above in this section regarding the planning policy rationale for deallocating this site from Green Belt. 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. It is considered therefore that there are no reasons on landscape grounds as to why the site is unsuitable as a housing allocation.
Cllr Simon Mabbott Derbyshire County Councillor for Ilkeston South and Kirk Hallam Division	Object	Habitat loss/ wildlife impacts,	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

Representing body	Support Object Comment	Summary of representation	EBC Response
			over time help to provide complementary habitat to the Local Nature Reserve (LNR). This should enable the presence of a wildlife corridor linking the LNR to surrounding countryside.
Cllr Simon Mabbott Derbyshire County Councillor for Ilkeston South and Kirk Hallam Division	Object	Bus provision, lack of funding for public transport.	Policy 1.5 delivers the following: Additional bus halts on the A6096 Ladywood Road with safe pedestrian access from the new development, including a suitable crossing of the A6096 Ladywood Road. DCC Highways have not identified any need for increased bus provision.
Cllr Simon Mabbott Derbyshire County Councillor for Ilkeston South and Kirk Hallam Division	Object	Impact on school capacity/ healthcare provision.	Please see comment above from DCC regarding education provision. The Council has agreed with the Integrated Care Board (ICB) to collect monies on a per home basis at each allocation, with the contributions being used to expand provision at local health facilities. These matters are also set out in the Infrastructure Delivery Plan which can be found in the Evidence Base Library.
Cllr Simon Mabbott Derbyshire County Councillor for Ilkeston South and Kirk Hallam Division	Object	Failure to meet local housing need. Wrong type/mix of homes. Not enough affordable housing.	The quantum of housing and site density are considered to be appropriate to the area. The 10% affordable housing contribution is based on independent viability evidence. The housing mix, in terms of number of bedrooms/ dwelling sizes has not yet been established and will be formalised at planning application stage.
Cllr Simon Mabbott Derbyshire County Councillor for Ilkeston South and Kirk Hallam Division	Object	Flood risk, Drainage issues, lack of drainage plans.	With regard to surface water flooding, there have been no concerns raised by Derbyshire County Council as local lead Flood Authority or the EA.

Representing body	Support Object Comment	Summary of representation	EBC Response
			The masterplan will need to include provision for Sustainable Drainage System (SuDS).

Strategic Policy 1.7 (SP1.7) West of Sandiacre

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted.
Derbyshire County Council – Highways*	Comment	It is considered that the proposal to provide vehicular and pedestrian access to the site via an extension to Larch Drive is acceptable. The extended access road serving the site would be required to be constructed to adoptable standards. Pedestrian and cycle access to the site via Footpath No. 1 is also essential. As stated, a Transport Assessment will be required to support an application which will demonstrate the need, if any, for junction improvements on the wider highway network to mitigate the impact of the additional vehicular trips generated by the development. If junction improvements are required, then the Transport Assessment should demonstrate that these can be satisfactorily provided in a safe and suitable manner.	Comment regarding forming vehicular and pedestrian access to the site is noted and supported. Council agrees with the need for a Transport Assessment (TA) to support any future planning application.
National Highways*	Comment	Potential for highway improvements in the area should be considered to enable development to be implemented in Long Eaton, Sandiacre and Ilkeston.	Comment noted. It would be expected that a TA would address any highway improvements necessary which enable development to occur without risk to the effective running of the strategic road network (SRN).
Sandiacre Parish Council*	Object	The Sandiacre Neighbourhood Plan (SNP) appears to have been overlooked by the Borough Council when undertaking the requirement to meet	The Council has a duty to meet the Borough's housing needs, thus must look across Erewash in line with the tested and established settlement

Representing body	Support Object Comment	Summary of representation	EBC Response
		<p>increased Government housing targets. 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. 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. 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.</p>	<p>hierarchy. Much of the allocation currently is private land and has no status as local open or green space, with the safeguarding of a PROW across the site retaining access to an extensive network of paths and the wider countryside accessed via footbridge west of the M1. Whilst comments from the Wildlife Trust conclude impact from development would be high, it does point towards the ability to provide mitigation through the provision of sufficient buffering to ensure housing remains separate from the adjoining Local Nature Reserve – a measure required by Criterion 4 of SP1.7.</p>
Sandiacre Parish Council*	Object	<p>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. 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.</p>	<p>DCC Highways in their response indicate that a safe and appropriate site access is achievable, whilst a Transport Assessment will be required to show how traffic generated by development would be managed across the local road network. Construction traffic is able to be controlled through the use of planning conditions to limit disturbance, imposed as part of any future planning approval. DCC Education have raised no concerns over existing capacities of school facilities in the area, and the Council have agreed the need for a financial contribution per property to be made by developers which will contribute towards the enhancement of local healthcare facilities. The Council has carried out extensive work to identify brownfield land. A site identified within Sandiacre Local Centre is at higher risk of flooding than the West of Sandiacre allocation.</p>

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire Wildlife Trust (DWT)	Comment	<p>The overall potential 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.</p>	<p>The Council notes the comments made by DWT from their representation and also notes the assessed potential risks posed to ecological assets by development. DWT highlight the role sufficient buffering can make in mitigated the impact on the adjacent Stoney Clouds Local Nature Reserve (LNR) and local wildlife site (the Council requires this at Criterion 4 of SP1.7), with a sympathetically designed development necessary to further reduce the assessed level of impact. Matters of site layout should be addressed at the planning application stage, along with the need for detailed ecological survey work (and assessment for BNG) called for by DWT.</p>
Carney Sweeney (Peveril Homes)	Support	Carney Sweeney welcome the proposed allocation of their client's site. Client is supportive of the	Comments noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		proposed allocation, albeit with some comments regarding the policy requirements.	
Carney Sweeney (Peeveril Homes)	Support	Proposed allocation offers an opportunity to deliver housing in a sustainable location as an extension to the Long Eaton urban area. Its proposed allocation is supported by several evidence base documents, including the Site Selection Paper, SA Update and Green Belt Review.	Support noted.
Carney Sweeney (Peeveril Homes)	Comment	SP1.7 states the delivery of 180 homes. However, initial technical and design work has been undertaken. To achieve the provisions of SP1.7 and other site considerations, the quantum of development for this parcel of land would be circa 100 dwellings. An indicative layout is provided within the representation.	Comments and information noted.
Carney Sweeney (Peeveril Homes)	Comment	Client agrees with the Council's judgement over delivery of housing commencing in Year 2 (2027-28) and has offered updated information on yearly delivery totals of 35 homes (2027-28), 50 homes (2028-29) and 15 homes (2029-30).	Comments and information noted.
Carney Sweeney (Peeveril Homes)	Comment	Criterion 3 of SP1.7 seeks to safeguard the route of PROW (Footpath No. 1) running across the site and access to Cloudside Road. Whilst the client would look to retain the footpath and make appropriate improvements, the policy should allow flexibility regarding the route of the footpath to not place under constraint or burden on any masterplanning/design process. Would be helpful	Noted. However, it is felt that the wording of the policy requirement, together with further information in the supporting Explanation, offer an appropriate degree of flexibility required to establish a suitable route across the allocation site. Re-wording policy to add terms such as 'diversion' may cause undue and unnecessary concern that development would seek to route the

Representing body	Support Object Comment	Summary of representation	EBC Response
		if this wording could look to allow for consideration of a suitable diversion of the footpath if found to be required.	PROW around the allocation, as opposed to passing through it.
Carney Sweeney (Peveril Homes)	Comment	Criterion 6 of SP1.7 is noted to address levels of affordable housing provision, and it is noted that this is subject to viability in the policy wording, which is welcomed.	Support noted.
Marrons (William Davis Homes)	Object	Site would be impacted by the M1. Air quality a concern as passing section often subject to standing traffic. Cites concerns that the Council have previously raised about Larch Drive being insufficient in its specification to serve a development at land beyond it.	A supporting representation from the site promoter on behalf of the developer demonstrates no issues or concerns which cannot be readily resolved or mitigated. The level of impact from the M1 is overstated. No AQMA exists here, with widening work through this section of the M1 contributing to an improved flow of traffic. Previous conclusions by the Borough Council in respect of the site's development potential were not based on the input of Highway engineers. DCC Highways have confirmed in their representation that site access to the allocation can be achieved.
Cllr Wayne Major. Erewash Borough Councillor for Sandiacre Ward	Object	Concern regarding impact on the wildlife, loss of mature trees and that the access route would fall within the boundary of the designated Local Nature Reserve. Potential conflict with NPPF (paras 179-182) and Countryside Act 1949.	The access route does not fall within the boundary of the Local Nature Reserve (LNR). There is however a slight overlapping of boundaries between the site and a non-statutory Local Wildlife Site (LWS). The SA recognises that there may be potential impacts on habitats through any future development of land at this location. As such it scored a minor negative (-1) in SA Objective 3 Criterion 1. With biodiversity assets in the immediate vicinity, development would have to demonstrate extreme care so as not to harm

Representing body	Support Object Comment	Summary of representation	EBC Response
			protected habitats and species present within the LNR and LWS. Other features help with the site's enclosure, not least a tree belt separating the site from the M1 and it would be expected that this would be retained for biodiversity and amenity reasons. The development could be designed to minimise risk and harm to protected species, notwithstanding the requirements of the BNG regime, something acknowledged by Derbyshire Wildlife Trust (DWT) in their representation about the site. See DWT comments and council response in this section (above) regarding this site.
Cllr Wayne Major Erewash Borough Councillor for Sandiacre Ward	Object	Concern about air quality.	No Air Quality Management Area (AQMA) exists here, with widening work through this section of the M1 contributing to an improved flow of traffic. Previous conclusions by the Borough Council in respect of the site's development potential were not based on the input of Highway engineers. DCC Highways have confirmed in their representation that site access to the allocation can be achieved. A supporting representation from the site promoter demonstrates no issues or concerns which cannot be readily resolved or mitigated.
Cllr Wayne Major Erewash Borough Councillor for Sandiacre Ward	Object	Scale of housing and density concerns. Brownfield site mentioned in appendix to Sandiacre Neighbourhood Plan should be used first instead of this allocation.	The Borough Council has carried out extensive work to identify available and suitable brownfield land, of which there is insufficient to meet housing need. The Sandiacre Neighbourhood Plan did not make any allocations for housing development. The Independent Examiner confirmed that the site

Representing body	Support Object Comment	Summary of representation	EBC Response
			mentioned here was not an allocation and therefore was not assessed. For the avoidance of doubt, the Neighbourhood Plan as adopted by Council does not include the appendices wherein this site is mentioned. It should also be noted that site is the former Great Bear distribution warehouses behind the Lidl store, that are in active use and therefore not available for redevelopment. They are also in Flood Zone 2 and so not suitable for development. Indeed, that site flooded extensively during Storm Babette, underlining its unsuitability for housing development.
Cllr Wayne Major Erewash Borough Councillor for Sandiacre Ward	Object	Quantum of housing and density are too high. Site topography means site is at risk of surface water flooding/ drainage issues.	The quantum of housing and site density are considered to be appropriate to the area. Nevertheless, it should be noted that the promoters have reduced the proposal from 180 to 100 dwellings, which would result in a lower density than that proposed in the policy. With regard to surface water flooding, there have been no concerns raised by Derbyshire County Council as local lead Flood Authority or the EA. It should be noted that the masterplan includes a Sustainable Drainage System (SuDS).
Cllr Wayne Major Erewash Borough Councillor for Sandiacre Ward	Object	Concern about road safety, congestion and bus provision including blocking of existing bus routes.	DCC Highways in their response indicate that a safe and appropriate site access is achievable, whilst a Transport Assessment will be required to show how traffic generated by development would be managed across the local road network. Construction traffic is able to be controlled through the use of planning conditions to limit disturbance,

Representing body	Support Object Comment	Summary of representation	EBC Response
			imposed as part of any future planning approval. DCC Highways did not mention any public transport requirements in their response. Enforcement against illegal parking that blocks bus access is a matter for DCC Highways to address.
Cllr Wayne Major Erewash Borough Councillor for Sandiacre Ward		Concern regarding school places and healthcare provision.	DCC Education have raised no concerns over existing capacities of school facilities in the area, and the Council have agreed the need for a financial contribution per property to be made by developers which will contribute towards the enhancement of local healthcare facilities. These are set out in the Infrastructure Delivery Plan (IDP) which forms part of the evidence base and will be updated as required.
Cllr Wayne Major Erewash Borough Councillor for Sandiacre Ward		Lack of justification to release Green Belt.	The justification for using this site has been addressed in the Green Belt Review and Site selection paper. It finds that the site falls on land that does not fulfil all three functions of the Green Belt.
Cllr Steve Bilbie Erewash Borough Councillor for Sandiacre Ward	Object	Objection on grounds of Traffic congestion, road safety, bus provision, wildlife/ biodiversity, school capacity, healthcare, type and quantum of housing, Green Belt, Landscape, Flooding/drainage, unsuitability of plot.	Please see responses set out above to these areas.

Strategic Policy 1.8 (SP1.8) North of Breadsall Hilltop

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted.
Derbyshire County Council – Highways*	Comment	It is noted that it is proposed that vehicular and pedestrian access to the site is from Dale Acre Way/Hungerhill Close. Whilst this is acceptable in principle, these roads are in the Derby City Council administrative area and will therefore need the approval of that authority. A Transport Assessment will be required to support an application which will demonstrate the need, if any, for junction improvements on the wider highway network to mitigate the impact of the additional vehicular trips generated by the development. It is considered that pedestrian links between the site and Hill Top, to provide good access to a frequent bus service running along the A609, would be beneficial and should be provided. If junction improvements are required, then the Transport Assessment should demonstrate that these can be satisfactorily provided in a safe and suitable manner.	Comment regarding forming vehicular and pedestrian access between the site and the A609 Hill Top is noted and supported. Council agrees with the need for a Transport Assessment to support any future planning application.
Natural England*	Comment	Proposes a modification to the policy 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	Comment noted. The Council agree that the continued recognition of Breadsall Railway Cutting SSSI is vital in reflection of its wider importance. However, the SSSI's designation remains part of Saved Policy EV10 in the Council's Development Plan. As a result, the SSSI's status, and by

Representing body	Support Object Comment	Summary of representation	EBC Response
		interest features for which the SSSI has been notified.	extension, the implications of development within its proximity, would be readily known to anyone bringing forward housing proposals at the allocation site and in the longer term, at the adjoining safeguarded land. This is thought to be sufficient to require evidence be provided at the planning application stage to demonstrate that development would not damage or destroy the interest features for which the SSSI has been notified.
Breadsall Parish Council*	Object	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.	Statutory consultees representing highway interests did not flag this issue in their responses. The Council would also expect the production of a TA, as advised by DCC Highways and National Highways, as part of any future planning application, to how any issues and concerns relating to the flow of traffic throughout the village would be adequately addressed.
Breadsall Parish Council*	Object	Concern was expressed at 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.	The area of Green Belt between Breadsall Village and the main urban area of Derby was subject of assessment within a systematic throughout the Borough. Designation here was shown to not contribute to all three of the purposes which formed the basis of assessment. Criterion 4 and 5 of SP1.8 together work to help create a positive relationship and interface between a development and the adjacent Green Infrastructure and wildlife assets. The ability for this to be implemented has been confirmed by the site promoter in their representation. No comments were received by the Council from those with responsibility for

Representing body	Support Object Comment	Summary of representation	EBC Response
			managing drainage and flood risk, whilst the site itself falls within FZ1. The submission of a drainage strategy alongside any future planning application would be expected by the Council to show how conditions both on and off-site would not be worsened.
Breadsall Parish Council*	Object	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.	The mapping presented to support the consultation proposals reflects the latest software and basemap that were available to Council Officers in the GIS applications it runs. The council was aware of the adjacent Durose development when drafting this policy, which provides the access to the proposed site. 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 during the future. The Council acknowledges an error in its published material which referenced Hungerhill Crescent instead of Hungerhill Close.
Cllr Carol Hart, Derbyshire County Councillor for Breadsall	Object	Concern over impacts on Breadsall, in particular traffic congestion, rat runs and flooding as a result of this proposal and other recent developments in the vicinity. Maps do not recognise adjacent Durose development (on Derby City side) and there is incorrect naming of streets. Some existing residential properties are included within the safeguarded area and residents are left unclear as to the implications.	Statutory consultees representing highway interests did not flag this issue in their responses. The Council would also expect the production of a TA, as advised by DCC Highways and National Highways, as part of any future planning application, to how any issues and concerns relating to the flow of traffic throughout the village would be adequately addressed. The council was aware of the adjacent Durose development when drafting this policy, which provides the access to the proposed site. The homes located at the Manor Farm complex would

Representing body	Support Object Comment	Summary of representation	EBC Response
			not be demolished in the event that Safeguarded Land comes forward for development at some point during the future. The Council acknowledges an error in its published material which referenced Hungerhill Crescent instead of Hungerhill Close.
Cllr Bethan Eddy Erewash Borough Councillor for Little Eaton and Stanley Ward	Object	Traffic congestion (in particular use of Breadsall as cut through to A38). Road safety in particular Brookside Rd and Lime Lane (which have had accidents), air quality, flooding, importance of Green Belt. Maps do not show the adjacent Durose development and a Hungerhill Close is named incorrectly a crescent.	Please see response directly above regarding congestion concerns and mapping issues. DCC highways have not indicated any particular concerns with regard to roads serving this site. It should be noted also that this would be addressed in detail again via a Transport Assessment related any future planning application. In terms of flood risk, the site falls within zone 1 which is the lowest risk. No comments were received by the Council from those with responsibility for managing drainage The submission of a drainage strategy will be required alongside any future planning application to show how impacts both on and off-site would be managed. The area of Green Belt between Breadsall Village and the Derby conurbation was subject of assessment within a systematic review of the entire Borough. The designation here was shown to not contribute to all three of the purposes and was therefore not considered to play an important function in the wider Green Belt. The area is not subject to an air quality management area (AQMA), and it is unlikely that additional vehicular movements would necessitate concerns over worsening air quality to a level where an AQMA is deemed necessary.

Representing body	Support Object Comment	Summary of representation	EBC Response
Cllr Robert Mee Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Concern regarding flood risk and release of Green Belt and mapping issues. Incorrect mapping	Please see responses to these issues set out in the section immediately above.
Cllrs Eyre, Mulhall and Trehwella, Derby City Councillors for Oakwood	Object	Traffic Congestion on A608 (which is incorrectly referred to as A609). Road safety. Should not link new development to the Durose Estate which has roads without markings and wasn't intended for this. Air Quality will be impacted.	Road number noted., Derby City Highways have not provided any comments re. congestion/ road safety. Re air quality, the area is not subject to an air quality management area (AQMA), and it is unlikely that additional vehicular movements would necessitate concerns over worsening air quality to a level where an AQMA is deemed necessary.
Cllrs Eyre, Mulhall and Trehwella, Derby City Councillors for Oakwood	Object	Wildlife/ biodiversity. Would like to see conclusions of a full study. Lack of information on school place provision and healthcare.	See below from DWT and council response re biodiversity/ wildlife issues. Further information on school place provision and healthcare can be found in the Infrastructure Delivery Plan which forms part of the Evidence Base Library.
Cllrs Eyre, Mulhall and Trehwella, Derby City Councillors for Oakwood	Object	Lack of evidence regarding Green Belt impacts, flooding/ drainage concerns, incorrect labelling on map. Number of houses is not suitable for the local area.	Green Belt impacts are set out in the Green Belt review and reiterated in the site selection paper which can be found in the Evidence Base library. Please see response above re flooding and drainage. Map labelling issue previously noted above. The quantum of housing is considered suitable in this location, as set out in the Sustainability Appraisal and reiterated in the site selection paper. These documents can be found in the Evidence Base Library.
Cllrs Eyre, Mulhall and Trehwella, Derby City Councillors for Oakwood	Object	Development of this site, which is a bolt on to Derby city should count towards Derby's housing figures.	No agreement to share housing growth has been established between Erewash Borough Council and the Derby Housing Market Area.

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire Wildlife Trust (DWT)	Comment	<p>The overall potential impact of development is assessed as Medium to 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 scale and could be addressed by mitigation and compensation measures. If development proposals progress, detailed ecological surveys</p>	<p>The Council notes the comments made by DWT from their representation and also notes the assessed potential risks posed to ecological assets by development. DWT highlight the level of risk is contingent of how much of the existing valuable habitat can be retained. SP1.1 requires the maintaining and enhancement, where possible, of certain habitat features, with the Council keen to reduce the level of potential risk from development at the allocation site through a sympathetic design and overall layout. Such matters should be addressed at a planning application stage, along with the need for detailed ecological survey work (and assessment for BNG) called for by DWT.</p>

Representing body	Support Object Comment	Summary of representation	EBC Response
		will be required together with assessments for Biodiversity Net Gain.	
Planning & Design Group (Redrow Homes)	Support	Allocation is an entirely appropriate and sustainable location for development. Site is available, suitable, deliverable and economically viable.	Support noted.
Planning & Design Group (Redrow Homes)	Support	Located in an adjacent to a residential edge of Derby, the allocation is in accordance with the Plan's spatial strategy and settlement hierarchy. The suitability of the area to accommodate new development has been established through the consent of a scheme in Derby City at Land North West of Mansfield Road (12/15/01520) in 2016. This allocation forms a logical extension to that now-developed scheme.	Support noted.
Planning & Design Group (Redrow Homes)	Support	Site selection clearly a direct result of a comprehensive site selection process – in response to Inspector's requests. The site selection methodology is clear.	Support noted.
Planning & Design Group (Redrow Homes)	Support	The site capacity (160 homes) is supported by the landowner. It achieves an efficient use of land as per the NPPF, whilst being able to deliver a high-quality residential development alongside necessary landscape and environmental infrastructure (inc. BNG). The site's capacity is supported by the indicative masterplan. The masterplan has been informed by technical assessment to guide development parameters and mitigation requirements. Vehicular and pedestrian	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		links would occur via Dale Acre Way and Hungerhill Close.	
Planning & Design Group (Redrow Homes)	Support	A strong landscape buffer is provided for along the north of the site, including strengthened woodland along the NW boundary with the existing Great Northern Greenway. Delivery of biodiversity, drainage and landscape provision is all achievable.	Support noted.
Planning & Design Group (Redrow Homes)	Support	Site promoter assures that delivery expectations (as per trajectory) are achievable. Wheeldon Bros routinely deliver 50 units per annum at their schemes. No landowner/market constraints that would prevent site delivery in timely manner.	Support noted.
Marrons (William Davis Homes)	Object	The site's development would represent a very significant erosion of the spatial and visual separation between Breadsall and the Derby urban area. There is no evidence to justify this in the GB Review, and no wider landscape or visual impacts are identified, which is surprising given the site's topography.	The Green Belt Review systematically appraises the performance of all Green Belt designation across the Borough. The Review concludes that Green Belt at this location does not meet all three of the purposes held to be relevant in Erewash.

Strategic Policy 1.9 (SP1.9) South of West Hallam

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Highways*	Comment	It is noted that a new vehicular and pedestrian access on Beech Lane will be required to serve the proposed development. It will need to be satisfactorily demonstrated that a safe and suitable access can be provided which takes into account the access to Scargill Primary School and the junction with Hallam Way as well as ensuring that highway and pedestrian safety is not compromised, particularly considering vehicular and pedestrian activity associated with the School. In addition, the provision of a footway along the site frontage of Beech Lane together with improvements to the bus stop facilities is considered to be essential. A Transport Assessment will be required to support an application which will demonstrate the need, if any, for junction improvements on the wider highway network to mitigate the impact of the additional vehicular trips generated by the development. If junction improvements are required, then the Transport Assessment should demonstrate that these can be satisfactorily provided in a safe and suitable manner.	Comment regarding forming vehicular and pedestrian access between the site and Beech Lane accounting for the proximity of Scargill Primary School and Hallam Way is noted and supported, as is the need for a new section of pavement along the southern side of Beech Lane (which SP1.9 requires). Council agrees with the need for a Transport Assessment to support any future planning application.
West Hallam Parish Council*	Object	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. Cites the diverse range of community facilities which adjoin Beech Lane, which due to its narrowness and lack of	Statutory consultees representing highway interests did not flag issues of congestion in their responses. Whilst not specifically requested by DCC Highways, the Council would also expect the production of a TA as part of any future planning application, to demonstrate how any issues and concerns relating to the flow of traffic at specific

Representing body	Support Object Comment	Summary of representation	EBC Response
		pavement along one side can be dangerous for pedestrians. Concern that additional vehicles using local roads will worsen air quality.	areas of the village would be adequately addressed. Criterion 1 of SP1.9 requires the introduction of pavement along the southern side of Beech Lane which adjoins the allocation site, addressing pedestrian safety fears. The area is not subject to an air quality management area (AQMA), and it is unlikely that additional vehicular movements would necessitate concerns over worsening air quality to a level where an AQMA is deemed necessary.
West Hallam Parish Council*	Object	Development would have a negative effect on biodiversity both during and after the build, with buzzards and badgers cited within the area.	Comments noted. However, Derbyshire Wildlife Trust provide information which suggests the potential level of impact from development at this location is low. Notwithstanding, in the event of development, a planning application must be accompanied by detailed ecological survey work which will advise of any necessary mitigation and compensation measures, whilst also informing how BNG will be delivered.
West Hallam Parish Council*	Object	Poor existing bus services, particularly during evenings (no buses). Greater car dependency will worsen localised congestion and lead to deterioration of air quality. Number of homes 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. Current waiting times at the local GP can reach four weeks, with current capacity insufficient. Additional	The provision of bus services is a largely commercial activity with providers needing to show profitability of services. The addition of new homes in West Hallam will increase potential customer patronage. As explained above, air quality is not of sufficient concern that intervention (via AQMA) is necessary. The allocation is around 150-200m away from a proposed Village Centre in West Hallam. Given the proximity, it is not thought that many residents at the allocation would choose to drive such a short distance to access the facilities. The Council has agreed with the Integrated Care

Representing body	Support Object Comment	Summary of representation	EBC Response
		residents from new homes would only worsen this situation.	Board (ICB) to collect monies on a per home basis at each allocation, with the contributions being used to expand provision at local health facilities.
West Hallam Parish Council*	Object	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. Development would alter the landscape to the south of the village by building on precious green belt land. Wildlife will have their habitats reduced.	The area of Green Belt south of West Hallam was subject of assessment within a systematic review of designation extending throughout the Borough. Designation here was shown to not contribute to all three of the purposes which formed the basis of assessment. Criterion 4 and 5 together recognise the sensitive surrounds of the allocation, by requiring an appropriate layout which respects the setting of the adjacent Conservation Area, whilst also acknowledging the existing views which look southwards from the allocation site.
Stanley & Stanley Common Parish Council*	Object	Stanley & Stanley Common PC 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 with existing issues of speeding traffic through the villages will not be helped by additional traffic generated by development. Concern expressed about the additional noise generated by the increase in traffic passing through the villages, whilst the 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 &	Statutory consultees representing highway interests did not flag issues of congestion in their responses. Council would also expect the production of a TA as part of any future planning application (as per the requirement from DCC Highways), to demonstrate how any issues and concerns relating to the flow of traffic and highway safety on specific roads and junctions across the wider functional network would be adequately addressed.

Representing body	Support Object Comment	Summary of representation	EBC Response
		Fiddle junction can obscure visibility and hamper access from it. Additional traffic at both junctions heightens risks of road traffic collisions.	
Stanley & Stanley Common Parish Council*	Object	Concerns about the ability of parishioners to access facilities at the Dales Shopping Centre in West Hallam, the nearest facilities to Stanley & Stanley Common. 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.	See comments immediately above. It would be for a TA's production alongside any future planning application to demonstrate that highway safety would not be prejudiced by development at the allocation site.
Sport England*	Object	Housing allocation adjacent to a cricket ground. As per Sport England's comments against SP1.3, the 'agent of change' principle at Para 200 of the NPPF is relevant, with housing potentially prejudicing the use of the adjacent facility. The policy must ensure this is avoided, and if necessary, should reference mitigation to protect the site such as the need for a cricket ball strike risk impact assessment being carried and any arising mitigation measures.	A cricket ball strike risk impact assessment would be expected to be undertaken at the planning application stage, with its findings influencing the layout of development and any physical forms of mitigation.

Representing body	Support Object Comment	Summary of representation	EBC Response
Cllr Carol Hart Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Site location is inappropriate due to proximity to primary school and recreation ground, causing traffic and parking issues. Road is unable to cope with more demand especially as lack of bus provision will result in more private car journeys. Lack of parking here also exacerbates the issue elsewhere in the village. Concern regarding highway safety in that access/ egress is inadequate and works would be required to several junctions in the vicinity	Statutory consultees representing highway interests (DCC) did not flag issues of congestion or road safety in their responses. It should be noted that the council would require a Transport Assessment as part of any future planning application (as per the requirement from DCC Highways), to demonstrate how any issues and concerns relating to the flow of traffic and highway safety on specific roads and junctions across the wider functional network would be adequately addressed. Enforcement against illegal parking is a matter for DCC Highways to address.
Cllr Carol Hart Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Concern over impact of development on the Green Belt and West Hallam Conservation Area	The area of Green Belt south of West Hallam was subject of assessment within a systematic review throughout the Borough. The Green Belt designation here was shown to not contribute to all three of the purposes which formed the basis of assessment. As such the site falls on the land that does not make an important contribution to the functioning of the wider Green Belt. With regard to the Conservation Area, Criterion 4 and 5 of Policy 1.9 together recognise the sensitive surrounds of the allocation, by requiring an appropriate layout which respects the setting of the adjacent Conservation Area, whilst also acknowledging the existing views which look southwards from the allocation site.
Cllr Robert Flatley Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Site location is inappropriate due to proximity to primary school and recreation ground, causing traffic and parking issues. Loss of Green Belt land	Please see response directly above with regard to road safety, congestion, landscape and the Green Belt. The Council has agreed with the Integrated Care Board (ICB) to collect monies on a per home

Representing body	Support Object Comment	Summary of representation	EBC Response
		and impact of rural landscape character. Impact on healthcare provision.	basis at each allocation, with the contributions being used to expand provision at local health facilities.
Cllr Robert Mee Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Concern over congestion and highway safety. Cars drive along the pavement when road blocked Particular problems during school drop off/ pick-up time. Impact on landscape and views over the valley.	Please see response above.
INOVO Consulting	Support	The site can provide highway authority standard access to serve development of the site and further traffic calming measures can be incorporated in vicinity of site if deemed necessary.	Support noted.
INOVO Consulting	Support	Capacity evaluation indicated that the site could accommodate 103-110 dwellings with 40% affordable housing provided, plus all the necessary infrastructure.	Support noted.
INOVO Consulting	Comment	Preliminary flood risk evaluation has established that site can be developed without detriment to flood risk.	Comment noted.
INOVO Consulting	Support	Site and adjacent land (i.e. safeguarded land) do not make a significant contribution to the purposes of the Green Belt, agree it would be an appropriate release.	Support noted.
Derbyshire Wildlife Trust*	Comment	The overall potential impact is assessed as Low based on a desktop study. This is primarily	Comments noted. Council agrees that in the event of development, a planning application must be

Representing body	Support Object Comment	Summary of representation	EBC Response
		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.	accompanied by detailed ecological survey work which will advise of any necessary mitigation and compensation measures, whilst also informing how BNG will be delivered.

Strategic Policy 1.10 (SP1.10) North of West Hallam

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted.
Derbyshire County Council – Highways*	Comment	It is noted that a new vehicular and pedestrian access on High Lane West will be required to serve the proposed development. It will need to be satisfactorily demonstrated that a safe and suitable access can be provided taking into account the visibility splays required. A secondary access for cycles and pedestrians on Park Hall Lane should be provided to enable access to Footpath No. 1, this could also serve as an access for emergency vehicles.	Comment regarding forming vehicular and pedestrian access between the site and High Lane West is noted and supported, as is the need for a secondary access for cycles and pedestrians on Park Hall Lane which the explanatory text supporting SP1.10 suggests. Whilst DCC Highways do not make any explicit request for the submission of a Transport Assessment as part of a future planning application, this may help to demonstrate how the above aspects can be integrated into a development proposal.
West Hallam Parish Council*	Object	Proposed road access adjacent to Millhouse crossroads enters A609 on dangerous bend with traffic passing at 40mph. Risks danger in exiting the allocation site. Reemphasises the points about unsuitability of access arrangements between the allocation site and the A609. A number of collisions have occurred at Millhouse crossroads. Increased traffic from the site would reduce air quality for existing residents and animals which live around the site. Inadequate bus connectivity to Nottingham and Derby exists. Greater reliance on the private car will worsen local congestion on local roads, giving rise to poorer air quality.	Statutory consultees representing highway interests did not flag issues of congestion in their responses. Whilst not specifically requested by DCC Highways, the Council would also expect the production of a TA as part of any future planning application, to demonstrate how any issues and concerns it highlights relating to the flow of traffic on certain sections of highway and the performance of particular junctions (particularly the Millhouse crossroads) are addressed. The area is not subject to an AQMA, and it is unlikely that the modest additional vehicular movements from around 35 homes would necessitate concerns

Representing body	Support Object Comment	Summary of representation	EBC Response
			over worsening air quality in this part of West Hallam to the point where an AQMA is necessary.
West Hallam Parish Council*	Object	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.	Comments noted. However, Derbyshire Wildlife Trust provide information which suggests the potential level of impact from development at this location is low. Notwithstanding, in the event of development, a planning application must be accompanied by detailed ecological survey work which will advise of any necessary mitigation and compensation measures, whilst also informing how BNG will be delivered.
West Hallam Parish Council*	Object	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. Parish Council cites difficulties in obtaining appointments at the local medical centre.	Comments regarding capacity at the local primary school are noted. Housing is already established on the north side of the A609 with residents able to cross to the southern side before walking on to access local amenities. With the required point of vehicular access to the allocation site being set away from the Millhouse crossroads, it is expected that residents of a development at this site would be able to cross the A609 without undue risk.
West Hallam Parish Council*	Object	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.	See Council response to matters regarding highway safety elsewhere within its response to West Hallam Parish Council which addresses this point. The addition of around 35 homes would not typically result in an inappropriate addition of noise.

Representing body	Support Object Comment	Summary of representation	EBC Response
West Hallam Parish Council*	Object	<p>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.</p> <p>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.</p>	<p>The area of Green Belt north of West Hallam was subject of assessment within a systematic review of designation extending throughout the Borough. Designation here was shown to not contribute to all three of the purposes which formed the basis of assessment. The allocation site comprises sizeable paddocks for horse grazing so land not accessible to the public, limiting its contribution to Green Infrastructure. Criterion 2 of SP1.1 requires the maintaining of existing hedgerow and tree belt to retain links to the surrounding countryside. Future residents of the allocation site would only be a maximum of 100 metres further away from local amenities, with many inhabitants not as distant.</p>
Stanley & Stanley Common Parish Council*	Object	<p>Stanley & Stanley Common PC 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 with existing issues of speeding traffic through the villages will not be helped by additional traffic generated by development. Concern expressed about the additional noise generated by the increase in traffic passing through the villages, whilst the 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</p>	<p>Statutory consultees representing highway interests did not flag issues of congestion in their responses. Council would also expect the production of a TA as part of any future planning application (as per the requirement from DCC Highways), to demonstrate how any issues and concerns relating to the flow of traffic and highway safety on specific roads and junctions across the wider functional network would be adequately addressed.</p>

Representing body	Support Object Comment	Summary of representation	EBC Response
		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.	
Stanley & Stanley Common Parish Council*	Object	Concerns about the ability of parishioners to access facilities at the Dales Shopping Centre in West Hallam, the nearest facilities to Stanley & Stanley Common. 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.	See comments immediately above. It would be for a TA's production alongside any future planning application to demonstrate that highway safety would not be prejudiced by development at the allocation site.
Derbyshire Wildlife Trust (DWT)	Comment	The overall potential 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	Comments noted. Council agrees that in the event of development, a planning application must be accompanied by detailed ecological survey work which will advise of any necessary mitigation and compensation measures, whilst also informing how BNG will be delivered.

Representing body	Support Object Comment	Summary of representation	EBC Response
		ecological surveys will be required together with assessments for Biodiversity Net Gain.	
Cllr Carol Hart Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Highways access inappropriate. Millhouse crossroads known as a problem already. Park Hall Lane is very narrow with blind bend and is a safety risk.	Statutory consultees representing highway interests did not flag issues of congestion or safety in their responses. Council would also expect a Transport Assessment as part of any future planning application (as per the requirement from DCC Highways), to demonstrate how any issues and concerns relating to the flow of traffic and highway safety on specific roads and junctions across the wider functional network would be adequately addressed.
Cllr Carol Hart Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Site is prone to flooding as is adjacent land.	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 Statutory Consultee (EA, Severn Trent or Derbyshire County Council (as the Local Lead Flood Authority)) has raised concerns over flooding or drainage in relation to this allocation.
Cllr Robert Mee Erewash Borough Councillor for West Hallam and Dale Abbey	Object	Concern over highway safety. Dangerous to crossroad near Junction to High Lane W/ Station Rd. Site is prone to flooding.	Please see responses immediately above.

Strategic Policy 1.11 (SP1.11) North of Borrowash

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted.
Derbyshire County Council – Highways*	Comment	It is noted that a new vehicular and pedestrian access on Cole Lane will be required to serve the proposed development. It will need to be satisfactorily demonstrated that a safe and suitable access can be provided taking into account the visibility splays required. The development should safeguard Footpath No.1, which crosses the site, as it enables access to the extensive rights of way network north of the A52 as well bus stops and other facilities to the south of the site	Comment regarding forming vehicular and pedestrian access between the site and Cole Lane is noted and supported, as is the need to safeguard PROW1 through the site which Criterion 2 of SP1.11 requires. Whilst DCC Highways do not make any explicit request for the submission of a Transport Assessment as part of a future planning application, this may help to demonstrate how the above aspects can be integrated into a development proposal – particularly in light of comments made by National Highways.
Ockbrook & Borrowash Parish Council*	Object	Two new housing allocations in Borrowash would 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.	Statutory consultees representing highway interests did not flag issues of congestion in their responses. Whilst DCC Highways do not make any explicit request for the submission of a Transport Assessment as part of a future planning application, the production of a TA would help to demonstrate if measures suggested by the Parish Council are required to ensure safe highway conditions – particularly in light of comments made by National Highways in respect of the site's relationship with the strategic road network/A52.
Ockbrook & Borrowash Parish Council*	Object	Concerns were raised relating to healthcare provision within the village. With the two General	The Council has agreed with the Integrated Care Board (ICB) to collect monies on a per dwelling

Representing body	Support Object Comment	Summary of representation	EBC Response
		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.	basis at each allocation, with the financial contributions being used to expand provision at local health facilities in line with an expanded population. 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 considering other infrastructure requirements. The latest Environment Agency mapping data shows the site located within FZ1, with data showing no records of surface water flooding. However, with the allocation site in the vicinity of the Ock Brook, the Council would require a drainage strategy to accompany any future planning application.
National Highways*	Comment	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.	Comment noted. A road safety review is able to be requested by the Council as part of the planning application process and could be combined with a Transport Assessment as suggested by National Highways in their General Comment on the matter.
Derbyshire Wildlife Trust (DWT)	Comment	The overall potential 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	Comments noted. Council agrees that in the event of development, a planning application must be accompanied by detailed ecological survey work which will advise of any necessary mitigation and compensation measures, whilst also informing how BNG will be delivered.

Representing body	Support Object Comment	Summary of representation	EBC Response
		ecological surveys will be required together with assessments for Biodiversity Net Gain.	
Planning & Design Group (Norman Woods)	Support	Landowner agrees with policy provisions at SP1.11 and confirms the site is available within the plan period. Provisions are acknowledged as proportional given the site's context.	Support noted.
Planning & Design Group (Norman Woods)	Support	A planning application is anticipated to be prepared for submission by late 2025 – early 2026. The number of dwellings per annum proposed is achievable and deliverable over the five-year timeframe.	Support noted.
Planning & Design Group (Norman Woods)	Support	The representation agrees with observations and assessments made in the Green Belt Review in respect of the site. They add further support for this site referring to NPPF revisions of Dec 2024, and the introduction of Grey Belt, which they believe the site would qualify as. The site would be prioritised as grey belt in accordance with NPPF Paragraph 148.	Support noted. As the Core Strategy Review is being examined against a prior version of the NPPF as per transitional arrangements, then matters regarding grey belt are not considered to be relevant or material to this.
Marrons (William Davis Homes)	Object	Unlikely to form a safe and suitable access within the current visibility splays. The presence of the A52 Brian Clough Way likely to subject the development to noise, and this constraint does not seem to have been considered in any measure.	A supporting representation from the site promoter on behalf of the developer demonstrates no issues or concerns which cannot be readily resolved or mitigated. SP1.11 requires a suitably designed acoustic barrier; a measure the site promoter concurs with. The Council welcome the opportunity to discuss with National Highways issues around maintaining safe vehicular access onto and exiting the A52 Brian Clough Way in respect of this allocation.

Representing body	Support Object Comment	Summary of representation	EBC Response
Tracy McFadden	Object	The representation highlights that current road infrastructure is not suitable, and the site's location adjacent to the A52 would pose health risks for new population. It also points to the lack of capacity in current healthcare and education facilities in Borrowash and Ockbrook, which will be compounded by the influx of new population.	No specific concerns have been raised by Statutory Consultees in relation to highways or air quality issues. Distribution and allocation of resources to local healthcare providers to be overseen by ICB, who will receive monies from the council via Section 106 agreements.

Strategic Policy 1.12 (SP1.12) West of Borrowash

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted.
Derbyshire County Council – Highways*	Comment	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.	Comments noted. All aspects requested by DCC Highways are made provision for by SP1.12. Council supports the importance of pedestrian links to the east, given Borrowash Local Centre and Ashbrook Infant & Junior School are within close walking distance.
Ockbrook & Borrowash Parish Council*	Object	The heightened potential for the coalescence of Borrowash and Spondon 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	Existing housing development at Manor Road, Borrowash projects closer to inset development within Derby City at Spondon than that which would occur at this allocation, with new housing restricted to the east of PROW41 which passes through the site. Housing at this location would therefore not result in further coalescence. Statutory consultees representing highway interests did not flag issues of congestion in their responses. Whilst DCC Highways do not make any explicit request for the submission of a Transport Assessment as part of a future planning application, the production of a TA would help to demonstrate if measures suggested by the Parish

Representing body	Support Object Comment	Summary of representation	EBC Response
		the junction between Victoria Avenue and the B5010.	Council are required to ensure safe highway conditions – particularly in light of comments made by National Highways in respect of the site's relationship with the strategic road network/A52.
National Highways*	Comment	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.	Comment noted. A road safety review is able to be requested by the Council as part of the planning application process, and could be combined with a Transport Assessment as suggested by National Highways in their General Comment on the matter.
Network Rail*	Comment	No objection to the proposal, but keen to ensure that an appropriate drainage strategy evolves which takes into consideration the impact (if any) on downstream/nearby drainage and the strategically important Midland Main Line (MML). Comments are made within the context of periodic flooding issues which affects the line between Long Eaton and Spondon. The MML's importance is a 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 (SP1.14), and that NR is consulted at such time for their views on the effectiveness of such a strategy. Additional criterion is sought to SP1.12 to deliver a suitable drainage strategy and that any off-site drainage works will be implemented by the development. Whilst existing Saved Policy DC7 addresses flood risk, there is no guarantee that a drainage strategy would consider the wider implications of increased	Comments noted. The Council agree with Network Rail that the continued safe operation of the MML on the section of track through Erewash is important for the wider network's ability to operate. A drainage strategy for each allocation (SP1.12 and SP1.14) would be required as part of any future planning application. At such a stage, the Council would consult with Network Rail to obtain views as to the suitability and scope of such work, allowing for the fact that applications for each site will not come forward simultaneously. Whilst the Council would not be against adding such a requirement as that made by Network Rail to both policies, it is felt that sufficient consultation at the application stage would be able to overcome Network Rail's concerns over any cumulative impact of development on the section of track between Long Eaton and Spondon.

Representing body	Support Object Comment	Summary of representation	EBC Response
		drainage run-off arising from development and its effect on the catchment affecting the Midland Main Line.	
Derbyshire Wildlife Trust (DWT)	Comment	The overall potential 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.	Comments noted. Council agrees that in the event of development, a planning application must be accompanied by detailed ecological survey work which will advise of any necessary mitigation and compensation measures, whilst also informing how BNG will be delivered.
Planning and Design Group (Wheeldon Brothers)	Support	Stresses the importance of a plan being adopted in Erewash to help address major housing shortage issues, whilst offering the development sector the certainty it needs. The comprehensive evidence submitted since the last Hearing Sessions adequately addresses and overcomes the soundness concerns raised by the Planning Inspector examining the Core Strategy Review. Any remaining concerns (none are identified by the representation) should be dealt with through an early Plan review rather than derailing the current Plan.	Support noted.
Planning and Design Group (Wheeldon Brothers)	Support	Agree with Borrowash's identification as a key settlement. Allocation is in accordance with the Plan's spatial strategy and settlement hierarchy. Allocation can clearly point towards a range of	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		walkable key services and amenities with Borrowash an appropriate location for growth.	
Planning and Design Group (Wheeldon Brothers)	Support	Confirms there are no insurmountable technical constraints that would prejudice its development that cannot be appropriately mitigated. State that delivery could occur immediately subject to the Plan's adoption. All amendments to SP1.3 by the Council are supported.	Support noted.
Planning and Design Group (Wheeldon Brothers)	Support	Site access from Derby Road is achievable. The surrounding road network is considered capable of accommodating additional flows without adverse impact in terms of traffic or highway safety. Opportunity to create pedestrian link towards Ashbrook School (via Victoria Ave) to help integrate site into the existing settlement.	Support noted.
Planning and Design Group (Wheeldon Brothers)	Support	Housing allocations have been carried out using a comprehensive and transport process that is based on a robust evidence base. The approach taken is logical and justified, and the reasoning behind allocating the additional sites in the CSR amendment is sound.	Support noted.
Planning and Design Group (Wheeldon Brothers)	Support	The site capacity (280 homes) and proposed area of safeguarded land is supported by the landowner. It achieves an efficient use of land as per the NPPF, whilst being able to deliver a high-quality residential development alongside necessary landscape and environmental infrastructure (inc. BNG).	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
Planning and Design Group (Wheeldon Brothers)	Support	The site is available, suitable, deliverable and viable for residential development. Delivery could occur immediately subject to the Plan's adoption. Provision of 25 dwellings in 2027/28 and 50 dwellings per annum until 2031 is considered a realistic timeframe for delivery.	Support noted.
Marrons (William Davis Homes)	Object	Highlight concerns at infilling a large area of land between Borrowash and Spondon (Derby urban area), thereby creating coalescence issues. The GB Review does not adequately consider this matter, instead looking at broad land parcels and does not present a substantive analysis of the GB sites allocated in the plan.	A supporting representation from the site promoter on behalf of the developer demonstrates no issues or concerns which cannot be readily resolved or mitigated. See Council response to Marrons comments at SP1 – Housing regarding criticisms of approach to Green Belt Review. In terms of coalescence, existing housing development at Manor Road, Borrowash projects closer to inset development within Derby City at Spondon than that which would occur at this allocation, with new housing restricted to the east of PROW41 which passes through the site. Housing at this location would therefore not result in further coalescence.

Strategic Policy 1.13 (SP1.13) East of Breaston

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted.
Derbyshire County Council – Highways*	Comment	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.	Comment regarding forming vehicular and pedestrian access between the site and the A6005 is noted. It will be for any future planning application to demonstrate how this would work, although the site promoter has submitted evidence helping to demonstrate that this is not thought to raise any technical difficulties.
Breaston Parish Council*	Object	Concerns expressed over the loss of Green Belt land and the resulting environmental impact on the affected land. Concern over the threat of Breaston's village character being eroded.	The area of Green Belt east of Breaston was subject of assessment within a systematic review of designation extending throughout the Borough. Designation here was shown to not contribute to all three of the purposes which formed the basis of assessment. Comments from DWT point to a low proposed impact from development, with any necessary mitigation (as well as the requirement for BNG) arising from ecological surveys, thought to be achievable. At the last Census, Breaston Parish was shown to have just short of 2,000 households. The addition of 50 units represents an increase of approx. 2.5% in household number. Such a modest level of increase is unlikely to erode the character of the village.

Representing body	Support Object Comment	Summary of representation	EBC Response
Breaston Parish Council*	Object	Worries over the strain on local services, with village infrastructure deemed to be insufficient to cope with additional demand.	Breaston has been recognised for its range and availability of services and amenities as a candidate Village Centre. The Council, through working with DCC Education to identify necessary contributions to fund any expansion of local schools and the agreement with the Derbyshire ICG to collect monies per dwelling to fund local healthcare provision should give reassurance that the village's planned increases in local infrastructure should be able to absorb an additional 50 homes.
Breaston Parish Council*	Object	The Parish Council 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. 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 Council have demonstrated a thorough approach to identifying brownfield land in Erewash ahead of having to subsequently look to Green Belt locations to contribute towards housing requirements. All major brownfield sites in the Borough have been identified and assessed, with a number of major brownfield development now under construction. Much brownfield land in Erewash struggles to demonstrate viability, and with a significant proportion in ownership which do not want to alter the current land-use, such land could not be deemed to be deliverable or developable. In terms of drainage and flooding, the site exists entirely within Flood Zone 1 of the EA's latest flood mapping. Consultees with a flooding focus (EA, DCC Lead Local Flood Authority and Severn Trent) made no comments in respect to issues regarding flooding, either on the site or on nearby land.

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire Wildlife Trust (DWT)	Comment	The overall potential 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.	Comments noted. Council agrees that in the event of development, a planning application must be accompanied by detailed ecological survey work which will advise of any necessary mitigation and compensation measures, whilst also informing how BNG will be delivered.
Marrons (William Davis Homes)	Object	Difficulties in obtaining sufficient vehicular access to the site are raised due to the surrounding built-up form. Also, a lack of footways along Heath Gardens would make the development car dependent. Insufficient evidence to demonstrate deliverability, and the perceived need for third party land to form access supports this.	A supporting representation from the site promoter on behalf of the developer demonstrates no issues or concerns which cannot be readily resolved or mitigated. Further details about the scale of flexibility which exists to form a safe vehicular access to the site have also been submitted by the site promoter.
Fisher German (on behalf of Stanton Estates)	Support	Site is one of the most sustainable due to proximity to Long Eaton and urban level service provision. Site is unconstrained and development can commence quickly.	Support noted.
Fisher German (on behalf of Stanton Estates)	Comment	Access on Heath Gardens not industry standard so will need to be altered – policy should be less specific in terms of access to ensure multiple options can be considered and informed evidence utilised.	Comment noted. Access Appraisal carried out by HUB Transport Planning confirms alternative options including the widening of Heath Gardens (as mentioned in the comment from HUB below).
Fisher German (on behalf of Stanton Estates)	Support	Allocation of around 50 homes is supported and considered deliverable. Flexibility in wording is	Support noted.

Representing body	Support Object Comment	Summary of representation	EBC Response
		welcomed as it enables pragmatic decision-making at planning application stage.	
Fisher German (on behalf of Stanton Estates)	Support	Additional land and property owned by Stanton Estates can be used to provide alternative access points to the site, which should give sufficient certainty that there is deliverable access to the site to facilitate development.	Support noted.
Fisher German (on behalf of Stanton Estates)	Comment	Adjacent land owned by Stanton Estates so site can be expanded if necessary or allocated as safeguarded land to enable higher housing growth if required.	Comment noted.
HUB Transport Planning	Support	Development of site not expected to have a material impact on the local highway network.	Support noted.
HUB Transport Planning	Comment	Options presented for alternative access to site: widening of Heath Gardens to 5.5m carriageway and installing an internal priority junction with site, or via Holly Avenue where the site owner also owns properties. Either way, existing track access to Derby Road should be upgraded to provide pedestrian and cycle route.	Comment noted.
Cllr Robert Mee EB Councillor for West Hallam and Dale Abbey		Concern regarding flooding.	No comments were received by the Council from those with responsibility for managing drainage and flood risk (EA, DCC Lead Local Flooding Authority or Severn Trent Water), whilst the site itself falls wholly within FZ1. The Council takes the view that the accuracy of Flood Zone maps published by the Environment Agency represent

Representing body	Support Object Comment	Summary of representation	EBC Response
			the most up-to-date and reliable source of evidence that a local planning authority can base its work on plan-making on.

Strategic Policy 1.14 (SP1.14) South West of Draycott

Representing body	Support Object Comment	Summary of representation	EBC Response
Derbyshire County Council – Education*	Comment	Allocation should make a financial contribution to primary and secondary education infrastructure, to be determined in line with Derbyshire County Council's 'Developer Contributions Protocol'.	Comment noted.
Derbyshire County Council – Highways*	Comment	It is noted that vehicular and pedestrian access to the site is to be via the existing Bankfields Farm access on the A6005 Derby Road. It is confirmed that the existing access arrangement will need to be improved to provide an access to adopted highway standards. The provision of a new footway from the site access to the westbound bus stop on Derby Road as well as pedestrian crossing facility of Derby Road to access the eastbound bus stop are essential to encourage sustainable travel. The development should safeguard Footpath No. 4 and encourage links to the PROW to connect into the wider PROW network. A Transport Assessment will be required to support an application which will demonstrate the need, if any, for junction improvements on the wider highway network to mitigate the impact of the additional vehicular trips generated by the development. If junction improvements are required, then the Transport Assessment should demonstrate that these can be satisfactorily provided in a safe and suitable manner.	Council notes the comments regarding highway access and safety made by DCC. It welcomes agreement over aspects of the policy such as the required provision of a footway and safeguarding of PROW4 through the allocation site. Council also supports the requirement of a TA alongside any future planning application.
Draycott Parish Council*	Object	Insufficient prior notification of proposals and consultation with Parish Council, whilst poor timing	No formal requirement to discuss proposals with any parish council prior to an amended CSR being taken to Extraordinary Council. All consultation

Representing body	Support Object Comment	Summary of representation	EBC Response
		of consultation and insufficient length of time allowed for responses.	and engagement undertaken as per the provisions set out by the Council's Statement of Community Involvement (SCI), with consultation arrangements also approved by Extraordinary Council.
Draycott Parish Council*	Object	Loss of agricultural land, the Green Belt's link to the village's heritage and the threat of seeing openness between Derby and Nottingham (and Draycott and Borrowash) reduced.	The area of Green Belt southwest of Draycott was subject of assessment within a systematic review of designation extending throughout the Borough. Designation here was shown to not contribute to all three of the purposes which formed the basis of assessment. Whilst agricultural land would be lost as a result of development, the farm at the centre of the allocation, Banksfield Farm, has been slowly diversifying operations on land in its immediate vicinity. This points to the ongoing lack of viability in the farming and agricultural operations.
Draycott Parish Council*	Object	Considerable evidence of the presence of a variety of animal species within this area, including some protected species.	Comments are noted. Following the information provided by Derbyshire Wildlife Trust (see their response), the Council are confident that given the Low to Medium potential level of impact from development at the allocation, all necessary and appropriate mitigation can be carried out, with compliance to BNG requirements also able to occur.
Draycott Parish Council*	Object	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.	Statutory consultees representing highway interests did not flag this issue in their responses. The Council would however expect the production of a TA, as advised by DCC Highways, as part of any future planning application, to how any issues and concerns relating to maintaining safe highway

Representing body	Support Object Comment	Summary of representation	EBC Response
			conditions at parts of the village would be adequately addressed.
Draycott Parish Council*	Object	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.	The Council has agreed with the Integrated Care Board (ICB) to collect monies on a per dwelling basis at each allocation, with the financial contributions being used to expand provision at the nearest local health facilities in line with an expanded population. The Council notes the comment regarding the availability of capacity in early years education provision. However, the proposal is of insufficient scale to warrant a new secondary-level facility to reduce out-travel from secondary age pupils. The small number of pupils a development of this scale would result in would see only minimal additional travel to nearby schools such as Wilsthorpe or Sandiacre Friesland.
Draycott Parish Council*	Object	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. 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. In addition to the Parish Council's representation, an independent Flood	No comments were received by the Council from those with responsibility for managing drainage and flood risk (EA, DCC Lead Local Flooding Authority or Severn Trent Water), whilst the site itself falls wholly within FZ1. The Council takes the view that the accuracy of Flood Zone maps published by the Environment Agency represent the most up-to-date and reliable source of evidence that a local planning authority can base its work on plan-making on. The submission of a drainage strategy alongside any future planning application would be expected by the Council to show how conditions both on and off-site would not be worsened. The Council acknowledge the

Representing body	Support Object Comment	Summary of representation	EBC Response
		Risk & Drainage Review of the proposed housing allocation site has been undertaken and should also be considered to form part of the representation.	submission of a Flood Risk & Drainage Review of the allocation site. The information contained is complex, and the Council lacks the in-house expertise to be able to make any reasoned judgements over its findings. This would ideally be critiqued by a body whose primary responsibility is the management of flood risk and drainage infrastructure.
Cllr Robert Mee EB Councillor for West Hallam and Dale Abbey	Comment	Concern regarding flooding	Please see response immediately above.
Draycott Parish Council*	Object	Development would erode the feeling of village life, with many residents choosing to move to Draycott to experience a slower pace of life.	This is not a material planning consideration. Planned new development in settlements should instead be considered against factors such as the availability of varying forms of infrastructure and the need to respect the built and natural environment to ensure growth maintains a sustainable balance within existing neighbourhoods.
Draycott Parish Council*	Object	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.	The provision of affordable housing at the allocation site will enable those locally who cannot afford to purchase on the open market an opportunity to stay within Draycott. Where residents of homes at the allocation site are employed is not something that can be controlled by the allocation policy. The scale of development proposed by the allocation is considered acceptable by the Council on the proviso that all criterion of SP1.14 are met, with reference to the findings of the Council's Key Settlements Paper

Representing body	Support Object Comment	Summary of representation	EBC Response
			showing Draycott to have the largest number of retail and leisure units in the proposed Village Centre of all four proposed centres.
Draycott Parish Council*	Object	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.	The SA Framework used throughout the Plan's review was deemed appropriate by the three statutory environmental consultees when consulted at the outset of the Plan's review. This has aided the consistency of SA work at each stage of review, although it is well known that as an element of plan-making, SA is the most subjective part. Notwithstanding this, the framework in which the SA has been conducted within has enabled the Council to test every reasonable alternative put before it, whether that be a potential development site or policy approach, in a balanced, independent manner. It is important to note that whilst other brownfield sites may notionally score more positively than this one, if a site is not deliverable or available then it cannot be considered as appropriate to accept housing growth. In terms of Draycott's general level of sustainability, the Council's Key Settlements Paper makes a case for why Draycott's core of facilities and amenities should be viewed as being commensurate as a Village Centre designation.
Draycott Parish Council*	Object	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.	National Grid, who are undertaking works to enhance the electricity network between Chesterfield and Willington were consulted over the latest changes to the Plan (and the addition of SP1.14), but did not respond. The lack of

Representing body	Support Object Comment	Summary of representation	EBC Response
			response indicates that no concern exists between the proximity of the enhanced power lines and possible future development at the allocation site.
Network Rail*	Comment	No objection to the proposal, but keen to ensure that an appropriate drainage strategy evolves which takes into consideration the impact (if any) on downstream/nearby drainage and the strategically important Midland Main Line (MML). Comments are made within the context of periodic flooding issues which affects the line between Long Eaton and Spondon. The MML's importance is a 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 (SP1.12), and that NR is consulted at such time for their views on the effectiveness of such a strategy. Additional criterion is sought to SP1.14 to deliver a suitable drainage strategy and that any off-site drainage works will be implemented by the development. Whilst 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.	Comments noted. The Council agree with Network Rail that the continued safe operation of the MML on the section of track through Erewash is important for the wider network's ability to operate. A drainage strategy for each allocation (SP1.14 and SP1.12) would be required as part of any future planning application. At such a stage, the Council would consult with Network Rail to obtain views as to the suitability and scope of such work, allowing for the fact that applications for each site will not come forward simultaneously. Whilst the Council would not be against adding such a requirement as that made by Network Rail to both policies, it is felt that sufficient consultation at the application stage would be able to overcome Network Rail's concerns over any cumulative impact of development on the section of track between Long Eaton and Spondon.
Derbyshire Wildlife Trust (DWT)	Comment	The potential 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 Council notes the comments made by DWT from their representation and also notes the assessed potential risks posed to ecological assets by development. DWT highlight the potential for habitats of greater value to be

Representing body	Support Object Comment	Summary of representation	EBC Response
		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.	present, including woodland on-site. An indicative masterplan, submitted by the site promoter, shows the retention of the woodland area to the east of the Bankfields Farm complex. Nevertheless, DWT's comments are important in highlighting impacts on species, particularly the bird assemblage, and detailed ecological surveys can further investigate this in order for a future application to make provision for adequate mitigation and compensation measures – as well as meet BNG requirements.
Advance Land and Planning Ltd on behalf of Seabridge Developments Ltd (SDL)	Support	Fully supports the allocation policy, and highlights findings of Sustainability Appraisal (SA3) which ranks the site as third best of within latest call for sites as set out in Table 10.	Support noted.
Advance Land and Planning Ltd on behalf of Seabridge Developments Ltd (SDL)	Support	Site is deliverable with both sections falling within same delivery agreement. Further evidence base work to support its deliverability has been undertaken including: a Topographical Survey, Landscape and Visual Appraisal, Flood Risk and Drainage Preliminary Drainage Strategy, Preliminary Ecological Statement, Access Feasibility work, Historic Environment and a Concept Plan.	Evidence base noted.
Advance Land and Planning Ltd on behalf of Seabridge Developments Ltd (SDL)	Comment	Welcomes the inclusion of safeguarded land in principle but seeks to expand this eastwards to include land up to Hall Farm. Considers that safeguarded land should be provided within the context of the latest version of NPPF (2024) and	Support noted. With regard to the proposed change, it should be noted that the Core Strategy Review is being examined against NPPF 2023 and as such it would be premature to take this course of action.

Representing body	Support Object Comment	Summary of representation	EBC Response
		the latest practice guidance which would justify the increase. Erewash's future housing need under revised standard method is significantly higher (approx. 39%) than the need this CSR is expected to meet. It will therefore be necessary for the council to undertake an early review of this emerging document. This is underlined further by the Local Government Reorganisation process which will delay in production of a new development plan document.	
Advance Land and Planning Ltd on behalf of Seabridge Developments Ltd (SDL)	Comment	Regarding Area B of Green Belt Review p93. Agrees that it would help round off the village, however, disagrees with conclusion regarding its contribution to the purposes of the Green Belt. Considers that the site falls within the definition of Grey Belt as per NPPF 2024 and should be safeguarded land to meet future housing need.	The council considers the findings of the Green Belt Review to be robust and do not need revisiting.
Advance Land and Planning Ltd on behalf of Seabridge Developments Ltd (SDL)	Comment	Commercial properties on Banksfield Farm should remain undesignated but included within a modified development boundary so not to prejudice its future development should it become available ahead of subsequent local plan review.	It is considered that including this part of the site within the safeguarded land does not prejudice its future development.

Strategic Policy 2 - Employment

Representing body	Support Object Comment	Summary of representation	EBC Response
Iceni Projects (GLP)	Object	Object to the amendment of the CSR on the basis that it doesn't include proposed amendments to the employment strategy as set out in SP2, so previous objections to grounds of soundness have not been addressed.	The Council's evidence produced since Hearing Session's (Erewash Strategic Logistics Update Report (ESLUR) – March 2025) makes the case as to why no amendments are necessary to the strategy that is presented by SP2. It is not felt that this is a legitimate objection, and does not add to existing objections by Iceni to the Core Strategy Review.
Iceni Projects (GLP)	Object	Queries whether the ESLUR should be accepted as an additional evidence base document at this stage of the Examination process.	In light of criticisms levelled at the Council's approach to how it has planned for logistics development prior to, and during the June 2024 Hearing Sessions, it reserves the right to keep under review information and data impacting upon the logistics sector which is materially significant in continuing to justify the Council's position in respect to its wider employment strategy. It is a matter of fact that the ESLUR is additional evidence before the Examination.
Iceni Projects (GLP)	Object	A number of concerns are raised insofar as the use of common evidence (EBE1 & EBE2) and the extent to which this has influenced the Council's position in planning to meet employment needs. Promoter cites the continued use of jointly commissioned Logistics evidence by the other Nottingham Core HMA councils continuing to provide the evidence underpinning an employment strategy within their own plan, suggesting that cooperation between councils is impacted by EBC unilaterally diverging from the evidence and joint	These concerns are not shared by the Borough Council's Duty to Cooperate partners in the Nottingham Core HMA, whose attention was specifically drawn to this additional evidence through the recent consultation and who chose to offer no comments upon it.

Representing body	Support Object Comment	Summary of representation	EBC Response
		approach previously adopted by all Core HMA councils. This calls into question the effectiveness of cooperation across the HMA to deliver identified strategic land needs.	
Iceni Projects (GLP)	Comment	Reiterate the significant demand for logistics development within the M1 corridor up to J28. Promoter cites evidence from detailed property market analysis, whilst also flagging the drivers of demand, with e-commerce suggested as not having plateaued post-COVID which continues to drive the demand for logistics premises.	As stated in the ESLUR, existing provision across the two HMAs (Core & Outer) is adequate to meet evidenced need. No exceptional case to justify release of Green Belt for strategic logistics has been proven.
Iceni Projects (GLP)	Comment	Commentary is provided on rental levels within the Midlands, with these continuing to grow for prime space, albeit at a slower rate than the peak level seen during COVID. Analysis submitted suggests that continued growth in logistics needs across the country, added to the geographical benefits of the East Midlands will continue to drive the need for new space in the region and in the M1 corridor.	As stated in the ESLUR, existing provision across the two HMAs is adequate to meet evidenced need. No exceptional case to justify release of Green Belt for strategic logistics had been proven.
Iceni Projects (GLP)	Comment	Iceni provide information to suggest the need figure for strategic logistics within the HMA remains robust. Cites the role of the Green Belt in suppressing historic completions and net absorptions. Resulting lowering of rates are not an accurate reflection of likely future market need. Factoring in the replacement of ageing stock and an appropriate vacancy rate, the preferred range of floorspace is still considered as accurate. A number of the sites identified in the ELSUR should	As stated in the ESLUR, existing provision across the two HMAs is adequate to meet evidenced need. No exceptional case to justify release of Green Belt for strategic logistics has been proven.

Representing body	Support Object Comment	Summary of representation	EBC Response
		be discounted due to reasons set out at Appendix 3 of the representation.	
Iceni Projects (GLP)	Comment	Greater Nottingham evidence identifies unmet need of 78-94ha after allocations and commitments are factored in. Iceni query what support Erewash has in presenting its own evidence, or whether it undermines the evidence on logistics prepared and used by the other Core HMA councils. Iceni suggest a residual unmet need of 97-216ha exists, with Erewash well placed to meet strategic logistics development. Needs must be taken account of in order for the Plan to be positively prepared and justified.	As stated in the ESLUR, existing provision across the two HMAs is adequate to meet evidenced need. No exceptional case to justify release of Green Belt for strategic logistics has been proven.
Iceni Projects (GLP)	Object	Concern that the Green Belt Review (GBR) undertaken by the Council is significantly flawed and does not provide an appropriate basis for informing policy decisions regarding GB release. A number of criticisms are levelled at the GBR, with it suggested that multiple stages of assessment are required and that the assessment methodology is flawed. Promoter suggests the assessment is wholly inconsistent with the PPG relating to GB reviews. A lack of scoring system and lack of clarity over conclusions means the work does not provide a sound basis on which to inform the Plan.	The GBR is considered to represent a robust and comprehensive assessment of the Borough's Green Belt. Taking a systematic approach, the GBR provides a pragmatic overview of the role and function of designation, focusing on the three purposes which are held to be relevant and appropriate. Criticisms of the GBR are considered unfair. The GBR was undertaken in accordance with the policy set out in NPPF 2023 under which this plan is being examined, and not the PPG released to advise criteria for reviewing Grey Belt under NPPF 2024. It is worth noting the support received by the Council in other representations from other site promoters in respect of the appropriateness of the GBR and the methodology it is founded upon.

Representing body	Support Object Comment	Summary of representation	EBC Response
Iceni Projects (GLP)	Object	Council has not provided any evidence regarding Exceptional Circumstances (EC) to justify release of the Green Belt in accordance with Paras 140-141 of the 2021 NPPF. Promoter is of the view that ECs exist in respect of the need for strategic logistics development and the unmet need as stated elsewhere in the representation.	All available and deliverable brownfield sites in Erewash have been considered, as first set out in the 2020 Options for Growth Consultation and at all subsequent stages of the plan's preparation. The Council cannot meet its objectively assessed housing need using brownfield land and permitted sites alone. This constitutes the exceptional circumstances required for the release of Green Belt land to meet housing needs. Sites were allocated in accordance with the Spatial Strategy. More information can be found in the Site Selection paper which forms part of the Evidence Base Library. The Council maintains, as presented by its evidence in respect of the need for strategic logistics development (ELSUR), that there is no case for the release of Green Belt land to facilitate development of logistics floorspace.

Strategic Policy 2.1 – Stanton North

Representing body	Support Object Comment	Summary of representation	EBC Response
		No representations were received in response to this part of the Core Strategy Review amendment.	

Strategic Policy 3 – Town, Local & Village Centres

Representing body	Support Object Comment	Summary of representation	EBC Response
		No representations were received in response to this part of the Core Strategy Review amendment.	

Strategic Policy 4 – Transport

Representing body	Support Object Comment	Summary of representation	EBC Response
		No representations were received in response to this part of the Core Strategy Review amendment.	

Strategic Policy 5 – Green Infrastructure

Representing body	Support Object Comment	Summary of representation	EBC Response
Carney Sweeney (Peveril Homes)	Object	The Green Infrastructure Technical Paper (GI Paper) prepared in support of Strategic Policy 5 does not take into account land ownership or availability across the allocated green infrastructure corridors. This poses questions about the effectiveness of the policy, as the Council could not make certain that the four objectives would be achieved where parts of the Nutbrook GI corridor include land in private ownership. Land at Thacker Barn is one such example of this.	The Paper does not set out to assess the contribution of individual land parcels to GI purposes set out in SP5, including land ownership and availability. Instead, the Paper seeks to justify the extent of land designated. When taken as a whole, the corridors are understood to contribute strongly to the four purposes outlined in Strategic Policy 5. Land ownership does not preclude GI function. Furthermore, Strategic GI corridors do not rely on land coming forward, as the bulk of designated land already contributes strongly to purposes of GI. Extension of corridors to key locations such as West Hallam Storage Depot represent areas of future opportunity whereby suitable proposals would enhance areas as multifunctional corridors.
Carney Sweeney (Peveril Homes)	Object	The GI paper indicates that the SP5 intends to act as another level of policy to 'control' development. As such, the site promoter is opposed to designation of their land at Thacker Barn as within the Strategic Green Infrastructure Corridor (SGI).	Wording in the GI Paper identified here is not considered to indicate the SGI corridor seeks to 'control' development. Instead, GI corridors seeks to safeguard areas and promote their importance in delivering environmental, social and economic benefits in line with the four objectives. This also promotes opportunities to explore ways to enhance the area's performance against the four objectives, with support from relevant stakeholders with an interest in GI issues, as well as assist with bidding for potential sources of funding. Land ownership does not preclude GI function. SP1.5 presents a positive management plan which contributes to the existence of a legible green

Representing body	Support Object Comment	Summary of representation	EBC Response
			infrastructure network in Erewash, and follows principles set by the Greater Nottingham Planning Partnership, for which the BGI strategy considers both private and public land to perform important roles in a multifunctional connected ecosystem network.

Other Sites

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
Parcels of land at former Oakwell Brickworks, Ilkeston	Turleys (for Tata Steel)	Comment	Refers to land which is the subject of two active planning applications for new housing on parcels in Tata Steel's ownership. Details of the proposals are included (Parcel A – 82 homes, ref ERE/1124/0050 and Parcel B – 16 homes, ref ERE/1124/0039). Both sites are part of the Ilkeston built-up area. The preferred location as part of the Ilkeston urban area ('the town') is cited, with the SA work demonstrating the sustainability of growth in this location. The Council's preference for development in this location has been shown through long-standing discussions with site promoters with the intention of bringing the two parcels of land forward for new housing development. Turleys call for the amended Core Strategy Review to be clearer that sites within the Ilkeston Urban Area (UA) are spatially preferable and the principle of residential development is acceptable. Allocating both sites would ensure clarity and help understand how many homes would be delivered from sites within the urban area. The live status of the applications reaffirms the deliverability of both sites. If allocations are not deemed suitable, Turleys call for additional text to confirm that residential development on sites in the Ilkeston UA is acceptable in principle, thus creating more certainty to those engaged in the development plan process.	Comments are noted. Representation correctly acknowledges the general principle for residential development afforded to locations within the Ilkeston urban area. This extends a long-standing policy aim of the Council which has prevailed across several iterations of Local Plan prepared for the Borough, with conditional support in place for redevelopment opportunities within each of the two main towns. Whilst allocations for each of the parcels could bring greater clarity in some respects over site capacities, an allocation may remove some flexibility through the imposition of criterion which adversely impacts on the ability to successfully bring forward each site to deliver much-needed new housing. A strong policy steer towards urban concentration over the last two decades has seen the Council adopt a pragmatic approach to redevelopment of sites within urban areas, by loosening the policy requirements around them. The Council take the view that the direction established through SP0 and SP1 provide sufficient scope to continue to encourage redevelopment opportunities within areas that SA work reaffirms are sustainably preferable spatial locations for growth within Erewash.

Rejected Sites

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
Land North of Croft Lane, Breadsall	Jon Imber (JMI Planning)	Comment	Site CSR-0006 immediately to the north of North of Breadsall Hilltop (SP1.8) allocation should also be included as an allocation. States that the site does not fulfil the three functions of Green Belt assessed in GBR and can be brought forward and developed quickly, independent of North of Breadsall Hilltop.	Site CSR-0006 in EBC's Sustainability Appraisal (SA) refers to the Land South of Croft Lane and so this rep has been interpreted as referring to that site, and not the North of Croft Lane as stated. Whilst it is true that the site CSR-0006 is within Countryside Unit 2 which was deemed by the Green Belt Review not to fulfil all three functions assessed, the parcel referred to sits to the north of the Great Northern Greenway which forms a strong physical barrier between it and the North of Breadsall Hilltop allocation. It is therefore not a natural extension of the allocated site. The site scored poorly in the SA due to its proximity to Croft Wood RIG (LWS) and because the separation of the site from substantial service and employment centres, would mean a more intensive use of private vehicles by residents of any housing development. Furthermore, the status of Breadsall in the plan's settlement hierarchy demonstrates other larger settlements are more appropriate locations for housing growth with new development not required to be delivered at settlements at this tier (G(ii)).
Land West of Hopwell Road, Draycott	Mair Land & Planning Consultants Ltd	Comment	33-acre site proposed is available and deliverable. Removing site from Green Belt could deliver 200-250 homes and land for community benefit. Mair believe the site does not meet any of the five purposes of the Green	The site referred to sits within Countryside Unit 13 and was assessed by the Green Belt Review as having 'reasonably strong countryside character' and that development here could encroach on the countryside.

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
			Belt and should be considered as an allocation. Local services of Draycott are within walking distance of the site.	Additionally, the site's southern border is the Derby to Nottingham mainline railway which provides a strong defensible boundary to the north of the village of Draycott. Green Belt here plays an important role in stopping the northern sprawl of Draycott into open countryside. This site was not submitted in the call for sites but two sites adjacent (one to the east and one to the west –CSR0008a and CSR0008b) were and both scored poorly in the SA and considered unsuitable for allocation. This was mainly due to the land fulfilling all three functions of Green Belt assessed.
Land West of Dale Road	Fisher German (on behalf of Bloor Homes)	Comment	The proposed site (CSR-0041) would be an 80-dwelling extension to the North of Spondon (SP1.4) allocation. Could be delivered quickly and increase land supply buffer. Site is considered to be one of the most sustainable available and should be allocated. Accepted that development would lead to some encroachment on the countryside but considers the site's contribution to Green Belt to have been overestimated. Consultee notes that Derby urban fringe allocations have been assessed in a different way to other sites and that urban fringe growth should be considered on a consistent basis. Assessment of land is unjustified.	It is acknowledged that the site scored well in the Sustainability Appraisal, however the area of Green Belt the site is part of is considered to serve a necessary function in keeping the urban sprawl of a large built-up area in check. The proposed site would extend development along Dale Road in a linear fashion towards Kirk Hallam and, therefore, also risk the merging of towns. The Green Belt Review was a systematic review of how the Green Belt functions in the borough and was not undertaken on a site-by-site basis. The methodology used for the GBR is considered sound and therefore its conclusions justified.
Land East of Morley Road	Fisher German (on behalf of Bloor Homes)	Comment	The proposed 280-dwelling site (CSR-0042) could be delivered quickly and would make a significant contribution to the housing supply in	The site scored poorly in the Sustainability Appraisal due to the scale of change having a potentially significant impact on the character of

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
			the Borough. Considers the area performs poorly against Green Belt purposes, particularly as it is a relatively small part of the area assessed by the GBR, so should be allocated.	the landscape in that area. Also, the traffic generated by the site would likely have a negative impact on how adjacent junctions and the road network would function for motorists and pedestrians. Additionally, the site is located within Countryside Unit 4 in the GBR, and this is a significant proportion of the Borough's central Green Belt area, performing an important role in safeguarding the countryside from encroachment at several locations towards the centre of the borough. The eastern section of the proposed site also falls within a sensitive area which serves to prevent the merging of towns.
Land South of Moor Farm Training Centre	Fisher German (on behalf of Bloor Homes)	Comment	The site (CSR-0043) is adjacent to the Acorn Way proposed allocation (SP1.3), on the opposite side of Acorn Way itself, and would extend built form in line with Moor Farm Training Centre. Site is contained, deliverable, and sustainable. Proposes that the site performs only a minor role against the three Green Belt purposes assessed and should be allocated.	This site also scored poorly in the SA and, as with Land East of Morley Road above, the site's location within Countryside Unit 4 means that it is part of an area of Green Belt that plays an important part in restricting urban sprawl. Additionally, the position of Acorn Way forms a strong defensible boundary that contains any further eastward expansion of Derby's urban area. The proposed site's allocation would breach that boundary and is therefore considered unsuitable for development.
Land off Draycott Road, Breaston	Carney Sweeney (Peveril Homes)	Comment	Site 85.61ha in size. Submitted to Call for Sites in 2024 as single combined site comprising four separate parcels of land. Taking into account the need for a defensible Green Belt boundary and technical matters, an overall housing yield across the combined site would see approx.	Comments noted. The Council, recognising the spatial layout of the land parcels put forward, assessed the parcels through the Sustainability Appraisal in a manner which reflected both the geography of the overall site, with land in other ownership separating other parcels under the

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
			995 homes delivered across a developable area of 41ha. The CSRA and associated evidence base documents present the site in a different configuration to that intended by the site promoter. The relevant passages from the Council's Site Selection Paper are cited, covering sites CSR-0008a, CSR-0008b & CSR-0046. However, the Council's assessment of the site appears to be done on the basis of combining Phase 1 & 2 and then Phase 3 & 4. Concern that the site does not appear to have been assessed as a combined site and individual parcels that could be delivered in a phased approach. This has also had an impact of the site capacities, which subsequently do not align with the details submitted. This should be reviewed for consistency by the Council.	control of the client, as well as the land under the control of Peveril Homes. This differed from the Phasing Plan supplied by the site promoter with the Council choosing to assess land based on current ownership arrangements. Whilst the Council notes the comments regarding the approach, the highly negative scores attributed to each of the three areas after the assessment of land as part of SA work must be noted. The scale of negative score suggests that even with an assessment in-keeping with the client's preferred configuration of land, scores and the eventually ranking of sites would have been largely consistent with what is presented within Table 10 of the SA summary document.
Land off Draycott Road, Breaston	Carney Sweeney (Peveril Homes)	Comment	Summaries of the Council's Green Belt Review findings in relation to the client's site are provided by the site promoter. Land within Phase 1 has been assessed as making a limited contribution to checking the unrestricted sprawl of the Breaston built-up area. There is therefore an opportunity for this parcel to come forward in this plan period. Further to this, Phase 1 and the wider parcels are located in a sustainable location and would align with SP0's Settlement Hierarchy where Breaston is identified as a Key Settlement where growth is being directed.	The Council notes the contribution that land within Phase 1 has been assessed as making to the overall role and function of Green Belt. However, notwithstanding the findings of the Green Belt Review, the conclusion reached in the assessment of CSR-0046 (which Phase 1 is contained wholly within) shows the poorest scoring site of all 44 new site appraisals tested as part of updated work to the SA. The lack of all-round sustainability demonstrated by the SA assessment indicates that despite Green Belt considerations and the spatial location enjoyed by the site, the location is not suitable to accommodate new growth.

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
Land at Grange Farm, Breaston	Carney Sweeney (Peveril Homes)	Comment	A site of 2.88ha in size. Representation cited commentary from the Site Selection Paper (SSP) explaining how the site has been assessed through the last stage of the Core Strategy Review's amendment. It is noted that the Council acknowledge the generally positive score assessed to the site from the SA assessment, ranked 7 of all assessed sites. As stated in the SSP, the reason for omission is the site's assessed performance against the criterion set out within the Green Belt Review. Extracts of GBR assessment relating to the individual sites is included. Promoter considers that the site makes limited contribution to checking the unrestricted sprawl of the Breaston built-up area. The M1 is cited as a defensible boundary which would prevent the joining of Breaston to the Long Eaton built-up area. Also cited is Breaston's sustainability as a Key Settlement, and its accessibility to nearby major urban centres. The findings of the SA and the promoter's view that not all Green Belt purposes are met by designation here reaffirm the suitability of the site as an allocation.	The Council acknowledge the site's status derived from the systematic assessment carried out by the Green Belt Review. This sees the Grange Farm included within an area of GB designation which has been assessed as not fulfilling all of the three purposes of GB utilised by the review. However, in terms of the site's relationship to the matter of separation, the linear form of built-up, inset areas stretching between the urban areas of Long Eaton and Derby (comprising several small and varying sized gaps) would see development of the site contribute to the merging of neighbouring towns (LE & Derby). The GBR at p69 provides further reasoning and analysis as to why consideration of separation maintains such heightened significance and importance in understanding the impact arising from development at this location and the Council's subsequent decision to reject allocating the site.
Land at Thacker Farm, NW of Kirk Hallam	Carney Sweeney (Peveril Homes)	Comment	A site 63ha in size. Disagree with the Council's previous decision to reject this site on Green Belt separation grounds between Kirk Hallam and West Hallam Storage Depot, as consideration should be given to the functionality of the latter. The SSP commentary for the site is included. Site promoter cites the positive score assessed to the site in the latest	The Council is of the view that the rationale for not allocating land at this location is robustly and effectively summarised by commentary which is included in the Site Selection Paper. This relates to the provision of infrastructure and maintaining the development viability of growth in this part of the Borough. The successful implementation of SP1.5, with a

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
			SA update, linking it to wider commentary over what constitutes a sustainable site. Concern that the SA hasn't been the basis for overlooking the site, rather that it cannot deliver a relief road. With this a requirement of SP1.5, assessment of the Thacker Farm site appears to be made on the basis of a comparative exercise against another parcel of land which should not be the case. Assessment should be on the basis of the site's merits and evidence base.	relief road to manage traffic flow across the immediate road network, may (without prejudice) allow scope to consider the suitability of land at this site for new housing within a future plan review.
Land at Thacker Farm, NW of Kirk Hallam	Carney Sweeney (Peveril Homes)	Comment	Extracts of the Green Belt Review as relevant for the land are included. Mention is made of the partial area of the site which falls outside of land which is assessed as contributing to the separation of Derby and Ilkeston urban areas.	Comments are noted.
Land at Thacker Farm, NW of Kirk Hallam	Carney Sweeney (Peveril Homes)	Comment	Reiterates the site's sustainable location, abutting Kirk Hallam and close to existing services and transport links. Principle of Kirk Hallam accepting growth is set through SP1.5, and development of this site can accommodate additional growth whilst offering the ability to extend the proposed relief road through to the A609. As a consequence of the SA's positive score and the GBR not being a determining factor in the Council's reasoning for rejecting this site, this parcel of land should be considered for allocation, aligning with the settlement hierarchy at SP0 given Kirk Hallam's status as part of the 'Town: The Ilkeston Urban Area'.	The Council reiterates the comments made above in response to points raised regarding the suitability of its evidence. It notes the promoter's mention of the longer-term potential to extend the relief road required by SP1.5 further northwards to connect to the A609, but the Council would see the potential for this to be considered as part of a future review of the Plan in line with adequate infrastructure capacity planning.

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
Land to the north of Croft Lane, Breadsall	Carney Sweeney (Peveril Homes)	Comment	A site 4.1ha in size. Located in close proximity to Breadsall and the administrative area of Derby City. No reference is made to the site in the amended Core Strategy Review and associated evidence base documents, nor mention in the Site Selection Paper. Promoter would welcome the Council's clarification on this matter.	The omission of this site from consideration in evidence such as the Sustainability Appraisal update or the Site Selection Paper is a reflection of the site's spatial status. As explained at 3.4 of the SA Summary Paper, sites which were re-submitted in a similar or identical format to previous submissions made earlier in the Plan's review were not subjected to re-appraisal. The site north of Croft Lane (SGA24) fits this circumstance. The SA Summary Paper goes on to state at 3.4.1 that previous SA assessments which remain unaffected (such as this site's) continue to form part of the work appraising the Plan as a whole. It should be noted that SGA24's assessment returned a score of -20 which is a more negative outcome than all new or revised assessments, demonstrating the poor level of sustainability displayed by the site. The site's omission from the SSP reflects the methodology utilised by the exercise which saw promoted sites as part of extensions to 'other settlements' not subject to consideration due to non-conformity with the preferred spatial growth distribution.
Land to the north of Croft Lane, Breadsall	Carney Sweeney (Peveril Homes)	Comment	Representation identifies extracts of the Green Belt Review as they relate to the site but identify that the site forms part of an area which the GBR concludes does not fulfil all three of the purposes assessed as part of the work. The representation discusses the status of Ockbrook as an 'Other Settlement' in SP0.	The Council notes the outcome of the GB Review in respect of this site. However, the promoted land represents an extension to a settlement which has been identified as fulfilling the status as an 'other settlement' as per SP0 (an outcome supported by the work of the SA update and the Erewash Settlement Paper). As

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
			Reference is made to the allocation North of Breadsall Hilltop (SP1.8) which demonstrates the existence of a social and economic relationship between Breadsall and Derby. The close proximity of the site to Ockbrook and Derby City reaffirms sustainability in an area where growth is being directed to via Green Belt release.	such, the site's location adjoining Breadsall is not spatially preferable when considering the suitability of new housing growth.
244 Victoria Avenue, Ockbrook	Tracy McFadden	Object	Land at 244 Victoria Avenue incorrectly identified as greenfield land and paddock in the SA and the 2022 SHLAA. There is no evidence to support these classifications, which are misleading. The site was previously excluded from SHLAA housing tranches due to its Green Belt status.	The Council acknowledge an oversight in the classification of the land in question. However, modest adjustments to the score involving greenfield development would make a negligible difference to the overall ranking of the site. Furthermore, the status of Ockbrook in the plan's settlement hierarchy demonstrates other larger settlements are more appropriate locations for housing growth with new development not required to be delivered at settlements at this tier of the hierarchy (G)(ii).
Sowbrook Lane, Stanton	Harris Lamb (Wulff Asset Management)	Object	The Council has not shown that all non-Green Belt sites in Erewash Borough have been exhausted and considered for allocation. Without allocation of Sowbrook Lane, NPPF exceptional circumstances (para 141) will not have been demonstrated.	The Council is of the view that all available and deliverable brownfield sites in Erewash have been considered. The site in question was the subject of a Planning Inquiry in 2023 where housing proposals were adjudged to be inappropriate and unsustainable development, despite its non-Green Belt status. Furthermore, the site was considered and assessed through the SA as one of a wide number of reasonable alternatives, where it returned a lower score in comparison to allocated Green Belt sites. The

Site	Representing body	Support Object Comment	Summary of representation	EBC Response
				approach to site selection is explained in further detail within the Site Selection Paper.
Land North of Cotmanhay (previously Strategic Policy 1.6)	Planning and Design Practice Ltd on behalf of Nurton Residential Ltd (NRL)	Object	Site should not have been removed from the Core Strategy Review. Disputes the council's conclusion regarding lack of progress. Site is considered deliverable and progress has been made with regard to ownership and promotion. Until recently the land had not been registered but the site and woodland is now in 3 ownerships but all within the same family. A land promoter has agreed in principle to heads of terms for the site's acquisition and an exclusivity agreement is due to be signed imminently. Site is sustainable, accords with the evidence base, and should remain in the Core Strategy Review Document.	Update is noted however council is of the same view regarding the site's deliverability. Furthermore it is evident that there is still no housebuilder engaged after 5 years.
Land North of Cotmanhay (previously Strategic Policy 1.6)	Planning and Design Practice Ltd on behalf of Nurton Residential Ltd (NRL)	Object	Erewash housing need is significantly higher under the new NPPF, which exceeds the Core Strategy Review requirement. Once the plan is adopted, the Council will need to work immediately on a new plan under the higher figure.	This is not relevant as the plan is being examined under provisions of 2023 NPPF. Council is aware regarding situation post adoption, but this is not reason to allocate the site in the CSR.
Land North of Cotmanhay (previously Strategic Policy 1.6)	Planning and Design Practice Ltd on behalf of Nurton Residential Ltd (NRL)	Object	Under the new NPPF the site could feasibly qualify as grey belt as a such should be prioritised over the release of other Green Belt locations.	Grey Belt provisions do not apply to the Core Strategy Review which is being examined against earlier version of NPPF.

Comments on Evidence Base (SA, Green Belt Review, Infrastructure Delivery Paper etc.)

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
Sustainability Appraisal (SA)	Carney Sweeney (Peveril Homes)	Comment	Flags the alterations made to Option G of the growth options, involving the testing of two new sub-options which assess the sustainability of growth at villages with a designated/proposed centre and villages without. Council have acted in response to a situation which sees limited available brownfield land exist in the Borough and difficulties in meeting a 5YLS, with growth assessed adjoining the villages to ensure other opportunities are taken into consideration. SA has now undertaken further assessment of Option G as part of testing reasonable alternatives, and on this basis, do not disagree with this approach or the findings of this assessment.	Comments noted and support over approach to additional SA work welcomed.
Sustainability Appraisal (SA)	Boyer Planning (Barratt David Wilson Homes North Midlands)	Support	Support the SA methodology used by the Council. Highlights that the SW of Kirk Hallam (SP1.5) scored well in the appraisal, with unique benefits, of relief road. When considered against the additional sites in the SA3 update, SGA25 South West of Kirk Hallam is considered to be the most sustainable greenfield site proposed to be allocated.	Support noted.
Sustainability Appraisal (SA)	Green 4 Planning (Bellway)	Object	There are various inconsistencies in how scores were applied in the Sustainability Appraisal (SA). When compared to West of Borrowash and North of Borrowash sites, East of Cole Lane scores considerably lower overall, with critiques of individual scores. This, despite	The Sustainability Appraisal was carried out in a consistent and proportionate manner. The Council have continued to utilise a SA Framework throughout the course of the Plan's review in testing new sites brought to the Council's attention in the autumn 2024 Call for

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
			being attached to a key settlement with access to the same services, facilities and transport network. The representation notes that only 3 assessments were looked at, raising questions about the overall reliability of the SA.	Sites exercise. The SA Framework was deemed appropriate by the three statutory environmental consultees when consulted at the outset of the Plan's review. The scoring applied to site and policy assessment is explained within the SA summary document at p15 and p16, with commentary of all objectives clear and consistent. The council is of the view that the SA work in its entirety is a robust and consistent piece of work which has appropriately guided the development of the Core Strategy Review and its amendment.
Sustainability Appraisal (SA)	Green 4 Planning (Bellway)	Object	The representation states that the promoter's site (East of Cole Lane) would score higher overall if taking into account the updated illustrative masterplan.	The Sustainability Appraisal (SA) can only take into account supporting documentation and information submitted at the 2024 Call for Sites, which formed the basis for the SA's update. Despite its production against a consistent framework of objectives and criterion, the SA will always be subject to a small degree of subjectivity. There is no rational reason to believe the site would score significantly higher upon re-appraisal.
Sustainability Appraisal (SA)	Green 4 Planning (Green 4 Development)	Object	The Sustainability Appraisal (SA) applies excessively negative scoring to the sites Hopwell Hall and Ockbrook Cricket Club. Scoring for these sites is inconsistent when compared to other site assessments. No plan showing all assessed sites is available.	A consistent and proportionate SA framework was utilised throughout the course of the Plan's review in testing new sites brought to the Council's attention in the autumn 2024 Call for Sites exercise. The SA Framework was deemed appropriate by the three statutory environmental consultees when consulted at the outset of the Plan's review. The scoring applied to site and policy assessment is

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
				explained within the SA summary document at Pages 15 and 16, with commentary of all objectives clear and consistent. Maps of all rejected assessed sites are available, to be viewed alongside the Policies Map.
Sustainability Appraisal (SA)	Green 4 Planning (Green 4 Development)	Object	Sustainability Appraisal scoring is inaccurate as it does not consider all submitted supporting information provided through the Local Plan and Call for Sites processes. The SA site assessment for Ockbrook Cricket Club does not take into account the landowner's provision for the club for on land elsewhere near Ockbrook, with improved facilities.	The SA can only take into account supporting documentation that was submitted at the Call for Sites stage undertaken in autumn 2024. Plans relating to the relocation of Ockbrook Cricket Club were only submitted as part of the representation made in response to the CSR amendment in May 2025. SA scores reflect all available information, and a site's individual merits. In any case, re-appraisal of the site alongside recently submitted evidence is likely to only make a negligible difference to the overall score.
Sustainability Appraisal (SA)	Harris Lamb (Wulff Asset Management)	Object	The representation identifies a series of inconsistencies with scoring in the Sustainability Appraisal (SA) and assert that the promoter's site (Sowbrook Lane) should score more positively. It provides a list of objective questions deemed to be scored unfairly or inaccurately.	The Council have continued to utilise a SA Framework throughout the course of the Plan's review in testing new sites brought to the Council's attention in the autumn 2024 Call for Sites exercise. The SA Framework was deemed appropriate by the three statutory environmental consultees when consulted at the outset of the Plan's review. The scoring applied to site and policy assessment is explained within the SA summary document at Pages 15 and 16, with commentary of all objectives clear and consistent.

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
Sustainability Appraisal (SA)	Harris Lamb (Wulff Asset Management)	Object	The individual SA assessment for the site at Sowbrook Lane does not take account of either the site's proximity to the South Stanton allocation, and other details provided through the planning application process.	Through the SA process, sites are considered on their own individual merits, and not in relation to other allocations. In any case, the allocation at Stanton South is not expected to commence development until the middle of the 6-10 year housing delivery tranche. Therefore, development at this location could not rely on services at Stanton South to increase its perceived sustainability. Further to this, it should be noted the site in question was the subject of a planning inquiry in 2023. The S78 Planning Inspector identified a series of shortcomings which cast serious doubts over the site's sustainability and suitability to accommodate housing.
Sustainability Appraisal (SA)	Iceni Projects (GLP)	Object	Notes that the March 2025 update of the SA includes an option (Option 5) which assesses the potential allocation of land. However, the Promoter disagrees that this Option has been looked at as a separate, standalone option to one which involves Stanton North, as it is felt that the allocation of both the Promoter's site and Stanton North is necessary to come closer to meeting the needs.	The Council has responded to the Inspector's concerns over the lack of assessment of the Promoter's site by creating and then testing Option 5 as part of its updated SA work. As the Council responses made to the Promoter's concerns suggest, it is firmly of the view that the quantum of need is much lower than that stated by Iceni in their representations – both for the June 2024 Hearings and the most recent consultation. The Council is satisfied therefore that it has tested all reasonable alternatives in respect to options to meet this form of employment need.
Sustainability Appraisal (SA)	Iceni Projects (GLP)	Object	Disagree with the unduly positive manner in which Option 2 has been scored by the Council, with Option 5 being assessed as the most	The Council supports the decisions made in respect to assessment of both Options 2 and 5. The SA framework has been consistently

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
			negative of the employment options. Icen believe these outcomes to be irrational. Assessment of Option 5 is unjustifiably negative, with reference made to the 'minor positive' awarded to improving the diversity and quality of jobs. Representation then goes on to provide contextual information about the logistics industry and the type of jobs being created within the sector.	applied to scoring of reasonable options right from the beginning of the Plan's review. As referred to elsewhere within Council responses to SA-related criticisms in this schedule, a level of subjectivity to decisions made as part of the SA process will exist given the wide and diverse range of matters it is expected to provide insight to in order to support the plan-making process.
Sustainability Appraisal (SA)	Icen Projects (GLP)	Object	Several specific score-related concerns over how the Council have assessed various SA objectives and individual criterion within Option 5 are set out by the Promoter in their representation. These relate to SA criterion covering the reduction of unemployment, land & buildings of the type required by businesses, community safety, transport, flooding & water quality and landscape & built environment.	As per the previous response, the Council continues to support the scores awarded to Option 5 as part of its work to update the Sustainability Appraisal to inform amendments to the Core Strategy Review.
Green Belt Review (GBR)	Planning and Design Group (Wheeldon Brothers)	Support	P&DG identify that no prescribed approach to Green Belt Reviews is set out in guidance, and that the one prepared by the council reasonably assesses and correctly identifies areas of limited contribution to the purposes of GB.	Support noted.
Green Belt Review (GBR)	Carney Sweeney (Peveril Homes)	Comment	It is noted that the GBR covers 3 of the 5 GB purposes, with this explained in the accompanying methodology. The methodology is noted to comprise a mapping exercise to assess the role and function of GB as a whole, with further work carried out over the 3 identified purposes. No wider comments are	Comments noted.

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
			offered on the overall work, but comments are made in respect of individual sites (including SP1.7). These will be found under the relevant headings.	
Green Belt Review (GBR)	Tracy McFadden	Object	The Green Belt Review is inconsistent and disproportionate, as 244 Victoria Avenue has not been assessed against Sprawl, as well as assessment of small parcels within large CUs. There is a lack of evidence how the site does not meet the five GB purposes. The Council's own documents (e.g., EBC15 Workstream 8) suggest a Green Belt review was required but not conducted for this site.	The Green Belt Review is consistent and proportionate in its assessment of green belt across the borough. Individual sites have not been subject to individual assessment (including testing against the five purposes) given the approach has been systematic. A Green Belt Review has been carried out, but for reasons mentioned above does not contain site specific assessment.
Green Belt Review (GBR)	Fisher German (on behalf of Stanton Estates)	Support	Council's conclusion that Area D does not impact ability of Green Belt to maintain separation between towns and that it makes only a limited contribution to unrestricted sprawl of Breaston is supported. Agreed that very special circumstances exist to release site from Green Belt.	Support noted.
Green Belt Review (GBR)	Green 4 Planning (Green 4 Development)	Object	The Green Belt Review concludes that small extensions to Ockbrook would have the same impact in terms of encroachment as development of a new settlement around Hopwell. This, despite EBC identifying that the site (Ockbrook Cricket Club) would round off village settlement boundaries.	Regardless of the size of extensions to Ockbrook, the Green Belt Review was not undertaken as a site focused assessment. In considering encroachment, the review utilised the methodology which explains clearly how countryside units are identified. Further, the review was undertaken on a systematic basis to determine which parts of green belt continue to contribute to all 3 of the purposes identified as appropriate to the designation inside Erewash.

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
Green Belt Review (GBR)	Green 4 Planning (Green 4 Development)	Object	For Section C, Area A (Ockbrook), commentary is inconsistent and at odds with conclusions. Conclusions are made more confusing, where under 'overall conclusion' the site is assessed as making a limited contribution, however under 'final conclusion' (pg141), it is shown to fulfil all three purposes. The review also seems to confuse the purpose of sprawl, with the provision of sporting facilities.	The Council acknowledges the wording of the conclusions for Ockbrook in Section C is incorrect and does not reflect the preceding commentary. This has had the effect of highlighting an inconsistency between the conclusion and how this is addressed within the Green Belt Review findings map. The council will amend and update the relevant passages of the review.
Green Belt Review (GBR)	Green 4 Planning (Green 4 Development)	Object	Commentary and conclusions in Section C for Area A also ignores information provided by site promoter explaining how the landowner will provide land for Ockbrook Cricket Club.	Supporting information related to the possible relocation of Ockbrook Cricket Club is not relevant to the Green Belt Review, as the review does not have a site-specific focus and appraises designation in a more systematic manner.
Green Belt Review (GBR)	Green 4 Planning (Bellway)	Object	Countryside Unit (CU) mapping is difficult to read – it is hard to identify the CU in question. Maps are also inconsistent and confusing. The key for parcels with limited contributions changes partway through, and no key is given for the plan which appears on p139. This raises questions about the accuracy of the work.	The Council is of the view that all mapping in the review is legible and that countryside units (CU) are clearly defined as per the explanation in the methodology. The council does however acknowledge an oversight in the consistency of maps pertaining to Purpose C (Sprawl) in the review. This is rectifiable, and the council does not consider this to have any significant impact on the accuracy of the work. In relation to the map on p139, whilst the Council accepts there is no key, the fact that there are only two types of site makes it clear that areas in black make only a limited contribution to sprawl. This is further aided by cross reference to individual settlement plans throughout Section Three.

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
Green Belt Review (GBR)	Green 4 Planning (Bellway)	Object	For each Section of the GB Review, a different method, and different scale parcels are used to assess contributions to the purpose, with a lack of any granular analysis aside from in Section C. This makes comparison and overall contribution of parcels difficult to evaluate. No standard form of ranking or scoring has been used for any section, providing no definitive conclusions.	As the Plan is being tested against an older iteration of the NPPF under transitional arrangements, there is no prescribed method for undertaking a Green Belt Review. This is recognised by other site promoters who display confidence in the effectiveness of its methodology used. The Green Belt Review was undertaken as a systematic assessment of Green Belt as a whole in Erewash Borough, not a review which was conducted on the basis of individual sites being promoted through the Plan. This is reflected in the methodology. Furthermore, there is no requirement for any form of ranking or scoring to be used in a Green Belt Review.
Green Belt Review (GBR)	Green 4 Planning (Bellway)	Object	The representation welcomes the completion of a Green Belt review by EBC and agrees with the 3 chosen purposes (Encroachment, Separation and Sprawl) that the study has chosen to focus on. However, concerns are raised in relation to approach taken which is contrary to recent guidance.	The Green Belt Review was carried out prior to the release of guidance within the NPPG advising on how to produce a Green Belt Review, which this representation acknowledges. Notwithstanding the council are confident that its methodology represents a robust and proportionate way which allows for green belt across the whole borough to be consistently assessed.
Green Belt Review (GBR)	Green 4 Planning (Bellway)	Object	For Green Belt Purpose C, conclusions are unclear and not transparent, with 'could' or 'would not' the only conclusions. There are significant discrepancies in the size of CUs and comparison between them, and so this section adds no value as larger units will obviously contribute to safeguarding, whilst smaller units	The Council is of the view that conclusions reached in respect of encroachment into the countryside are clear and instructive. The sizes of CUs vary as a consequence of physical features which are set out in the methodology. Furthermore, variations in the sizes of CUs do not lend themselves to conclusions that use

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
			will not. Isolated parcels will also obviously appear as encroaching, though CU2 has been judged 'would not encroach'.	more definitive wording. The methodology was shared with partner councils in the Nottingham and Derby HMAs (including both county councils). No issues regarding the methodology as a whole were raised.
Green Belt Review (GBR)	Green 4 Planning (Bellway)	Object	For Green Belt Purpose B, there is a lack of granular analysis of whether land, including small parcels between or adjoining inset settlements would impact on the function of the corridors B and F. Narrowing of gaps between settlement boundaries has not been considered. Conclusions for Corridor B and Corridor F state that a further study will provide more clarity on the status of Green Belt between villages to ensure that land between inset settlements does not contribute to a lessening of separation. No further study is indicated to be forthcoming.	In terms of separation, the Green Belt Review clearly examines the gaps between towns and urban areas, rather than on a settlement-by-settlement basis. The Council wishes to clarify that no further study or work outside of the Green Belt Review is forthcoming regarding any of the Corridors identified in the review. To clarify, the wording cited by the site promoter refers to a need to consider impacts where green belt land falls within more than one corridor.
Green Belt Review (GBR)	Green 4 Planning (Bellway)	Object	Conclusions for Green Belt Purpose A are brief and only identify land that makes limited contributions. Conclusions for sprawl are also inconsistent and unfocused, bringing in further commentary on encroachment and separation issues, that is not backed up with evidence from these previous sections. Green4 strongly contest the conclusion reached that Area C (West of Borrowash) would not reduce separation between Borrowash and Spondon, while the Area F (East of Cole Lane) which is over 2.5 miles away from the M1, would reduce separation.	In relation to Purpose A, for each settlement a definitive conclusion exists. Conclusions for all parcels are reached in the commentary prior to each settlement map, however only parcels of land deemed to make a limited contribution to this purpose (those edged in blue) are specifically referred to. In respect of separation, Area C does not reduce the current gap between inset areas at Borrowash and Spondon. Nevertheless, in reaching conclusions on the contribution green belt makes, it is essential to view all designation against all 3 purposes under consideration

Evidence Base	Representing body	Support Object Comment	Summary of representation	EBC Response
				within the review as part of its systematic approach.
Site Selection Paper (SSP)	Planning and Design Group (Wheeldon Brothers)	Support	Provides a clear and robust methodology of how the new additional sites have been identified by the Council. The SSP has clearly been informed by a Green Belt Review. Both sites in the control of Wheeldon Brothers are located within Green Belt found not to be performing to purposes of the designation.	Support noted.
Site Selection Paper (SSP)	Green 4 Planning (Bellway)	Object	Concerns regarding to the accuracy and robustness of both the Sustainability Appraisal and Green Belt Review; Questions whether they are sound enough evidence on which to base the selection of sites as explained through the Site Selection Paper.	The Council is strongly of the view that both the Sustainability Appraisal and Green Belt Review have been carried out accurately, consistently and appropriately. It should be noted that site promoters of allocations have demonstrated their support for the work of both named documents. This demonstrates that a robust and effective basis for site selection has been carried out.

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

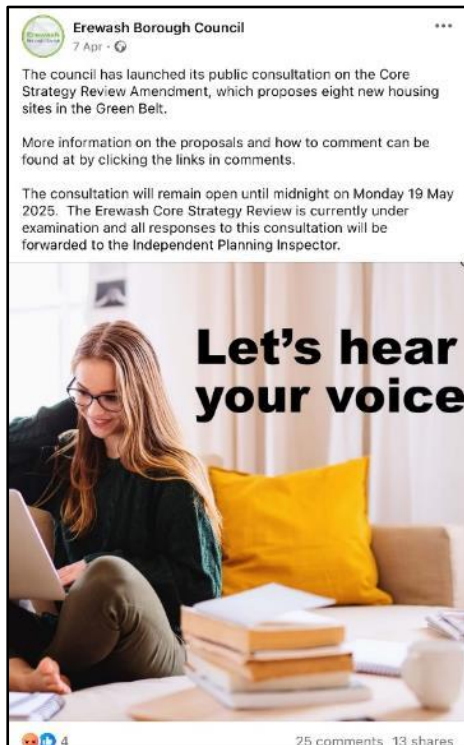
The consultation will remain open until midnight on Monday 19 May 2025. The Erewash Core Strategy Review is currently under examination and all responses to this consultation will be forwarded to the Independent Planning Inspector.

ENDS

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

Appendix C - 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.




Erewash Borough Council · Follow

29 Apr · 🌐

More than 500 people have already taken part in the consultation on the Core Strategy Review Amendment, which proposes new housing sites in the Green Belt in Erewash.

The consultation is open until 19 May.

📄 For more information and to have your say please go to www.erewash.gov.uk/localplan



Let's hear your voice

👍👎👏 4

16 comments 3 shares

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



Erewash BC

@ErewashBC

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

Provide feedback at erewash.gov.uk/localplan before 19 May.



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

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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.



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**Let's hear
your voice**

 21 comment 6 shares

Appendix D – Website data from public consultation

