

Strategic Growth Options Draft Sustainability Appraisal

For consultation

January 2020

Erewash Borough Council

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1.0 **Introduction**

Erewash Core Strategy Review

- 1.1 In accordance with government policy, the strategic policies of the Erewash Core Strategy (adopted in 2014) setting out the overall strategy for the pattern, scale and quality of housing development are now due for review. Erewash Borough Council, working in partnership with other Housing Market Area councils¹, is undertaking a review of the Erewash Core Strategy to facilitate this.

Purpose of the Strategic Growth Options Sustainability Appraisal

- 1.2 The Strategic Growth Options Draft Sustainability Appraisal (herein referred to as 'Draft SA') is a focused interim stage of Sustainability Appraisal which tests a total of eight potential strategic Options for Growth within Erewash Borough specifically. The findings from the Draft SA have informed the Growth Strategy as presented in the Growth Options paper. The potential strategic growth options are as follows:

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

- 1.3 Whilst each of the options are related to potential allocations, the Draft SA is focused on assessing the various approaches to growth in general terms; essentially, the policy approach to growth. As a result the assessment is kept broad and avoids focus on detailed characteristics of individual sites.

Secondary, Cumulative and Synergistic effects

- 1.4 In accordance with the Strategic Environmental Assessment Directive, the Draft SA considers the short, medium and long-term, permanent and temporary, positive and negative effects of the various approaches on the Sustainability Appraisal Framework (detailed at Section 2). However, it does not assess the secondary, cumulative or synergistic effects.
- 1.5 The Draft SA is focused on assessing each option on its own merits, without prejudice from other options which may or may not form part of a submitted strategy. It is considered that secondary, cumulative and synergistic effects should be considered at a later stage of Sustainability Appraisal.

¹ The Nottingham Core HMA consists of Broxtowe, Erewash, Gedling, Nottingham City and Rushcliffe councils.

Sustainability Appraisal Scoping Report 2019

- 1.6 The Draft SA follows on from the Sustainability Appraisal Scoping Report which was produced in partnership with the Core Housing Market Area authorities. In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), it was consulted on with the consultation bodies in July 2019. The Sustainability Appraisal Scoping Report provides the basis for the Draft SA and both should be read in close conjunction. In particular, the Sustainability Appraisal Scoping Report provides the full background to Sustainability Appraisal relevant to the Erewash Core Strategy Review and the Draft SA (including baseline data, policy review and development of the Sustainability Appraisal Framework); this is not repeated here.
- 1.7 In order to ensure parity with the Sustainability Appraisal process to date, and to ensure alignment with future stages which will be carried out in partnership with Housing Market Area authorities, the Draft SA is fully aligned with the Sustainability Appraisal Framework (objectives) and approach to scoring established in the Sustainability Appraisal Scoping Report and ratified through public consultation referred to in 1.6.

Alterations and caveats

- 1.8 Despite the willingness to remain in conformity with wider Housing Market Area work, some very minor alterations have been applied to the Sustainability Appraisal Framework to provide clarity, or to avoid including questions which would be irrelevant to the process (in light of what is being tested) being followed by the council. This is to ensure that all questions provide value to this focused assessment process. These alterations are highlighted below to ensure transparency. Light blue indicates where new wording had been added for the purpose of this exercise. Deleted elements are clearly shown in red and with strikethrough.
- 1.9 References to 'it' within the criteria questions specifically for the purposes of this exercise should be interpreted as 'the option'.

2.0 Sustainability Appraisal Framework

Role of the Sustainability Appraisal Framework

2.1 The Sustainability Appraisal Framework contains a list of objectives which are the culmination of work carried out at the Sustainability Appraisal Scoping stage, based on the review of other relevant plans, policies and programmes, the analysis of the baseline data and the identification of key sustainability issues (see Sustainability Appraisal Scoping Report). The Sustainability Appraisal Framework provides a basis against which emerging policies or allocations can be tested. Table 1 below sets out the Sustainability Appraisal objectives and also links them with Strategic Environmental Assessment Directive topics.

Table 1. Sustainability Appraisal objectives

Sustainability Appraisal objectives			Strategic Environmental Assessment Directive topics
1	Housing	To ensure that the housing stock meets the housing needs <i>of the population</i> , including gypsies, travellers and travelling showpeople.	<ul style="list-style-type: none"> • Population • Material assets
2	Employment and Jobs	To create employment opportunities.	<ul style="list-style-type: none"> • Population • Material assets
3	Economic Structure and Innovation	To provide the physical conditions for a high quality modern economic structure including infrastructure to support the use of new technologies.	<ul style="list-style-type: none"> • Population • Material assets
4	Shopping Centres	Increase the vitality and viability of existing shopping centres.	<ul style="list-style-type: none"> • Population • Human health
5	Health and Wellbeing	To improve health and wellbeing and reduce health inequalities.	<ul style="list-style-type: none"> • Population • Human health
6	Community Safety	To improve community safety, reduce crime and the fear of crime.	<ul style="list-style-type: none"> • Population • Human health
7	Social Inclusion	To promote and support the development and growth of social capital and to improve social inclusion and to close the gap between the most deprived areas within the plan area.	<ul style="list-style-type: none"> • Population • Human health
8	Transport	To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to improve travel choice and accessibility.	<ul style="list-style-type: none"> • Air • Climatic factors
9	Brownfield Land	To make efficient use of brownfield land and recognise biodiversity value where appropriate.	<ul style="list-style-type: none"> • Soil • Material assets
10	Energy and Climate Change	To minimise energy usage and to develop low carbon energy resource, reducing dependency on non-renewable sources.	<ul style="list-style-type: none"> • Climatic factors
11	Pollution and Air Quality	To manage air quality and minimise the risk posed by air, noise and other types of pollution.	<ul style="list-style-type: none"> • Air • Climatic factors • Human health

12	Flooding and Water Quality	To minimise the risk of flooding and to conserve and improve water quality.	<ul style="list-style-type: none"> • Water • Climatic factors
13	Natural Environment, Biodiversity, Green and Blue Infrastructure	To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	<ul style="list-style-type: none"> • Biodiversity • Fauna • Flora
14	Landscape and Built Environment	To protect and enhance the landscape and townscape character, including heritage and its setting and enhancing the place through good design.	<ul style="list-style-type: none"> • Landscape
15	Heritage	To conserve the area's heritage and provide better opportunities for people to enjoy culture and heritage.	<ul style="list-style-type: none"> • Cultural heritage
16	Natural Resources and Waste Management	To prudently manage the natural resources of the area including soils, safeguarding minerals and waste.	<ul style="list-style-type: none"> • Soil • Material assets

Sustainability Appraisal Policy Criteria

2.2 The objectives identified at Table 1 can form the basis for assessment of emerging allocation and policy proposals. However, the potential strategic growth options amount to policy approaches, and therefore the Draft SA is concerned specifically with policy criteria when carrying out assessment against the objectives.

2.3 There are two key elements to assessing options against objectives; criteria questions and scoring. Table 2 sets out the policy criteria questions that will be used to assess the options against the objectives.

Table 2. Policy Criteria Questions

Sustainability Appraisal objectives		Policy criteria questions	
1	Housing To ensure that the housing stock meets the housing needs <i>of the population</i> , including gypsies, travellers and travelling showpeople.	1	Will it increase the range and affordability of housing for all social groups?
		2	Will it provide sufficient pitches and plots for gypsies and travellers and travelling showpeople?
		3	Will it reduce homelessness?
		4	Will it reduce the number of unfit/vacant homes?
		5	Will it provide the required infrastructure?
2	Employment and Jobs To create employment opportunities.	1	Will it improve the diversity and quality of jobs?
		2	Will it reduce unemployment?
		3	Will it improve rural productivity in terms of employment opportunities?
3	Economic Structure and Innovation To provide the physical conditions for a high quality	1	Will it provide land and buildings of a type required by businesses?
		2	Will it provide business/university clusters?
		3	Will it create jobs in high knowledge sectors?

	modern economic structure including infrastructure to support the use of new technologies.	4	Will it encourage graduates to live and work within the plan area?
		5	Will it provide the required infrastructure?
4	Shopping Centres Increase the vitality and viability of existing shopping centres.	1	Will it encourage the vitality of the city centre, town centre, district centre or local centre?
5	Health and Wellbeing To improve health and wellbeing and reduce health inequalities.	1	Will it reduce health inequalities?
		2	Will it improve access to health services?
		3	Will it increase the opportunities for recreational physical activity?
		4	Will it provide new open space or improve the quality of existing open space?
		5	Will it improve access to local food growing opportunities?
6	Community Safety To improve community safety, reduce crime and the fear of crime.	1	Will it reduce crime and the fear of crime?
		2	Will it contribute to a safe a secure built environment?
7	Social Inclusion To promote and support the development and growth of social capital and to improve social inclusion and to close the gap between the most deprived areas within the plan area.	1	Will it protect and enhance existing cultural assets?
		2	Will it improve access to, encourage engagement with and residents' satisfaction in community activities?
		3	Will it increase the number of facilities e.g. shops, community centres?
		4	Will it provide for the educational needs of the population?
8	Transport To make efficient use of the existing transport infrastructure, help reduce the need to travel by car, improve accessibility to jobs and services for all and to improve travel choice and accessibility.	1	Will it use and enhance existing transport infrastructure?
		2	Will it help to develop a transport network that minimises the impact on the environment?
		3	Will it reduce journeys undertaken by private car by encouraging alternative modes of transport?
		4	Will it increase accessibility to services and facilities?
9	Brownfield Land To make efficient use of brownfield land and recognise biodiversity value where appropriate.	1	Will it make efficient use of brownfield land?
		2	Will the development approach minimise the impact on the biodiversity interests of the site land ?
10	Energy and Climate Change To minimise energy usage and to develop low carbon energy resource, reducing dependency on non-renewable sources.	1	Will it result in additional energy use?
		2	Will it improve energy efficiency of new-buildings the building stock within the plan area ?
		3	Will it support the generation and use of renewable energy?
		4	Will it support the development of community energy systems?
		5	Will it ensure that buildings are able to deal with future changes in climate change?

11	Pollution and Air Quality To manage air quality and minimise the risk posed by air, noise and other types of pollution.	1	Will it increase levels of air, noise and other types of pollution?
12	Flooding and Water Quality To minimise the risk of flooding and to conserve and improve water quality.	1	Will it minimise or mitigate flood risk?
		2	Will it improve water quality?
		3	Will it conserve water?
		4	Will it improve or help to promote water efficiency?
		5	Will it cause a deterioration of Water Framework Directive status or potential of onsite watercourses?
13	Natural Environment, Biodiversity, Green and Blue Infrastructure To increase biodiversity levels and protect and enhance Green and Blue Infrastructure and the natural environment.	1	Will it help protect and improve biodiversity and avoid harm to protected species?
		2	Will it allow for biodiversity net gains?
		3	Will it conserve and enhance the geological environment?
		4	Will it maintain and enhance woodland cover and management?
		5	Will it provide new open space of green space?
		6	Will it improve the quality of existing open space?
		7	Will it encourage and protect or improve Green and/or Blue Infrastructure networks?
14	Landscape and Built Environment To protect and enhance the landscape and townscape character, including heritage and its setting and enhancing the place through good design.	1	Does it respect or preserve identified landscape character?
		2	Does it have a positive impact on visual amenity?
		3	Will it maintain and / or enhance the local distinctiveness of the townscape or settlement character?
		4	Will it conserve or enhance the interrelationship between the landscape and the built environment?
15	Heritage To conserve the area's heritage and provide better opportunities for people to enjoy culture and heritage.	1	Will it conserve and enhance the historic environment, designated and non-designated heritage assets and their settings?
		2	Will it respect, maintain and strengthen the local character and distinctiveness e.g. landscape/ townscape character?
		3	Will it provide better opportunities for people to access and understand local heritage and to participate in cultural activities?
		4	Will it protect or improve access and enjoyment of the historic environment?
		5	Will it conserve and enhance the archaeological environment?
16	Natural Resources and Waste Management To prudently manage the natural resources of the area including soils, safeguarding minerals and waste.	1	Will it lead to reduced consumption of raw materials?
		2	Will it promote the use of sustainable design, materials and construction techniques?
		3	Will it result in additional waste?
		4	Will it reduce hazardous waste?
		5	Will it protect the best and most versatile (BMV) agricultural land?
		6	Will it prevent the loss of greenfield land to development?

2.4 Assessment of options against objectives for the purpose of the Draft SA amounts to the answering of individual policy criteria questions as identified in Table 2. By considering what effect the different options are likely to have on each of the policy criteria questions, a score – from ‘major positive’ through to ‘major negative’- is awarded to each of the questions; Table 3 demonstrates the colour coding and symbols associated with this.

Table 3. Score coding

Major positive ++	Minor positive +	Uncertain (?) or No impact (0)	Minor negative -	Major negative --
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2.5 The scores attributed to each policy criteria question under each objective are then extrapolated up into an overall score for each objective, using the approach set out in Table 4 below, which is based on the same approach applied to assessing individual policy criteria questions.

Table 4. Scoring of Overall objectives

Major positive ++	Minor positive +	Uncertain (?) or No impact (0)	Minor negative -	Major negative --
The policy would have a significant positive impact on one or more of the policy criteria questions or a minor positive impact on a significant number of the questions	The policy would have a minor positive impact on at least one of the policy criteria questions	Unknown effect or the policy has no implications for the objective	The policy would have a minor negative impact on at least one of the policy criteria questions	The policy would have a significant negative impact on one or more of the policy criteria questions or a minor negative impact on a significant number of the questions

2.6 Through this process, the Draft SA is able to assess each potential growth option against the Sustainability Appraisal Framework in a consistent manner. This helps to identify the most sustainable options. The outputs are presented as part of the Sustainability Appraisal Matrix at the end of the document and this enables comparisons between the options to be carried out efficiently.

2.7 For the purpose of this scoring, ‘significant number of questions’ as referenced in Table 4 is considered to be satisfied where a majority (or more) of the criteria questions forming a Sustainability Appraisal objective are awarded the same minor negative or positive score. The presence of a ‘major’ score will be taken into account also and may reverse this. By way of example, if 3 out of 4 questions are awarded

minor negative against a Sustainability Appraisal objective, but there is a major positive against the other, this would not result in an overall major score of any type.

3.0 Assessments

- 3.1 Sustainability Appraisal assessments are carried out and organised in table format within which a commentary is provided justifying a score against each of the policy criteria questions which fall under each Sustainability Appraisal objective. An additional column then provides a score against each overall Sustainability Appraisal objective which takes into account scores applied to each of the related policy criteria questions.

- 3.2 The role of the Draft SA has been to assess a range of spatial policy approaches to growth. As a result, the assessments have had to take a broad, yet rational position when assessing the sustainability of each of the eight options. This is despite each comprising a mixture of sites and land extents. Option G is a particularly strong example of this and includes the greatest range between very small and very large sites. Understandably, the scale of impact from sites of vastly contrasting sizes has resulted in very different objective outcomes being reached, yet despite this the Option must still be assessed as a single entity. Indeed, it is important to state that the role of the Draft SA has not been to assess individual allocations. Assessments have been undertaken pragmatically to consider impacts on objectives across all sites which form each Option, and to reach a conclusion which takes into account the inherent extremities created by following such an approach.

Table 5. Option A – Growth within Long Eaton Urban Area (the conurbation)

OPTIONS		PERFORMANCE			RATINGS			
		SA OBJECTIVE		POLICY CRITERIA QUESTIONS		CRITERIA QUESTION	OBJECTIVE	
A	Growth within Long Eaton Urban Area (the conurbation)	1	Housing	1	Growth within the conurbation will result in new housing which accommodates a wide range of social groups. In particular, the nature of the conurbation means that different development types – including higher density flat schemes – could be accommodated appropriately given the sustainability credentials and character of the area. There may be some limitations to what can be achieved in terms of affordable housing contributions as a result of the more limited site sizes and potential viability constraints on complex brownfield sites. However the ability of the conurbation to provide for a wide range of accommodation types in response to a wide spectrum of social requirements should minimise any impact from this. The intensification of the existing urban area will result in an uplift in the provision of new homes and this will improve affordability within a relatively competitive housing market.	++	++	
				2	The Derbyshire Gypsy and Traveller Accommodation Assessment (2014) requires the provision of a single gypsy and traveller pitch within the borough by 2019, with the single pitch amounting to the full need across the whole period covered by the Assessment (2018-2033). The intention was to provide this through the development management process in response to an application, should one be submitted, so no land required allocation. The continuation of this approach would mean that this approach to growth would not specifically provide pitches	0		

				and/ or plots, but equally would not preclude the opportunity to satisfy the borough’s requirement through the development management process, should an application be received. The approach is therefore considered to have a neutral effect on this objective.			
			3	The provision of new dwellings within the existing urban area including a wide variety of types and affordability levels will diversify the housing stock and introduce additional provision in a location where homelessness is more likely to be an issue of significance (the urban area). This is likely to have a positive impact on homelessness in the longer term as capacity increases trickle down, ultimately having a positive impact on homeless accommodation capacity because affordable housing becomes more readily available to those moving out of homelessness.	+		
			4	It is possible that the redevelopment of a site within the urban area – which will likely be previously developed land - may encompass existing unfit or vacant homes which fall within the land holding, which results in their redevelopment as part of the wider scheme. This is certainly a more likely prospect within the urban area given the predominant brownfield nature of urban sites. The precise extent of this possibility however is unknown in view of the widespread and incremental approach to development that this approach would result in.	0		
			5	Development sites within the conurbation are generally small scale. As a result there is limited opportunity for contributions made as a result of development. This does not preclude the possibility that contributions will be sought on sites of 10 or more homes, but the effects on provision of new infrastructure will be limited, ad hoc and potentially slow to emerge as it takes time to gather the	+		

				required sums from numerous development sites. Notwithstanding this, the conurbation represents the by far the most sustainable location in terms of <i>existing</i> infrastructure provision, and is able to accommodate additional growth because of this.			
		2	Employment and Jobs	1	There will be some short-term improvement to the diversity and quality of jobs available locally, resulting from the associated construction activity. However because of the nature of sites within the conurbation being of limited scale, it is unlikely that new and permanent employers would be attracted to new development sites as part of mixed-use proposals. Whilst there may be some pressure from developers to repurpose existing employment sites for housing via this approach, policies exist to restrict this to only the lowest quality sites so valuable employment sites do not form part of this approach.	0	0
				2	Development of sites for housing through this approach will deliver a short-term boost to employment as a result of associated construction activity. Long-term levels of employment are unlikely to be influenced; the sites being developed are unlikely to be mixed-use due to their limited scale and in view of housing having a much higher alternative use value. Whilst there may be some pressure from developers to repurpose existing employment sites for housing via this approach, policies exist to restrict this to only the lowest quality sites so valuable employment sites do not form part of this approach.	0	
				3	Rural productivity will remain relatively distinct from the urban area in employment and jobs terms. There may be some prospect that the replacement of poor quality employment sites within the urban area with housing development will result in a slight shift in businesses	0	

				considering relocating from urban to rural areas but this would be a minor trend.			
		3	Economic Structure and Innovation	1	There may be the potential for land and buildings of the type required by businesses to be provided as part of larger scale mixed-use redevelopment sites, though it is expected that the prospects of this are minimal given the limited size of housing development sites within the conurbation required to deliver the approach. Notwithstanding this, it is not expected that this approach would see the <i>removal</i> of land and buildings of the type required by businesses as delivery of the approach does not require the replacement of good quality employment premises as per the protections afforded to good and upper-average employment land through the Erewash Core Strategy and Erewash Employment Land Survey 2019.	0	+
				2	Due to the limited size of housing development sites identified within the conurbation to facilitate the approach, business and university clusters will not be provided – such an outcome would require large-scale development.	0	
				3	It is unlikely to provide jobs in high knowledge sectors as business and university clusters are unlikely to locate through this approach (see 3(2)) and it is not expected that the approach will in itself create permanent, long-term employment either.	0	
				4	Graduates will be afforded a greater opportunity to live and work within the plan area on the basis of a boosted supply of new homes within the conurbation which already provides for a wide range of important facilities and services, and which enjoys outstanding connectivity to both Nottingham and Derby which both host successful universities. However, the lack of development through this approach at a scale which attracts university clusters	+	

				or notable employment opportunities will limit the positive impact of this.			
			5	The approach does not include provision for new employment as it is focused on housing development. As such there is no requirement to provide infrastructure specific to economic structure and innovation.	0		
		4	Shopping Centres	1	The town centre of Long Eaton will benefit significantly in terms of encouraging its long-term viability and vitality through this approach. By focusing housing development, and thus population growth within the conurbation, the town centre is more likely to be able to sustain itself both economically and socially in the long term.	++	++
		5	Health and Well Being	1	The conurbation has in place a substantial range of existing health infrastructure (doctors surgeries, dentists etc.) and the conurbation more widely also provides for extensive facilities (including university hospitals) from which new and existing residents will and do benefit from. The focus of new residential development within the conurbation encourages active lifestyles as new residents are able to go about their lives in a sustainable manner, including by walking to nearby services and facilities, and engaging with accessible sport and recreation. The wider conurbation provides an abundance of facilities to accommodate this, complimented by high quality sustainable connectivity options. This approach has the potential to reduce health inequalities as a result.	++	+
				2	Focusing development within the conurbation will increase the extent of population who benefit from easy and sustainable access to existing health facilities as described at 5(1). Related increase in demand will in the longer term result in a need for additional investment in provision to meet increasing demand. This raises the potential for new	+	

				and/or improved services to be provided either locally or within the wider conurbation as a whole.			
			3	New development within the conurbation is expected to be incremental and of limited scale. As such it is unlikely that the approach will command adequate levels of contributions to fund <i>new</i> recreational facilities. However such an approach will serve to increase the extent of population with access to <i>existing</i> facilities present within the conurbation. Moreover, the conurbation benefits from public recreational assets, easily accessible to the population locally – for example the River Erewash and Erewash Canal, and for a significant range of facilities and assets more widely also.	+		
			4	New development within the conurbation is expected to be incremental and of limited scale. As such it is unlikely that the approach will command adequate levels of contributions to fund new or improve existing open space. Given the scale of individual development sites likely to form this approach, it is highly unlikely that open space other than that which may provide for minor amenity needs, will result from new development. There may be a minor risk that disused or unkempt open space assets will be lost to development.	-		
			5	The approach will not improve access to local food growing opportunities. There is a small risk that intensification of the urban environment will put at risk the long-term viability of private allotment sites where alternative forms of development (housing) are promoted. However at this time the approach does not rely on the re-use of public or private allotment sites which are evidenced as still being in use.	0		
	6	Community Safety	1	The redevelopment of brownfield sites through urban intensification could lead to a reduction in crime, where			++

				crime occurrence is present on derelict and unkempt land. Redevelopment of such sites is also likely to reduce the fear of crime, as sites are regenerated having a significant positive impact on the character and appearance of an area. An increase in population within the conurbation resulting from the approach will also increase opportunities for natural surveillance. On the contrary, there may be a minor risk of an increase in crime, brought about by the associated increase in population facilitated by redevelopment (and specifically, an intensification of the urban environment).	+		
			2	The approach will rely on redevelopment of brownfield sites with some of these expected to be derelict and unkempt with associated built environment safety issues. In such circumstances, their redevelopment would resolve this and could foster a reduction in structurally unsafe buildings and hazardous sites, leading to an increasingly safe and secure built environment.	++		
	7	Social Inclusion	1	The increase in population within the established urban area, brought about through a strategy of intensification, could help to sustain and enhance existing cultural assets (for example a library or museum) that would otherwise be at risk from closure. There is a very minor risk that the promotion of this strategy might encourage the disposal of privately owned assets to accommodate new housing growth should this present a more commercially attractive proposition. However there are a variety of mechanisms available to protect such assets (including local plan policy and Assets of Community Value protections) which would maintain their existence and allow each to retain an important and viable position serving the wider area.	+		++
			2	It is expected that an increasing diversification and extent of population, facilitated by an approach of urban			

				intensification, will help to sustain existing and enable new community activities within the conurbation (see 7(1)). The approach will help influence an increase in the proportion of the wider population who will benefit from easy access to such activities and thus increase general engagement and satisfaction.	+		
			3	An increasing diversification and extent of population within the conurbation facilitated by an approach of intensification will help to sustain and potentially increase the number of facilities where this generates a clear demand. Where demand increases through population growth, there may be the potential for increasing the range of facilities as an expanded offer becomes commercially viable. There is a very minor risk that such an approach might encourage the disposal of privately owned assets to accommodate new housing growth. However there are a variety of mechanisms available to protect such assets (for example through Local Plan policy or Assets of Community Value designations) which would maintain their existence and allow each to retain an important and viable position within the wider environment. In any case the disposal of existing assets for alternative uses is made less likely in the event of population growth where increased demand would significantly bolster commercial viability, as with new facilities.	+		
			4	New development within the conurbation is expected to be incremental and of limited scale. As such it is unlikely that the approach will command adequate levels of contributions to fund <i>new</i> educational facilities. This presents a small risk that existing provision will be stretched at least in the short-term, however the local education authority ultimately have a duty to provide an	0		

				appropriate number of school places to serve the local population.		
	8	Transport	1	<p>The approach will use (and rely on) the existing transport infrastructure of the conurbation. New development is expected to be incremental and of limited scale. As such it is unlikely that the approach will command adequate levels of contributions to fund <i>new</i> transport infrastructure. Given the associated population increase, this will lead to an increase in demand on the existing system. Notwithstanding this, opportunities to enhance the system incrementally – for example by increasing the frequency and availability of public transport in response to demand and commercial opportunities – may arise.</p>	-	++
			2	<p>The approach focuses development within a conurbation that is served by a comprehensive transport network. As such the construction of large-scale infrastructure (such as a new road) will not be required and land with environmental value will not be put at risk through such construction. The locating of new development as proposed closely connects a growing population to existing employment, services and facilities as well as public transport options, reducing the need to travel long distances and unsustainably. This should contribute to the development of a transport network which in the long-term minimises impact on the environment.</p>	++	
			3	<p>The focusing of development within the conurbation will contribute to influencing the reduction of private car journeys by encouraging the use of alternative modes of transport, when compared with likely effects from development outside of the conurbation. Development focused within the conurbation will benefit from an established transport network with employment, services</p>	++	

				and facilities as well as public transport options within close reach of residents.		
			4	The approach to focus development within the conurbation will expand the proportion of the wider population living within close proximity to existing services and facilities, in effect helping to increase general accessibility to services and facilities (including public transport), particularly when considered against other potential options for growth. This approach has a particularly strong effect on the objective in view of the area's vicinity to facilities available throughout the wider conurbation.	++	
	9	Brownfield Land	1	A large proportion of land identified for housebuilding within the conurbation has been previously developed but is limited in supply. Intensification of the urban environment as this approach advocates, in the context of delivering the required number of homes, will influence an approach which efficiently re-uses brownfield land. This is especially the case within the urban context, where the provision of higher densities on brownfield sites is also feasible and relates well to securing the effective use of brownfield land.	++	++
			2	The redevelopment of brownfield land, which represents a large proportion of total development within the conurbation, will present risks to biodiversity as with any development (including greenfield). However in general, redevelopment of land which has previously been developed is an approach likely to minimise any adverse impact on the biodiversity interests of land in general.	+	
	10	Energy and Climate Change	1	Any new development of this type will result in additional energy use. However when compared with other approaches, the location of new development within the conurbation presents opportunities to reduce potential	0	+

				energy use through minimising travel and promoting modal shift. The growing population will be able to access services, facilities and employment without the use of a private car, or through the use of public transport.			
			2	The energy efficiency of new dwellings built as part of this approach will be far superior to much of the existing older housing stock. In essence this will contribute to a general improvement in the energy efficiency of the plan area housing stock overall.	+		
			3	There is potential that new development will seek to incorporate the generation and use of renewable energy sources in-site (for example, via solar panels attached to individual dwellings), however there is not currently a statutory requirement for this. The expected limited scale of sites contributing to this approach within the conurbation rule out the possibility of larger-scale interventions (for example, development of community energy systems – see 10(4) or centralised power generation).	0		
			4	The limited scale of sites available for development within the conurbation makes opportunities for larger-scale interventions such as community energy systems as a direct result of new development unlikely. Equally, the approach would not specifically prohibit provision of a community energy systems should a developer present a solution that were able to be accommodated within the area - and indeed, the presence of a growing number of households an existing significant population may provide additional commercial impetus for such an approach to be developed in the longer term.	0		
			5	Any new development will be subject to climate change policy, guidance and regulations stipulating the standards to which construction should be undertaken. This includes			

				in relation to flood risk. The construction of new dwellings in this way will apply through any of the approaches being considered. Given that development as part of this approach is expected to be incremental, there is not expected to be opportunity to incorporate wider-scale interventions to ensure wholesale climate change adaptability.	0		
		11	Pollution and Air Quality	1	The locating of new development within the conurbation brings a growing population in close proximity to existing employment, services and facilities as well as public transport options, reducing the need to travel long distances via private car and increasing the opportunity for clean forms of travel (such as walking and cycling) to proliferate. Therefore, whilst any new development has the potential to increase pollution, the focusing of development within established urban environments will have the least-negative effect. The approach relates to housing development only and as such it is not envisaged that noise will be a significant output. Notwithstanding this, any impacts from increased noise will be extremely minimal within the context of an already established urban environment.	-	-
		12	Flooding and Water Quality	1	Sites which have been identified by the Erewash Strategic Housing Land Availability Assessment as being available to contribute to delivering this approach within the conurbation fall within either Flood Zone 1 or 2. Therefore the approach will be able to effectively minimise or mitigate flood risk when taken as a whole. However, it is obvious that new development within an urbanised area at risk from flooding will require any arising flood risk to be minimised or mitigated at the outset, and this does represent a minor negative impact in sustainability terms. On balance though, in view of the ability of the approach	0	+

				to minimise and mitigate, the effect is considered to be neutral.			
			2	It is expected that the redevelopment of brownfield sites within the conurbation – some of which may display varying levels of contamination – would lead to the improvement of local water quality. This effect will be magnified by the near-total avoidance of construction on greenfield sites as a result of this approach, which act as important natural drainage assets as part of the wider water cycle.	+		
			3	Locally, the approach is likely to impact negatively on water conservation, creating additional demand to be met as a result of local population growth despite building regulations providing scope for more efficient use of water (see 12(4)).	-		
			4	The water efficiency credentials of new dwellings being built when compared with existing older stock within the conurbation will be superior owing to building regulations. In essence this will lead to a general improvement in the water efficiency of the plan area’s stock and promotion of water efficiency in general.	+		
			5	The approach is unlikely to result in a deterioration of Water Framework Directive status or of on-site watercourses. Most development sites within the conurbation will be previously developed land with appropriate means of drainage to treatment facilities already in place. The redevelopment of existing urban sites is unlikely to introduce new risks to the Water Framework Directive status given the existing condition of land as described. There is the potential to improve water quality and the associated Water Framework Directive status through remediation as discussed at 12(2).	0		

		13	Natural Environment, Biodiversity, Green and Blue Infrastructure	1	It is considered that the approach, which directs new development to the conurbation, will help ensure the long-term protection of alternative sites with more pronounced biodiversity value that fall outside of the area from development pressures. In addition, the redevelopment of brownfield sites – potentially subject to contamination – could present opportunities for biodiversity improvements which would not present themselves without prospects of redevelopment. Brownfield sites often display biodiversity value themselves, however this can be managed as part of redevelopment, and in any case the re-use of brownfield land is considered a more sensitive proposition in biodiversity terms when compared with potential development on greenfield land. It is assumed in the absence of more detailed and up-to-date information on specific sites that protected species could be at risk and this would need to be carefully managed through the development management process.	+	+	
				2	Redeveloping predominantly brownfield sites does present an opportunity to secure biodiversity net gains as part of new development, for example resulting from site remediation and implementation of amenity green space, even if very minor in scale.	+		
				3	It is expected that the approach will have a minor impact on the geological environment given that it relates to development which will require the extraction of material to facilitate construction. No Regionally Important Geomorphological Sites are identified on or under the land in question as identified within the Strategic Housing Land Availability Assessment.	-		
				4	The approach will contribute positively to maintaining woodland cover and management within the plan area, as no woodland would be put at risk as a result of	0		

				implementing the approach. It is not expected the approach would result in woodland enhancement though.			
			5	It is not expected that new open space will be provided through this approach given the limited scale of individual development sites, likely incremental approach to development and thus limited capacity for contributions to be sought on this matter. There is the potential for developers to incorporate incidental amenity green space into housing schemes and in a scenario where the development replaces a derelict brownfield site, this could result in minor net gain of green space.	+		
			6	The approach will not improve the quality of existing open space given the limited scale of individual development sites, the likely incremental approach to development and thus, create limited capacity for contributions to off-site enhancements to be sought on this matter. It is also unlikely that the approach will lead to the deterioration of existing green space – the vast majority of sites underpinning this approach are brownfield.	0		
			7	The approach will contribute positively to raising the profile of green and blue infrastructure networks within the urban area by focusing population growth around them (e.g. the Erewash Canal, West Park, Trent Valley area and River Erewash) helping to ensure their long-term viability and protection. The potential for expansion and improvements to such networks is also more viable alongside a growing population. As discussed, there is the potential for blue infrastructure to be improved on the basis of redeveloping potential contaminated brownfield sites and such development could also facilitate opportunities for net biodiversity gain on sites which currently provide very little associated benefit. Such improvements and long-term prospects will be against a	+		

				context of likely increased usage and related pressures as a result of population growth which may present some challenges which need to be carefully managed. The approach will help to minimise impacts on sensitive green and blue infrastructure outside of the conurbation – for example within the Erewash Green Belt.			
		14	Landscape and Built Environment	1	The approach will respect and preserve landscape character by focusing growth within an existing urban environment. therefore outside of identified landscape character areas	++	++
				2	The approach will see the redevelopment of a large number of brownfield sites located within the conurbation - some of these sites display an appearance which is of detriment to the quality of the townscape they are sited within. Their redevelopment will therefore benefit wider general visual amenity. Focusing development in this way will also minimise impacts on surrounding identified landscape character areas outside the conurbation and associated visual amenity. In terms of site-specific development, visual impacts will need to be carefully managed through the development management process with a particular focus on design. On balance, this approach results in a positive impact on visual amenity.	+	
				3	The approach has a strong potential to enhance the local distinctiveness of the townscape through high quality redevelopment of sites within the conurbation, particularly brownfield sites which currently detract from the quality of the local environment. Enhancement may not always be possible, but this would need to be managed through the development management process.	+	
				4	Through the approach, there are opportunities to enhance the inter-relationship between the landscape and built environment. For example, through raising the profile of		

				and ultimately expanding the urban green infrastructure network in conjunction with population growth and developing better connections to the surrounding countryside. In general, the approach sees the continuation of the approach taken so far – to focus development within the urban area – and so would act to maintain the current inter-relationship between the two entities. Any risk posed to natural connections through site development are outweighed considerably by the potential for enhancements.	+		
		15	Heritage	1	Policy protections exist to ensure the conservation of historic assets (such by way of Conservation Area and Listed Building designations) even in the context of growth. There remain some risks – particularly that incremental growth, intensifying the existing urban area, will erode the settings of assets and designations over time. There is however some opportunity to enhance such settings, and the setting of the urban environment in general, through the re-use of brownfield sites which otherwise are of visual detriment to the area.	+	++
				2	The approach does present an opportunity to strengthen local character and townscape, by redeveloping brownfield sites which, in their current condition, may be of detriment to the character of the area.	+	
				3	The focus of development within the conurbation will increase the proportion of the wider population within easy access of local heritage assets and cultural activities. This will provide better opportunities for people to access and understand local heritage and to participate in cultural activities.	+	
				4	The approach itself will not protect or enhance access to and enjoyment of the historic environment but will also not be of detriment. There may be the opportunity to		

				improve both elements through individual developments, but this cannot be foreseen outside of known responses to existing policy requirements and protections relating to the historic environment.	0	Green		
			5	The approach itself will not conserve or enhance the archaeological environment – the development management process, along with relevant existing policy stipulations, will need to ensure individual developments appropriately respond to the archaeological environment and mitigate where required. There may be some archaeological value in some of the sites required to deliver the approach however this would be identified and responded to through the development management process.	0			
		16	Natural Resources and Waste Management	1	The approach, being related to housing development specifically, will not lead to a reduction in the consumption of raw materials. As part of the development required to deliver the approach, a short term increase in the use of raw materials is likely, as with any scenario whereby the construction of new dwellings is a central facet.	-	Light Green	
				2	The approach does not specifically promote the use of sustainable design, materials and construction techniques. These are largely controlled by building regulations and local policy does look to encourage sustainable design in recognition of climate change and mitigation. However this is a focussed issue which would need to be addressed through the masterplanning and development management processes. Notwithstanding this, there may be wider opportunities for integrating sustainable approaches in response to this approach (such as community energy systems as discussed at Objective 10) given the focus of population and utilities within the conurbation.	0		

				3	The approach will result in an increase in household waste locally in the long term and construction waste in the short term.	-		
				4	The approach in general will not have an impact on the production of hazardous waste locally. There is the minor potential that in redeveloping brownfield sites, some prevailing industrial uses which are responsible for the production of hazardous waste will be dispersed. There is also the potential that the sites themselves, upon being redeveloped, will benefit from remediation, minimising seepage of historic hazardous materials which may be present in the ground.	+		
				5	The approach will strongly protect the best and most versatile agricultural land by promoting development within the conurbation and away from agricultural land.	++		
				6	The approach will in general prevent the loss of greenfield land to development, certainly in relation to the countryside and wider Green Belt. But there does remain some risk of very minor levels of redevelopment on greenfield sites <i>within</i> the conurbation.	+		

Table 6. Option B - Growth within Ilkeston Urban Area (the town)

OPTIONS		PERFORMANCE				RATINGS	
		SA OBJECTIVE		POLICY CRITERIA QUESTIONS		CRITERIA QUESTION	OBJECTIVE
B	Growth within Ilkeston Urban Area (the town)	1	Housing	1	Growth within the town will result in new housing which accommodates a wide range of social groups. In particular, the nature of the town means that different development types – including higher density flat schemes – could be accommodated appropriately given the sustainability credentials and character of the area. It is expected that there will be significant limitations around what affordable provision can be achieved as a result of market housing development. This is due to the relatively poor-performing housing market in the town, compared with other areas of the Borough. However, the affordable nature of the market in general within the town also reduces the importance of affordable specific development when considered in the context of providing housing for a range of social groups. The intensification of the town’s urban area will result in an uplift in the provision of new homes and this will improve affordability in any case.	+	++
				2	The Derbyshire Gypsy and Traveller Accommodation Assessment (2014) requires the provision of a single Gypsy and Traveller pitch within the borough by 2019, with the single pitch amounting to the full need across the whole period covered by the Assessment (2018-2033). The intention was to provide this through the development management process in response to an application, should one be submitted, so no land required allocation. The continuation of this approach would mean that this approach to growth would not specifically provide pitches	0	

				and/ or plots, but equally would not preclude the opportunity to satisfy the borough's requirement through the development management process, should an application be received. The approach is therefore considered to have a neutral effect on this objective.			
			3	The provision of new dwellings within the town will diversify the housing stock and introduce additional provision in a location where homelessness is more likely to be an issue of significance (the town's urban area). This is likely to have a positive impact on homelessness in the longer term as capacity increases trickle down, ultimately having a positive impact on homeless accommodation capacity because affordable housing becomes more readily available to those moving out of homelessness. In the town specifically, given the relatively high levels of affordability which underpin the local housing market, this effect is likely to be stronger and more direct than in other parts of the plan area for example the conurbation (Long Eaton).	++		
			4	It is possible that the redevelopment of a site within the urban area – which will likely be previously developed land - may encompass existing unfit or vacant homes which fall within the land holding, which results in their redevelopment as part of the wider scheme. This is certainly a more likely prospect within the urban area given the predominant brownfield nature of urban sites. The precise extent of this possibility however is unknown in view of the widespread and incremental approach to development that this approach would result in.	0		
			5	Development sites within the town are generally small scale. As a result there is limited opportunity for contributions made as a result of development. This does not preclude the possibility that contributions will be			

				sought on sites of 10 or more homes, but the effects on provision of new infrastructure will be limited, ad hoc and potentially slow to emerge as it takes time to gather the required sums from numerous development sites. This is exacerbated considerably within the town because of the relatively weak housing market and low land values which will apply additional pressure to the balance of deliverability and viability. However in general the town represents a sustainable location in terms of <i>existing</i> infrastructure provision (albeit not as sustainable as the conurbation), and is able to accommodate additional growth because of this.	0			
		2	Employment and Jobs	1	There will be some short-term improvement to the diversity and quality of jobs available locally, resulting from the associated construction activity. However because of the nature of sites within the town being of limited scale, it is unlikely that new and permanent employers would be attracted to new development sites as part of mixed-use proposals. Whilst there may be some pressure from developers to repurpose existing employment sites for housing via this approach, policies exist to restrict this to only the lowest quality sites so valuable employment sites do not form part of this approach.	0	0	
				2	Development of sites for housing through this approach will deliver a short term boost to employment as a result of associated construction activity. Long term levels of employment are unlikely to be influenced; the sites being developed are unlikely to be mixed use due to their limited scale and in view of housing having a much higher alternative use value. Whilst there may be some pressure from developers to repurpose existing employment sites for housing via this approach, policies exist to restrict this	0		

				to only the lowest quality sites so valuable employment sites do not form part of this approach.			
			3	Rural productivity will remain relatively distinct from the urban area in employment and jobs terms. There may be some prospect that the replacement of poor quality employment sites within the urban area with housing development will result in a slight shift in businesses considering relocating from urban to rural areas but this would be a minor trend.	0		
		3	Economic Structure and Innovation	1	There may be the potential for land and buildings of the type required by businesses to be provided as part of larger scale mixed-use redevelopment sites, though it is expected that the prospects of this are minimal given the limited size of housing development sites within the town required to deliver the approach. Notwithstanding this, it is not expected that this approach would see the <i>removal</i> of land and buildings of the type required by businesses as delivery of the approach does not require the replacement of good quality employment premises as per the protections afforded to good and upper-average employment land through the Erewash Core Strategy and Economic and Employment Land Study 2019.	0	+
			2	Due to the limited size of housing development sites identified within the town to facilitate the approach, business and university clusters will not be provided – such an outcome would require large-scale development.	0		
			3	It is unlikely to provide jobs in high knowledge sectors as business and university clusters are unlikely to locate through this approach (see 3(2)) and it is not expected that the approach will in itself create permanent, long-term employment either.	0		
			4	Graduates will be afforded a greater opportunity to live and work within the plan area on the basis of a boosted			

				supply of new homes within the town which already provides for a wide range of important facilities and services, and which enjoys outstanding connectivity to Nottingham and which hosts successful universities. However, the lack of development through this approach at a scale which attracts university clusters or notable employment opportunities will limit the positive impact of this.	+		
			5	The approach does not include provision for new employment as it is focused on housing development. As such there is no requirement to provide infrastructure specific to economic structure and innovation.	0		
		4	Shopping Centres	1	The town centre of Ilkeston will benefit significantly in terms of encouraging its long-term viability and vitality through this approach. By focusing housing development, and thus population growth within the town, the town centre is more likely to be able to sustain itself both economically and socially in the long term.	++	++
		5	Health and Well Being	1	The town has in place an existing health infrastructure (doctors surgeries, dentists etc.) from which new and existing residents will and do benefit from. The focus of new residential development within the town encourages active lifestyles as new residents are able to go about their lives in a sustainable manner, including by walking to nearby services and facilities and engaging in sport and recreation. The town provides a good range of facilities to accommodate this. This approach has the potential to reduce health inequalities as a result.	+	+
				2	Focusing development within the town will increase the extent of population who benefit from easy and sustainable access to existing health services as described at 5(1). Related increase in demand will in the longer term result in a need for additional investment in provision to	+	

				meet increasing demand. This raises the potential for new and/or improved services to be provided locally.			
			3	New development within the town is expected to be incremental and of limited scale. As such it is unlikely that the approach will command adequate levels of contributions to fund <i>new</i> recreational facilities. However such an approach will serve to increase the extent of population with access to <i>existing</i> facilities present within the town. Moreover, the town benefits from public recreational assets, easily accessible to the population within the area – for example the River Erewash and Erewash Canal.	+		
			4	New development within the town is expected to be incremental and of limited scale. As such it is unlikely that the approach will command adequate levels of contributions to fund new or improve existing open space. Given the scale of individual development sites likely to form this approach, it is highly unlikely that open space other than that which may provide for minor amenity needs, will be integrated into new development. There may be a minor risk that disused or unkempt open space assets will lost to development.	-		
			5	The approach will not improve access to local food growing opportunities. There is a small risk that intensification of the urban environment will put at risk the long-term viability of private allotment sites where alternative forms of development (housing) are promoted. However at this time the approach does not rely on the re-use of public or private allotment sites which are evidenced as still being in use.	0		
	6	Community Safety	1	The redevelopment of brownfield sites through urban intensification could lead to a reduction in crime, where crime occurrence is present on derelict and unkempt land.		++	

				<p>Redevelopment of such sites is also likely to reduce the fear of crime, as sites are regenerated having a significant positive impact on the character and appearance of an area. An increase in population within the town resulting from the approach will also increase opportunities for natural surveillance. On the contrary, there may be a minor risk of an increase in crime, brought about by the associated increase in population facilitated by redevelopment (and specifically, an intensification of the urban environment).</p>	+		
			2	<p>The approach will rely on redevelopment of brownfield sites with some of these expected to be derelict and unkempt with associated built environment safety issues. Their redevelopment will help to foster a reduction in structurally unsafe buildings and hazardous sites and contribute to the expansion of a safe and secure built environment.</p>	++		
	7	Social Inclusion	1	<p>The increase in population within the established urban area, brought about through a strategy of intensification, could help to sustain and enhance existing cultural assets (for example a library or museum) that would otherwise be at risk from closure. There is a very minor risk that the promotion of this strategy might encourage the disposal of privately owned assets to accommodate new housing growth should this present a more commercially attractive proposition. However there are a variety of mechanisms available to protect such assets (including local plan policy and Assets of Community Value protections) which would maintain their existence and allow each to retain an important and viable position serving the wider area.</p>	+	++	
			2	<p>It is expected that an increasing diversification and extent of population, facilitated by an approach of urban intensification, will help to sustain existing and enable new</p>			

				community activities within the town (see 7(1)). The approach will help influence an increase in the proportion of the wider population who will benefit from easy access to such activities and thus increase general engagement and satisfaction.	+		
			3	An increasing diversification and extent of population within the town facilitated by an approach of intensification will help to sustain and potentially increase the number of facilities where this generates a clear demand. Where demand increases through population growth, there may be the potential for increasing the range of facilities as an expanded offer becomes commercially viable. There is a very minor risk that such an approach might encourage the disposal of privately owned assets to accommodate new housing growth. However there are a variety of mechanisms available to protect such assets (for example through Local Plan policy or Assets of Community Value designations) which would maintain their existence and allow each to retain an important and viable position within the wider environment. In any case the disposal of existing assets for alternative uses is made less likely in the event of population growth where increased demand would significantly bolster commercial viability, as with new facilities.	+		
			4	New development within the town is expected to be incremental and of limited scale. As such it is unlikely that the approach will command adequate levels of contributions to fund <i>new</i> educational facilities. This presents a small risk that existing provision will be stretched at least in the short term, however the local education authority ultimately have a duty to provide an appropriate number of school places to serve the local population.	0		

		8	Transport	1	The approach will use (and rely on) the existing transport infrastructure of the town. New development is expected to be incremental and of limited scale. As such it is unlikely that the approach will command adequate levels of contributions to fund <i>new</i> transport infrastructure. Given the associated population increase, this will lead to an increase in demand on the existing system. Notwithstanding this, opportunities to enhance the system incrementally – for example by increasing the frequency and availability of public transport in response to demand and commercial opportunities – may arise.	-	+	
				2	The approach focuses development within a town served by an established transport network. As such the construction of large-scale infrastructure (such as a new road) will not be required and land with environmental value will not be put at risk through such construction. The locating of new development as proposed closely connects a growing population to existing employment, services and facilities as well as public transport options, reducing the need to travel long distances and unsustainably. This should contribute to the development of a transport network which in the long-term minimises impact on the environment.	++		
				3	The focusing of development within the town will contribute to influencing the reduction of private car journeys by encouraging the use of alternative modes of transport, when compared with likely effects from development outside of the town. Development focused within the town will benefit from an established transport network with employment, services and facilities as well as public transport options within close reach of residents.	++		
				4	The approach to focus development within the town will expand the proportion of the wider population living			

				within close proximity to existing services and facilities, in effect helping to increase general accessibility to services and facilities (including public transport), particularly when considered against other potential options for growth.	+		
		9	Brownfield Land	1	A large proportion of land identified for housebuilding within the town has been previously developed. Intensification of the urban environment as this approach advocates, in the context of delivering the required number of homes, will influence an approach which efficiently re-uses brownfield land. This is especially the case within the urban context, where the provision of higher densities on brownfield sites is also feasible and relates well to securing the effective use of brownfield land.	++	++
				2	The redevelopment of brownfield land, which represents a large proportion of total development within the town, will present risks to biodiversity as with any development (including greenfield). However in general, redevelopment of land which has previously been developed is an approach likely to minimise any adverse impact on the biodiversity interests of land in general.	+	
		10	Energy and Climate Change	1	Any new development of this type will result in additional energy use. However when compared with other approaches, the location of new development within the town presents opportunities to reduce potential energy use through minimising travel and promoting modal shift. The growing population will be able to access services, facilities and employment without the use of a private car, or through the use of public transport.	0	+
				2	The energy efficiency of new dwellings built as part of this approach will be far superior to much of the existing older housing stock. In essence this will contribute to a general	+	

				improvement in the energy efficiency of the plan area housing stock overall.			
			3	There is potential that new development will seek to incorporate the generation and use of renewable energy sources in-site (for example, via solar panels attached to individual dwellings), however there is not currently a statutory requirement for this. The expected limited scale of sites contributing to this approach within the town rule out the possibility of larger-scale interventions (for example, development of community energy systems – see 10(4) or centralised power generation).	0		
			4	The limited scale of sites available for development within the town makes opportunities for larger-scale interventions such as community energy systems as a direct result of new development unlikely. Equally, the approach would not specifically prohibit provision of a community energy system should a developer present a solution that were able to be accommodated within the area - and indeed, the presence of a growing number of households may provide additional commercial impetus for such an approach to be developed in the longer term.	0		
			5	Any new development will be subject to climate change policy, guidance and regulations stipulating the standards to which construction should be undertaken. This includes in relation to flood risk. The construction of new dwellings in this way will apply through any of the approaches being considered. Given that development as part of this approach is expected to be incremental, there is not expected to be opportunity to incorporate wider-scale interventions to ensure wholesale climate change adaptability.	0		
	11	Pollution and Air Quality	1	The locating of new development within the town brings a growing population in close proximity to existing			-

				employment, services and facilities as well as public transport options, reducing the need to travel long distances via private car and increasing the opportunity for clean forms of travel (such as walking and cycling) to proliferate. Therefore, whilst any new development has the potential to increase air pollution, the focusing of new development within established urban environments will have the least-negative effect. As the approach relates to housing development only, it is not envisaged that noise will be a significant output. Notwithstanding this, any impacts from increased noise will be extremely minimal within the context of an already established urban environment.	-		
		12	Flooding and Water Quality	1	Sites which have been identified by the Erewash Strategic Housing Land Availability Assessment as being available to contribute to delivering this approach within the town fall within either Flood Zone 1 or 2. Therefore the approach will be able to effectively minimise or mitigate flood risk when taken as a whole. However, it is obvious that new development within an urbanised area at risk from flooding will require any arising flood risk to be minimised or mitigated at the outset, and this does represent a minor negative impact in sustainability terms. On balance though, in view of the ability of the approach to minimise and mitigate, the effect is considered to be neutral.	0	+
				2	It is expected that the redevelopment of brownfield sites within the town – some of which may display varying levels of contamination – would lead to the improvement of local water quality. This effect will be magnified by the near-total avoidance of construction on greenfield sites as a result of this approach, which act as important natural drainage assets as part of the wider water cycle.	+	

			3	Locally, the approach is likely to impact negatively on water conservation, creating additional demand to be met as a result of local population growth despite building regulations providing scope for more efficient use of water (see 12(4)).	-		
			4	The water efficiency credentials of new dwellings being built when compared with existing older stock within the town will be superior owing to building regulations. In essence this will lead to a general improvement in the water efficiency of the plan area's stock and promotion of water efficiency in general.	+		
			5	The approach is unlikely to result in a deterioration of Water Framework Directive status or of on-site watercourses. Most development sites within the town will be previously developed land with appropriate means of drainage to treatment facilities already in place. The redevelopment of existing urban sites is unlikely to introduce new risks to the Water Framework Directive status given the existing condition of land as described. There is the potential to improve water quality and the associated Water Framework Directive status through remediation as discussed at 12(2).	0		
		13	Natural Environment, Biodiversity, Green and Blue Infrastructure	1	It is considered that the approach, which directs new development to within the town, will help ensure the long-term protection of alternative sites with more pronounced biodiversity value that fall outside of the area from development pressures. In addition, the redevelopment of brownfield sites – potentially subject to contamination – could present opportunities for biodiversity improvements which would not present themselves without prospects of redevelopment. Brownfield sites often display biodiversity value themselves, however this can be managed as part of redevelopment, and in any case the re-use of brownfield	+	+

				land is considered a more sensitive proposition in biodiversity terms when compared with potential development on greenfield land. It is assumed in the absence of more detailed and up-to-date information on specific sites that protected species could be at risk and this would need to be carefully managed through the development management process.			
			2	Redeveloping predominantly brownfield sites does present an opportunity to secure biodiversity net gains as part of new development, for example resulting from site remediation and implementation of amenity green space, even if very minor in scale.	+		
			3	It is expected that the approach will have a minor impact on the geological environment given that it relates to development which will require the extraction of material to facilitate construction. No Regionally Important Geomorphological Sites are identified on or under the land in question as identified within the Strategic Housing Land Availability Assessment.	-		
			4	The approach will contribute positively to maintaining woodland cover and management within the plan area, as no woodland would be put at risk as a result of implementing the approach. It is not expected the approach would result in woodland enhancement though.	0		
			5	It is not expected that new open space will be provided through this approach given the limited scale of individual development sites, likely incremental approach to development and thus limited capacity for contributions to be sought on this matter. There is the potential for developers to incorporate incidental amenity green space into housing schemes and in a scenario where the development replaces a derelict brownfield site, this could result in minor net gain of green space.	+		

			6	The approach will not improve the quality of existing open space given the limited scale of individual development sites, the likely incremental approach to development and thus, create limited capacity for contributions to off-site enhancements to be sought on this matter. It is also unlikely that the approach will lead to the deterioration of existing green space – the vast majority of sites underpinning this approach are brownfield.	0		
			7	The approach will contribute positively to raising the profile of green and blue infrastructure networks within the urban area by focusing population growth around them (e.g. the Erewash Canal, Wash Meadows, Victoria Park, Nutbrook Corridor and River Erewash) helping to ensure their long term viability and protection. The potential for expansion and improvements to such networks is also more viable alongside a growing population. As discussed, there is the potential for blue infrastructure to be improved on the basis of redeveloping potential contaminated brownfield sites and such development could also facilitate opportunities for net biodiversity gain on sites which currently provide very little associated benefit. Such improvements and long term prospects will be against a context of likely increased usage and related pressures as a result of population growth which may present some challenges which need to be carefully managed. The approach will help to minimise impacts on sensitive green and blue infrastructure outside of the town – for example within the Erewash Green Belt.	+		
		14	Landscape and Built Environment	1	The approach will respect and preserve landscape character by focusing growth within an existing urban environment, therefore outside of identified landscape character areas.	++	++

				2	The approach will see the redevelopment of a large number of brownfield sites located within the town - some of these sites display a condition which is of detriment to the quality of the townscape they are sited within. Their redevelopment will therefore benefit wider general visual amenity. Focusing development in this way will also minimise impacts on surrounding identified landscape character areas and associated visual amenity. In terms of site- specific development, visual impacts will need to be carefully managed through the development management process with a particular focus on design. On balance, this approach results in a positive impact on visual amenity.	+		
				3	The approach has a strong potential to enhance the local distinctiveness of the townscape through high quality redevelopment of sites within the town, particularly brownfield sites which currently detract from the quality of the local environment. Enhancement may not always be possible, but this would need to be managed through the development management process.	+		
				4	Through the approach, there are opportunities to enhance the inter-relationship between the landscape and built environment. For example, through raising the profile of and ultimately expanding the urban green infrastructure network in conjunction with population growth and developing better connections to the surrounding countryside. In general, the approach sees the continuation of the approach taken so far – to focus development within the urban area – and so would act to maintain the current inter-relationship between the two entities. Any risk posed to natural connections through site development are outweighed considerably by the potential for enhancements.	+		

		15	Heritage	1	Policy protections exist to ensure the conservation of historic assets (such by way of Conservation Area and Listed Building designations) even in the context of growth. There remain some risks – particularly that incremental growth, intensifying the existing urban area, will erode the settings of assets and designations over time. There is however some opportunity to enhance such settings, and the setting of the urban environment in general, through the re-use of brownfield sites which otherwise are of visual detriment to the area.	+	++	
				2	The approach does present an opportunity to strengthen local character and townscape, by redeveloping brownfield sites which, in their current condition, may be of detriment to the character of the area.	+		
				3	The focus of development within the town will increase the proportion of the wider population within easy access of local heritage assets and cultural activities. This will provide better opportunities for people to access and understand local heritage and to participate in cultural activities.	+		
				4	The approach itself will not protect or enhance access to and enjoyment of the historic environment but will also not be of detriment. There may be the opportunity to improve both elements through individual developments, but this cannot be foreseen outside of known responses to existing policy requirements and protections relating to the historic environment.	0		
				5	The approach itself will not conserve or enhance the archaeological environment – the development management process, along with relevant existing policy stipulations, will need to ensure individual developments appropriately respond to the archaeological environment and mitigate where required. There may be some	0		

				archaeological value in some of the sites required to deliver the approach however this would be identified and responded to through the development management process.			
		16	Natural Resources and Waste Management	1	The approach, being related to housing development specifically, will not lead to a reduction in the consumption of raw materials. As part of the development required to deliver the approach, a short term increase in the use of raw materials is likely, as with any scenario whereby the construction of new dwellings is a central facet.	-	+
				2	The approach does not specifically promote the use of sustainable design, materials and construction techniques. These are largely controlled by building regulations and local policy does look to encourage sustainable design in recognition of climate change and mitigation. However this is a focussed issue which would need to be addressed through the masterplanning and development management processes.	0	
				3	The approach will result in an increase in household waste locally in the long term and construction waste in the short term.	-	
				4	The approach in general will not have an impact on the production of hazardous waste locally. There is the minor potential that in redeveloping brownfield sites, some prevailing industrial uses which are responsible for the production of hazardous waste will be dispersed. There is also the potential that the sites themselves, upon being redeveloped, will benefit from remediation, minimising seepage of historic hazardous materials which may be present in the ground.	+	
				5	The approach will strongly protect the best and most versatile agricultural land by promoting development within the town and away from agricultural land.	++	

			6	The approach will in general prevent the loss of greenfield land to development, certainly in relation to the countryside and wider Green Belt. But there does remain some risk of very minor levels of redevelopment on greenfield sites within the town.	+		
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Table 7. Option C – Growth within the Rural Area (the villages)

OPTIONS		PERFORMANCE				RATINGS		
		SA OBJECTIVE		POLICY CRITERIA QUESTIONS		CRITERIA QUESTION	OBJECTIVE	
C	Growth within the Rural Area (the villages)	1	Housing	1	Small levels of growth within the rural villages, as is propagated by this approach, will result in some new housing which may help diversify the market and increase the range and affordability of housing for some social groups, but it is expected to be to a limited extent given the restricted range of accommodation types which would be considered suitable for rural locations, as well as the very modest scale of development emerging which, among other restrictions, would limit the extent to which contributions towards affordable provision could be sought. Rural locations are more limited in their provision of employment, facilities and other assets and this will also limit their potential to provide adequately for a wide range of social groups – such as those without access to a private vehicle.	0	-	
				2	The Derbyshire Gypsy and Traveller Accommodation Assessment (2014) requires the provision of a single Gypsy and Traveller pitch within the borough by 2019, with the single pitch amounting to the full need across the whole period covered by the Assessment (2018-2033). The intention was to provide this through the development management process in response to an application, should one be submitted, so no land required allocation. The continuation of this approach would mean that this approach to growth would not specifically provide pitches and/ or plots, but equally would not preclude the opportunity to satisfy the borough’s requirement through	0		

				the development management process, should an application be received. The approach is therefore considered to have a neutral effect on this objective.			
			3	It is considered unlikely that the approach will have any effect on levels of homelessness due to the very limited scope of proposed redevelopment advocated by this approach as well as the lack of affordability in general within the rural areas, limiting the range and diversity of affordable stock which might be developed. In addition, geographically the rural areas are far less significant in terms of tackling homelessness as the problem is far less persistent than in urban areas, so any effect will be further diluted when assessing against the plan area's homelessness situation as a whole.	0		
			4	It is possible that the redevelopment of a site within rural settlements – which will likely be previously developed land - may encompass existing unfit or vacant homes which fall within the land holding, which results in their redevelopment as part of the wider scheme. The precise extent of this possibility however is unknown in view of the widespread and incremental approach to development that this approach would result in.	0		
			5	The scale of development advocated by this approach is very minor. As a result, there is very limited opportunity for contributions made as a result of development to the extent that <i>new</i> infrastructure can be provided. Compounding this is the generally limited nature of existing infrastructure in the rural areas when compared with urban parts of the plan area that would be required to absorb impacts from any new development through this approach.	-		
	2	Employment and Jobs	1	There will be some short-term improvement to the diversity and quality of jobs available locally, resulting			0

				from the associated construction activity. However due to the very limited scale of development and attributed population growth associated with this approach, it is highly unlikely that new and permanent employers would be encouraged to locate.	0		
				2 Development of sites for housing through this approach will deliver a short-term – though very minor - boost to employment as a result of associated construction activity. Long-term levels of employment are very unlikely to be influenced due to the very limited scale of development and attributed population growth associated with this approach.	0		
				3 There will be a short-term improvement to rural productivity in terms of employment opportunities as a result of associated construction activity locally. Given that it is not expected this approach would attract new employers, or help facilitate new employment sites, this trend would not be observed over the long-term.	0		
		3	Economic Structure and Innovation	1 The scale of development forming this approach is so minimal when extrapolated out across the borough as a whole that it is highly unlikely the approach would lead to the provision of land and buildings of the type required by businesses. Notwithstanding this, it is not expected that this approach would see the <i>removal</i> of land and buildings of the type required by businesses as delivery of the approach does not require the replacement of good quality employment premises as per the protections afforded to good and upper-average employment land through the Erewash Core Strategy and Economic and Employment Land Study 2019.	0	0	
				2 The scale of development forming this approach is so minimal when extrapolated out across the borough as a whole that business and university clusters will not be	0		

				provided – such an outcome would require large-scale development.			
			3	It is highly unlikely to provide jobs in high knowledge sectors as business and university clusters are unlikely to locate through this approach (see 3(2)) and it is not expected that the approach will in itself create permanent, long-term employment either.	0		
			4	The approach will do very little to attract graduates to locate within the plan area. Rural settlements, with such minor levels of growth and limited connectivity, are not expected to attract the interest of graduates seeking work, likely within the conurbations or town.	0		
			5	The approach does not include provision for new employment as it is focused on housing development. As such there is no requirement to provide infrastructure specific to economic structure and innovation.	0		
		4	Shopping Centres	1	A small amount of growth within rural villages will help to support the vitality of village centre provision. In terms of formal designations, there is the potential for some benefit to arise for one Local Centre through this approach (Borrowash).	+	+
		5	Health and Well Being	1	The approach will fail to locate new population close to existing health infrastructure of the extent and range required to support the needs of a growing population. Rural populations tend to be more reliant on use of the private car to access services and facilities provided by larger settlements and this reduces the opportunity to promote active lifestyles as residents are generally unable to go about their lives in an entirely sustainable manner, such as by walking to nearby services and facilities. This fails to promote a reduction in health inequalities.	0	-
				2	The approach will not improve accessibility to health services for the population. On the contrary, it will		

				increase the population having to access services through unsustainable means, such as use of the private car. Notwithstanding this, there is no evidence that the approach would be of detriment to existing levels of access to services. Given the minor levels of development associated with this approach, there is no scope for improvements to existing facilities or provision of new.	0		
			3	The limited scale of growth associated with the approach means that prospects to facilitate new or improve existing recreational facilities locally is extremely limited. Compounding this is the fact that existing facilities are more limited in supply within rural areas and would be placed under greater pressure in the event of a significantly expanding population; however the limited scale of growth proposed as part of this approach limits impacts from this. Moreover, the availability of natural recreational assets which could accommodate physical activity help to neutralise risks associated with such an approach.	0		
			4	The approach is based on very minor and incremental growth. As such, it is highly unlikely that new open space will be provided. In addition, it is very unlikely there will be scope – such as that resulting from developer contributions – to improve existing open space. There may be a minor risk that disused or unkempt open space assets will be lost to development.	-		
			5	The approach will not improve access to local food growing opportunities. There is a very small risk that intensification of rural villages will put at risk the long-term viability of private allotment sites where alternative forms of development (housing) are promoted. However, the very minor scale of development amounting to this approach limits this risk.	0		

		6	Community Safety	1	Some redevelopment sites within rural villages will be brownfield in nature and thus may suffer from dereliction and associated crime issues. Their redevelopment could therefore reduce crime as well as the fear of crime, as sites are regenerated, contributing positively to the character and appearance of an area. An increase in population within the villages will also increase the opportunity for natural surveillance. On the contrary, there may be a minor risk of an increase in crime, brought about by the associated increase in population facilitated by redevelopment. The consolidation of these potential effects will likely result in a minor influence on the objective when compared with potential effects on urban environments given the very limited scale of development amounting to this approach.	+	+	
				2	Some redevelopment sites within rural villages will be brownfield in nature and thus could suffer from associated built environment safety issues. In such circumstances, their redevelopment would resolve by fostering a reduction in structurally unsafe buildings and unsecured sites, leading to an increasingly safe and secure built environment. The consolidation of these potential effects will likely result in a minor influence on the objective when compared with potential effects on urban environments given the very limited scale of development amounting to this approach.	+		
		7	Social Inclusion	1	A very minor increase in population within the rural villages amounting to this approach could help to sustain existing cultural assets (for example a library or village hall) that would otherwise be at risk from closure but only to an extremely limited extent. It is also unlikely that there would be the potential for enhancement resulting from this approach. There is also a very minor risk that the	0	0	

				promotion of this strategy might encourage the disposal of privately owned assets to accommodate new housing growth should this present a more commercially attractive proposition. However there are a variety of mechanisms available to protect such assets (including local plan policy and Assets of Community Value protections) which would maintain their existence and allow each to retain an important and viable position serving the wider area.			
				2 Whilst a very minor increase in population within rural villages could help to sustain existing assets, it is not thought that such an approach would act to noticeably improve access to, engagement with and residents' satisfaction with community activities.	0		
				3 A very minor increase in population resulting from this approach could help to sustain existing facilities (such as shops) but would not be of a scale to warrant any notable increase in the number of facilities. Indeed there is a very minor risk that such an approach might encourage the disposal of privately owned assets to accommodate new housing growth. However there are a variety of mechanisms available to protect such assets (for example through Local Plan policy or Assets of Community Value designations) which would maintain their existence and allow each to retain an important and viable position within the wider environment.	0		
				4 New development within rural villages will be incremental and of very limited scale. As such it is expected that any marginal increase in school-age children resulting from this approach will be adequately absorbed into the existing school system.	0		
		8	Transport	1 The approach will use existing rural village and surrounding transport infrastructure, however the very minor scale of growth is not expected to place noticeable	0		--

				<p>demand on the transport system. This also means it is unlikely there will be any scope to enhance transport-related infrastructure.</p>			
			2	<p>This approach is not likely to require the development of new infrastructure that would put at risk any element of the environment. However, the approach – whilst only minor in scale – in the long-term would see growth in locations which fail to provide the full range of facilities and services required by a population. It would fail to – in general – closely connect a growing population to existing employment, services and facilities as well as public transport options, increasing the need to travel long distances via unsustainable means of transport. This will introduce additional impacts on the environment.</p>	-		
			3	<p>The approach will fail to connect a growing population to larger centres providing employment, services and facilities, increasing the need to travel long distances via unsustainable means of transport. In effect it is expected that the approach will result in an increase in private car journeys with the scope to promote alternative modes of transport being limited.</p>	-		
			4	<p>Some rural villages provide for very little, if any, local services and facilities. Overall therefore it is not considered the approach would amount to tangibly increasing accessibility to services and facilities when also considering that the approach would not result in a need for new services or facilities to be established either. On a very minor scale, the approach could contribute to increasing the extent of overall population in the plan area with poor access to services and facilities. This is mitigated due to the very minor extent of growth that would result from this approach, but not removed entirely.</p>	-		

		9	Brownfield Land	1	The approach limits opportunities for growth to within settlement extents. As a result there is a strong possibility that land utilised will be brownfield in nature; thus the approach will make use of brownfield land. This will be done less efficiently than in a more urban context, which may also be able to accommodate increased densities on brownfield land.	+	++
				2	The redevelopment of brownfield land will present risks to biodiversity as with any development (including greenfield). However in general, redevelopment of land which has previously been developed is an approach likely to minimise impact on the biodiversity interests of land in general. This effect is particularly strong within rural settlements; any development within this context is likely to have a bigger effect on the surrounding rural environs by protecting biodiversity interests.	++	++
		10	Energy and Climate Change	1	Any new development of this type will result in additional energy use. However, when compared with other approaches, the location of new development within the rural villages is likely to enhance this effect due to the likely dependence of an incumbent population on use of the private car to access the full range of services and facilities required. The scale of development forming this approach is limited enough that this effect (on the plan area) would be minor.	-	-
				2	The energy efficiency of new dwellings built as part of this approach will be far superior to much of the existing older housing stock. However given the extremely limited scale of growth attributed to this approach, the effect is considered negligible overall.	0	-
				3	There is potential that new development will seek to incorporate the generation and use of renewable energy sources in-site (for example, via solar panels attached to		-

				individual dwellings), however there is not currently a statutory requirement for this and in any case the scale of development is so minor that the effect on the plan area would be negligible. The very limited scale of development forming this approach rules out the possibility of larger-scale interventions (for example, development of community energy systems – see 10(4) or centralised power generation).	0		
			4	The limited scale of development forming this approach makes opportunities for larger-scale interventions such as community energy systems as a direct result of new development highly unlikely. The lack of presence of a significant existing population in rural areas also means that scope for development of such a system, supported by the wider population, would be extremely limited.	0		
			5	Any new development will be subject to climate change policy, guidance and regulations stipulating the standards to which construction should be undertaken. This includes in relation to flood risk. The construction of new dwellings in this way will apply through any of the approaches being considered. Given that development as part of this approach will be incremental and of a very minor scale, there is not expected to be opportunity to incorporate wider-scale interventions to ensure wholesale climate change adaptability.	0		
		11	Pollution and Air Quality	1	The locating of new development within the rural villages will largely fail to locate a growing population in close proximity to existing employment, services and facilities. It is therefore unlikely to reduce the need to travel by private car and will likely fail to increase opportunities for the proliferation of clean forms of travel (such as walking and cycling) and thus minimise any potential to mitigate air pollution. The extent of development facilitated by this	-	-

				approach is extremely limited so, whilst the extent of impact on pollution levels is minimal, it is nonetheless negative. The approach relates to housing development only and as such it is not envisaged that noise will be a significant output, particularly in the context of the very limited scale of development associated with the approach.			
		12	Flooding and Water Quality	1	Sites which have been identified by the Erewash Strategic Housing Land Availability Assessment as being available to contribute to delivering this approach within the rural villages fall within either Flood Zone 1 or 2. Therefore the approach will be able to effectively minimise or mitigate flood risk when taken as a whole. Even where flood risk issues do emerge, the very limited scale of growth associated with this approach impacts will be negligible.	0	0
				2	It is possible that the redevelopment of brownfield sites within the rural villages – some of which may display varying levels of contamination – could lead to the improvement of local water quality. This effect will be magnified by the near-total avoidance of construction on greenfield sites as a result of this approach, which act as important natural drainage assets as part of the wider water cycle. However on balance the effect is likely to be so minor, because the extent of past industrial activities within the rural villages is likely to be extremely limited; and thus the risks emerging from associated contamination are likely to be very minimal.	0	
				3	Locally, the approach is likely to impact negatively on water conservation, creating additional demand to be met as a result of local population growth.	-	
				4	The water efficiency credentials of new dwellings being built when compared with existing older stock within the rural villages will be superior owing to building regulations.	+	

				In essence this will lead to a general improvement in the water efficiency of the plan area's stock and promotion of water efficiency in general.			
			5	The approach is unlikely to result in a deterioration of Water Framework Directive status or of on-site watercourses. Most development sites within the rural villages will be previously developed land with appropriate means of drainage to treatment facilities already in place. The redevelopment of existing urban sites is unlikely to introduce new risks to the Water Framework Directive status given the existing condition of land as described. There is the potential to improve water quality and the associated Water Framework Directive status through remediation as discussed at 12(2).	0		
		13	Natural Environment, Biodiversity, Green and Blue Infrastructure	1	It is considered that the approach, which directs new development to within the rural villages and will likely require primarily the re-use of brownfield land, will help ensure the long-term protection of alternative sites with more pronounced biodiversity value that fall outside of them, from development pressures. In addition, the redevelopment of brownfield sites – potentially subject to contamination – could present opportunities for biodiversity improvements which would not present themselves without prospects of redevelopment. Brownfield sites often display biodiversity value themselves, however this can be managed as part of redevelopment, and in any case the re-use of brownfield land is considered a more sensitive proposition in biodiversity terms when compared with potential development on greenfield land. It is assumed in the absence of more detailed and up-to-date information on specific sites that protected species could be at risk and	+	+

				<p>this would need to be carefully managed through the development management process.</p>			
				<p>2 Redeveloping predominantly brownfield sites does present an opportunity to secure biodiversity net gains as part of new development, for example resulting from site remediation and implementation of amenity green space, even if very minor in scale.</p>	+		
				<p>3 It is expected that the approach will have a minor impact on the geological environment given that it relates to development which will require the extraction of material to facilitate construction. No Regionally Important Geomorphological Sites are identified on or under the land in question as identified within the Strategic Housing Land Availability Assessment.</p>	-		
				<p>4 The approach will contribute positively to maintaining woodland cover and management within the plan area, as no woodland would be put at risk as a result of implementing the approach. It is not expected the approach would result in woodland enhancement though.</p>	0		
				<p>5 It is not expected that new open space will be provided through this approach given the limited scale of individual development sites, likely incremental approach to development and thus limited capacity for contributions to be sought on this matter. There is the potential for developers to incorporate incidental amenity green space into housing schemes and in a scenario where the development replaces a derelict brownfield site, this could result in minor net gain of green space.</p>	+		
				<p>6 The approach will not improve the quality of existing open space given the limited scale of individual development sites, the likely incremental approach to development and thus, create limited capacity for contributions to off-site enhancements to be sought on this matter. It is also</p>			

				unlikely that the approach will lead to the deterioration of existing green space – by focussing development within the existing built extent of the villages, it is expected that the majority of sites underpinning this approach will be brownfield.	0		
			7	The approach is unlikely to have a noticeable positive or negative impact on blue or green infrastructure networks given the very limited extent of growth forming part of this approach. The focus of development within the existing built extent of villages will help ensure such networks are not impacted upon negatively.	0		
		14	Landscape and Built Environment	1	Rural settlements in Erewash are located within defined Landscape Character Areas. Therefore, there is the risk that development within the rural settlements will impact negatively on wider landscape character value, however this is considered to be very minor. Overall, the approach will ensure that development is located within the existing built extent of the rural settlements and in general this represents an approach which is likely to respect and preserve identified landscape character.	+	+
				2	The approach will see the redevelopment of brownfield sites within existing settlements - some of these sites display an appearance which is of detriment to the quality of the townscape they are sited within. Their redevelopment will therefore benefit wider general amenity. Focusing development in this way will also minimise impacts on surrounding identified landscape character areas outside of settlements and associated visual amenity. In terms of site-specific development, visual impacts will need to be carefully managed through the development management process with a particular focus on design. On balance, this approach results in a positive impact on visual amenity.	+	

			3	The approach has a strong potential to enhance the local distinctiveness of the settlements through high quality redevelopment of brownfield sites which currently detract from the quality of the local environment. Enhancement may not always be possible, but this would need to be managed through the development management process with a focus on securing good design.	+	
			4	The very minor scale and incremental approach to growth associated with this option is unlikely to enhance the inter-relationship between the landscape and built environment. There is a very minor risk that natural connections which link villages to their surrounding countryside are more prevalent within rural settlements and these may be put at risk through site redevelopment.	-	
	15	Heritage	1	Policy protections exist to ensure the conservation of historic assets (such by way of Conservation Area and Listed Building designations) even in the context of growth. There remain some risks – particularly that incremental growth, intensifying the built form of a settlement, will erode the settings of assets and designations over time. There is however some opportunity to enhance such settings, and the setting of the built environment in general, through the re-use of brownfield sites which otherwise are of visual detriment to the area.	+	+
			2	The approach does present an opportunity to strengthen local character and townscape, by redeveloping brownfield sites which, in their current condition, may be of detriment to the character of the area.	+	
			3	Due to the very limited scale of growth attributed to this approach, it is unlikely to increase the proportion of the wider population within easy access of local heritage	0	

				assets and cultural activities to the extent that there would perceived benefits in relation to this objective.			
				4 The approach itself will not protect or enhance access to and enjoyment of the historic environment but will also not be of detriment. There may be the opportunity to improve both elements through individual developments, but this cannot be foreseen outside of known responses to existing policy requirements and protections relating to the historic environment. The very minor-scale and incremental approach to delivery within this approach does not present opportunities to implement specific interventions to improve access.	0		
				5 The approach itself will not conserve or enhance the archaeological environment – the development management process, along with relevant existing policy stipulations, will need to ensure individual developments appropriately respond to the archaeological environment and mitigate where required. There may be some archaeological value in some of the sites required to deliver the approach however this would be identified and responded to through the development management process.	0		
		16	Natural Resources and Waste Management	1 The approach, being related to housing development specifically, will not lead to a reduction in the consumption of raw materials. As part of the development required to deliver the approach, a short term increase in the use of raw materials is likely, as with any scenario whereby the construction of new dwellings is a central facet.	-		+
				2 The approach does not specifically promote the use of sustainable design, materials and construction techniques. These are largely controlled by building regulations and local policy does look to encourage sustainable design in recognition of climate change and mitigation. However	0		

				<p>this is a focussed issue which would need to be addressed through the masterplanning and development management processes.</p>			
			3	<p>The approach will result in a very minor increase in household waste locally in the long term and construction waste in the short term.</p>	-		
			4	<p>The approach in general will not have an impact on the production of hazardous waste locally. It is not felt that the limited presence of past industrial activities on brownfield sites within rural villages will be extensive enough to result in a measurable benefit either (such as through associated remediation).</p>	0		
			5	<p>The approach will strongly protect the best and most versatile (BMV) agricultural land by promoting development within the rural villages and away from agricultural land.</p>	++		
			6	<p>The approach will in general prevent the loss of greenfield land to development, certainly in relation to the countryside and wider Green Belt. But there does remain some risk of very minor levels of redevelopment on greenfield sites within the village extents.</p>	+		

Table 8. Option D – New Settlements not in the Green Belt

OPTIONS		PERFORMANCE				RATINGS	
		SA OBJECTIVE		POLICY CRITERIA QUESTIONS		CRITERIA QUESTION	OBJECTIVE
D	New Settlements not in the Green Belt	1	Housing	1	New settlement growth outside of the Green Belt has the potential to accommodate a relatively significant amount of growth, giving rise to a notable positive impact on local affordability, not least because of the relatively competitive nature of the local housing markets associated with the two sites earmarked to accommodate this growth (West Hallam Storage Depot associated with West Hallam settlement, and Stanton Regeneration Site associated with Ilkeston, but also the rural area including Stanton by Dale and Dale Abbey). However, the range of types of dwellings likely to be accommodated on such a development will be limited when compared, for example, to developing within an existing urban area. Existing rural Green Belt sensitivities surrounding the sites will have a restrictive impact on design possibilities and is likely to rule out or severely limit flatted development, for example. The relative isolation of the sites will also mean development is situated further from existing facilities and services provided by the urban areas, further limiting the potential to accommodate for a wide range of social groups. In view of the above, this approach will have a limited impact on diversifying the range of accommodation available within the borough to different social groups, but a positive one nonetheless.	+	++
				2	The Derbyshire Gypsy and Traveller Accommodation Assessment (2014) requires the provision of a single G&T pitch within the borough by 2019, with the single pitch amounting to the full need across the whole period		

				covered by the Assessment (2018-2033). The intention was to provide this through the development management process in response to an application, should one be submitted, so no land required allocation. The continuation of this approach would mean that this approach to growth would not specifically provide pitches and/ or plots, but equally would not preclude the opportunity to satisfy the borough's requirement through the development management process, should an application be received. The approach is therefore considered to have a neutral effect on this objective.	0		
			3	The provision of new dwellings in any form and in any location will have a positive effect on the availability of stock across the borough, and this should help to resolve issues of homelessness in areas where the problem is more pronounced – i.e. within the urban areas, as the housing market in general becomes more fluid. The provision of new dwellings as part of a standalone settlement could see the migration of residents out from the urban areas as the increase in stock availability provides an opportunity for residents to progress through the housing market, potentially freeing up affordable stock more local to the problem.	+		
			4	Given the existing employment use of both sites amounting to this approach, it is unlikely that their redevelopment will lead to a reduction in unfit or vacant homes within the borough.	0		
			5	The scale of development on each of the sites amounting to this approach would mean that they would have the potential to deliver the required infrastructure to accommodate the proposals. This approach has a positive effect on the objective, however this is in the context of an	+		

				absence of existing infrastructure to accommodate the proposed growth and this limits the effect.			
		2	Employment and Jobs	1	In the short-term, the diversity and quality of jobs available locally in accommodating this approach will noticeably improve given the scale of development involved and associated requirement for construction expertise. The range of these jobs, given the scale of development, will be broad and varied linked with a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, the scale of development is highly likely to attract employers to locate as part of mixed use development associated with this approach. This would include employers seeking to deliver the required local facilities and services which would form part of the developments but also potentially those seeking to provide bespoke employment provision as part of a mixed-use approach to development. This will have a notable positive impact on the diversity and quality of jobs. Notwithstanding this, redevelopment of the sites amounting to this approach will also result in the displacement of employment provision currently in place on the sites and whilst this is considered to be significantly outweighed by the benefits as described above in relation to this objective, it is nevertheless a slight limitation of the approach.	++	++
				2	Delivery of this approach will result in a short-term boost to employment given the scale of development involved and associated requirement for construction expertise. The range of these jobs, given the scale of development, will be broad and varied linked with a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, the scale of development is highly likely to attract employers to locate as part of mixed-use		

				development associated with this approach. This would include employers seeking to deliver the required local facilities, services and infrastructure which would form part of the developments but also potentially those seeking to provide bespoke employment provision as part of a mixed use approach to development. This in turn would have a positive effect on employment levels locally. Notwithstanding this, redevelopment of the sites amounting to this approach will also result in the displacement of employment provision currently in place on the sites and whilst this is considered to be significantly outweighed by the benefits as described above in relation to this objective, it is nevertheless a slight limitation of the approach.	+		
			3	Rural productivity will remain relatively distinct from this approach in employment and jobs terms. The approach will not result in an increase in employment opportunities within the rural area and nor will it unreasonably challenge the prosperity of existing employment opportunities.	0		
		3	Economic Structure and Innovation	1	In view of the scale of and comprehensive approach to development proposed as part of this approach, it is very likely that land and buildings of the type required by businesses could be provided as part of a mixed-use approach to delivery. Given that the sites facilitating this approach are currently in employment use (albeit with significant portions now vacant, derelict and generally under-utilised), the approach will effectively see the reduction in some employment stock. However the sites are available for redevelopment because they are failing to meet the needs of businesses and new employment provision would be of higher quality and more likely to meet the needs of employers. The approach does not	+	++

				therefore advocate or require the replacement of good quality or 'in-demand' employment premises.			
			2	In view of the scale of development proposed as part of this approach, as well as the location of development in close proximity of or adjacent to the conurbation and town, there is potential for business and university clusters to be facilitated as part of a mixed-use approach to development.	+		
			3	In view of the scale of development proposed as part of this approach, and its location adjacent to or in the vicinity of the conurbation and town, there is the potential for high knowledge employment sectors to be well accommodated as part of a mixed-use approach to development.	+		
			4	Graduates will be afforded a greater opportunity to live and work within the plan area on the basis of a significantly boosted supply of new homes within the vicinity of the town and conurbation, both of which provide for a wide range of important facilities and services, and which enjoy outstanding connectivity to both Nottingham and Derby; cities which both host successful universities. As discussed at 3(2), this approach gives rise to some potential for the locating of university and business clusters too, as well as new employment in general as part of a mixed-use approach to development.	+		
			5	Whilst the approach does not explicitly provide for new employment as it is focused on housing development, the scale of development amounting to the approach will mean new infrastructure in general will be required, and this infrastructure is likely to benefit economic structure and innovation objectives as well as housing ones. Ultimately, the approach has the potential to provide the required infrastructure in economic structure and innovation terms.	+		

		4	Shopping Centres	1	The scale of development forming part of this approach will result in some benefit to Ilkeston town centre, as well as Sandiacre Local Centre. This is as a result of the population increase associated with this approach, at locations adjacent or nearby to Ilkeston and Sandiacre. Whilst some retail provision will be provided as part of the approach, this will be limited to servicing the needs of the new communities only so will not adversely impact on local retailing performance. On balance the approach will encourage the vitality of the respective centres.	+	+	
		5	Health and Well Being	1	The approach will not reduce health inequalities. The approach will be required to provide health facilities for the associated incumbent population, but this is a minimum requirement rather than improvement over current prospects. Integration of green spaces and associated infrastructure should help to encourage active lifestyles within the sites, but equally an element of travelling out of the development sites will be required to access nearby town and local centres to benefit from other facilities.	0	+	
				2	The approach will not improve access to health services for the general population. The approach will be required to provide health facilities for the associated incumbent population only.	0		
				3	The scale of development is such that the integration of green spaces and recreational assets will form part of the approach and this will introduce new assets to the wider community. The extent to which this will attract in the wider population, rather than just serve the needs of the incumbent population, is not known. Given the scale of development, there may be the opportunity to improve existing facilities nearby.	+		

			4	The scale of development is such that the integration of green spaces and recreational assets will form part of the approach and this will introduce new assets to the wider community. Notably, the sites are currently in employment use and brownfield in nature. This could therefore result in a net gain of green spaces for the borough as a whole.	+	
			5	The approach will not improve access to local food growing opportunities. Equally, it is not thought that there are any risks to food growing opportunities resulting from the approach.	0	
	6	Community Safety	1	The approach would lead to the redevelopment of sizeable brownfield sites. Both sites suffer from dereliction and under-utilisation to varying degrees and their redevelopment could lead to a reduction in crime, where crime occurrence is present as a result of their condition. Redevelopment of such large-scale sites is also likely to reduce the fear of crime locally, as the approach would amount to large-scale regeneration, resulting in a positive impact on the character and appearance of the wider area and heighten the general sense of security. A significant increase in population on-site resulting from this approach will also increase the opportunity for natural surveillance across land which benefits from very little currently. Notwithstanding the above, there is a risk of an increase in crime within the immediate area, brought about by the associated increase in population facilitated by the approach. However the potential benefits in contributing towards community safety in relation to crime and fear of crime are considered to outweigh such risks.	+	++
			2	The approach will rely on redevelopment of large brownfield sites, both of which suffer with varying levels of dereliction and under-utilisation with associated built environment safety issues. In such circumstances, their	++	

			redevelopment would resolve this by fostering a reduction in structurally unsafe buildings and unsecured land within the area, leading to an expansion of a safe and secure built environment.		
7	Social Inclusion	1	This approach may lead to the creation of new cultural assets (for example a library or community hall) as part of the mixed-use approach to development associated with the establishment of a new settlement. The incumbent population to new settlements, given their scale, may also contribute to increasing the demand for existing assets within nearby settlements. The approach is highly unlikely to put at risk any existing assets, given the absence of cultural assets on the sites amounting to this approach.	+	++
		2	The approach will likely require the creation of new assets as part of the mixed-use approach to development associated with the establishment of a new settlement. Such assets will be required to meet the needs of the incumbent population only. Their positive impact on existing population and its access to, engagement and satisfaction with them is therefore likely to be very limited.	0	
		3	The approach requires development of a scale which means facilities will need to be provided to support the incumbent population, with the potential for residual benefits to be felt by the existing nearby population also. As a result, the approach will likely result in at least a small increase in the number of facilities.	+	
		4	The approach requires development of a scale which means new educational facilities will need to be provided directly to meet the needs of school-age children living at new settlements.	++	
8	Transport	1	The approach will use the existing transport infrastructure serving the related brownfield sites and surroundings including nearby settlements (including the conurbation		+

				and town). It will apply additional pressure to the network but, due to the scale of development, will also result in opportunities for network enhancements to accommodate the growth.	+		
			2	The approach will require improvements to the existing network, as well as creation of new transport infrastructure within the brownfield sites, but does not require the implementation of significant infrastructure development which might lead to environmental impact. The locating of new development as proposed – in close proximity to the town and conurbation - closely connects a growing population to existing employment, services and facilities as well as public transport options, reducing the need to travel long distances and unsustainably. The approach also provides the opportunity to establish new employment, services and facilities as part of a mixed-use development, further reducing the need for this. This should contribute to the development of a transport network which in the long-term minimises impact on the environment.	+		
			3	The approach is based on the redevelopment of large brownfield sites in close proximity to existing settlements. Enhancements to sustainable connections to existing settlements (for example greenways) will form part of redeveloped sites. Facilities and services to provide for the needs of the incumbent population will be incorporated within the approach and transport infrastructure improvements will be implemented (this could include, for example, the provision of a limited bus service). As a result, there are opportunities which present themselves through this approach that would reduce the need to travel by private car. Notwithstanding this, the approach would see growth outside of existing settlements and at a significant	-		

			scale. This unlikely to have a positive effect on this objective overall.			
		4	The approach is based on the redevelopment of large brownfield sites in close proximity to existing settlements. This, alongside the provision of services and facilities as part of the redevelopment of these sites, will result in an increase in the overall extent of population who have access to services and facilities.	+		
	9	Brownfield Land	1	The approach will rely entirely on the re-use of brownfield land at a scale which will also see the provision of new facilities and services, also in close proximity to the existing urban environment. This approach represents a highly efficient re-use of brownfield land.	++	++
			2	The redevelopment of brownfield land at this scale will present risks to biodiversity as with any development (including greenfield). Through comprehensively approaching development of the sites, areas of biodiversity value can be integrated with new development and protected, where required. In general, redevelopment of land which has previously been developed is an approach likely to minimise any adverse impact on the biodiversity interests of land in general.	++	
	10	Energy and Climate Change	1	Any new development of this type will result in additional energy use. This approach will result in a more significant increase in energy use at a given location, by focusing development at scale across two sites. However the approach includes the provision of new services and facilities to support the incumbent population and development would be in close proximity to existing urban centres. This presents an opportunity to reduce energy use by minimising the need to travel and promoting modal shift. The growing population will be able to access	0	++

				services, facilities and employment without the use of a private car, or through the use of public transport.			
			2	The energy efficiency of new dwellings built as part of this approach will be far superior to much of the existing older stock elsewhere in the Borough. In essence this will contribute to a general improvement in the energy efficiency of the plan-area housing stock. Given the scale of growth proposed, this would result in a strong effect overall.	++		
			3	There is potential that the approach could incorporate the generation and use of renewable energy including through larger-scale interventions (for example, development of community energy systems – see 10(4) or centralised power generation) due to the scale of development amounting to this approach, as well as the expected comprehensive approach to implementation associated with this approach.	+		
			4	The scale of development proposed and expected comprehensive approach to implementation associated with this approach means that the approach has potential to facilitate the development of community energy systems.	+		
			5	Any new development will be subject to climate change policy, guidance and building regulations stipulating the standards to which construction should be undertaken. This includes in relation to flood risk too. The construction of new dwellings in this way will apply through any of the approaches being considered. However, comprehensive and large-scale development as advocated through this approach does provide additional opportunity to integrate measures such as community energy systems as discussed. Additionally, comprehensive redevelopment does present the opportunity to incorporate substantial climate change	+		

			mitigation measures, such as site-wide urban drainage solutions, which would otherwise be unattainable (for example, through incremental development). There is an increased potential to ensure buildings are able to deal with future changes in climate change through this approach.			
	11	Pollution and Air Quality	1	The approach amounts to development at a scale that would warrant the establishment of some service provision on-site. This, alongside locations close by to existing service centres means that the approach will minimise pollution impacts – particularly in relation to air quality – as the need to travel by private car is reduced and opportunities to proliferate clean forms of travel increase (such as walking and cycling). However, the scale of development forming this approach is such that there will be a negative impact on this objective. This impact is further limited however as a result of the use of brownfield land some of which is in active employment use. The change in use from employment to housing – even if limited in extent – is likely to mitigate pollution concerns associated with housing growth, including noise and air related. In addition, land remediation which will be required will result in a reduction in land pollutants which have long been present in the ground. Its redevelopment will therefore result in a tangible benefit for the plan area resulting from the remediation of land pollutants at scale. This benefit is considered key in identifying the approach as having a neutral effect on pollution and air quality, on balance.	0	0
	12	Flooding and Water Quality	1	The land required to deliver the approach benefits from extremely limited flood risk to the extent that all housing development as part of this approach could be accommodated within Flood Zone 1. The scale of	++	++

				development will have implications for the wider water cycle in terms of run-off, for example, but the approach would allow for the implementation of site-wide mitigation measures to address this. Additionally, the approach relies on the re-use of brownfield land and thus avoids development of greenfield land which acts as an important natural drainage asset as part of the wider water cycle. This approach will significantly contribute to the minimising or mitigation of flood risk more widely.			
			2	The land required to deliver the approach suffers from varying degrees of ground contamination. Remediation of the land as part of the development process would be instrumental in improving water quality more widely.	++		
			3	Locally, the approach is likely to impact negatively on water conservation, creating additional demand to be met as a result of local population growth despite building regulations providing scope for more efficient use of water (see 12(4)).	-		
			4	The water efficiency credentials of new dwellings being built when compared with existing older stock within the plan area will be superior owing to building regulations. In essence this will lead to a general improvement in the water efficiency of the plan area's stock and promotion of water efficiency in general. The scale of growth and intended comprehensive approach to development advocated by this approach will lead to a strong effect on this objective, particularly in terms of promotion.	++		
			5	The approach is unlikely to result in a deterioration of Water Framework Directive status or of on-site watercourses. The land required to deliver the approach is previously developed land with appropriate means of drainage to treatment facilities already in place. There is the potential to improve water quality and the associated	0		

				Water Framework Directive status through remediation as discussed at 12(2).			
		13	Natural Environment, Biodiversity, Green and Blue Infrastructure	1	The focus of development on large brownfield sites will help ensure the long-term protection of alternative sites with more pronounced biodiversity value. The redevelopment of the sites – which both suffer from contamination - will present significant opportunities for biodiversity improvements at a scale which would not present themselves without prospects of redevelopment. The land in question does display biodiversity value in its current state, however this can be managed as part of redevelopment, and in any case the re-use of brownfield land is considered a more sensitive proposition in biodiversity terms when compared with potential development on greenfield land. It is assumed in the absence of more detailed and up-to-date information that protected species could be at risk and this would need to be carefully managed through the masterplanning process.	+	++
				2	Redeveloping the sites will facilitate biodiversity net gains, resulting from site remediation in conjunction with implementation of amenity green space, green/blue infrastructure and connectivity into the wider countryside as would be instrumental as part of a comprehensive redevelopment of the sites.	++	
				3	It is expected that the approach will have a minor impact on the geological environment given that it relates to development which will require the extraction of material to facilitate construction. However there is some potential for enhancement of the geological environment on-site through the creation of significant blue and green infrastructure assets. No Regionally Important Geomorphological Sites are identified within the land in question.	0	

				4	Woodland assets are present within the sites. Whilst the land available to accommodate this approach is expansive enough to avoid encroachment onto these assets, their presence within the extents of redeveloped land does, by definition, introduce risk to their continued existence. This risk will remain until such a time that assets are fully protected or integrated as part of site-wide masterplans where they are not already. Indeed, large proportions of the woodland assets are already protected (through Tree Preservation Orders) but this is not exhaustive. The approach will need to be applied in a way which looks to maintain and enhance woodland cover and management if it is to result in a positive effect on this objective.	-	
				5	It is expected that, given the scale of development proposed and comprehensive approach to implementation associated with this approach, new open space, green/blue infrastructure and green space assets will be provided. This results in a particularly positive effect on this objective considering that this would also be achieved on brownfield land.	++	
				6	Given the scale of development proposed and comprehensive approach to implementation associated with this approach, there is the potential that the approach will result in improvement in the quality of existing open space nearby or within the sites themselves through related developer contributions.	+	
				7	The approach presents an opportunity to significantly expand and improve both blue and green infrastructure networks which link closely with the urban parts of the borough, for example the Nutbrook Trail to the north of the Stanton Regeneration Site and the disused railway line and emerging Great Northern Greenway (Cycle Route 672) which has the potential to connect West Hallam Storage	++	

				<p>Depot with Ilkeston and Derby. Indeed, the approach could be instrumental in the delivery of such schemes which otherwise may not progress. The scale of the development sites are such that there is strong potential to develop new and enhanced networks both within and across the sites as part of their redevelopment, in addition to linking into existing wider networks which span the Borough and travel further afield.</p>			
		14	Landscape and Built Environment	1	<p>The approach will result in a significant change to land within an existing defined landscape character type (identified as Coalfield Village Farmlands). Naturally, this will go on to impact on the identified landscape character. The extent to which such an approach to growth will preserve or respect this character is less clear in the absence of detailed development proposals. The land in question does not currently positively contribute to the defined landscape character; it is brownfield in nature, at odds in character terms to its surrounding landscape. Redevelopment of the land provides the opportunity to better integrate into the wider landscape character, such as through the introduction of strategic green infrastructure and by developing a strong approach to meeting good design principles. Notwithstanding this, the growth proposed is significant. Therefore, a redeveloped site will still remain slightly incongruous with the landscape character to which the land in question sits within.</p>	+	+
				2	<p>The approach will see the redevelopment of large-scale brownfield sites which in their current condition display a condition which is of detriment to the visual amenity of the surrounding countryside. On balance it is considered that visual amenity will be improved upon through redevelopment, however this will require careful management through the masterplanning and</p>	+	

				development management processes with a particular focus on design.			
			3	The approach will have a limited effect on local distinctiveness of existing settlement character. Redevelopment is of such a scale that the development itself will likely establish its own character. Notwithstanding this, there may be some potential for influence over the settlement character of Ilkeston as the approach leads to a significant change in an adjacent largely underutilised employment site. How development manages its effect on settlement character precisely will need to be carefully controlled through the masterplanning and development management processes with a particular focus on design.	0		
			4	Through the approach, there are significant opportunities to enhance the inter-relationship between the landscape and built environment. For example, through raising the profile of and ultimately expanding the urban green infrastructure network in conjunction with population growth and developing better connections to the surrounding countryside. Comprehensive development on this scale presents an opportunity to introduce new green infrastructure assets at scale.	++		
	15	Heritage	1	The comprehensive approach to growth has the potential to provide opportunities for enhancement to existing assets such as through the re-purposing of assets or integration with broader projects such as implementation of new green infrastructure provision. The risk is that development on this scale could have an overwhelmingly detrimental effect on assets and their settings within the local area due to resultant levels of intensification, however the comprehensive approach provides the	+		+

				opportunity to incorporate protections into the design and implementation.			
			2	Potential impacts on surrounding landscape and nearby settlement character will need to be carefully managed through this approach due to the scale of growth proposed. However on balance, the redevelopment of large scale brownfield sites which suffer from contamination and dereliction and are already at general odds with surrounding settlement and landscape character, is considered likely to result in a positive effect on this objective. Through comprehensive redevelopment, there is the potential to consolidate and strengthen local character including the sites' industrial past, including in relation to landscape character as discussed at section 14.	+		
			3	The approach will result in an increased population with access to assets relating to the sites themselves. There may be the potential to expand the effect to include assets and cultural activities of nearby settlements as a result of attempts to integrate the sites with surrounding areas – such as through the incorporation of expansive green infrastructure trails which could result from the approach.	+		
			4	There is the potential for the approach to improve access to and enjoyment of the historic environment. As discussed, the comprehensive approach to redevelopment provides the opportunity to protect and enhance existing assets on site, as well as the introduction of new strategic access to nearby settlements (i.e. through implementation of green infrastructure) and their assets.	+		
			5	No recorded archaeological assets are present on the land required to deliver the approach. As a result, the approach will conserve the archaeological environment but is unlikely to enhance it.	0		

		16	Natural Resources and Waste Management	1	The approach, being related to housing development specifically, will not lead to a reduction in the consumption of raw materials. As part of the development required to deliver the approach, a short term increase in the use of raw materials is likely, as with any scenario whereby the construction of new dwellings is a central facet.	-	+	
				2	The approach does not specifically promote the use of sustainable design, materials and construction techniques. These are largely controlled by building regulations and local policy does look to encourage sustainable design in recognition of climate change and mitigation. However this is a focussed issue which would need to be addressed through the masterplanning and development management processes. Notwithstanding this, there is potential that the approach could incorporate the generation and use of renewable energy including through larger-scale interventions (such as community energy systems) or centralised power generation due to the scale of development amounting to this approach as well as the expected comprehensive approach to implementation and its location nearby to existing urban areas.	+		
				3	The approach will result in an increase in household waste locally in the long term and construction waste in the short term.	-		
				4	The approach will reduce the production of hazardous waste locally, by replacing current industrial land uses with housing. There is a strong benefit also with redeveloping the land in question in order to implement wide spread remediation on land which has become contaminated through historic industrial uses.	++		
				5	The approach will strongly protect the best and most versatile (BMV) agricultural land by promoting	++		

				development within the conurbation and away from agricultural land.			
			6	The approach will strongly prevent the loss of greenfield land to development, by focussing development on large scale brownfield land. The approach is likely to result in a net gain of greenfield land, as past industrial land is replaced with green spaces to compliment residential development.	++		

Table 9. Option E – Extension of the conurbations into the Green Belt

OPTIONS		PERFORMANCE				RATINGS	
		SA OBJECTIVE		POLICY CRITERIA QUESTIONS		CRITERIA QUESTION	OBJECTIVE
E	Extension of the conurbations into the Green Belt	1	Housing	1	This approach has the potential to accommodate a relatively significant amount of growth, giving rise to a notable positive impact on local affordability by contributing to meeting demand, not least because of the relatively competitive nature of the local housing markets at each of the conurbations. However, the range of types of dwellings likely to be accommodated on such development sites will be limited when compared, for example, to developing <i>within</i> the urban area. This is because existing landscape sensitivities will have a restrictive impact on design possibilities and is likely to rule out or severely limit flatted development, for example. By their geographical location such sites will also be situated further from facilities and services, further limiting their ability to accommodate for a wide range of social groups. In view of the above, this approach will have a limiting impact on diversifying the range of accommodation available within the borough to different social groups, but a positive one nonetheless.	+	+
				2	The Derbyshire & East Staffordshire Gypsy and Traveller Accommodation Assessment (2014) requires the provision of a single G&T pitch within the borough by 2019, with the single pitch amounting to the full need across the whole period covered by the Assessment (2018-2033). The intention was to provide this through the development management process in response to an application, should one be submitted, so no land required allocation. The continuation of this approach would mean that this	0	

				<p>approach to growth would not specifically provide pitches and/or plots, but equally would not preclude the opportunity to satisfy the borough's requirement through the development management process, should an application be received. The approach is therefore considered to have a neutral effect on this objective.</p>			
			3	<p>The provision of new dwellings in any form and in any location will have a positive effect on the availability of stock across the borough, and this should help to reduce issues of homelessness in areas where the problem is more pronounced – i.e. within the conurbations, as the housing market in general becomes more fluid. The geographical proximity of development sites within this approach to the existing conurbations means that this effect could be more direct than in other approaches.</p>	+		
			4	<p>The sites amounting to this approach are greenfield in nature and are in non-housing uses. As a result it is considered unlikely that their redevelopment will lead to a notable reduction in unfit or vacant homes within the borough.</p>	0		
			5	<p>The sites amounting to this approach are not substantial enough to provide for significant elements of new infrastructure as part of their development. However the approach does mean that development will benefit from existing infrastructure within the conurbations, being in close proximity to key services and facilities.</p>	0		
	2	Employment and Jobs	1	<p>In the short-term, the diversity and quality of jobs available locally in accommodating this approach will noticeably improve given the scale of development involved and associated requirement for construction expertise. The range of these jobs, given the scale of development, will be broad and varied linked with a variety of sectors including engineering, clerical, service, professional and manual. In</p>		+	

				<p>the longer term, the scale of development has the potential to attract employers to locate – either within the existing conurbation but nearby to the related growth or within the new development. The former is more likely, given that whilst the approach does involve significant development, it is not in the order of the scale of a new settlement, for example, which would require its own infrastructure and service provision internally. Notwithstanding this, it is likely that new employment prospects will emerge as a result from a need to expand existing facilities within the conurbations to service the growing population.</p>	+		
		2	<p>Delivery of this approach will result in a short-term boost to employment given the scale of development involved and associated requirement for construction expertise. The range of these jobs, given the scale of development, will be broad and varied linked with a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, the scale of development is likely to attract employers to locate in response to population growth, for example to expand nearby service provision, and it is expected this would have a positive effect on employment levels locally.</p>	+			
		3	<p>There will be a short-term improvement to rural productivity in terms of employment opportunities as a result of associated construction activity locally. Growth in this way would be strongly linked with the adjacent conurbations and associated productivity. However the approach does present some risk to existing rural employment – such as within the agricultural sector, and therefore rural productivity - resulting from the development of land in productive agricultural use for housing. Notwithstanding this, an increase in population</p>	0			

				on the rural fringe may help to ensure long-term viability of existing rural businesses nearby. This helps to minimise negative impacts from the risks.			
		3	Economic Structure and Innovation	1	The sites amounting to the approach are of a scale which means there may be the potential for land and buildings of the type required by businesses to form part of a mixed-use approach to development, but this would not amount to a substantial portion of development, if any at all. Notwithstanding this, it is not expected that this approach would see the <i>removal</i> of land and buildings of the type required by businesses as delivery of the approach does not require the replacement of good quality employment premises as per the protections afforded to good and upper-average employment land through the Erewash Core Strategy and Erewash Employment Land Survey 2019.	0	+
				2	This approach is unlikely to result in development at a scale which would attract business or university clusters. It is noted that there is the potential to attract some business use, as part of a mixed-use approach to development, but at a limited scale.	0	
				3	This approach is unlikely to attract high knowledge employment sectors to locate over and above any other form of employment. The fact that the development is not of a scale to attract business or university clusters is a notable influence on this. Equally the approach will not put at risk any existing high knowledge sector employment; indeed population increase, particularly adjacent to Derby City conurbation, may help to sustain existing provision such as that associated with the University or manufacturers such as Rolls Royce and Bombardier.	0	
				4	Graduates will be afforded a greater opportunity to live and work within the plan area on the basis of a boosted supply of new homes adjacent to the conurbations, both of		

				which provide for a wide range of important facilities and services, and which enjoy outstanding connectivity to both Nottingham and Derby; cities which both host successful universities.	+		
			5	The approach will warrant the provision of required infrastructure to service the housing development itself, but little else such as that which may help to provide for the conurbation's economic structure and supporting greater innovation.	0		
	4	Shopping Centres	1	The town centre of Long Eaton and city centre of Derby to a lesser extent will benefit through this approach. By enabling growth adjacent to the conurbations and within close proximity to the respective centres, a growing population is able to support and contribute both economically and socially to their function. Any retail offer provided through this approach would be limited to the role of servicing the new population only.	+		+
	5	Health and Well Being	1	The conurbation has in place a substantial existing health infrastructure (doctors surgeries, dentists etc.) and the conurbation more widely also provides for extensive facilities (including two major hospitals) from which new and existing residents will and do benefit from. The focus of new residential development adjacent to the conurbation encourages active lifestyles as new residents are able to go about their lives in a sustainable manner, including by walking to nearby services and facilities, and engaging with accessible sport and recreation. The wider conurbation provides an abundance of facilities to accommodate this, complimented by high quality means of sustainable connectivity. This effect on the objective is not as strong as it would be if development were focused within the conurbation, but is present nonetheless. This	+		+

				approach has the potential to reduce health inequalities as a result.			
			2	Focussing development adjacent to the conurbation will increase the extent of population who benefit from sustainable access to existing health facilities as described at 5(1). Related increase in demand will in the longer term result in a need for additional investment in provision to meet increasing demand. This raises the potential for new and/or improved services to be provided either locally or within the wider conurbation as a whole.	+		
			3	New development adjacent to the conurbation part of the conurbation will be of a scale that new recreational facilities, or improvement of existing, could form part of the development or result nearby. This will serve to increase the extent of population with access to facilities – both existing and potentially new - provided by the conurbation and/or development proposals. Moreover, the conurbation benefits from existing public recreational assets which will be accessible to an incumbent population through this approach; for example the River Erewash and Erewash Canal. The wider conurbation provides for a significant range of facilities and assets also.	++		
			4	Given the scale of development associated with this approach, it is possible that new open space could be facilitated, or improvements to existing spaces could be afforded. However, the approach relies on the re-use of greenfield and open land on the fringes of the conurbation which at least partly is publically accessible, so in effect would result in the loss of open space to which the public can currently access. This limits the potential positive effect resulting from the creation of new open space.	0		
			5	The approach will not improve access to local food growing opportunities and it does present a risk to such			

			opportunities as it relies on the expansion of the conurbation into surrounding countryside. At least some of this land is currently farmed. It is not thought it is farmed directly for crop production at this time but developing on the land would sterilise future opportunities.	-	
	6	Community Safety	1 The approach requires redevelopment of land which in general is undeveloped in the traditional 'urban' sense (employment, housing, industry), therefore there will be very little associated crime, or fear of crime present. There may be some potential to reduce forms of rural crime through the approach, but it is considered this is far outweighed by the likely increase in crime and fear of crime likely to be generated as a result of population increases associated with the approach.	-	-
			2 The approach requires redevelopment of land which in general is undeveloped in the traditional 'urban' sense (employment, housing, industry). As such, there is very little present on sites in the way of 'built environment' and so sites do not suffer from safety issues in terms of structures forming part of the built environment. There may be the presence of security issues on sites, where the potential for rural crime is concerned for example, however in general there is little opportunity to contribute to a safe and secure built environment through this approach. Indeed, the development of such sites risks creating a much expanded built environment, providing additional opportunities where crime may occur.	-	
	7	Social Inclusion	1 The increase in population adjacent to the conurbations resulting from this approach could help to sustain and enhance existing cultural assets nearby (for example a library or museum) that would otherwise be at risk from closure. Development of the scale set out by this approach is unlikely to warrant the establishment of new assets.	+	++

			2	Increasing the population adjacent to the conurbations and associated cultural assets will see an increase in the proportion of the wider population who will benefit from easier access to related activities and thus increase general engagement and satisfaction.	+	
			3	The approach will not result directly in the establishment of new facilities. However the increase in population resulting from development and adjacent to the conurbation may contribute to increasing demand for assets so may therefore act as a catalyst for additional facilities in the long-term.	+	
			4	The approach would not result in development of a scale which warrants new educational facilities being provided. However development would be of scale that contributions could be justifiably sought to expand and enhance existing nearby facilities, for instance within the conurbations.	+	
	8	Transport	1	The approach will use (and rely on) the existing transport infrastructure of the conurbations. New development is expected to be of a scale which is able to attract contributions to fund improvements to this infrastructure and thus enhance it, but is unlikely to fund the development of new. The associated population increase will lead to an increase in demand on the existing system but resulting improvements afforded by the growth will help mitigate this.	+	++
			2	The approach focuses development adjacent to the conurbations which benefit from an established and comprehensive transport network. However, the approach does rely on the expansion of infrastructure into predominantly greenfield locations. The approach therefore will impact on the immediate environment in the short-term. However the locating of new development as	0	

				proposed helps to closely connect a growing population to existing employment, services and facilities as well as public transport options, reducing the need to travel long distances and using unsustainable modes. This should contribute to the development of a transport network which in the long-term minimises impact on the environment.			
			3	The focusing of development adjacent to the conurbations will contribute to reducing the number of journeys undertaken by the private car by encouraging use of alternative modes of transport, when compared with likely effects from development in more isolated locations. Development which is focused adjacent to the conurbations will benefit from access to an established and comprehensive transport network with employment, services and facilities as well as public transport options within close reach of residents.	+		
			4	The approach to focus development adjacent to the conurbations will expand the proportion of the wider population living within close proximity to existing services and facilities, in effect helping to increase general accessibility to services and facilities (including public transport), particularly when considered against other potential (and more isolated) options for growth. This approach has a particularly strong effect on the objective in view of the area's vicinity to facilities available through each of the conurbations.	++		
	9	Brownfield Land	1	Some very minor aspects of the land required to deliver this approach could be classified as brownfield. Predominantly though, the approach relies on expansion of the urban area onto surrounding greenfield land. It therefore does not make efficient use of available brownfield land.	--	--	

			2	There are increased risks to biodiversity interests resulting from this approach, given the predominantly natural or rural status of land required to deliver this approach. As a result, the approach is limited in its ability to minimise impacts on biodiversity value.	-		
		10	Energy and Climate Change	1	Any new development of this type will result in additional energy use. However when compared with other approaches, the location of new development adjacent to the conurbations presents opportunities to reduce potential energy use through minimising travel and promoting modal shift. The growing population will be able to access services, facilities and employment without the use of a private car, or through the use of public transport.	0	++
				2	The energy efficiency of new dwellings built as part of this approach will be far superior to much of the existing older stock elsewhere in the Borough. In essence this will contribute to a general improvement in the energy efficiency of the plan area housing stock.	+	
				3	There is potential that the approach could incorporate the generation and use of renewable energy including through larger-scale interventions (for example, development of community energy systems – see 10(4) or centralised power generation) due to the scale of development amounting to this approach as well as the expected comprehensive approach to implementation associated with this approach.	+	
				4	The scale of development proposed and expected comprehensive approach to implementation associated with this approach means that the approach has potential to facilitate the development of community energy systems.	+	
				5	Any new development will be subject to climate change policy, guidance and building regulations stipulating the		

				standards to which construction should be undertaken. This includes in relation to flood risk too. The construction of new dwellings in this way will apply through any of the approaches being considered. However comprehensive and large-scale development as advocated through this approach does provide additional opportunity to integrate measures such as community energy systems as discussed. Additionally, comprehensive redevelopment does present the opportunity to incorporate substantial climate change mitigation measures, such as site-wide urban drainage solutions, which would otherwise be unattainable (for example, through incremental development). There is an increased potential to ensure buildings are able to deal with future changes in climate change through this approach.	+			
		11	Pollution and Air Quality	1	The locating of new development adjacent to the conurbations brings a growing population in close proximity to existing local employment, services and facilities as well as public transport options, reducing the need to travel long distances via private car and increasing the opportunity for clean forms of travel (such as walking and cycling) to proliferate and the potential to mitigate pollution levels. However, the reliance on primarily greenfield (and likely tranquil) land in the countryside to deliver the approach does mean that even minor effects on pollution levels – including noise resulting from the new population – will be of detriment to this objective. Notwithstanding this, a considerable extent of the land in question is known to have contamination issues, resulting from previous use as landfill. As such, land remediation which is expected to be required will result in a reduction in land pollutants which have long been present in the ground. Redevelopment through this approach will result	0	0	

				in a tangible benefit for the plan area resulting from the remediation of land pollutants at scale. This benefit is considered key in identifying the approach as having a neutral effect on pollution and air quality in the context of known wider concerns relating to this matter.			
		12	Flooding and Water Quality	1	The land required to deliver this approach benefits from very limited flood risk to the extent that all housing development could be accommodated within Flood Zone 1. The scale of development will have implications for the wider water cycle in terms of run-off, for example, but the approach would allow for the implementation of site-wide mitigation to address this. Notwithstanding this, the approach does rely on the development of greenfield land in the countryside which in its current form will play a role in facilitating drainage and managing the wider water cycle in general. The development of the land to accommodate this approach will remove this asset, notwithstanding the potential to implement site-wide mitigation for any arising flood risk.	-	-
				2	In view of the role played by greenfield land as part of the wider water cycle (discussed at 12(1)), redevelopment of greenfield land at the scale advocated by the approach (leading to significant additional demands on water supply and drainage) has the potential to have an adverse effect on local water quality. However, it is also known that a large extent of land required to deliver the approach is likely to suffer from contamination by virtue of its previous use as landfill. Remediation of the land as part of the development process is likely to be instrumental in improving water quality more widely.	0	
				3	Locally, the approach is likely to impact negatively on water conservation, creating additional demand to be met as a result of local population growth despite building	-	

				regulations providing scope for more efficient use of water (see 12(4)).			
			4	The water efficiency credentials of new dwellings being built when compared with existing older stock within the plan area will be superior owing to building regulations. In essence this will lead to a general improvement in the water efficiency of the plan area's stock and promotion of water efficiency in general.	+		
			5	The approach has the potential, without mitigation, to result in a deterioration of Water Framework Directive status or of on-site watercourses. The land required to deliver the approach is both greenfield and in the countryside, and therefore is relatively unimpeded in terms of natural water quality. The replacement of this with built development presents risks which would need to be properly managed and mitigated. However, a large portion of the land in question, whilst greenfield in nature, is likely to suffer from contamination which through development could be remediated. This opens up the opportunity to improve water quality and the associated Water Framework Directive status through ensuring underground contaminants which may interact with water assets locally are managed.	0		
	13	Natural Environment, Biodiversity, Green and Blue Infrastructure	1	Implementation of the approach would require sensitive redevelopment to ensure protection of existing assets which are present in close proximity or adjacent to the land in question. Until a sensitive approach is formulated and agreed, there is risk presented to biodiversity assets through implementation of this approach and thus at this stage it is assumed assets could be subject of harmful development. It is assumed in the absence of more detailed and up-to-date information that protected species could be at risk and this would need to be carefully	-		--

				<p>managed through the masterplanning and development management process. In general terms, the scope for improving biodiversity on the land in question is limited, given that its current state is likely to be of at least reasonable value given its primarily natural and semi-natural status.</p>			
			2	<p>Redevelopment of land may provide the opportunity to introduce specific and high quality biodiversity assets integral to the wider development. However in general terms, the approach would see the replacement of primarily greenfield (natural and semi-natural) countryside with urban form, risking existing biodiversity and significantly outweighing any potential for net gain. On balance, it is considered that the approach has more potential to result in biodiversity net-loss rather than gain.</p>	-		
			3	<p>It is expected that the approach will have a minor impact on the geological environment given that it relates to development which will require the extraction of material to facilitate construction. No Regionally Important Geomorphological Sites are identified within the land in question.</p>	-		
			4	<p>The semi-natural and natural condition of the land required to deliver this approach indicates that sporadic woodland or tree cover will be present. In addition, the presence of formal woodland is recorded, as well as tree planting amounting to small groups of trees (copses). There is the potential for development to positively incorporate such assets and have this certified through the masterplanning and development management process. However until this time, there is an assumption that woodland cover and long-term management would be placed at risk through implementation of this approach.</p>	-		

			5	It is expected that, given the scale of development proposed and comprehensive approach to implementation associated with this approach, some green space assets will be provided as part of development. This may be in terms of incidental amenity green space; the approach is unlikely to be able to facilitate substantial new green space assets or open space. More crucially though, this approach to development will result in the loss of large sections of open countryside, at least some of which is publically accessible via Public Rights of Way. The approach will therefore result in a net loss of green and open space.	-		
			6	Given the scale of development proposed and comprehensive approach to implementation associated with this approach, there is the potential to improve the quality of existing open space nearby. This perceived benefit is outweighed however by the loss of publicly accessible open space resulting from development on open countryside. The approach will therefore result in a net reduction in quality of existing open space.	-		
			7	The approach presents an opportunity to incorporate new or improved green and blue infrastructure to development, for example through utilisation of and enhancement to related public footpaths, and water bodies which are present on some of the land. The approach therefore provides an opportunity to encourage such networks as well as protect existing.	+		
		14	Landscape and Built Environment	1	The approach will result in a significant change to land which spans three defined landscape character types (Plateau Estate Farmlands, Lowland Village Farmland and Riverside Meadows). Given the land is predominantly undeveloped and thus is likely to accurately reflect the landscape designations applied to it, this approach conflicts with a need to respect or preserve its identified	-	-

				landscape character. Through high quality design, it should be possible to mitigate impacts on wider landscape designations however – such as through inclusion of soft edge-of-site buffers and with a pragmatic approach to building densities. Through this the approach is likely to be able to preserve wider landscape character value, but impacts on local value are unavoidable.			
			2	A large proportion of the land in question provides for good visual amenity given it contributes to the conurbations setting. Redevelopment of the land is likely to impede this, notwithstanding the potential for mitigation through the development process.	-		
			3	The approach lends itself to respecting and potentially enhancing the local distinctiveness of related townscape and settlement character. The approach would lead to development of a scale which would require it to interact with and respect the existing adjacent built form, essentially implementing a continuation of the established form of development. How the effects on settlement character are managed will need careful control through the masterplanning and development management processes though, so effects are not entirely understood.	0		
			4	Through the approach, there are opportunities to enhance the inter-relationship between the landscape and built environment. For example, through incorporating new connections between them through redevelopment of land as advocated by this approach. Scale of growth associated with this approach is restricted enough to ensure existing forms of connections can be strengthened by retaining links between existing settlement and remaining landscape.	+		
	15	Heritage	1	There are no designated or non-designated assets falling within the land amounting to this approach and any			+

				nearby assets and their settings are highly unlikely to be affected due to their sufficient separation. As a result, the approach will conserve the historic environment but is unlikely to enhance it.	0		
			2	The approach relies on the redevelopment of greenfield land categorised as part of landscape character types in County-wide assessment. In this respect therefore the approach will not maintain or strengthen landscape character and distinctiveness. There is however the potential to protect and enhance townscape character and distinctiveness through careful design which appreciates and strengthens the existing built form.	0		
			3	The approach will result in an increased population adjacent to urban areas, where the existing population already benefit from a wide range of heritage assets and cultural activities to access and engage with. This will help to provide better opportunities for a wider population to access and understand local heritage and to participate in cultural activities.	+		
			4	The approach will significantly increase the population adjacent to urban areas who already benefit from historic assets. Through good design, access to this will be introduced, connecting the new development with the existing urban areas. Ultimately this has the potential to improve access to and enjoyment of the historic environment for a wider proportion of the population.	+		
			5	No recorded archaeological assets are present on the land required to deliver the approach. As a result, the approach will conserve the archaeological environment but is unlikely to enhance it.	0		
	16	Natural Resources and	1	The approach, being related to housing development specifically, will not lead to a reduction in the consumption of raw materials. As part of the development required to	-	-	

			Waste Management		deliver the approach, a short-term increase in the use of raw materials is likely, as with any scenario whereby the construction of new dwellings is a central facet.			
				2	The approach does not specifically promote the use of sustainable design, materials and construction techniques. These are largely controlled by building regulations and local planning policy does look to encourage sustainable design in recognition of the increasing threat of climate change and advocating suitable mitigation. However this is a focused issue which would need to be addressed through the masterplanning and development management processes.	0		
				3	The approach will result in an increase in household waste locally in the long-term and construction waste in the short-term.	-		
				4	The approach in general will not have an impact on the production of hazardous waste locally. Some of the land in question is likely to benefit from remediation (where it is filled ground) so there is the potential to eliminate seepage of historic hazardous materials which may be present in the ground through redevelopment.	+		
				5	The land in question is classified as Grade 3 agricultural land - none is identified as Grades 1 or 2. Data is not available at this time for all of Erewash to separate Grades 3a and 3b. As Grade 3a is classified as 'Best and Most Versatile' (BMV), there is the potential that the approach will fail to protect BMV agricultural land therefore.	-		
				6	Implementation of the approach relies predominantly on the use of greenfield land and therefore will result in its loss, not the prevention of it.	--		

Table 10. Option F – Extension of the town into the Green Belt

OPTIONS		PERFORMANCE				RATINGS	
		SA OBJECTIVE		POLICY CRITERIA QUESTIONS		CRITERIA QUESTION	OBJECTIVE
F	Extension of the town into the Green Belt	1	Housing	1	This approach has the potential to accommodate a relatively significant amount of growth, giving rise to a notable positive impact on local affordability by contributing to meeting demand. Indeed, it is expected that there will be significant limitations around what affordable provision can be included with new development here due to the relatively poor strength of the town’s housing market, compared with other areas of the Borough. However, the greater affordability of the town’s housing market in general also reduces the importance of affordable specific development when considered in the context of providing housing for a range of social groups. The range of types of dwellings likely to be accommodated on the sites amounting to this approach will be limited when compared, for example, to developing <i>within</i> the town. This is because existing landscape sensitivities will have a restrictive impact on design possibilities and is likely to rule out or severely limit flatted development, for example. By their geographical location such sites will also be situated further from facilities and services, further limiting their ability to accommodate for a wide range of social groups. In view of the above, this approach will have a limiting impact on diversifying the range of accommodation available within the borough to different social groups, but a positive one nonetheless.	+	+
				2	The Derbyshire & East Staffordshire Gypsy and Traveller Accommodation Assessment (2014) requires the provision of a single G&T pitch within the borough by 2019, with the		

				single pitch amounting to the full need across the whole period covered by the Assessment (2018-2033). The intention was to provide this through the development management process in response to an application, should one be submitted, so no land required allocation. The continuation of this approach would mean that this approach to growth would not specifically provide pitches and/or plots, but equally would not preclude the opportunity to satisfy the borough's requirement through the development management process, should an application be received. The approach is therefore considered to have a neutral effect on this objective.	0		
			3	The provision of new dwellings in any form and in any location will have a positive effect on the availability of stock across the borough, and this should help to resolve issues of homelessness in areas where the problem is more pronounced – i.e. within the town, as the housing market in general becomes more fluid. The geographical proximity of development sites within this approach to the town means that this effect could be more direct than in other approaches.	+		
			4	The sites amounting to this approach are greenfield in nature and are in non-housing uses. As a result it is considered unlikely that their redevelopment will lead to a notable reduction in unfit or vacant homes within the borough.	0		
			5	One of the sites forming part of this approach is of a scale that it would be expected to contribute significantly towards the provision of new infrastructure – primarily a new access road. This will amount to a significant benefit to the area more widely, including in respect of delivery of the new settlements outside of the Green Belt and associated highway mitigation. In any case, the approach	+		

				will also see development benefit from existing infrastructure within the town, being in close proximity to key services and facilities.			
		2	Employment and Jobs	1	In the short-term, the diversity and quality of jobs available locally in accommodating this approach will noticeably improve given the scale of development involved and associated requirement for construction expertise. The range of these jobs, given the scale of development, will be broad and varied linked with a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, the scale of development has the potential to attract employers to locate – either within the existing town but nearby to the related growth or within the new development. The former is more likely, given that whilst the approach does involve significant development, it is not in the order of the scale of a new settlement, for example, which would require its own infrastructure and service provision internally. Notwithstanding this, it is likely that new employment prospects will emerge as a result from a need to expand existing facilities within the town to service the growing population.		+
				2	Delivery of this approach will result in a short-term boost to employment given the scale of development involved and associated requirement for construction expertise. The range of these jobs, given the scale of development, will be broad and varied linked with a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, the scale of development is likely to attract employers to locate in response to population growth, for example to expand nearby service provision, and it is expected this would have a positive effect on employment levels locally.		+

			3	There will be a short-term improvement to rural productivity in terms of employment opportunities as a result of associated construction activity locally. Growth in this way would be strongly linked with the adjacent town and associated productivity. However the approach does present some risk to existing rural employment – such as within the agricultural sector, and therefore rural productivity - resulting from the development of land in productive agricultural use for housing. Notwithstanding this, an increase in population on the rural fringe may help to ensure long term viability of existing rural businesses nearby. This helps to minimise negative impacts from the risks.	0		
		3	Economic Structure and Innovation	1	The sites amounting to the approach are of a scale which means there may be the potential for land and buildings of the type required by businesses to form part of a mixed use approach to development, but this would not amount to a substantial portion of development, if any at all. Notwithstanding this, it is not expected that this approach would see the <i>removal</i> of land and buildings of the type required by businesses as delivery of the approach does not require the replacement of good quality employment premises as per the protections afforded to good and upper-average employment land through the Erewash Core Strategy and Erewash Employment Land Survey 2019.	0	+
			2	This approach is unlikely to result in development at a scale which would attract business or university clusters. It is noted that there is the potential to attract some business use, as part of a mixed-use approach to development, but at a limited scale.	0		
			3	This approach is unlikely to attract high knowledge employment sectors to locate over and above any other form of employment. The fact that the development is not	0		

				of a scale to attract business or university clusters is a notable influence on this. Equally the approach will not put at risk any existing high knowledge sector employment.			
			4	Graduates will be afforded a greater opportunity to live and work within the plan area on the basis of a boosted supply of new homes adjacent to the town, which provides for a wide range of important facilities and services, and which enjoys good connectivity to Nottingham which hosts two successful universities.	+		
			5	The approach will warrant the provision of required infrastructure to service the housing development itself, but little else such as that which may help to provide for the town's economic structure and supporting greater innovation.	0		
	4	Shopping Centres	1	The town centre of Ilkeston will benefit through this approach. By enabling growth adjacent to the town and within close proximity to the centre, a growing population is able to support and contribute both economically and socially to its function. Any retail offer provided through this approach would be limited to the role of servicing the new population only.	+		+
	5	Health and Well Being	1	The town has in place an existing health infrastructure (including doctors surgeries, dentists and a community hospital) from which new and existing residents will and do benefit from. The focus of new residential development adjacent to the town encourages active lifestyles as new residents are able to go about their lives in a sustainable manner, including by walking to nearby services and facilities and engaging in sport and recreation. The town provides a good range of facilities to accommodate this. This approach has the potential to reduce health inequalities as a result.	+		0

				2	Focussing development adjacent to the town will increase the extent of population who benefit from sustainable access to existing health services as described at 5(1). Related increase in demand will in the longer term result in a need for additional investment in provision to meet increasing demand. This raises the potential for new and/or improved services to be provided locally.	+		
				3	New development adjacent to the town will be of a scale that new recreational facilities, or improvement of existing, could form part of the development or result nearby. This will serve to increase the extent of population with access to facilities – both existing and potentially new - provided by the town and/or development proposals. Moreover, the town benefits from existing public recreational assets which will be accessible to an incumbent population through this approach; for example the River Erewash and Erewash Canal.	+		
				4	Given the scale of development associated with this approach, it is possible that new open space could be facilitated, or improvements to existing spaces could be afforded. However, the approach relies on the re-use of greenfield and open land on the fringes of the town which at least partly is publically accessible, so in effect would result in the loss of open space to which the public can currently access. This limits the potential positive effect resulting from the creation of new open space.	0		
				5	The approach will not improve access to local food growing opportunities and it does present a risk to such opportunities as it relies on the expansion of the town into countryside. At least some of this land is currently farmed, including – it is understood – for arable means. Developing on the land would also sterilise future opportunities.	--		

		6	Community Safety	1	The approach requires redevelopment of land which in general is undeveloped in the traditional 'urban' sense (employment, housing, industry), therefore there will be very little associated crime, or fear of crime present. There may be some potential to reduce forms of rural crime through the approach, but it is considered this is far outweighed by the likely increase in crime and fear of crime likely to be generated as a result of population increases associated with the approach.	-	-
				2	The approach requires redevelopment of land which in general is undeveloped in the traditional 'urban' sense (employment, housing, industry). As such, there is very little present on sites in the way of 'built environment' and so sites do not suffer from safety issues in terms of structures forming part of the built environment. There may be the presence of security issues on sites, where the potential for rural crime is concerned for example, however in general there is little opportunity to contribute to a safe and secure built environment through this approach. Indeed, the development of such sites risks creating a much expanded built environment, providing additional opportunities where crime may occur.	-	-
		7	Social Inclusion	1	The increase in population adjacent to the town resulting from this approach could help to sustain and enhance existing cultural assets nearby (for example a library or museum) that would otherwise be at risk from closure. Development of the scale set out by this approach is unlikely to warrant the establishment of new assets.	+	++
				2	Increasing the population adjacent to the town and associated cultural assets will see an increase in the proportion of the wider population who will benefit from easier access to related activities and thus increase general engagement and satisfaction.	+	++

			3	The approach will not result directly in the establishment of new facilities. However the increase in population resulting from development and adjacent to the town may contribute to increasing demand for assets so may therefore act as a catalyst for additional facilities in the long term.	+	
			4	The approach would not result in development of a scale which warrants new educational facilities being provided. However development would be of scale that contributions could be justifiably sought to expand and enhance existing nearby facilities, for instance within the town.	+	
	8	Transport	1	The approach will use (and rely on) the existing transport infrastructure of the town. New development is expected to be of a scale which is able to attract contributions to fund improvements to this infrastructure and thus enhance it. Given the scale of proposals, it is also expected that in the longer term the approach could justify the delivery of a new access road locally around part of the land in question which will significantly enhance the existing offer and alleviate existing traffic issues. The associated population increase will lead to an increase in demand on the existing system but resulting improvements afforded by the growth will help mitigate this.	+	+
			2	The approach focuses development adjacent to the town which benefits from an established and comprehensive transport network. However, the approach does rely on the expansion of infrastructure into predominantly greenfield locations. The approach therefore will impact on the immediate environment in the short-term. In the longer term, intentions to build a new access road locally around part of the land in question will also present risks.		

				However the locating of new development as proposed helps to closely connect a growing population to existing employment, services and facilities as well as public transport options, reducing the need to travel long distances and using unsustainable modes. This should contribute to the development of a transport network which in the long-term minimises impact on the environment.	0		
			3	The focusing of development adjacent to the town will contribute to reducing the number of journeys undertaken by the private car by encouraging use of alternative modes of transport, when compared with likely effects from development in more isolated locations. Development which is focused adjacent to the town will benefit from access to an established and comprehensive transport network with employment, services and facilities as well as public transport options within close reach of residents.	+		
			4	The approach to focus development adjacent to the town will expand the proportion of the wider population living within close proximity to existing services and facilities, in effect helping to increase general accessibility to services and facilities (including public transport), particularly when considered against other potential (and more isolated) options for growth.	+		
		9	Brownfield Land	1	Some very minor aspects of the land required to deliver this approach could be classified as brownfield. Predominantly though, the approach relies on expansion of the urban area onto surrounding greenfield land. It therefore does not make efficient use of available brownfield land.	--	--
				2	There are increased risks to biodiversity interests resulting from this approach, given the predominantly natural or rural status of land required to deliver this approach. As a	-	

				result, the approach is limited in its ability to minimise impacts on biodiversity value.			
		10	Energy and Climate Change	1	Any new development of this type will result in additional energy use. However when compared with other approaches, the location of new development adjacent to the town presents opportunities to reduce potential energy use through minimising travel and promoting modal shift. The growing population will be able to access services, facilities and employment without the use of a private car, or through the use of public transport.	0	++
				2	The energy efficiency of new dwellings built as part of this approach will be far superior to much of the existing older stock elsewhere in the Borough. In essence this will contribute to a general improvement in the energy efficiency of the plan area housing stock.	+	
				3	There is potential that the approach could incorporate the generation and use of renewable energy including through larger-scale interventions (for example, development of community energy systems – see 10(4) or centralised power generation) due to the scale of development amounting to this approach as well as the expected comprehensive approach to implementation associated with this approach.	+	
				4	The scale of development proposed and expected comprehensive approach to implementation associated with this approach means that the approach has potential to facilitate the development of community energy systems.	+	
				5	Any new development will be subject to climate change policy, guidance and building regulations stipulating the standards to which construction should be undertaken. This includes in relation to flood risk too. The construction of new dwellings in this way will apply through any of the		

			<p>approaches being considered. However comprehensive and large-scale development as advocated through this approach does provide additional opportunity to integrate measures such as community energy systems as discussed. Additionally, comprehensive redevelopment does present the opportunity to incorporate substantial climate change mitigation measures, such as site-wide urban drainage solutions, which would otherwise be unattainable (for example, through incremental development). There is an increased potential to ensure buildings are able to deal with future changes in climate change through this approach.</p>	+	
11	Pollution and Air Quality	1	<p>The locating of new development adjacent to the town brings a growing population in close proximity to existing local employment, services and facilities as well as public transport options, reducing the need to travel long distances via private car and increasing the opportunity for clean forms of travel (such as walking and cycling) to proliferate and the potential to mitigate air pollution levels. However, the reliance on primarily greenfield (and likely tranquil) land in the countryside to deliver the approach does mean that even minor effects on pollution levels – including noise resulting from the new population – will be of detriment to this objective.</p>	-	-
12	Flooding and Water Quality	1	<p>The land required to deliver this approach sits entirely within Flood Zone 1 and thus benefits from very limited flood risk. The scale of development will have implications for the wider water cycle in terms of run-off, for example, but the approach would allow for the implementation of site-wide mitigation to address this. Notwithstanding this, the approach does rely on the development of greenfield land in the countryside which in its current form will play a role in facilitating drainage and managing the wider water</p>	-	--

				cycle in general. The development of the land to accommodate this approach will remove this asset, notwithstanding the potential to implement site-wide mitigation for any arising flood risk.			
			2	In view of the role played by greenfield land as part of the wider water cycle (discussed at 12(1)), redevelopment of greenfield land at the scale advocated by the approach (leading to significant additional demands on water supply and drainage) has the potential to have an adverse effect on local water quality.	-		
			3	Locally, the approach is likely to impact negatively on water conservation, creating additional demand to be met as a result of local population growth despite building regulations providing scope for more efficient use of water (see 12(4)).	-		
			4	The water efficiency credentials of new dwellings being built when compared with existing older stock within the plan area will be superior owing to building regulations. In essence this will lead to a general improvement in the water efficiency of the plan area's stock and promotion of water efficiency in general.	+		
			5	The approach has the potential, without mitigation, to result in a deterioration of Water Framework Directive status or of on-site watercourses. The land required to deliver the approach is both greenfield and in the countryside, and therefore is relatively unimpeded in terms of natural water quality. The replacement of this with built development presents risks which would need to be properly managed and mitigated.	-		
	13	Natural Environment, Biodiversity,	1	The approach does not put at direct risk existing assets, but a sensitive approach around Ancient Woodland which straddles two sections of developable area as part of this approach to the north of Ilkeston will need to be adopted.			--

			Green and Blue Infrastructure	<p>It is assumed in the absence of more detailed and up-to-date information that protected species could be at risk and this would need to be carefully managed through the masterplanning and development management process. In general terms, the scope for improving biodiversity on the land in question is limited, given that its current state is likely to be of at least reasonable value given its primarily natural and semi-natural status.</p>	-		
				<p>2 Redevelopment of land may provide the opportunity to introduce biodiversity assets integral to the wider development, and such assets could be of higher value than existing land and thus result in net gain. However in general terms the approach would see the replacement of primarily greenfield (natural and semi-natural) countryside with urban form and therefore the likelihood of this is considered limited. On balance, it is considered that the approach has more potential to result in biodiversity net-loss rather than gain.</p>	-		
				<p>3 It is expected that the approach will have a minor impact on the geological environment given that it relates to development which will require the extraction of material to facilitate construction. No Regionally Important Geomorphological Sites are identified within the land in question.</p>	-		
				<p>4 The semi-natural and natural condition of the land required to deliver this approach indicates that sporadic woodland or tree cover will be present. Ancient Woodland is present straddling two sections of development land to the north of Ilkeston and development on either side does present a risk to this asset unless appropriate mitigation is secured through the masterplanning and development management processes. Until such time, there is an assumption that woodland cover and long-term</p>	-		

				management could be placed at risk through implementation of this approach.			
			5	It is expected that, given the scale of development proposed and comprehensive approach to implementation, some green space assets will be provided as part of development. This may be in terms of incremental amenity green space; the approach is unlikely to be able to facilitate substantial green space assets or open space. More crucially though, this approach to development will result in the loss of large sections of open countryside, at least some of which is publically accessible via Public Rights of Way. The approach will therefore result in a net loss of green and open space.	-		
			6	Given the scale of development proposed and comprehensive approach to implementation associated with this approach, there is the potential to improve the quality of existing open space nearby. This perceived benefit is outweighed however by the loss of publicly accessible open space resulting from development on open countryside. The approach will therefore result in a net reduction in quality of existing open space.	-		
			7	The approach presents an opportunity to incorporate new or improved green and blue infrastructure to development, for example through utilisation of and enhancement to related public footpaths, and water bodies which are adjacent to some of the land. The approach therefore provides an opportunity to encourage such networks as well as protect existing.	+		
		14	Landscape and Built Environment	1	The approach will result in a significant change to land which spans two defined landscape character types (Coalfield Estate Lands and Coalfield Village Farmland). Given the land is predominantly undeveloped and thus is likely to accurately reflect the landscape designations		-

				<p>applied to it, this approach conflicts with a need to respect or preserve its identified landscape character. Through high quality design, it should be possible to mitigate impacts on wider landscape designations however – such as through inclusion of soft edge-of-site buffers and with a pragmatic approach to building densities. Through this the approach is likely to be able to preserve wider landscape character value, but impacts on local value are unavoidable.</p>	-		
			2	<p>A large proportion of the land in question provides for good visual amenity given it contributes to the town’s setting. Redevelopment of the land is likely to impede this, notwithstanding the potential for mitigation through the development process.</p>	-		
			3	<p>The approach lends itself to respecting and potentially enhancing the local distinctiveness of related townscape and settlement character. The approach would lead to development of a scale which would require it to interact with and respect the existing adjacent built form, essentially implementing a continuation of the established form of development. How the effects on settlement character are managed will need careful control through the masterplanning and development management processes though, so effects are not entirely understood.</p>	0		
			4	<p>Through the approach, there are opportunities to enhance the inter-relationship between the landscape and built environment. For example, through incorporating new connections between them through redevelopment of land as advocated by this approach. Scale of growth associated with this approach is restricted enough to ensure existing forms of connections can be strengthened by retaining links between existing settlement and remaining landscape.</p>	+		

		15	Heritage	1	There are no designated or non-designated assets falling within the land amounting to this approach, nor any known assets nearby. As a result, the approach will conserve the historic environment but is unlikely to enhance it.	0	+
				2	The approach relies on the redevelopment of greenfield land categorised as part of landscape character types in County-wide assessment. In this respect therefore the approach will not maintain or strengthen landscape character and distinctiveness. There is however the potential to protect and enhance townscape character and distinctiveness through careful design which appreciates and strengthens the existing built form.	0	
				3	The approach will result in an increased population adjacent to a town which already benefits from a wide range of heritage assets and cultural activities to access and engage with. This will help to provide better opportunities for a wider population to access and understand local heritage and to participate in cultural activities.	+	
				4	The approach will significantly increase the population adjacent to the town who already benefit from historic assets. Through good design, access to this will be introduced, connecting the new development with the town. Ultimately this has the potential to improve access to and enjoyment of the historic environment for a wider proportion of the population.	+	
				5	No recorded archaeological assets are present on the land required to deliver the approach. As a result, the approach will conserve the archaeological environment but is unlikely to enhance it.	0	
		16	Natural Resources and	1	The approach, being related to housing development specifically, will not lead to a reduction in the consumption		--

			Waste Management	of raw materials. As part of the development required to deliver the approach, a short-term increase in the use of raw materials is likely, as with any scenario whereby the construction of new dwellings is a central facet.	-		
				2 The approach does not specifically promote the use of sustainable design, materials and construction techniques. These are largely controlled by building regulations and local planning policy does look to encourage sustainable design in recognition of the increasing threat of climate change and advocating suitable mitigation. However this is a focused issue which would need to be addressed through the masterplanning and development management processes.	0		
				3 The approach will result in an increase in household waste locally in the long-term and construction waste in the short-term.	-		
				4 The approach in general will not have an impact on the production of hazardous waste locally.	0		
				5 A small section of the land is question is classified as Grade 3 agricultural land - none is identified as Grades 1 or 2. The majority of land is classified as Grade 4. Data is not available at this time for all of Erewash to separate Grades 3a and 3b. As Grade 3a is classified as 'Best and Most Versatile' (BMV), there is the potential that the approach will fail to protect BMV agricultural land entirely therefore.	-		
				6 Implementation of the approach relies predominantly on the use of greenfield land and therefore will result in its loss, not the prevention of it.	--		

Table 11. Option G – Extension of the villages into the Green Belt

OPTIONS		PERFORMANCE				RATINGS	
		SA OBJECTIVE		POLICY CRITERIA QUESTIONS		CRITERIA QUESTION	OBJECTIVE
G	Extension of the villages into the Green Belt	1	Housing	1	This approach has the potential to accommodate a relatively significant amount of growth, giving rise to a notable positive impact on local affordability by contributing to meeting demand. The range of types of dwellings likely to be accommodated on the sites amounting to this approach will be limited. Landscape sensitivities which equally apply to within villages as to outside them will have a restrictive impact on design possibilities and is likely to rule out or severely limit the scope for flatted development, for example. By their geographical location such sites will also be situated further from facilities and services that may be provided by the villages, further limiting their ability to accommodate for a wide range of social groups; for example those who do not have access to a private car. In view of the above, this approach will have a limiting impact on diversifying the range of accommodation available within the Borough to different social groups, but a positive one nonetheless by virtue of helping to meet general demand.	+	+
				2	The Derbyshire & East Staffordshire Gypsy and Traveller Accommodation Assessment (2014) requires the provision of a single G&T pitch within the borough by 2019, with the single pitch amounting to the full need across the whole period covered by the Assessment (2018-2033). The intention was to provide this through the development management process in response to a planning application, should one be submitted, so no land required formal allocation. The continuation of this approach would	0	

				mean that this approach to growth would not specifically provide pitches and/or plots, but equally would not preclude the opportunity to satisfy the Borough's requirement through the development management process, should an application be received. The approach is therefore considered to have a neutral effect on this objective.			
			3	The provision of new dwellings in any form and in any location will have a positive effect on the availability of stock across the Borough, and this should help to resolve issues of homelessness in areas where the problem is more pronounced – i.e. within the town, as the housing market in general becomes more fluid. The geographical disconnect of this approach from the main urban areas (the town and conurbation) where the issue is expected to be more pronounced means that the effect on this objective will be less noticeable than elsewhere.	+		
			4	The sites amounting to this approach are greenfield in nature, or in specific uses other than housing. As a result it is considered unlikely that the development of greenfield land will lead to a notable reduction in unfit or vacant homes within the borough.	0		
			5	One of the sites forming part of this approach is of a scale that would be expected to contribute significantly towards the provision of new infrastructure. However, this is not likely to be the case in most instances, and the villages provide only limited access to existing infrastructure for new residents to benefit from.	0		
	2	Employment and Jobs	1	In the short-term, the diversity and quality of jobs available locally in accommodating this approach will noticeably improve given the scale of development involved and associated requirement for construction skills and expertise. The range of these jobs, given the scale of		+	

				development, will be broad and varied spanning a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, some of the approach results in development of a scale that would attract employers to locate as part of mixed-use development. The generally rural environment associated with this approach to growth is likely to limit positive impacts.	+		
			2	Delivery of this approach will result in a short-term boost to employment given the scale of development involved and associated requirement for construction skills and expertise. The range of these jobs, given the scale of development, will be broad and varied spanning a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, the scale of development is likely to attract employers to locate as part of mixed-use approach to development, as well as in response to longer term population growth, and it is expected this would have a positive effect on employment levels locally.	+		
			3	There will be a short-term improvement to rural productivity in terms of employment opportunities as a result of associated construction activity locally. There is the risk that the approach, relying on extending the villages out into surrounding countryside, would result in some negative effects on rural employment – such as within the agricultural sector with lost farming land, and therefore rural productivity – due to the re-purposing of such land for housing development. However, the scale of development would be such that new employers would be attracted to the area, and an increase in population within the rural areas may help to ensure long-term viability of	0		

				existing nearby rural businesses. This helps to minimise negative impacts from the risks.			
		3	Economic Structure and Innovation	1	The sites amounting to the approach are of a scale which means there is the potential for land and buildings of the type required by businesses to form part of a mixed-use approach to development. Additionally, it is not expected that this approach would see the <i>removal</i> of land and buildings of the type required by businesses as delivery of the approach does not require the replacement of good quality employment premises as per the protections afforded to good and upper-average employment land through the Erewash Core Strategy and Erewash Employment Land Survey 2019.	+	+
				2	In view of the scale of development proposed as part of this approach, there is potential for business and university clusters to be facilitated as part of a mixed-use approach to development. However the locations relied upon to deliver growth as part of this approach are relatively isolated, albeit connected to existing rural villages, and this is likely to limit the potential to attract such development.	0	
				3	In view of the scale of development proposed as part of this approach, there is the potential for high knowledge employment sectors to be well accommodated as part of a mixed-use approach to development. However, as with 3(2), the location of growth would be relatively isolated and this is likely to limit the potential to attract such development.	0	
				4	Graduates will be afforded a greater opportunity to live and work within the plan area on the basis of a significantly boosted supply of new homes. However, this approach would direct these homes into relatively isolated locations with limited access to the conurbations and town and is therefore likely to minimise potential for this to occur.	0	

			5	Whilst the approach does not explicitly provide for new employment as it is instead focused on housing development, the scale of development amounting to part of the approach will mean new infrastructure will be required, and this infrastructure is likely to benefit economic structure and innovation objectives in addition to housing ones. Ultimately, the approach has the potential to provide the required infrastructure in economic structure and innovation terms to a limited extent.	+		
		4	Shopping Centres	1	By enabling growth adjacent to the villages and within close proximity to their centres, a growing population would be able to support and contribute both economically and socially to their function. In terms of formal designations, there is the potential for significant benefit to arise for one Local Centre through this approach (Borrowwash). There is the risk that the scale of development associated with some of the approach may encroach on the function of nearby centres as required service and retail provision results in new competition (such as for Draycott and Breaston), but it is not considered that this outweighs the potential benefits of the approach in relation to this objective overall.	+	+
		5	Health and Well Being	1	The approach will fail to locate new population close to existing health infrastructure of the extent and range required to support the needs of a growing population. Rural populations tend to be more reliant on use of the private car to access services and facilities provided by larger settlements and this reduces the opportunity to promote active lifestyles as residents encounter barriers which mean they are generally unable to go about their lives in an entirely sustainable manner, such as by walking or cycling to nearby services and facilities. This fails to	0	--

				<p>promote a reduction in health inequalities. As part of the approach, there is the potential to provide health facilities as part of at least one mixed-use development, but this is a minimum requirement rather than improvement over current prospects.</p>			
			2	<p>In general the approach will not improve accessibility to health services for the overall population, particularly where development is of a limited scale. It is expected that the approach will result in an increase in the proportion of the population who have to use unsustainable means of transport to access existing facilities, due to the rural location of growth associated with this approach. Notwithstanding this, there is the potential that more extensive development options forming part of this approach could deliver improvements to existing or new healthcare facilities as part of their build-out. This may in turn improve accessibility locally, however this is not considered to be a possibility which is representative of the approach as a whole, and in any case, such improvements or additions of facilities would be focused on servicing the incumbent populations rather than the population at large.</p>	0		
			3	<p>Existing facilities are more limited in supply within rural areas and would be placed under greater pressure in the event of significantly expanded populations. However a proportion of the approach includes development at a scale which could attract the provision of new recreation assets in areas which currently have limited supply. This, coupled with natural recreation assets which exist within the rural areas suggests that the approach could increase opportunities for recreational activity on the proviso that strong and legible connections are provided to these assets.</p>	+		

			4	A proportion of the approach includes development at a scale which could attract new open space, or sponsor improvements to existing assets in the adjacent village(s). It is likely therefore that the approach could have a positive impact on this objective. However, the approach relies on the use of substantial amounts of greenfield land and countryside which at least partly is accessible via public rights of way, so in effect would result in the loss of open space which the general public can currently access. This limits the potential positive effect resulting from the creation of new open space.	-	
			5	The approach will not improve access to local food growing opportunities and it does present a risk to such opportunities as overall the approach relies on the use of a substantial amount of countryside. At least some of this land is currently farmed, including – it is understood – for arable methods of agriculture. Developing on the land would also take away the future opportunity for crop production in close proximity to rural populations.	--	
	6	Community Safety	1	The approach requires the development of land which in general is untouched by traditional ‘urban’ forms such as employment, housing or industry). Therefore there will be very little associated crime, or fear of crime at present. There may be some potential to reduce forms of rural crime (e.g. theft from farms, harm to livestock, wildlife crime) through the approach, but it is considered this is far outweighed by the likely increase in crime and fear of crime which will be experienced as a result of the introduction of significant populations associated with the approach. Given the substantial scale of development proposed overall, there is the potential for this approach to be of severe detriment to the objective.	--	--

			2	The approach requires the development of land which in general is untouched by traditional 'urban' forms such as employment, housing or industry). As such, there is very little present on sites in the way of 'built environment' and so sites do not suffer from safety issues in terms of structures forming part of the built environment. There may be the presence of security issues on sites, where the potential for rural crime is concerned for example, however in general there is little opportunity to contribute to a safe and secure built environment through this approach. Indeed, the development of such sites presents the risk of creating a much expanded built environment which gives rise to more substantial safety and security issues. Given the substantial scale of development proposed overall, there is the potential for this approach to be of substantial detriment to the objective.	--		
		7	Social Inclusion	1	An increase in population adjacent to rural villages resulting from this approach could help to sustain existing cultural assets (for example a library or village hall) that would otherwise be at risk from closure. A proportion of the approach involves substantial levels of development which may open up opportunities for also improving existing assets. There may be some risk that on the more substantial sites, new facilities would be required, and their development may present competition to nearby existing facilities within the villages, and this may threaten the continuing viability of existing assets. However this scale of development is not uniform across the approach.	0	+
				2	Increasing the population adjacent to the villages and associated cultural assets will see an increase in the proportion of the wider population who will benefit from easier access to related activities and thus increase general engagement and satisfaction. There is the risk to existing		

				assets presented through increased competition as considered at 7(1), but in general the effect on the various elements of this criteria question is considered to be positive.	+		
			3	A proportion of the approach will result in development which is of a scale that will require the provision of new assets including facilities such as shops and community centres. Whilst this is only a proportion of the approach, when viewed together with the general population increase that would result from the approach overall, it is considered likely to have a positive effect on this criteria question and lead to a general increase in the number of facilities within the plan area.	+		
			4	A proportion of the approach will result in development which is of a scale that will require the provision of educational facilities on-site to meet the needs of a newly-created school age population. This will result in a positive effect; in general providing for the educational needs of the incumbent population. As a minimum, development would be of scale that contributions could be justifiably sought to expand and enhance existing nearby educational facilities, for instance at schools within the villages.	+		
	8	Transport	1	The approach would result in overall substantial growth in rural locations adjacent to villages; some of which experience limited transport provision and relatively low levels of connectivity. The approach would make use of existing transport infrastructure, though likely also apply significant pressures to it. The scale of growth means there is the potential for enhancements to existing infrastructure nearby, but in reality this alone would fall significantly short of providing what is required to absorb demand arising from new development for a proportion of the approach at least, and the focus would need to be on	-		--

				developing new and substantial infrastructure interventions rather than enhancement of the existing system.			
			2	The approach will require the delivery of significant transport infrastructure on existing greenfield land which will have an adverse impact on the environment. Whilst the scale of development for part of the approach does provide the opportunity to establish new employment, services and facilities as part of a mixed-use development, in reality a large proportion of the population will continue to be employed, and seek services, outside of the development, particularly in relation to smaller scale development associated with some elements of the approach. Given the relatively isolated (rural-village) locations associated with this growth option, the approach will significantly increase the extent of plan-area population who require the use of private vehicles to travel, resulting in longer-term environmental implications.	--		
			3	It is expected the approach will significantly increase the number of journeys undertaken by private car in view of the relatively isolated (rural-village) locations for growth linked to this approach which will result in key local services being largely accessible only through private car travel.	--		
			4	The approach to focus development adjacent to the rural villages will expand the proportion of the wider population living within close proximity to services and facilities provided by those locations. However, rural villages are generally limited in the extent of services and facilities they are able to provide and this reduces the effect of this approach in this regard. A proportion of the approach includes large-scale development, and in these circumstances new facilities and services would be	+		

			provided as part of a mixed-use approach to development. This factor is instrumental in indicating a minor positive effect on this criteria question.				
		9	Brownfield Land	1	Small areas of the land required to deliver this approach could reasonably be classified as brownfield. Predominantly though, the approach relies on the expansion of rural villages out onto surrounding greenfield land, and in some instances this would be to a significant extent. It therefore does not make efficient use of available brownfield land.	--	--
				2	There are increased risks to biodiversity interests resulting from this approach, given the predominantly natural and rural status of land required to deliver this approach. As a result, the approach is limited in its ability to minimise any adverse impacts on biodiversity value. This effect is particularly strong from this approach due to the substantial scale of development that would be sought for a proportion of the approach.	--	--
		10	Energy and Climate Change	1	Any new development of this type will result in additional energy use. This is likely to be a strong effect in this case due to the scale of development forming part of this approach at given locations. In addition, the location of new development adjacent to the rural villages is likely to further enhance this effect due to the likely dependence of a newly-introduced population on the use of the private car to access the full range of services and facilities required.	--	-
				2	The energy efficiency of new dwellings built as part of this approach will be far superior to much of the existing stock elsewhere in the Borough. In essence this will contribute to a general improvement in the overall energy efficiency of the plan-area housing stock. Given the scale of growth proposed overall, this would result in a strong effect.	++	

				3	There is potential that part of the approach could incorporate the generation and use of renewable energy including through larger-scale interventions (for example, development of community energy systems – see 10(4), or centralised power generation), due to the scale of development amounting to part of this approach, assuming that a comprehensive approach to development were adopted.	+		
				4	The scale of development proposed within part of this approach means that there is the potential to facilitate the development of community energy systems, particularly if development were to be implemented comprehensively.	+		
				5	Any new development will be subject to climate change policy, guidance and building regulations stipulating the standards to which construction should be undertaken. This includes in relation to flood risk. The construction of new dwellings in this way will apply through any of the approaches being considered. However, comprehensive and large-scale development as advocated through part of this approach does provide additional opportunity to integrate measures such as community energy systems as discussed at 10(4). Additionally, comprehensive development does present the opportunity to incorporate substantial climate change mitigation measures, such as site-wide urban drainage solutions, which would otherwise be unattainable (for example, through incremental and smaller-scale development). There is an increased potential to ensure buildings are able to deal with future changes in climate change through this approach. However, the significant scale of growth attributed to this approach overall and the locating of growth largely on greenfield land, does severely off-set any positive outcomes from this effect.	0		

		11	Pollution and Air Quality	1	Part of the approach relies on the large-scale development of greenfield land in the countryside. As a result it is expected that, despite there being potential for the provision of some employment, services and local facilities within development sites, the approach will encourage and generate high usage of the private car and therefore severely restrict any potential to minimise air pollution resulting from development. This is exacerbated by the expected inability of rural villages to provide the required services and facilities across the approach as a whole. The reliance on greenfield land in the countryside, which contributes to largely a tranquil environment, will also result in a significant increase in relative noise pollution. The approach will be of significant detriment to this objective.	--	--	
		12	Flooding and Water Quality	1	Part of the land required to deliver this approach suffers from some existing flood risk (falling within Flood Zones 2 or 3). The scale of development is such that significant site-wide mitigation strategies could be put in place to help deal with drainage and flood issues resulting from development, but it remains that the scale of development on greenfield land within the countryside would be very significant. Such land plays a role in facilitating drainage and managing the wider water-cycle in general. The development of such land to accommodate this approach will remove this asset, notwithstanding the potential to implement site-wide mitigation for any arising flood risk, and on balance it is considered would result in a potentially major detriment to the wider water cycle when taken as a whole. It is recognised that the extent of some of the development required to deliver this approach would be much smaller scale. As a result the negative effect on this criteria question is reduced.	-	-	

				2	In view of the role played by greenfield land as part of the wider water-cycle (discussed at 12(1)), redevelopment of greenfield land at the scale advocated by the approach when taken as a whole (leading to significant additional demands on water supply and drainage) has the potential to have a significant adverse effect on the infrastructure which helps to ensure acceptable levels of local water quality.	--		
				3	Locally, the approach is likely to impact negatively on water conservation, creating additional demand to be met as a result of local population growth despite building regulations providing scope for more efficient use of water (see 12(4)). Given the significant scale of development in specific locations attributed to at least part of this approach, the negative effect on this criteria question is increased.	--		
				4	The water efficiency credentials of new dwellings being built when compared with existing older stock within the plan area will be superior owing to building regulations. In essence this will lead to a general improvement in the water efficiency of the plan area's stock and promotion of water efficiency in general. The scale of growth advocated by this approach when taken as a whole is so significant that the positive effect will be major.	++		
				5	The approach is likely, without mitigation, to result in a deterioration of Water Framework Directive status or of on-site watercourses. The land required to deliver the approach is both greenfield and in the countryside, and therefore relatively unimpeded in terms of natural water quality. The replacement of this with built development at such an extensive scale for part of the approach presents risks which are unlikely to be able to be entirely mitigated for.	--		

		13	Natural Environment, Biodiversity, Green and Blue Infrastructure	1	The approach is very likely to result in harm to biodiversity. This is due to the extensive scale of development proposed for part of the approach and location of development within primarily natural and semi-natural greenfield land in the countryside. Whilst specific improvements to assets as part of development may be possible, it is considered that the locating of this scale of growth – and specifically the urbanising of sizeable areas of natural and semi-natural greenfield land - markedly outweighs any potential for this. It is assumed in the absence of more detailed and up-to-date information that protected species could be at risk and this would need to be carefully managed through the masterplanning process.	--	--	
				2	Redevelopment of land may provide an opportunity to introduce specific and high quality biodiversity assets integral to the wider development. However in general terms, the approach would see the replacement of primarily greenfield (natural and semi-natural) parts of the countryside with urban forms of development, risking existing biodiversity and significantly outweighing any potential for delivering net gain. This risk is particularly cogent as a result of the significant scale of development associated with part of the approach and ultimately it is considered that the approach is likely to result in significant biodiversity net-loss because of this.	--		
				3	It is expected that the approach will have a minor impact on the geological environment given that it relates to development which will require the extraction of material to facilitate construction. No Regionally Important Geomorphological Sites are identified within the land in question.	-		
				4	The semi-natural and natural status of the land required to deliver this approach indicates that sporadic woodland or			

				tree cover will likely be present. There is the potential for development to positively incorporate such assets and have this certified through the masterplanning and development management process. However until this time, there is an assumption that woodland cover and long-term management would be placed at risk through implementation of this approach. This risk is particularly cogent as a result of the significant scale of development associated with part of this approach.	-		
			5	It is expected that, given the scale of development proposed, green and open space of varying types will form part of development to some extent. However this does not outweigh the associated loss of existing publically accessible open space to facilitate construction that would occur. In addition, parts of the approach rely on much smaller sites which would not provide the same level of contribution in this regard.	0		
			6	Given the scale of development proposed there is the potential for new open space to form part of its implementation overall. This is outweighed however by the loss of publicly accessible open space resulting from the development of open countryside which sees Public Rights of Way provide access. The approach will therefore result in a net reduction in the quality of existing open space when taken as a whole.	--		
			7	The approach presents an opportunity to incorporate new or improved green and blue infrastructure to development, for example through utilisation of and enhancement to related public footpaths, and water bodies which are present on some of the land. The approach therefore provides an opportunity to encourage the creation of new green and blue assets whilst protecting existing assets, on a significant scale.	+		

		14	Landscape and Built Environment	1	The approach will result in change to land which spans a variety of landscape character types. The effect therefore is expected to be negative, notwithstanding the potential for mitigation through the development management process, due to the predominantly tranquil and much unaltered rural environs that would be affected. This is particularly the case due to the scale of development forming part of the approach as proposed, though it is also recognised that smaller sites will have a much reduced level of impact.	-	-	
				2	The approach is highly likely to impact on undeveloped land which as a result of its openness and rural character provides a positive setting for historic settlements. Redevelopment of such land will ultimately result in a negative effect on this objective.	-		
				3	Any development in extension to a settlement will need to interact with and respect the existing adjacent built form, essentially implementing a continuation of the established pattern of development wherever this is desirable. How development manages its effect on a settlement's character precisely will need to be carefully controlled through the masterplanning and development management processes with a particular focus on design, the effects of which are not fully understood at this stage. However the scale of development associated with the approach and close correlation with development sites and existing settlements means there is an ongoing risk to this objective.	-		
				4	The approach has the potential to severely diminish existing relationships between the landscape and built environment. Such relations are at risk of being threatened by the scale of development which forms part of the approach, with the potential for existing settlements to be			

				physically isolated from surrounding landscape as a result. The scale of development may present opportunities for the creation of new links between the built environment and remaining unaltered landscape, but this benefit would not outweigh the risks as described.	++	
	15	Heritage	1	Heritage assets are present both within and adjacent to parts of land required to deliver the approach. Policy protections exist to ensure the conservation of historic assets (such by way of Conservation Area and Listed Building designations) even in the context of growth. The scale of growth associated with the approach is such that heritage assets may be at risk without adequate mitigation, but there may also be the opportunity to enhance assets within or adjacent to growth areas too.	0	+
			2	The approach relies on the redevelopment of large areas of greenfield land categorised as part of a range of landscape character types in County-wide assessment. In this respect the approach will not therefore maintain or strengthen landscape character and distinctiveness and presents some risks to it. There is however the potential to protect and enhance townscape character and distinctiveness through careful design which respects and strengthens the quality of the existing built form of the rural villages, given the proximity of development adjacent to existing settlements.	-	
			3	The scale of growth would result in the creation of large new populations adjacent to rural villages and who benefit from local heritage assets and the provision of cultural activities. The scale of growth for at least a part of the approach has the potential to provide good quality access to these places, such as through the creation of expansive and accessible green infrastructure trails. There is the potential that the approach will therefore significantly	+	

				expand the extent of population who will have improved opportunities to access and understand local heritage and to participate in cultural activities.			
			4	There is the potential for the approach to improve access to and enjoyment of the historic environment. As discussed, the scale of growth does present an opportunity to connect a much expanded population into neighbouring rural villages which benefit from related assets through improved access, such as through implementation of green infrastructure and improved public transport provision.	+		
			5	No recorded archaeological assets are present on land required to deliver the approach. As a result, the approach will conserve the archaeological environment but is unlikely to enhance it.	0		
		16	Natural Resources and Waste Management	1	The approach, being related to housing development specifically, will not lead to a reduction in the consumption of raw materials. As part of the development required to deliver the approach, a short-term increase in the use of raw materials is likely, as with any scenario whereby the construction of new dwellings is a central facet.	-	--
				2	The approach does not specifically promote the use of sustainable design, materials and construction techniques. These are largely controlled by building regulations, with local policy also looking to encourage sustainable design in recognition of climate change and seeking acceptable mitigation. However this is a focused issue which would need to be addressed through the masterplanning and development management processes. Notwithstanding this, there is potential that parts of the approach could incorporate the generation and use of renewable energy including through larger-scale interventions (such as community energy systems) or centralised power	+	

				generation due to the scale of development amounting to this approach.			
				3 Part of the approach will result in a significant increase in household waste locally in the long-term and construction waste in the short-term.	--		
				4 The approach in general will not have an impact on the production of hazardous waste locally.	0		
				5 A large section of the land in question is classified as Grade 2 agricultural land. The majority of remaining land is classified as Grade 3. Data is not available at this time for all of Erewash to allow for the separation of Grades 3a and 3b. As Grade 3a is classified as 'Best and Most Versatile' (BMV) agricultural land along with Grade 2, the approach presents a significant risk to BMV agricultural land and will fail considerably in protecting it.	--		
				6 Implementation of the approach relies on the development of large areas of predominantly greenfield land and therefore will result in a substantial loss of greenfield land, not prevention of it.	--		

Table 12. Option H – New Settlements in the Green Belt

OPTIONS		PERFORMANCE				RATINGS	
		SA OBJECTIVE		POLICY CRITERIA QUESTIONS		CRITERIA QUESTION	OBJECTIVE
H	New Settlements in the Green Belt	1	Housing	1	New settlement growth within the Green Belt has the potential to accommodate a significant amount of growth. It is expected this would result in a positive impact on local affordability, though attributing this improvement to a locality is complex given the approach would result in the creation of new settlements detached from existing housing markets. Given the scale of growth which could be delivered by such an approach however, the impact is likely to be felt borough-wide by significantly increasing fluidity in the wider housing market. However, the range of types of dwellings likely to be accommodated on such a development will be limited when compared, for example, to developing within an existing urban area. Existing rural Green Belt sensitivities will have a severely restrictive impact on design possibilities and is likely to rule out or severely limit flatted development, for example. Though the approach would result in new settlements which are isolated from existing facilities and services, the scale of development accommodated would likely result in the provision of independent provision which could aid in accommodating for a wide range of social groups.	+	++
				2	The Derbyshire Gypsy and Traveller Accommodation Assessment (2014) requires the provision of a single G&T pitch within the borough by 2019, with the single pitch amounting to the full need across the whole period covered by the Assessment (2018-2033). The intention was to provide this through the development management process in response to an application, should one be	0	

				submitted, so no land required allocation. The continuation of this approach would mean that this approach to growth would not specifically provide pitches and/ or plots, but equally would not preclude the opportunity to satisfy the borough's requirement through the development management process, should an application be received. The approach is therefore considered to have a neutral effect on this objective.			
			3	The provision of new dwellings in any form and in any location will have a positive effect on the availability of stock across the borough, and this should help to resolve issues of homelessness in areas where the problem is more pronounced – i.e. within the urban areas, as the housing market in general becomes more fluid. The provision of new dwellings as part of a standalone settlement could see the migration of residents out from the urban areas as the increase in stock availability provides an opportunity for residents to progress through the housing market, potentially freeing up affordable stock more local to the problem. The scale of the proposals amounting to this approach would be significant enough that it is expected the effect will be more pronounced than with some other approaches.	+		
			4	The sites amounting to this approach are greenfield in nature or in specific use other than housing. As a result it is considered unlikely that their redevelopment will lead to a notable reduction in unfit or vacant homes within the borough.	0		
			5	The significant scale of development attributed to this specific approach means that it is likely to be able to deliver required new infrastructure. Such an outcome could mitigate implications resulting from the isolated location of development, away from existing settlements	+		

				and available infrastructure, though these would be substantial impacts to surmount.			
		2	Employment and Jobs	1	In the short-term, the diversity and quality of jobs available locally in accommodating this approach will noticeably improve given the scale of development involved and associated requirement for construction expertise. The range of these jobs, given the scale of development, will be broad and varied linked with a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, the scale of development is highly likely to attract employers to locate as part of the new settlements. This would include employers seeking to deliver the required local facilities and services which would form part of the developments but also potentially those seeking to provide bespoke employment provision as part of a mixed-use approach to development.	+	+
				2	Delivery of this approach will result in a short term boost to employment given the scale of development involved and associated requirement for construction expertise. The range of these jobs, given the scale of development, will be broad and varied linked with a variety of sectors including engineering, clerical, service, professional and manual. In the longer term, the scale of development is highly likely to attract employers to locate as part of the new settlements. This would include employers seeking to deliver the required local facilities, services and infrastructure which would form part of the developments but also potentially those seeking to provide bespoke employment provision as part of a mixed-use approach to development. This in turn would have a positive effect on employment levels locally.	+	
				3	There will be a short-term improvement to rural productivity in terms of employment opportunities as a		

				<p>result of associated construction activity locally. It is expected that employers will be attracted to locate within new development resulting from this approach given its scale; either in providing the required services and facilities or in delivering a bespoke employment offer as part of a mixed-use approach. This would potentially result in a significant increase in productivity within the <i>existing</i> rural area (i.e. increase in employment opportunities). However, it would be facilitated by a complete change in the character of the area. The scale of development forming part of this approach would be such that to consider it an improvement to <i>rural</i> productivity exclusively would fail to recognise the inevitable transformation of the area to urban. The extent to which this approach can be attributed to improving rural productivity is therefore extremely limited. That being said, the remaining rural areas surrounding any new development of the scale advocated by this approach would likely benefit from additional employment opportunities afforded by the presence of the development and increase in population. However, in conflict with this will also be the required land-take which would very likely see the loss of existing rural businesses – including agricultural – to facilitate the growth.</p>	-		
		3	Economic Structure and Innovation	1	In view of the scale of and comprehensive approach to development proposed as part of this approach, it is very likely that land and buildings of the type required by businesses could be provided as part of a mixed-use approach to delivery.	+	+
				2	In view of the scale of development proposed as part of this approach, there is potential for business and university clusters to be facilitated as part of a mixed-use approach to development. However the locations relied upon to deliver growth as part of this approach are relatively	0	

				isolated and this is likely to counter any potential to attract such development.			
			3	In view of the scale of development proposed as part of this approach, there is the potential for high knowledge employment sectors to be well accommodated as part of a mixed-use approach to development. However, as with 3(2), the location of growth would be relatively isolated and this is likely to counter any potential to attract such development.	0		
			4	Graduates will be afforded a greater opportunity to live and work within the plan area on the basis of a significantly boosted supply of new homes. However the approach would direct these homes into relatively isolated locations with limited access to the conurbations and town and is therefore likely to minimise potential for this to occur.	0		
			5	Whilst the approach does not explicitly provide for new employment as it is focused on housing development, the scale of development amounting to the approach will mean new infrastructure in general will be required, and this infrastructure is likely to benefit economic structure and innovation objectives as well as housing ones. Ultimately, the approach has the potential to provide the required infrastructure in economic structure and innovation terms.	+		
	4	Shopping Centres	1	The relatively isolated location of development amounting to this approach will fail to present benefits to any designated centres. On the contrary, the scale of development is so significant that there is the likelihood that such an approach will act to undermine the vitality and viability of nearby Sandiacre and Borrowash local centres as significant retail and service provision is likely to be required to support the incumbent population, and in a way which is isolated from existing settlements.	-	-	

		5	Health and Well Being	1	The approach will not reduce health inequalities. The approach will be required to provide health facilities for the associated incumbent population, but this is a minimum requirement rather than improvement over current prospects. Integration of green spaces and associated infrastructure should help to encourage active lifestyles within the sites, but equally an element of travelling out of the development sites will be required to access nearby town and local centres to benefit from other facilities.	0	--	
				2	The approach will not improve access to health services for the general population. The approach will be required to provide health facilities for the associated incumbent population only.	0		
				3	The scale of development is such that the integration of green spaces and recreational assets will form part of the approach and this will introduce new assets to the wider community. The extent to which this will attract in the wider population, rather than just serve the needs of the incumbent population, is not known. Given the scale of development, there may be the opportunity to improve existing facilities nearby however the relative isolation of development resulting from this approach will limit the extent of this.	+		
				4	The scale of development is such that the integration of green spaces and recreational assets will form part of the approach and this will introduce new assets to the wider community. However, the approach relies on the re-use of substantial amounts of greenfield land and countryside which at least partly is accessible via public rights of way, so in effect would result in the loss of open space to which the public can currently access. This limits the potential	-		

				positive effect resulting from the creation of new open space.			
			5	The approach will not improve access to local food growing opportunities and it does present a risk to such opportunities as it relies on the use of a substantial amount of countryside. At least some of this land is currently farmed, including – it is understood – for arable methods of agriculture. Developing on the land would also take away the future opportunity for crop production.	--		
		6	Community Safety	1	The approach requires redevelopment of land which in general is undeveloped in the traditional 'urban' sense (employment, housing, industry), therefore there will be very little associated crime, or fear of crime present. There may be some potential to reduce forms of rural crime (e.g. theft from farms, harm to livestock, wildlife crime) through the approach, but it is considered this is far outweighed by the likely increase in crime and fear of crime which will be experienced as a result of significant population increases associated with the approach. Given the substantial scale of development proposed, there is the potential for this approach to be of severe detriment to the objective.	--	--
				2	The approach requires redevelopment of land which in general is undeveloped in the traditional 'urban' sense (employment, housing, industry). As such, there is very little present on sites in the way of 'built environment' and so sites do not suffer from safety issues in terms of structures forming part of the built environment. There may be the presence of security issues on sites, where the potential for rural crime is concerned for example, however in general there is little opportunity to contribute to a safe and secure built environment through this approach. Indeed, the development of such sites presents the risk of creating a much expanded built environment	--	

				which gives rise to more substantial safety and security issues. Given the substantial scale of development proposed, there is the potential for this approach to be of substantial detriment to the objective.			
		7	Social Inclusion	1	Such an approach will result in a very large population increase. Ultimately, the scale of this is such that existing assets elsewhere in the plan area may benefit in terms of demand increases contributing to their long-term protection. This effect is tempered significantly however by the relatively isolated location of development adopted by this approach and the inevitable requirement that such an approach will be required to provide assets to serve any incumbent population. Given the scale of development amounting to this approach within the rural area, there may be risk to existing assets through development as a result of increased competition resulting from this approach. For example, a new facility required to form part of the new settlement by virtue of its scale, may inadvertently replace the need for an existing facility within nearby settlements, ultimately leading to the demise of existing assets.	-	+
				2	The approach will require the creation of new assets within the development. Such assets will be required to meet the needs of the incumbent population only. However due to the extent of development associated with this approach, there is the potential that new assets will be of a scale that they are able to serve nearby existing communities too, ultimately resulting in an improvement in overall access to, engagement and satisfaction with cultural assets.	+	
				3	The approach requires development of a scale which means facilities will need to be provided to support the incumbent population, with the potential for residual benefits to be felt by the existing nearby population also.	++	

				As a result, the approach will likely result in a significant increase in the number of facilities.		
			4	The approach requires development of a scale which means new educational facilities will need to be provided directly to meet the needs of school-age children living at new settlements.	++	
	8	Transport	1	The approach would result in relatively substantial growth in an isolated location. It will therefore use and place significant strain on surrounding (and inadequate) infrastructure which is rural by nature. Given the predominantly greenfield status of the land and thus very limited infrastructure provision within the growth areas, the scale of new infrastructure that will need to be developed will vastly outpace what an enhanced existing system can accommodate. The scale of growth means there is the potential for enhancements to existing infrastructure nearby, but in reality this alone would fall significantly short of providing what is required to absorb the impacts of new development and the focus would need to be on developing new and substantial infrastructure interventions rather than enhancement of the existing system. In any case, the scale and isolation of growth through this approach is such that even with significant intervention, existing transport infrastructure will be severely impacted upon.	-	--
			2	The approach will require significant infrastructure development on existing greenfield land which will have an adverse impact on the environment. Whilst the scale of development does provide the opportunity to establish new employment, services and facilities as part of a mixed-use development, in reality a large proportion of the population will continue to be employed, and seek services, outside of the development. Given the relatively	--	

				isolated locations associated with this growth option, the approach will significantly increase the extent of plan area population who require the use of private vehicles to travel, resulting in longer term environmental implications.			
				3 It is expected the approach will significantly increase the number of journeys undertaken by private car in view of the relatively isolated locations for growth linked to this approach.	--		
				4 The scale of growth is such that a mixed-use approach to development would result in some provision of services and facilities to serve the incumbent population. This would serve the new population but would not increase general accessibility to services and facilities when considering the population as a whole. The relative isolation of growth resulting from this approach means improvements in accessibility to existing facilities and services for the population as whole is unlikely to be achieved.	0		
		9	Brownfield Land	1 Some very minor aspects of the land required to deliver this approach could be classified as brownfield. Predominantly though, the approach relies on developing greenfield land, away from existing urban areas and to a significant extent. It therefore does not make efficient use of available brownfield land.	--	--	
				2 There are increased risks to biodiversity interests resulting from this approach, given the predominantly natural or rural status of land required to deliver this approach. As a result, the approach is limited in its ability to minimise any adverse impacts on biodiversity value. This effect is particularly strong from this approach due to the substantial scale of development that would be sought in isolated and often sensitive locations; leading to additional environmental concerns potentially with significant	--		

				adverse implications for biodiversity (e.g. see points raised at 8(2)).			
		10	Energy and Climate Change	1	Any new development of this type will result in additional energy use. This approach will result in a very significant increase in energy use at a given location, as a result of the scale of growth proposed. Whilst the approach includes the provision of new services and facilities to support the incumbent population, development would be relatively isolated, detached from existing urban centres and rural settlements. As such the approach is expected to act to encourage the continued reliance on use of the private car to access employment, services and facilities located within established population centres around the borough and this neutralises any potential for energy reduction.	--	+
				2	The energy efficiency of new dwellings built as part of this approach will be far superior to much of the existing older stock elsewhere in the Borough. In essence this will contribute to a general improvement in the energy efficiency of the plan-area housing stock. Given the scale of growth proposed, this would result in a strong effect overall.	++	
				3	There is potential that the approach could incorporate the generation and use of renewable energy including through larger-scale interventions (for example, development of community energy systems – see 10(4) or centralised power generation) due to the scale of development amounting to this approach, as well as the expected comprehensive approach to implementation associated with this approach.	+	
				4	The scale of development proposed and expected comprehensive approach to implementation associated with this approach means there is the potential to facilitate the development of community energy systems.	+	

			5	Any new development will be subject to climate change policy, guidance and building regulations stipulating the standards to which construction should be undertaken. This includes in relation to flood risk too. The construction of new dwellings in this way will apply through any of the approaches being considered. However, comprehensive and large scale development as advocated through this approach does provide additional opportunity to integrate measures such as community energy systems as discussed. Additionally, comprehensive redevelopment does present the opportunity to incorporate substantial climate change mitigation measures, such as site-wide urban drainage solutions, which would otherwise be unattainable (for example, through incremental and small scale development). There is an increased potential to ensure buildings are able to deal with future changes in climate change through this approach. The significant scale of growth attributed to this approach and location of growth largely on greenfield land, isolated from existing population centres, does severely off-set the positive outcome from this effect however.	0		
		11	Pollution and Air Quality	1	The approach relies on the large-scale development of greenfield land in the countryside, relatively isolated from existing settlements. As a result it is expected that, despite there being potential for the provision of some employment, services and local facilities within development sites, the approach will encourage use of the private car and therefore severely restrict any potential to minimise air pollution resulting from development. The reliance on greenfield (and likely tranquil) land in the countryside will also result in a significant increase in relative noise pollution. The approach will be of significant detriment to this objective.	--	--

		12	Flooding and Water Quality	1	The land required to deliver this approach benefits from very limited flood risk to the extent that all housing development as part of this approach could be accommodated within Flood Zone 1. The scale of development is such that significant site-wide mitigation strategies could be put in place to help deal with drainage and flood issues resulting from development, but it remains that the scale of development on greenfield land within the countryside would be very significant. Such land plays a role in facilitating drainage and managing the wider water cycle in general. The development of such land to accommodate this approach will remove this asset, notwithstanding the potential to implement site-wide mitigation for any arising flood risk, and on balance it is considered would result in a potentially major detriment to the wider water cycle.	--	--	
				2	In view of the role played by greenfield land as part of the wider water cycle (discussed at 12(1)), redevelopment of greenfield land at the scale advocated by the approach (leading to significant additional demands on water supply and drainage) has the potential to have a significant adverse effect on local water quality.	--		
				3	Locally, the approach is likely to impact negatively on water conservation, creating additional demand to be met as a result of local population growth despite building regulations providing scope for more efficient use of water (see 12(4)). Water conservation will be particularly impacted on in this case by the scale of development across just two locations advocated by the approach.	--		
				4	The water efficiency credentials of new dwellings being built when compared with existing older stock within the plan area will be superior owing to building regulations. In essence this will lead to a general improvement in the	++		

				water efficiency of the plan area's stock and promotion of water efficiency in general. The scale of growth advocated by this approach is so significant that the effect will be major.			
			5	The approach is likely, without mitigation, to result in a deterioration of Water Framework Directive status or of on-site watercourses. The land required to deliver the approach is both greenfield and in the countryside, and therefore relatively unimpeded in terms of natural water quality. The replacement of this with built development at such an expansive scale presents risks which are unlikely to be entirely mitigated for.	--		
		13	Natural Environment, Biodiversity, Green and Blue Infrastructure	1	The approach is very likely to result in harmful detriment to biodiversity. This is due to the extensive scale of development proposed and location entirely within natural and semi-natural greenfield land in the countryside. Whilst specific improvements to assets as part of development may be possible, it is considered that the locating of such extensive growth – and specifically the urbanising of sizeable areas of natural and semi-natural greenfield land - markedly outweighs any potential for this. It is assumed in the absence of more detailed and up-to-date information that protected species could be at risk and this would need to be carefully managed through the masterplanning process.	--	--
				2	Redevelopment of land may provide the opportunity to introduce specific and high quality biodiversity assets integral to the wider development. However in general terms, the approach would see the replacement of primarily greenfield (natural and semi-natural) countryside with urban form, risking existing biodiversity and significantly outweighing any potential for net gain. This risk is particularly cogent as a result of the significant scale	--	

				of development associated with this approach and ultimately it is considered that the approach is likely to result in significant biodiversity net-loss because of this.			
			3	It is expected that the approach will have a minor impact on the geological environment given that it relates to development which will require the extraction of material to facilitate construction. No Regionally Important Geomorphological Sites are identified within the land in question.	-		
			4	The semi-natural and natural status of the land required to deliver this approach indicates that sporadic woodland or tree cover will be present. In addition, the presence of formal woodland is recorded, as well as tree planting amounting to small groups of trees (copses). There is the potential for development to positively incorporate such assets and have this certified through the masterplanning and development management process. However until this time, there is an assumption that woodland cover and long-term management would be placed at risk through implementation of this approach. This risk is particularly cogent as a result of the significant scale of development associated with this approach.	-		
			5	It is expected that, given the scale of development proposed and comprehensive approach to implementation, green and open space of varying types will form part of development. However this does not outweigh the associated loss of existing publically accessible open space to facilitate construction that would result.	0		
			6	Given the scale of development proposed and comprehensive approach to implementation associated with this approach there is the potential for new open space to form part of any development. This is outweighed			

				however by the loss of publicly accessible open space resulting from development on open countryside through the form of Public Rights of Way. The approach will therefore result in a net reduction in the quality of existing open space.	--		
			7	The approach presents an opportunity to incorporate new or improved green and blue infrastructure to development, for example through utilisation of and enhancement to related public footpaths, and water bodies which are present on some of the land. The approach therefore provides an opportunity to encourage such networks as well as protect existing, on a significant scale.	+		
		14	Landscape and Built Environment	1	The approach will result in a significant change to land within multiple existing defined landscape character types (identified as Plateau Village Farmlands and Lowland Village Farmlands). Given the relative isolation of land in question from existing patterns of development and the extensive scale of growth attributed to the approach, it is considered highly unlikely that the approach will be able to respect or preserve the existing landscape condition whilst also accommodating large-scale growth to the extent that it would to any reasonable extent mitigate negative effects adequately.	--	--
				2	The expansive scale of development that would form this approach in relatively isolated countryside locations would result in a significant negative impacts on visual amenity within the context of landscape value. Notwithstanding the potential for mitigation - particularly on the fringes of new development to help provide a softened edge - it is considered that the approach would result in very negative effects on this objective.	--	

			3	Despite the relatively isolated location, the extensive scale of growth associated with this approach is highly likely to impact negatively on the local distinctiveness of settlement character. At least part of the approach will result in new development which results in a more urbanised built-form than that evident within the closest settlements, impacting significantly on the distinctiveness of character in these settlements.	-		
			4	The approach has the potential to severely diminish existing relationships between the landscape and built environment. Such relations are at risk of being overwhelmed by the scale of development which is central to this approach, with the potential for existing settlements to be physically isolated from surrounding landscape. The scale of development may present opportunities for the creation of new links between the built environment and landscape, but this benefit would not outweigh the risks as described.	--		
		15	Heritage	1	There are no designated or non-designated assets falling within the land amounting to this approach and any nearby assets and their settings are highly unlikely to be affected due to their being clear separation. As a result, the approach will conserve the historic environment but is unlikely to enhance it.	0	-
			2	The approach relies on the redevelopment of significant areas of greenfield land under landscape type designation. In this respect therefore the approach will not maintain or strengthen landscape character and distinctiveness; it will in fact be of significant detriment to such designations. There is also limited potential to protect and enhance townscape character and distinctiveness due to separation of growth from existing settlements associated with this approach.	--		

			3	The scale of growth will result in a large new population in relatively close proximity to nearby settlements which benefit from local heritage assets and the provision of cultural activities. The scale of growth has the potential to provide good quality access to these places, such as through the creation of expansive green infrastructure trails. There is the potential that the approach will therefore significantly expand the extent of population who will have improved opportunities to access and understand local heritage and to participate in cultural activities.	+		
			4	There is the potential for the approach to improve access to and enjoyment of the historic environment. As discussed, the scale of growth does present an opportunity to connect a much expanded population into nearby settlements which benefit from related assets through improved access, such as through implementation of green infrastructure.	+		
			5	No recorded archaeological assets are present on the land required to deliver the approach. As a result, the approach will conserve the archaeological environment but is unlikely to enhance it.	0		
		16	Natural Resources and Waste Management	1	The approach, being related to housing development specifically, will not lead to a reduction in the consumption of raw materials. As part of the development required to deliver the approach, a short term increase in the use of raw materials is likely, as with any scenario whereby the construction of new dwellings is a central facet.	-	--
				2	The approach does not specifically promote the use of sustainable design, materials and construction techniques. These are largely controlled by building regulations and local policy does look to encourage sustainable design in recognition of climate change and mitigation. However this		

				is a focussed issue which would need to be addressed through the masterplanning and development management processes. Notwithstanding this, there is potential that the approach could incorporate the generation and use of renewable energy including through larger-scale interventions (such as community energy systems) or centralised power generation due to the scale of development amounting to this approach. The relatively isolated location may limit the deliverability of such interventions.	+		
			3	The approach will result in a significant increase in household waste locally in the long term and construction waste in the short term.	--		
			4	The approach in general will not have an impact on the production of hazardous waste locally.	0		
			5	A large section of the land in question is classified as grade 2 agricultural land. The majority of remaining land is classified as grade 3. Data is not available at this time for all of Erewash to separate grades 3a and 3b. As grade 3a is classified as 'Best and Most Versatile' (BMV) along with grade 2, the approach presents a significant risk to BMV agricultural land and will fail considerably in protecting it.	--		
			6	Implementation of the approach relies on large areas of predominantly greenfield land and therefore will result in a loss of greenfield land, not prevention of it.	--		

4.0 Conclusions

4.1 Table 13 is a matrix containing all scores awarded to each of the 16 Sustainability Appraisal objectives, when tested against each of the 8 Strategic Options for Growth.

Table 13. Sustainability Appraisal Matrix

		SUSTAINABILITY APPRAISAL OBJECTIVES															
		Housing	Employment and Jobs	Eco. Structure and Innovation	Shopping Centres	Health and Wellbeing	Community Safety	Social Inclusion	Transport	Brownfield Land	Energy and Climate Change	Pollution and Air Quality	Flooding and Water Quality	Natural Environment, etc.	Landscape and Built Environment	Heritage	Natural Resources and Waste, etc.
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
GROWTH OPTIONS	A – Growth within Long Eaton Urban Area (the conurbation)	++	0	+	++	+	++	++	++	++	+	-	+	+	++	++	+
	B – Growth within Ilkeston Urban Area (the town)	++	0	+	++	+	++	++	+	++	+	-	+	+	++	++	+
	C – Growth within the Rural Area (the villages)	-	0	0	+	-	+	0	--	++	-	-	0	+	+	+	+
	D – New Settlements not in the Green Belt	++	++	++	+	+	++	++	+	++	++	0	++	++	+	+	+
	E – Extension of the conurbations into the Green Belt	+	+	+	+	+	-	++	++	--	++	0	-	--	-	+	-
	F – Extension of the town into the Green Belt	+	+	+	+	0	-	++	+	--	++	-	--	--	-	+	--
	G – Extension of the villages into the Green Belt	+	+	+	+	--	--	+	--	--	-	--	-	--	-	+	--
	H – New Settlements in the Green Belt	++	+	+	-	--	--	+	--	--	+	--	--	--	--	-	--

4.2 The Draft SA identifies Option D as being a highly sustainable approach to strategic housing delivery. A noticeable and unique advantage of the approach is its re-use and necessary remediation of large quantities of brownfield land. The remediation and re-use of the land in general presents a number of positive outputs which are unique to this option. For example, remediation of significant areas of contaminated land neutralises negative effects upon the pollution and air quality objective caused by population growth and has the potential to improve effects associated with the

flooding and water quality objective. This result in many ways is expected; the Spatial Strategy of the current Erewash Core Strategy relies largely on redevelopment of the Stanton Regeneration Site, contributing to this option, to facilitate strategic growth. The sustainability credentials of this approach are therefore already well documented, having been independently tested at Examination in Public.

- 4.3 Options A and B, which look to urban intensification and making best use of brownfield land within the existing urban areas of Long Eaton and Ilkeston, are also identified as being highly sustainable options. Option A has a marginally more positive effect than Option B, largely because of its association with the wider conurbation and links to a more comprehensive transport infrastructure. Option C, despite being based on a similar premise of settlement intensification, is notably less sustainable when assessed against the scoring mechanisms in comparison to Options A and B. This is mainly related to scale (very minor levels of development are unlikely to justify related improvements to services or employment provision) and location (villages are located away from the most advanced infrastructure, including health provision and transport connectivity).
- 4.4 Of the remaining options, E and F (extension of the conurbations into the Green Belt and extension of the town into the Green Belt respectively) are the next most sustainable approaches. Option E is marginally more sustainable than Option F owing in part to the additional benefits to be gained from locating growth adjacent to urban areas with more advanced transport connections, services and facilities (the conurbations). Notably many of the objective scores are shared with Options A and B and the output is similarly positive overall. The key issue for Options E and F are their expected negative impact on the brownfield, natural environment and flooding and water quality objectives; all influenced by the central facet of this approach requiring the development of greenfield land in the countryside.
- 4.5 Notwithstanding commentary provided at 3.2, Options G and H score similarly poorly in sustainability terms. In particular, the transport, brownfield land, pollution and air quality, natural environment, landscape and built environment and natural resources and waste objectives are all negatively impacted upon. A central facet to this outcome is that both options include the development of substantial amounts of greenfield land in the countryside, and this has common impacts on the same objectives.