From:	Susan Farmery
Sent time:	01/04/2022 20:32:06
To:	Planning Policy
Subject:	Proposed development of spondon wood greenbelt

To whom it may concern

I wish to raise my objection to the proposal from erewash borough council to destroy an area of greenbelt land adjacent to the border of Spondon in order to build houses.

I cannot understand how ebc can think this is in any way an acceptable proposal.

Whilst I understand that ebc feel the greenbelt land is not of significant interest, and therefore would appear to place no value on the wildlife and hedgerows which currently thrive there, I fail to understand how destroying any greenbelt land can be justified when the government clearly state this should only be done in exceptional circumstances. Once this land is gone, it is gone forever, your contribution to destroying our rapidly declining green spaces and replacing it with more concrete and tightly packed, shoddy houses. How can you believe this is ok?

I believe the decision is based on convenience for ebc who are well aware that they will bring in the revenue whilst financially impacting the services of DCC. The impact on local services will be huge, with no need for ebc to spend any of the extra money they will bring in. This hardly seems fair but maybe you are so short sighted you only care about targets and revenue. Your proposal is shameful and I can only hope you will see sense and reconsider before youvdestry greenbelt land.

I await your justification

Thank you

Sue farmery

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From:	Stella Salt
Sent time:	02/04/2022 14:15:02
To:	Planning Policy
Cc:	
Subject:	SG26

Please find below my concerns and questions regarding approval of the above.

1. Have EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centres? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents, these sites should have been prioritised before declassifying green belt land that abuts DCC.

2. Site SGA 26 is on the extreme edge of EBC and is directly adjacent to DCC land. If houses are to be built there, then the housing numbers should be allocated to DCC numbers rather than EBC, therefore negating the argument that EBC need this land to meet their housing quotas!

DCC would, after all, have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this.

Exactly how much council tax (at current 2022 rates) would EBC be collecting per annum from residents in the proposed housing development & how much of this will then be passed on to Derby City Council in respect of the above additional costs?

3. The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to its inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of land north of Spondon a couple of weeks before the meeting and not its actual location. This is very poor consultation and shows total disregard & disrespect to Spondon residents.

4. As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Governments Duty to Cooperate that governs the discussions between neighbouring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined-up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbours and not just to selfishly, effectively dump housing on their borders in order to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbours under the Duty to Cooperate.

5. EBC unilaterally proceeded with a last minute bolt-on addition of Site SGA 26 just north of Spondon without due consideration of residents outside of EBC boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non-EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night. This was grossly unprofessional of EBC & is not a respectful way to conduct business.

6. The EBC Leader has stated in correspondence to Spondon Councillors:

We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary.

#### How dismissive of her & how convenient!

EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the west, despite this having the bigger impact on them. I doubt the Leader or other EBC members would find this acceptable if it was the other way round.

7. Spondon SGA26 has been promoted by EBC without any appraisal of all urban areas in Erewash. How can it be inevitable that this location is inherently more sustainable than others, or that its deletion from the Green Belt would have the least harm on the function of that Green Belt? Suburban sprawl cannot be sustainable & should not, therefore, be allowed to happen.

8. The Minister of State for Housing has stated that Green Belt should only be used in exceptional circumstances. What specific exceptional circumstances are there that makes SGA26 acceptable, when it wont even meet the needs of Erewash residents?

9. Development of SGA 26 will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic. There are also pedestrians cyclist & motorist safety concerns associated with the additional burden on the various routes through Spondon, which, quite frankly, are already busy enough.

10. The local Secondary School, West Park Academy is over-subscribed and has had to expand already to meet the needs of Derby residents. This would be the obvious school of choice for any residents of SGA 26. Yet again, no consultation has taken place with the Academy or with the School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning this is Derbyshire County Councils role. Have they even been consulted & where is this evidenced?

11. There are only a few routes out of Spondon and the main one is through the village, down Williocroft Road and along Nottingham Road to the A52. Sandringham Driveis also used as a cut-through to & from the A52 & Derby. This area already has a high level of air pollution and adding a 240 house residential development to the area will increase the air pollution and affect the health and wellbeing of Spondon residents.

(see also my comments in 9. above).

12. SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected.

What ecological impact surveys were completed before bolting-on SGA 26 to this consultation & where is the outcome of any survey undertaken?

13. Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an ancient woodland and, as such, are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include:

- breaking up or destroying connections between woodlands and ancient or veteran trees
- reducing the amount of semi-natural habitats next to ancient woodland
- increasing the amount of pollution, including dust
- increasing disturbance to wildlife from additional traffic and visitors
- increasing light or air pollution
- increasing damaging activities like fly-tipping and the impact of domestic pets
- changing the landscape character of the area

14. EBC and the Planning Department must be, & are now challenged to show what assessments have been done on this ancient woodland, in order to clarify & confirm that none of the impacts identified above would happen if a development were to go ahead.

15. This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected roads & properties in Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been undertaken to prove that this will not add to this pressure & risk? Can this assessment be provided for full perusal by local Spondon, Ockbrook and Borrowash residents, Derby City Council & DerbyshireCounty Council, please.

Stella Salt

From:	VINCENT sanger
Sent time:	17/04/2022 13:01:32
To:	Planning Policy
Subject:	SGA 26

#### Sir/ Madam

I wish to object to land north of Spondon known as SGA 26 now included within E.B.C. home building plans.

1. Any property built on this land will be expected to use Spondon as its prime provider for unfractured, schooling and medical needs, all these services are fully utilised and it would not be sustainable to expect more pressure on them, particularly as they would be out of the Derby catchment and their council tax would be paid to E.B.C.

2. This is prime green belt and the Government has stated that green belt should only be used as a very last resort.

3. With the current political crises in Ukraine the Government is considering food and power security for our Country, the loss of prime arable land goes against the consideration of our Conservative leadership.

Regards.

Mr Vincent Sanger

From:	Samuel Harper
Sent time:	06/04/2022 20:39:47
To:	Planning Policy
Subject:	SGA 26

I am writing to register my protest at the proposed development known as SGA 26

Have EBC undertaken a proper green belt review that highlight any potential site closer go the built up areas within EBC area? These sites should be prioritised over any bolt onto neighbouring councils. This proposed site would best suit the needs of DCC residents rather than EBC residents. Any sites closer to the centres of EBC towns should be utilised before de classifying SGA 26 as green belt.

SGA 26 site directly abuts DCC land. If any houses are built on this land it would be DCC providing the infrastructure maintenance. I.E Roads, schools, dentists, doctors, shops, etc. The housing allocation would go to DCC not EBC along with the council tax to pay for the aforementioned services. This would therefore not be included within EBC quota and would not help EBC to meet their housing target.

EBC hav referred to a meeting in 2020 but from my recollation at that time this scheme was not included. It was only thrown in as a quick last-minute replacement for an abandoned scheme at Sawley with little or no proper time for proper consideration by Spondon residents or Derby City Council (or I suspect Erewash). The first that any Spondon residents knew of this proposal was a article in the Derby telegraph in March 2021. This article was therefore a bombshell to all of us. To me this dreadful scheme has too many shortcomings. Two key features however are that it not only fails to address the real needs of EBC but it is also particularly damaging to one of the most sensitive and valuable parts of its greenbelt land. The last sentence in the Spondon section of the artivle says it all: "It's development would have a relatively limited impact on the Green Belt". In the previous paragraph EBC also see the wood as "a robust Green Belt boundary". It's not; it's an ancient woodland (a declining resource) in need of all the protection it can get. There have been many articles in the Derby telegraph highlighting the problems and damage resulting from building Oakwood right up to Chaddesden Wood has caused and makes the important point that this field is the buffer needed to provide this protection. At last month's meeting of EBC too much was made of the 'small proportion' of green belt being taken, with absolutely no recognition of the special value of this particular <u>field.It</u> is the proposed site that is the buffer to ancient woodland, the woodland should not be used as the buffer.

In the EBC council meeting in March 2022 it was stated that EBC had consulted with DCC. It is my understanding that the planning department at DCC was only told of the land two weeks before it was included in EBC core strategy. They were not told of the location, just land north of Spondon. The first Spondon residents were aware of the proposal was a week before it went to full council meeting in March 2021.Neither DCC or EBC residents were given time to object. This is extremely poor consultation and a total disregard to all residents of either DCC or EBC

There has been a totally dismissive attitude by EBC council towards DCC councillors. The leader has stated in correspondence with Spondon councillors that EBC are members of the Greater Nottingham planning area so they tend to have more discussion with Nottingham and will not be signing up to the Derbyshire planning framework. They have also been told by the EBC leader "I understand you are not happy about the Spondon site but it is in EBC Boundaries". So EBC seem to look towards Nottingham and are willing to have discussions with them but not their neighbours to the west.

Further evidence of this dismissive attitude was shown at the March 2022 council meeting when **set the set of the set of** 

EBC even refer to the site as "The Spondon site" yet they make a great deal out of being within Erewash. The whole of Spondon is within DCC boundaries. By referring to it as the Spondon site does this not show how little it would do for the EBC residents. It is just being used as a number of houses to add to fulfilling the quota.

More evidence of this dismissive attitude can be seen in the way over 700 objections by non EBC residents was referred to in the March 2022 council report. The report simply stated the were by non EBC residents. That's it. Not what the actual objections were, just non EBC.

As stated by the Minister of State for housing " greenbelt land should only be used in exceptional circumstances ". What are the

exceptional circumstances that makes SGA26 acceptable, when it will not meet the needs of EBC residents. SGA26 has been pushed forward by EBC without a full assessment of the urban areas of the Borough. Removing the site from greenbelt and building on it is not sustainable, how can this site be more sustainable without an assessment of the urban areas.

What ecology survey has been carried out to assess the impact on wildlife in the area. The site is well known for the herd of Fallow deer that use the area, as well as hares, lapwings bats and doormice. However the developers, land owners have already erected sturdy fencing to keep the deer out. It smacks of greed, if there is a problem stopping you from developing, remove the problem before anyone can object. Irrespective of the impact on the wildlife.

SGA26 is bordering Spondon wood which is classed as ancient woodland by DEFRA by building closer to the woodland this sill affect the species that it supports. Using the woodland as a buffer is not sustainable it will have an impact on the natural habitat next to the woodland, increase air and light pollution, destroy ancient and veteran trees. What guarantees are there that the wood will not be affected by any of the above.

Which schools would any children attend? The report into the site presented to EBC council says that funding to local schools would be provided. How much funding? Which school? Enough funding g to build more classrooms? The local schools are already over subscribed so new buildings would be needed aswell as teachers. But EBC keep saying it's in our Borough so we'll build on it but then want the children to go to a school in DCC. How does this benefit the residents of EBC? Have Derbyshire County Council been consulted? They would provide the school places for Erewash residents but at a Derby school .

Has any assessment been made to the impact on the roads? Most of the traffic will be heading into Spondon yet Derby will not receive any money for the upkeep of the roads. The only other way to access the A52 is through Ockbrook. What impact will this have on the village?

In 2014 several houses backing onto the site were flooded, this is despite the area being classed as Flood zone 1. What assessment of the site has been made to show that the development of SGA26 will not add to this problem? The problem has now become more acute since the recent erection of fencing which now means the ditch which drains the field cannot now be accessed to be cleaned out.

From:PlanningSent time:15/03/2022 09:04:17To:Planning PolicySubject:FW: Kirk Hallam Core Strategy

From: john hickling
Sent: 15 March 2022 08:27
То:
Subject: Kirk Hallam Core Strategy

I have tried the on line from several times but can't get past CAPCHA

With regard to the Kirk Hallam development

1) I feel it is imperative that more consideration is given to the effects infrastructure such as roads, schools, shops etc.

2) Little has been mentioned about the effects this will have on Pioneer Meadow and it's flora and fauna. The opinion of councillors will not do. It needs an independent in depth study by environment experts.

Regards, John Hickling From: Sent time: To: Subject: Planning 29/03/2022 10:41:23 Planning Policy FW: Website contact

Kind regards,





-----Original Message-----

From:

Sent: 29 March 2022 10:39

To:

Subject: FW: Website contact

Good morning

Please see enquiry below

Kind Regards



Save time....do it online.

Register for a My Erewash account to see personalised information about your Council Tax or benefit claim. Submit on-line forms to keep us informed.

https://www.erewash.gov.uk/index.php/sign-in.html

-----Original Message-----

From: Rose Rice

Sent: 29 March 2022 10:34

Subject: Website contact

Regarding proposed development at Spondon wood North SG26. Environment issues ancient wood with protected tress wildlife in abundance also flowers will be badly damaged due to air pollution from this development. The fallow deers will not forage in the woods as to noisy and there very nervous this has been the home for many years now. We are being asked to save the environment all the time this would cause great damage. Safety issues entrance to development is very dangerous Dale Road is far to busy with lots of heavy lorries up and down, the alterations made have not slowed traffic down and it is not going stop the volume of traffic only increase it. The proposed amount of houses there is going to be at least 400 vehicles plus, then all the delivery vehicles also. The planned pavement from the development is going to be inadequate for the quantity of pedestrians using it. Its going to be accidents waiting to happen also maybe some fatal. and theres has been many accidents on this stretch of Road. Facilities are full to bursting alreadyDoctors Dentist School parents are living on there nerves now not knowing if there child is going get a place in the local schools. When I read a builder plot of gold with lovely views yes our views which we were not allowed to mention which we paid for when buying our property. Builder need to get there backs into brownfield site first with all the modern machinery to do the hard graft for them, not build on easy GREENBELT. Right from the start it been done underhanded the first we knew it was on the front of Derby evening telegraph thats why we paid a lawyer to look into things for us and flaws were found by EBC. No consideration for Spondon residents from the start. Also this land has a very high water table we had ducks on it last year, we have had our garage flooded in the past and the old drains on Dale Road will not take anymore wear, if they collapsed it would be expense to DCC to whom we pay our council Tax . EBC would get all the council Tax from this development but DCC are going to be lumbered with all the expense of extra wear on the roads and drains etc. Hoping Secretary of State see the flaws in this build and stop it before something serious happens from the safety aspect.Mr and Mrs A Rice

From:	Planning
Sent time:	29/03/2022 11:09:27
То:	Planning Policy
Cc:	Enquiries
Subject:	FW: Don't build on spondon green belt

Kind regards,



From: Sent: 29 March 2022 10:50 To:

Subject: FW: Don't build on spondon green belt

Good morning Please see below

Kind Regards



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From: pete sibanda Sent: 29 March 2022 10:46 To: Subject: Don't build on spondon green belt

Deer live there and it's lovely and green. Build on brownfield instead please or somewhere else or just stop building ? Cheers

On Behalf Of Gemma Allt

Sent: 30 March 2022 05:11 To: Subject: Online Planning Enquiry - Make A Representation

New online Planning Enquiry/Make a Representation form submission.

The following information has been submitted online via www.erewash.gov.uk

#### **Details:**

From:

# **Form Type: Make A Representation**

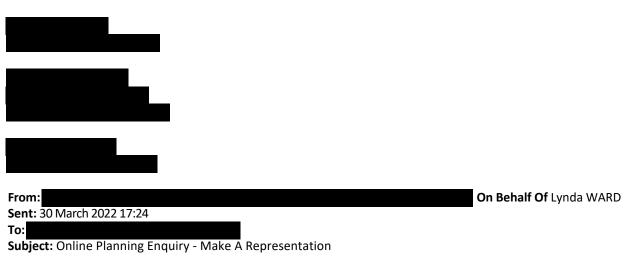
Name:	Gemma Allt
Email Address:	
Customer Address:	
Phone Number:	
Site Address:	SGA 26
Customer Correspondence	
** Enquiry Details:	
** File Upload:	
<b>**</b> Application Ref / ERE:	SGA26
** Case Officer:	
<b>** Customer Views:</b>	Objection
**Comments	This planning application on green belt land and on Spondon's boundary is a disgrace. EBC know exactly what they're doing to save themselves the cost of more infrastructure by sticking 6000 homes on DCC boarder and let them

deal with the fallout. The Spondon community will not cope with this amount of new homes in an already over populated area for doctors and schools. I am appalled that this can be happening when there are plenty of other areas for small developments well within Erewash itself. Such a beautiful part of the English countryside disregarded yet again to fullfill new housing requirements laid out by the government. I urge you to reconsider this terrible decision.



From:	Planning
Sent time:	31/03/2022 07:48:47
To:	Planning Policy
Subject:	FW: Online Planning Enquiry - Make A Representation

#### Kind regards,

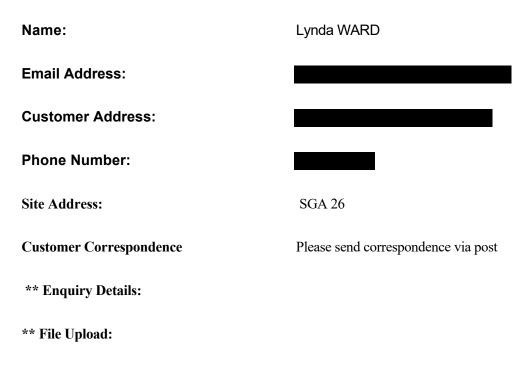


New online Planning Enquiry/Make a Representation form submission.

The following information has been submitted online via www.erewash.gov.uk

# <u>Details:</u>

# Form Type: Make A Representation



<b>**</b> Application Ref / ERE:	SGA 26
** Case Officer:	
** Customer Views:	Objection
**Comments	<ul> <li>I object strongly to SGA 26 for the following reasons :</li> <li>1. The exit road from the planned site will join a main road (Ilkeston to Derby via Spondon) which is already dangerous</li> <li>2. The health of existing residents (many elderly and with existing health problems) adjoining the site will be severely impacted during and after the development is built</li> <li>3. Air quality will be impacted during building and afterwards due to increased traffic</li> <li>4. Local schools are already oversubscribed</li> <li>5. Local healthcare/GPs are already struggling to cope with the amount of patients</li> <li>6. Traffic through Spondon is already at gridlock at certain times during the day</li> <li>7. This site is Green Belt the current Conservative government pledged to protect Green Belt! Spondon residents will be certain to change allegience if this plan is not stopped</li> </ul>

From:	Planning
Sent time:	12/04/2022 09:08:36
To:	Planning Policy
Subject:	FW: Online Planning Enquiry - Make A Representation
Attachments:	62548af34de85-Objection Oakwood.docx

On Behalf Of Mr Ashley Pearson

From: Sent: 11 April 2022 21:09

To: Subject: Online Planning Enquiry - Make A Representation

New online Planning Enquiry/Make a Representation form submission.

The following information has been submitted online via www.erewash.gov.uk

### <u>Details:</u>

# **Form Type:** Make A Representation

Name:	Mr Ashley Pearson
Email Address:	
Customer Address:	
Phone Number:	
Site Address:	Morley Road/Acorn Way
Customer Correspondence	
<b>** Enquiry Details:</b>	
** File Upload:	62548af34de85-Objection Oakwood.docx
** Application Ref / ERE:	Morley Road/Acorn Way/Oakwood Derby Proposal
** Case Officer:	Erewash Borough Council
** Customer Views:	Objection
**Comments	I would like to object to the proposal to build 600 new homes near Morley Road/Acorn Way. Currently the site is greenbelt site and the proposal is to this

fundamentally turn this landscape into concrete.

Proposal: 600 Homes off Morley Road/Acorn Way

I would like to object to the proposal to build 600 new homes near Morley Road/Acorn Way. Currently the site is greenbelt site, and the proposal is to this fundamentally turn this landscape into concrete. The town and country planning act 1947, green belts were intended to protect countryside through controlling the post-war urban sprawl of towns and cities presently, green belt land represents up to just 13% of the total area of England. I appreciate the challenges of building more homes, however, to suggest that you have exhausted every other location within the Erewash Borough Council Catchment does not seem plausible. Apparently, the government is committed to the purpose of green belt land and as such to protect, conservation and enhancement of green belt land, expect in very exceptional circumstances that can be clearly demonstrated by a local authority. I would challenge yourself to answer that question "Have we explored every other opportunity?" Green belt land should be cherished, it's extremely valuable for food production, flood prevention and climate change mitigation and much more.

Currently Oakwood is one of the Largest Housing Estates in England, recently approved plans towards Breadsall has seen more land replaced by concrete which again is disappointing to see.

Infrastructure – I have **a strain** on public roads and services. How do Erewash Borough Council intend on dealing with these issues? Will you be paying the council tax you receive from the 600 homes to Derby City Council to pay towards improvements to these services?

As mentioned previously I would like to object to these plans, Erewash Borough Council have many other sites they could consider and I genially believe ones that are not Green Belt.

62548af34de85-Objection Oakwood.docx

On Behalf Of Albert Hartley

Sent: 13 April 2022 17:53 To: Subject: Online Planning Enquiry - Make A Representation

New online Planning Enquiry/Make a Representation form submission.

The following information has been submitted online via www.erewash.gov.uk

# <u>Details:</u>

From:

# Form Type: Make A Representation

Name:	Albert Hartley
Email Address:	
Customer Address:	
Phone Number:	
Site Address:	Sga26
Customer Correspondence	
<b>** Enquiry Details:</b>	
** File Upload:	
<b>**</b> Application Ref / ERE:	
** Case Officer:	
** Customer Views:	Objection
**Comments	

more appropriate sites other than SGA 26, that are nearer to EBC geographical centers? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents these sites should have been prioritised before de – classifying green belt land that abuts DCC.

Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. Surely if houses are to be built there then the housing numbers should be allocated to DCC numbers rather than EBC therefore negating the argument that EBC need this land to meet their housing quotas! DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this.

The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents.

As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighboring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbors and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbors under the Duty to Cooperate.

EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night.

Totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite dumping on them.

Spondon SGA26 has been promoted by EBC without any appraisal of all urban areas in Erewash. How can it be 'inevitable' that this location is inherently more sustainable than others? Or that it's deletion from the Green Belt would have the least harm on the function of that Green Belt? Suburban sprawl cannot be sustainable. The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents?

Development of SGA 26 will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic.

The local Secondary School, West Park Academy is over subscribed and has had to expand already to meet the needs of Derby residents. This would be the obvious school of choice for any residents of SGA 26. Again no consultation has taken place with the Academy or with the School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning – this is Derbyshire County Council's role. Have they even been consulted?

There are only a few routes out of Spondon and the main one is down through the village, down Williocroft Road and along Nottingham Road to the A52. This area already has a high level of air pollution and adding a 240 house residential development to the area will increase the air pollution and affect the health and wellbeing of Spondon residents.

SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation?

Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include:

breaking up or destroying connections between woodlands and ancient or veteran trees

reducing the amount of semi-natural habitats next to ancient woodland

increasing the amount of pollution, including dust

increasing disturbance to wildlife from additional traffic and visitors

increasing light or air pollution

increasing damaging activities like fly-tipping and the impact of domestic pets

changing the landscape character of the area

All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there?

EBC and the planning department should be challenged to show what

assessments have been done on this Ancient woodland that would show that none of the impacts above would happen if a development were to go ahead?

This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could not add to this pressure?



On Behalf Of Barbara Hartley

Sent: 13 April 2022 17:56 To: Subject: Online Planning Enquiry - Make A Representation

New online Planning Enquiry/Make a Representation form submission.

The following information has been submitted online via www.erewash.gov.uk

# <u>Details:</u>

From:

# Form Type: Make A Representation

Name:	Barbara Hartley
Email Address:	
Customer Address:	
Phone Number:	
Site Address:	Sga26
Customer Correspondence	
** Enquiry Details:	
** File Upload:	
<b>**</b> Application Ref / ERE:	
** Case Officer:	
<b>**</b> Customer Views:	Objection
**Comments	
	Have EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC

geographical centers? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents these sites should have been prioritised before de – classifying green belt land that abuts DCC.

Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. Surely if houses are to be built there then the housing numbers should be allocated to DCC numbers rather than EBC therefore negating the argument that EBC need this land to meet their housing quotas! DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this.

The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents.

As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighboring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbors and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbors under the Duty to Cooperate.

EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night.

Totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite dumping on them.

Spondon SGA26 has been promoted by EBC without any appraisal of all urban areas in Erewash. How can it be 'inevitable' that this location is inherently more sustainable than others? Or that it's deletion from the Green Belt would have the least harm on the function of that Green Belt? Suburban sprawl cannot be sustainable. The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents?

Development of SGA 26 will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic.

The local Secondary School, West Park Academy is over subscribed and has had to expand already to meet the needs of Derby residents. This would be the obvious school of choice for any residents of SGA 26. Again no consultation has taken place with the Academy or with the School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning – this is Derbyshire County Council's role. Have they even been consulted?

There are only a few routes out of Spondon and the main one is down through the village, down Williocroft Road and along Nottingham Road to the A52. This area already has a high level of air pollution and adding a 240 house residential development to the area will increase the air pollution and affect the health and wellbeing of Spondon residents.

SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation?

Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include:

breaking up or destroying connections between woodlands and ancient or veteran trees

reducing the amount of semi-natural habitats next to ancient woodland

increasing the amount of pollution, including dust

increasing disturbance to wildlife from additional traffic and visitors

increasing light or air pollution

increasing damaging activities like fly-tipping and the impact of domestic pets

changing the landscape character of the area

All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there?

EBC and the planning department should be challenged to show what assessments have been done on this Ancient woodland that would show that

none of the impacts above would happen if a development were to go ahead?

This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could not add to this pressure?

From:	Planning
Sent time:	19/04/2022 16:32:21
To:	Planning Policy
Subject:	FW: Online Planning Enquiry - Make A Representation

#### Kind regards,



On Behalf Of Andrew Harper

Subject: Online Planning Enquiry - Make A Representation

New online Planning Enquiry/Make a Representation form submission.

The following information has been submitted online via www.erewash.gov.uk

### <u>Details:</u>

To:

#### **Form Type: Make A Representation**

Name:	Andrew Harper
Email Address:	
Customer Address:	
Phone Number:	
Site Address:	Sga 26
Customer Correspondence	
<b>** Enquiry Details:</b>	
** File Upload:	

\*\* Application Ref / ERE:

**	Case	<b>Officer:</b>
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**\*\*** Customer Views:

\*\*Comments

Objection

Firstly I wish to apologise for not posting earlier. I have had some devastating family news and been dealing with this. However, please find below information to help us keep protesting and taking part in the next stage of consultation.

Unfortunately, despite hundreds if not thousands of objections being received, and the protest at and inside the Council House, Erewash Borough Council's Core Strategy Review Document was passed, meaning that land north of Spondon known as SGA 26 is now included within Erewash's Plans to build 6,000 new houses within the Erewash Borough Council area.

We are all deeply disappointed with this decision.

However, the passage of this strategy does not mean that building work will commence tomorrow.

There is now a consultation on the Strategy, after which the strategy will be sent to the Secretary of State.

You can make representation on the EBC form <a href="https://www.erewash.gov.uk/local-plan-section/core-strategy-review.html">https://www.erewash.gov.uk/local-plan-section/core-strategy-review.html</a>

or email:	
Write:	

Please write, email or fill in the form and get as many of your friends and family to do so.

I will also resubmit the legal document that this group raised funds to have written.

Below are a few issues that you can raise.

Have EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centers? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents these sites should have been prioritised before de – classifying green belt land that abuts DCC.

Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. Surely if houses are to be built there then the housing numbers should be allocated to DCC numbers rather than EBC therefore negating the argument that EBC need this land to meet their housing quotas! DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this.

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From:	Planning
Sent time:	19/04/2022 16:32:37
To:	Planning Policy
Subject:	FW: Online Planning Enquiry - Make A Representation

#### Kind regards,

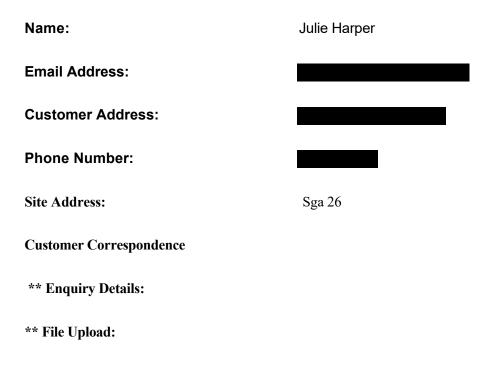


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The following information has been submitted online via www.erewash.gov.uk

### <u>Details:</u>

#### Form Type: Make A Representation



\*\* Application Ref / ERE:

** Case Officer:	
** Customer Views:	Objection
**Comments	Firstly I wish to apologise for not posting earlier. I have had some devastating family news and been dealing with this. However, please find below information to help us keep protesting and taking part in the next stage of consultation.
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From:	Patricia Hill
Sent time:	31/03/2022 15:11:19
To:	Planning Policy
Subject:	Representation Re: SGA:26

SGA:26 is located on extreme edge of Erewash and directly abuts Derby City Council land, namely Spondon. This development will impact on Spondons already congested roads. It is horrendous to drive out of Spondon at peak times. There is only one street (Willowcroft Road) that can be used directly out of Spondon, otherwise it means a substantial diversion through 2villages, that also get congested at peak times. With the proposed housing development It will be near impossible to achieve this. Plus the strain on Spondon/Derby infrastructure, local schools (The Secondary School, West Park Academy is already oversubscribed and has had to expand already).

There seems to be a lack of consideration towards Spondon residents and DCC. as no consultation has taken place with the Academy or with the School Place Planning on DCC. EBC will have no responsibility for School Place Planning this will fall to DCC. Whilst EBC will be entitled to the community charge incurred from the development.

Lack of consideration towards Spondon residents and DCC was made obvious when The Derby Telegraph published an article relating to the plans for SGA:26 to be included in the Core Strategy, this was a week prior to a full Council Meeting in March 2021. This was the first DCC or Spondon residents had been informed. Subsequently it has come to light that EBC had a Council meeting in 2020 relating to the Core Strategy..

The Minister of State for Housing has stated that Green Belt should only be used in exceptional circumstances. What exceptional circumstances make SGA:26 acceptable? 71% of EBC land is Green Belt, how can SGA:26 be justified, when it wont meet the needs of Erewash residents.

Have EBC undertaken a Green Belt review to establish if there are more appropriate sites other than SGA:26 Green Belt? Surely the 71% of EBC GreenBelt land would geographically be more suitable to Erewash residents needs. Recently a survey was collated from a FOI form and it revealed 1,806 empty properties in Erewash. These properties will have all the infrastructure available. No reason to devastate the precious wildlife and countryside because this is the other side of the coin..Global Warming!

At the 03/03/2022 Council meeting Spondon residents were only allowed to stand outside the Council building and was not even allowed to speak. Total disrespect and discrimination.

I would appreciate an acknowledgement of receipt of my representation please.

Mrs Patricia Hill

From:	Patricia Hill
Sent time:	31/03/2022 18:07:38
To:	Planning Policy
Subject:	Consultation Core Strategy SGA:26

My concerns are the already congested roads causing traffic jams at peak times, which will be worsened by the new development. The pollution the extra traffic will cause and the pressure it will bring to the infrastructure, to Spondon residents and Derby.

There is only one road out of Spondon and one side of that has alway a line of parked vehicles so the traffic is continually stop/starting, which adds to the slow progress causing more pollution. The only alternative is to use the A52, but this means travelling through The village of Ockbrook, a picturesque village which already has its share of congestion from vehicles using the A52 including

Lorries going to the West Hallam storage depot.

My other concern is the destruction of wild life whose habitat is the Spondon Wood which has some protected species including badgers, lapwing, crested newts, bats and dormice etc. What ecological survey was completed before SGA:26 was added to this consultation.

The wildlife do not do well where noise, pollution and dust will be caused by 480 plus new residents. The wood itself was designated as an Ancient Woodland by DEFRA. Which is a fragile environment and is in danger of destruction.

SGA:26 is on the extreme edge of Erewash and directly abuts DCC land. Surely these houses should boost Derbys building quota if Derby has to supply refuse collection, school places, doctors surgeries and dentists, whilst EBC receives the Community Charge. This will not bode well with Spondon residents or DCC, they will most likely have a Community Charge increase to supplement the shortfall.

Mr. Christopher Hill



From:	Patricia Hill
Sent time:	08/04/2022 16:00:38
To:	Planning Policy
Subject:	SGA:26 - Objection to Proposed Development

Further to my Objection email dated 31/03)2022.

I would like to point out that there is a need to safe guard the countryside, Green Belt from encroachment. To demonstrate the scale of encroachment on SGA:26. The centre point of Derby is Sadler Gate/Market Square, and the nearest point of SGA:26. This distance is 6.19 Km, shows the site would contribute an enlargement of 2.4%. Adding to increase in infrastructure and damage to the Ancient Woodland (designated by DEFRA). The wood is under extreme danger of destruction

When Oackwood was built, next to Chaddesden, the woodland that was situated on Chaddesden Park, and systematically was destroyed by youths lighting fires continuously and general vandalism was occurring. The fire brigade had to regularly attend Chaddesden wood. There is very little of significance left now and the land owners of Locko Estates should go and take a visit to Chaddesden wood and see for themselves what could lie ahead.

Regards,

Mrs Patricia Hill



From:	Mair Jones
Sent time:	04/04/2022 11:08:29
To:	Planning Policy
Subject:	Save Spondon green belt land
То:	Planning Policy

### Dear Sirs,

We object most strongly to the building of housing on the green belt land at Spondon. The traffic on Dale road will be horrendous and Spondon village will be badly affected as it is now before the extra traffic. Also the schools and doctors surgeries will struggle as they do and its totally unfair for Derby City Council to pay for these services when it should be Erewash council should funds the whole of the development.

Yours faithfully

Dr G and Mrs M Jones

From:	Kathryn Siviter
Sent time:	29/03/2022 06:22:18
To:	Planning Policy
Subject:	Against SGA 26

Please can you record and put forward my disagreements with SGA 26.

The impact on Derby City Council as it will have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this.

Residents were only made aware of the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents.

The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents?

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This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could not add to this pressure?

Many thanks

Kathryn Siviter

From: Sent time: To: Subject: julie harper 04/04/2022 16:48:44 Planning Policy SGA 26

I am writing to register my protest at the proposed development known as SGA 26

Have EBC undertaken a proper green belt review that highlight any potential site closer go the built up areas within EBC area? These sites should be prioritised over any bolt onto neighbouring councils. This proposed site would best suit the needs of DCC residents rather than EBC residents. Any sites closer to the centres of EBC towns should be utilised before de classifying SGA 26 as green belt.

SGA 26 site directly abuts DCC land. If any houses are built on this land it would be DCC providing the infrastructure maintenance. I.E Roads, schools, dentists, doctors, shops, etc. The housing allocation would go to DCC not EBC along with the council tax to pay for the aforementioned services. This would therefore not be included within EBC quota and would not help EBC to meet their housing target.

EBC have referred to a meeting in 2020 but from my recollection at that time this scheme was not included. It was only thrown in as a quick last-minute replacement for an abandoned scheme at Sawley with little or no proper time for proper consideration by Spondon residents or Derby City Council (or I suspect Erewash). The first that any Spondon residents knew of this proposal was a article in the Derby telegraph in March 2021. This article was therefore a bombshell to all of us. To me this dreadful scheme has too many shortcomings. Two key features however are that it not only fails to address the real needs of EBC but it is also particularly damaging to one of the most sensitive and valuable parts of its greenbelt land. The last sentence in the Spondon section of the artivle says it all: "It's development would have a relatively limited impact on the Green Belt". In the previous paragraph EBC also see the wood as "a robust Green Belt boundary". It's not; it's an ancient woodland (a declining resource) in need of all the protection it can get. There have been many articles in the Derby telegraph highlighting the problems and damage resulting from building Oakwood right up to Chaddesden Wood has caused and makes the important point that this field is the buffer needed to provide this protection. At last month's meeting of EBC too much was made of the 'small proportion' of green belt being taken, with absolutely no recognition of the special value of this particular <u>field. It</u> is the proposed site that is the buffer to ancient woodland, the woodland should not be used as the buffer.

In the EBC council meeting in March 2022 it was stated that EBC had consulted with DCC. It is my understanding that the planning department at DCC was only told of the land two weeks before it was included in EBC core strategy. They were not told of the location, just land north of Spondon. The first Spondon residents were aware of the proposal was a week before it went to full council meeting in March 2021.Neither DCC or EBC residents were given time to object. This is extremely poor consultation and a total disregard to all residents of either DCC or EBC

There has been a totally dismissive attitude by EBC council towards DCC councillors. The leader has stated in correspondence with Spondon councillors that EBC are members of the Greater Nottingham planning area so they tend to have more discussion with Nottingham and will not be signing up to the Derbyshire planning framework. They have also been told by the EBC leader "I understand you are not happy about the Spondon site but it is in EBC Boundaries". So EBC seem to look towards Nottingham and are willing to have discussions with them but not their neighbours to the west.

Further evidence of this dismissive attitude was shown at the March 2022 council meeting when **sectors** would not answer a question from a EBC resident even though it had been sent in through official channels two week previously, giving him him adequate time to prepare his response. I feel that throughout this whole process EBC has treated DCC residents as an irrelevance even though all of the impact will be on these residents.

EBC even refer to the site as "The Spondon site" yet they make a great deal out of being within Erewash. The whole of Spondon is within DCC boundaries. By referring to it as the Spondon site does this not show how little it would do for the EBC residents. It is just being used as a number of houses to add to fulfilling the quota.

More evidence of this dismissive attitude can be seen in the way over 700 objections by non EBC residents was referred to in the

March 2022 council report. The report simply stated they were by non EBC residents. That's it. Not what the actual objections were, just non EBC.

As stated by the Minister of State for housing "greenbelt land should only be used in exceptional circumstances ". What are the exceptional circumstances that makes SGA26 acceptable, when it will not meet the needs of EBC residents. SGA26 has been pushed forward by EBC without a full assessment of the urban areas of the Borough. Removing the site from greenbelt and building on it is not sustainable, how can this site be more sustainable without an assessment of the urban areas.

What ecology survey has been carried out to assess the impact on wildlife in the area? The site is well known for the herd of Fallow deer that use the area, as well as hares, lapwings bats and doormice. However the developers, land owners have already erected sturdy fencing to keep the deer out. It smacks of greed, if there is a problem stopping you from developing, remove the problem before anyone can object. Irrespective of the impact on the wildlife.

SGA26 is bordering Spondon wood which is classed as ancient woodland by DEFRA by building closer to the woodland this sill affect the species that it supports. Using the woodland as a buffer is not sustainable it will have an impact on the natural habitat next to the woodland, increase air and light pollution, destroy ancient and veteran trees. What guarantees are there that the wood will not be affected by any of the above.

Which schools would any children attend? The report into the site presented to EBC council says that funding to local schools would be provided. How much funding? Which school? Enough funding g to build more classrooms? The local schools are already over subscribed so new buildings would be needed aswell as teachers. But EBC keep saying it's in our Borough so we'll build on it but then want the children to go to a school in DCC. How does this benefit the residents of EBC? Have Derbyshire County Council been consulted? They would provide the school places for Erewash residents but at a Derby school.

Has any assessment been made to the impact on the roads? Most of the traffic will be heading into Spondon yet Derby will not receive any money for the upkeep of the roads. The only other way to access the A52 is through Ockbrook. What impact will this have on the village?

In 2014 several houses backing onto the site were flooded, this is despite the area being classed as Flood zone 1. What assessment of the site has been made to show that the development of SGA26 will not add to this problem? The problem has now become more acute since the recent erection of fencing which now means the ditch which drains the field cannot now be accessed to be cleaned out.

Thank you Julie Harper

From:	Joseph Frost
Sent time:	12/04/2022 15:36:40
To:	Planning Policy
Subject:	Core Strategy Review Representation

#### Dear Sir/ Madam

I am writing to express my strong objection to the declassifying of Green Belt SGA:26 Spondon Woods. I believe this would be a poor decision for the following reasons. Firstly, I do not believe Erewash Borough Council have fulfilled it's legal duty to cooperate' with Derby City Council and Spondon Residents on this proposal. The SGA 26 site has been considered ahead of other sites which are much closer to Erewash residents. This site above does not meet the needs of Erewash Residents and will instead meet the needs of Derby Residents. This development is being bolted on to Spondon without any consultation with that community. The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents. If this is to be adding to the Spondon community (as it will) then they surely should be consulted, if it is to be treated as a separate community then this would provide no green belt land between this 'Erewash' community and Spondon. Have EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centers? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents these sites should have been prioritised before de – classifying green belt land that abuts DCC. Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. Surely if houses are to be built there then the housing numbers should be allocated to DCC numbers rather than EBC therefore negating the argument that EBC need this land to meet their housing quotas! DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this. As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighboruing authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbours and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbours under the Duty to Cooperate. EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night.

Totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite dumping proposed developments like this on them.

The detrimental impact that development of this site will have on Spondon is immense, but it will also affect Derby. In what looks like a quite shady and dishonest move the council tax, and new homes bonus will be paid to Erewash whilst it will be Spondon and Derby that has to provide, school places, GP's, Dentists, road maintenance etc. West Park School is already heavily over-subscribed as are the local GPS with this proposed development and the one on Acorn Way there will be no possible way to accommodate this extended population. West Park has not the funding nor the space to expand any further and already take in students from Erewash communities because Erewash has not provided appropriate educational provision for it's communities. The impact on the volume of traffic in Spondon, particularly on Willowcroft Road and Nottingham Road, will be immense making already over-busy roads borderline unfunctional at times. Add into this further potential traffic from developments near West Hallam and the fact HGVs are passing through a village that cannot handle them already (partly because they cannot pass through Erewash communities) is a recipe for disaster and this is before the increase in air pollution for residents is considered.

The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances so claim that there were objections to other sites is not a good enough reason to develop on this green belt. Erewash council

know that they don't have any other available green belt that suits their residents as , to my knowledge, they have not completed a Green Belt Review. This review would enable them to strategically look at sites that will keep settlements separate but will suit the needs of Erewash residents and not Derby's. It is incredibly frustrating that Spondon is developing new homes in a responsible and sustainable manner but is then blindsided by another council who are 'passing the buck' by dropping homes on another community's border that they have no plan to support with services but do plan to claim the council tax and new homes bonus. It's irresponsible, dishonest and erodes trust between council and communities.

Access to the proposed site is from the A6096 to the east. Because of the size of this site, any proposed development would be incredibly unsafe onto an unrestricted spread country road with national speed limit, with no other possibility for access or egress, for pedestrians, cyclists and vehicles. This road has no been proposed to be dropped to 50MPH which sems very suspect that this has come to pass now when accidents on this stretch of road have been dropping over the years. Even at 50MPH, this road is too fast for the entrance to a housing estate. To compound this situation, the large herd of deer whom use the current green belt for grazing will be displaced and will roam further bringing them into contact with the incredibly busy A6096 and , to the West, Locko Road which will result in a significant increase in accidents which could result in the loss of both human and deer life. Evidence of this is already available with accidents being caused by fencing being put up ( again, rather suspiciously with the farmer never using this land to graze cattle before but this being the reason being given for the fencing being put up). Putting profit before safety is a disgraceful attitude by EBC.

The affect on the areas biodiversity would be devastating. The wildlife, ecology, nature conservation, habitats and species would be irreversibly affected. The hedgerows around the site, trees in the woods and wildlife would all be affected. This development would be fatal for endangered species such as bats, dormouse, great crested newts and others. Spondon wood is ancient woodland so whilst not specifically listed as Priority Habitat, the site is referred to in the national planning policy as important. Birds listed in Schedule 1 of the Wildlife and Country Act are Ciri bunting, Harriers, Heron, Kingfisher, Barn Owl, Peregrine, Darford Warbler and Woodlark are all native to Spondon Wood and the effect on their habitat and hunting grounds would be significant and seriously endanger their conservation. SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation? Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include:

- Breaking up or destroying connections between woodlands and ancient or veteran trees
- Reducing the amount of semi-natural habitats next to ancient woodland
- Increasing the amount of pollution, including dust Increasing disturbance to wildlife from additional traffic and visitors
- Increasing light or air pollution
- Increasing damaging activities like fly-tipping and the impact of domestic pets
- Changing the landscape character of the area

All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there? EBC and the planning department should be challenged to show what assessments have been done on this Ancient woodland that would show that none of the impacts above would happen if a development were to go ahead? If a housing development is to be built then a safe space or corridor for the nature and deer in particular should be considered at the western edge of the proposed development site so there is space for the animals to move safely between wooded areas.

This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could not add to this pressure?

Residents who's properties overlook this property (many of which are bungalows) would lose privacy and light as well as see their property value drop significantly. Light pollution, as a result of this potential new development, should not be dismissed nor should it's impact on the local wildlife (bats and barn owls in particular). A large majority of those with properties backing onto this area are retired or of retirement age and were looking forward to spending their twilight years in the tranquil setting they had worked their whole lives to acquire. To have that needlessly ripped away when there are far more suitable actions is both cruel and could potentially affect their mental health especially in the current climate.

I hope you consider my objection as it is one that is shared by a large number of people both from Spondon and beyond. There are far more suitable sites available in Erewash that will benefit their residents and not put undue pressure on another community and council whilst devastating green belt land and local biodiversity.

Your faithfully

Joe Frost

Joseph Frost

From: Sent time: To: Subject:

13/04/2022 13:37:00 Planning Policy; Planning The Core Strategy Review Consultation



### Dear Sir/ Madam

I am writing to express my strong objection to the declassifying of Green Belt SGA:26 Spondon Woods. I believe this would be a poor decision for the following reasons. Firstly, I do not believe Erewash Borough Council have fulfilled it's legal duty to cooperate' with Derby City Council and Spondon Residents on this proposal. The SGA 26 site has been considered ahead of other sites which are much closer to Erewash residents. This site above does not meet the needs of Erewash Residents and will instead meet the needs of Derby Residents. This development is being bolted on to Spondon without any consultation with that community. The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents. If this is to be adding to the Spondon community (as it will) then they surely should be consulted, if it is to be treated as a separate community then this would provide no green belt land between this 'Erewash' community and Spondon. Have EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centers? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents these sites should have been prioritised before de – classifying green belt land that abuts DCC. Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. Surely if houses are to be built there then the housing numbers should be allocated to DCC numbers rather than EBC therefore negating the argument that EBC need this land to meet their housing quotas! DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this. As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighboruing authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbours and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbours under the Duty to Cooperate. EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night.

Totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite dumping proposed developments like this on them.

The detrimental impact that development of this site will have on Spondon is immense, but it will also affect Derby. In what looks like a quite shady and dishonest move the council tax, and new homes bonus will be paid to Erewash whilst it will be Spondon and Derby that has to provide, school places, GP's, Dentists, road maintenance etc. West Park School is already heavily over-subscribed as are the local GPS with this proposed development and the one on Acorn Way there will be no possible way to accommodate this extended population. West Park has not the funding nor the space to expand any further and already take in students from Erewash communities because Erewash has not provided

appropriate educational provision for it's communities. The impact on the volume of traffic in Spondon, particularly on Willowcroft Road and Nottingham Road, will be immense making already over-busy roads borderline unfunctional at times. Add into this further potential traffic from developments near West Hallam and the fact HGVs are passing through a village that cannot handle them already (partly because they cannot pass through Erewash communities) is a recipe for disaster and this is before the increase in air pollution for residents is considered.

The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances so claim that there were objections to other sites is not a good enough reason to develop on this green belt. Erewash council know that they don't have any other available green belt that suits their residents as , to my knowledge, they have not completed a Green Belt Review. This review would enable them to strategically look at sites that will keep settlements separate but will suit the needs of Erewash residents and not Derby's. It is incredibly frustrating that Spondon is developing new homes in a responsible and sustainable manner but is then blindsided by another council who are 'passing the buck' by dropping homes on another community's border that they have no plan to support with services but do plan to claim the council tax and new homes bonus. It's irresponsible, dishonest and erodes trust between council and communities.

Access to the proposed site is from the A6096 to the east. Because of the size of this site, any proposed development would be incredibly unsafe onto an unrestricted spread country road with national speed limit, with no other possibility for access or egress, for pedestrians, cyclists and vehicles. This road has no been proposed to be dropped to 50MPH which sems very suspect that this has come to pass now when accidents on this stretch of road have been dropping over the years. Even at 50MPH, this road is too fast for the entrance to a housing estate. To compound this situation, the large herd of deer whom use the current green belt for grazing will be displaced and will roam further bringing them into contact with the incredibly busy A6096 and , to the West, Locko Road which will result in a significant increase in accidents which could result in the loss of both human and deer life. Evidence of this is already available with accidents being caused by fencing being put up ( again, rather suspiciously with the farmer never using this land to graze cattle before but this being the reason being given for the fencing being put up). Putting profit before safety is a disgraceful attitude by EBC.

The affect on the areas biodiversity would be devastating. The wildlife, ecology, nature conservation, habitats and species would be irreversibly affected. The hedgerows around the site, trees in the woods and wildlife would all be affected. This development would be fatal for endangered species such as bats, dormouse, great crested newts and others. Spondon wood is ancient woodland so whilst not specifically listed as Priority Habitat, the site is referred to in the national planning policy as important. Birds listed in Schedule 1 of the Wildlife and Country Act are Ciri bunting, Harriers, Heron, Kingfisher, Barn Owl, Peregrine, Darford Warbler and Woodlark are all native to Spondon Wood and the effect on their habitat and hunting grounds would be significant and seriously endanger their conservation. SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation? Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include:

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- Changing the landscape character of the area

All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there? EBC and the planning department should be challenged to show what assessments have been done on this Ancient woodland that would show that none of the impacts above would happen if a development were to go ahead? If a housing development is to be built then a safe space or corridor for the nature and deer in particular should be considered at the western edge of the proposed development site so there is space for the animals to move safely between wooded areas.

This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could

### not add to this pressure?

Residents who's properties overlook this property (many of which are bungalows) would lose privacy and light as well as see their property value drop significantly. Light pollution, as a result of this potential new development, should not be dismissed nor should it's impact on the local wildlife (bats and barn owls in particular). A large majority of those with properties backing onto this area are retired or of retirement age and were looking forward to spending their twilight years in the tranquil setting they had worked their whole lives to acquire. To have that needlessly ripped away when there are far more suitable actions is both cruel and could potentially affect their mental health especially in the current climate.

I hope you consider my objection as it is one that is shared by a large number of people both from Spondon and beyond. There are far more suitable sites available in Erewash that will benefit their residents and not put undue pressure on another community and council whilst devastating green belt land and local biodiversity.

Your faithfully

Joe Frost

N.B. May I ?request to receive confirmation this e mail has been received by the relevant parties.

From:	Diana Watakam
Sent time:	Diane Watchorn 17/03/2022 21:36:04
To:	Planning Policy
Subject:	Re: Planning kirk hallam
Many thanks for your Regards diane watcho	email, can i leave the email as my representation please.
On Thu, 17 Mar 2022	, 2:56 pm wrote:
Dear Diane,	
this issue and the fo	nding this representation through. Apologies you were not able to use the online form, we have now fixed rm is now working should you wish to submit your comments to the consultation. We will accept this sentation unless you wish to use the online form, in which case this email representation will be
Thank you	
From: Sent: 15 March 2022	14:03
То:	

Subject: Planning kirk hallam

Good afternoon i carnt seem to navigate through the online petition. I live on

Firstly I've watched the traffic build up more over the years from our schools to the point is ridiculous on Godfrey, ladywood road, Bulls head. I've seen emergency vehicles struggle on these roads at peak times, has anyone actually asked these services the problems they have. To build the amount off houses there saying, is going to add to all these problems the new road is actually a road to nowhere, will just lead to the endless lines of traffic. The pioneer pond is a beautiful place why ruin something so lovely. I'm not totally against new builds what i am against is making a problem we have with traffic 10x worse. A few years ago my dad fell at home cavendish rd it was rush hour took me 10 mins to get there. I've actually tried this run again recently around the same time took me 20 mins. This email probably won't make a difference but least i know I've had input. Regards D Watchorn



From:	David Marsden
Sent time:	08/04/2022 12:12:38
To:	Planning Policy
Subject:	SGA 26 Spondon Wood proposed development

I strongly object to this development on multiple grounds.

At this location a well defined city boundary exists, any encroachment into green belt land would be unconscionable. The area is indicated on maps as a deer park. Its use has been agricultural. In light of current impending food crisis per Ukraine/Russia war it is obvious that Britain needs to be more self reliant on food production. Land for this purpose must not be sacrificed.

There are many areas in Borrowash where brownfield and non agricultural land is available. These have access to less conjested roads.

Developers preference for green belt land should be ignored.

Spondon village in rush hour has been a problem for years, traffic backing up from the end of Willowcroft well up Dale road. Any added traffic from the development would cause an intolerable situation also rendering vehicular acces to properties on Dale road even more difficult.

Spondon wood is a wildlife habitat which is becoming increasingly rare. Government has a policy to preserve such locations. Housing on its boundary unfortunately means domestic cats will render much of this extinct.

The added population will overload all services in spondon are already critical ie. roads, schools, dentists and doctors. These are added cost to Derby city but the development ratepayers revenue will be to Erewash.

D. Marsden

From:	
Sent time:	19/04/2022 10:40:49
То:	Planning Policy
Subject:	Core Strategy Review Consultation

Good morning, please note that Breadsall Parish Council wishes to make the following comment on the Core Strategy:

It appears that the proposed building on Acorn Way is likely to have a detrimental impact on the amount of traffic coming through Breadsall, and there does not appear to be any proposed mitigation for this.

# Regards

Liz

## <u>Liz Holgate</u>



From:Barbara HartleySent time:04/04/2022 16:23:35To:Planning PolicySubject:Sga 26

I am writing to register my protest at the proposed development known as SGA 26

Have EBC undertaken a proper green belt review that highlight any potential site closer go the built up areas within EBC area? These sites should be prioritised over any bolt onto neighbouring councils. This proposed site would best suit the needs of DCC residents rather than EBC residents. Any sites closer to the centres of EBC towns should be utilised before de classifying SGA 26 as green belt.

SGA 26 site directly abuts DCC land. If any houses are built on this land it would be DCC providing the infrastructure maintenance. I.E Roads, schools, dentists, doctors, shops, etc. The housing allocation would go to DCC not EBC along with the council tax to pay for the aforementioned services. This would therefore not be included within EBC quota and would not help EBC to meet their housing target.

EBC hav referred to a meeting in 2020 but from my recollection at that time this scheme was not included. It was only thrown in as a quick last-minute replacement for an abandoned scheme at Sawley with little or no proper time for proper consideration by Spondon residents or Derby City Council (or I suspect Erewash). The first that any Spondon residents knew of this proposal was a article in the Derby telegraph in March 2021. This article was therefore a bombshell to all of us.

To me this dreadful scheme has too many shortcomings. Two key features however are that it not only fails to address the real needs of EBC but it is also particularly damaging to one of the most sensitive and valuable parts of its greenbelt land. The last sentence in the Spondon section of the article says it all: "It's development would have a relatively limited impact on the Green Belt". In the previous paragraph EBC also see the wood as "a robust Green Belt boundary". It's not; it's an ancient woodland (a declining resource) in need of all the protection it can get. There have been many articles in the Derby telegraph highlighting the problems and damage resulting from building Oakwood right up to Chaddesden Wood has caused and makes the important point that this field is the buffer needed to provide this protection. At last month's meeting of EBC too much was made of the 'small proportion' of green belt being taken, with absolutely no recognition of the special value of this particular <u>field.It</u> is the proposed site that is the buffer to ancient woodland, the woodland should not be used as the buffer.

In the EBC council meeting in March 2022 it was stated that EBC had consulted with DCC. It is my understanding that the planning department at DCC was only told of the land two weeks before it was included in EBC core strategy. They were not told of the location, just land north of Spondon. The first Spondon residents were aware of the proposal was a week before it went to full council meeting in March 2021.Neither DCC or EBC residents were given time to object.This is extremely poor consultation and a total disregard to all residents of either DCC or EBC

There has been a totally dismissive attitude by EBC council towards DCC councillors. The leader has stated in correspondence with Spondon councillors that EBC are members of the Greater Nottingham planning area so they tend to have more discussion with Nottingham and will not be signing up to the Derbyshire planning framework. They have also been told by the EBC leader "I understand you are not happy about the Spondon site but it is in EBC Boundaries". So EBC seem to look towards Nottingham and are willing to have discussions with them but not their neighbours to the west.

Further evidence of this dismissive attitude was shown at the March 2022 council meeting when **sector and a sector attitude** would not answer a question from a EBC resident even though it had been sent in through official channels two week previously, giving him him adequate time to prepare his response. I feel that throughout this whole process EBC has treated DCC residents as an irrelevance even though all of the impact will be on these residents.

EBC even refer to the site as "The Spondon site" yet they make a great deal out of being within Erewash. The whole of Spondon is within DCC boundaries. By referring to it as the Spondon site does this not show how little it would do for the EBC residents. It is just being used as a number of houses to add to fulfilling the quota.

More evidence of this dismissive attitude can be seen in the way over 700 objections by non EBC residents was referred to in the March 2022 council report. The report simply stated the were by non EBC residents. That's it. Not what the

actual objections were, just non EBC.

As stated by the Minister of State for housing " greenbelt land should only be used in exceptional circumstances ". What are the exceptional circumstances that makes SGA26 acceptable, when it will not meet the needs of EBC residents. SGA26 has been pushed forward by EBC without a full assessment of the urban areas of the Borough. Removing the site from greenbelt and building on it is not sustainable, how can this site be more sustainable without an assessment of the urban areas.

What ecology survey has been carried out to assess the impact on wildlife in the area. The site is well known for the herd of Fallow deer that use the area, as well as hares, lapwings bats and doormice. However the developers, land owners have already erected sturdy fencing to keep the deer out. It smacks of greed, if there is a problem stopping you from developing, remove the problem before anyone can object. Irrespective of the impact on the wildlife.

SGA26 is bordering Spondon wood which is classed as ancient woodland by DEFRA by building closer to the woodland this will affect the species that it supports. Using the woodland as a buffer is not sustainable it will have an impact on the natural habitat next to the woodland, increase air and light pollution, destroy ancient and veteran trees. What guarantees are there that the wood will not be affected by any of the above.

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In 2014 several houses backing onto the site were flooded, this is despite the area being classed as Flood zone 1. What assessment of the site has been made to show that the development of SGA26 will not add to this problem? The problem has now become more acute since the recent erection of fencing which now means the ditch which drains the field cannot now be accessed to be cleaned out.

Thankyou Barbara Hartley



From:Andrew HarperSent time:04/04/2022 16:04:35To:Planning PolicySubject:SGA26

I am writing to register my protest at the proposed development known as SGA 26

Have EBC undertaken a proper green belt review that highlight any potential site closer go the built up areas within EBC area? These sites should be prioritised over any bolt onto neighbouring councils. This proposed site would best suit the needs of DCC residents rather than EBC residents. Any sites closer to the centres of EBC towns should be utilised before de classifying SGA 26 as green belt.

SGA 26 site directly abuts DCC land. If any houses are built on this land it would be DCC providing the infrastructure maintenance. I.E Roads, schools, dentists, doctors, shops, etc. The housing allocation would go to DCC not EBC along with the council tax to pay for the aforementioned services. This would therefore not be included within EBC quota and would not help EBC to meet their housing target.

EBC hav referred to a meeting in 2020 but from my recollation at that time this scheme was not included. It was only thrown in as a quick last-minute replacement for an abandoned scheme at Sawley with little or no proper time for proper consideration by Spondon residents or Derby City Council (or I suspect Erewash). The first that any Spondon residents knew of this proposal was a article in the Derby telegraph in March 2021. This article was therefore a bombshell to all of us.

To me this dreadful scheme has too many shortcomings. Two key features however are that it not only fails to address the real needs of EBC but it is also particularly damaging to one of the most sensitive and valuable parts of its greenbelt land. The last sentence in the Spondon section of the artivle says it all: "It's development would have a relatively limited impact on the Green Belt". In the previous paragraph EBC also see the wood as "a robust Green Belt boundary". It's not; it's an ancient woodland (a declining resource) in need of all the protection it can get. There have been many articles in the Derby telegraph highlighting the problems and damage resulting from building Oakwood right up to Chaddesden Wood has caused and makes the important point that this field is the buffer needed to provide this protection. At last month's meeting of EBC too much was made of the 'small proportion' of green belt being taken, with absolutely no recognition of the special value of this particular field. It is the proposed site that is the buffer to ancient woodland, the woodland should not be used as the buffer.

In the EBC council meeting in March 2022 it was stated that EBC had consulted with DCC. It is my understanding that the planning department at DCC was only told of the land two weeks before it was included in EBC core strategy. They were not told of the location, just land north of Spondon. The first Spondon residents were aware of the proposal was a week before it went to full council meeting in March 2021.Neither DCC or EBC residents were given time to object. This is extremely poor consultation and a total disregard to all residents of either DCC or EBC

There has been a totally dismissive attitude by EBC council towards DCC councillors. The leader has stated in correspondence with Spondon councillors that EBC are members of the Greater Nottingham planning area so they tend to have more discussion with Nottingham and will not be signing up to the Derbyshire planning framework. They have also been told by the EBC leader "I understand you are not happy about the Spondon site but it is in EBC Boundaries". So EBC seem to look towards Nottingham and are willing to have discussions with them but not their neighbours to the west.

Further evidence of this dismissive attitude was shown at the March 2022 council meeting when **sectors** would not answer a question from a EBC resident even though it had been sent in through official channels two week previously, giving him him adequate time to prepare his response. I feel that throughout this whole process EBC has treated DCC residents as an irrelevance even though all of the impact will be on these residents.

EBC even refer to the site as "The Spondon site" yet they make a great deal out of being within Erewash. The whole of Spondon is within DCC boundaries. By referring to it as the Spondon site does this not show how little it would do for the EBC residents. It is just being used as a number of houses to add to fulfilling the quota.

More evidence of this dismissive attitude can be seen in the way over 700 objections by non EBC residents was referred to in the

March 2022 council report. The report simply stated the were by non EBC residents. That's it. Not what the actual objections were, just non EBC.

As stated by the Minister of State for housing "greenbelt land should only be used in exceptional circumstances". What are the exceptional circumstances that makes SGA26 acceptable, when it will not meet the needs of EBC residents. SGA26 has been pushed forward by EBC without a full assessment of the urban areas of the Borough. Removing the site from greenbelt and building on it is not sustainable, how can this site be more sustainable without an assessment of the urban areas.

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Thankyou Andrew Harper



From:	Albertina Hartley
Sent time:	04/04/2022 16:29:59
To:	Planning Policy
Subject:	Sga26

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Have EBC undertaken a proper green belt review that highlight any potential site closer go the built up areas within EBC area? These sites should be prioritised over any bolt onto neighbouring councils. This proposed site would best suit the needs of DCC residents rather than EBC residents. Any sites closer to the centres of EBC towns should be utilised before de classifying SGA 26 as green belt.

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To me this dreadful scheme has too many shortcomings. Two key features however are that it not only fails to address the real needs of EBC but it is also particularly damaging to one of the most sensitive and valuable parts of its greenbelt land. The last sentence in the Spondon section of the article says it all: "It's development would have a relatively limited impact on the Green Belt". In the previous paragraph EBC also see the wood as "a robust Green Belt boundary". It's not; it's an ancient woodland (a declining resource) in need of all the protection it can get. There have been many articles in the Derby telegraph highlighting the problems and damage resulting from building Oakwood right up to Chaddesden Wood has caused and makes the important point that this field is the buffer needed to provide this protection. At last month's meeting of EBC too much was made of the 'small proportion' of green belt being taken, with absolutely no recognition of the special value of this particular <u>field.It</u> is the proposed site that is the buffer to ancient woodland, the woodland should not be used as the buffer.

In the EBC council meeting in March 2022 it was stated that EBC had consulted with DCC. It is my understanding that the planning department at DCC was only told of the land two weeks before it was included in EBC core strategy. They were not told of the location, just land north of Spondon. The first Spondon residents were aware of the proposal was a week before it went to full council meeting in March 2021.Neither DCC or EBC residents were given time to object.This is extremely poor consultation and a total disregard to all residents of either DCC or EBC

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Further evidence of this dismissive attitude was shown at the March 2022 council meeting when **the meeting** would not answer a question from a EBC resident even though it had been sent in through official channels two week previously, giving him him adequate time to prepare his response. I feel that throughout this whole process EBC has treated DCC residents as an irrelevance even though all of the impact will be on these residents.

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What ecology survey has been carried out to assess the impact on wildlife in the area. The site is well known for the herd of Fallow deer that use the area, as well as hares, lapwings bats and doormice. However the developers, land owners have already erected sturdy fencing to keep the deer out. It smacks of greed, if there is a problem stopping you from developing, remove the problem before anyone can object. Irrespective of the impact on the wildlife.

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In 2014 several houses backing onto the site were flooded, this is despite the area being classed as Flood zone 1. What assessment of the site has been made to show that the development of SGA26 will not add to this problem? The problem has now become more acute since the recent erection of fencing which now means the ditch which drains the field cannot now be accessed to be cleaned out.

Thankyou Albert Hartley



From:		
Sent time:	06/04/2022 11:08:05	
То:	Planning Policy	
Subject:	Objection to proposed planning for Field behind Huntley Avenue Spondon, in front of Locko Woods. Site SGA 26	
PLEASE NOTI EMAIL	THAT HAVE NO INVOLVEMENT IN THIS SITUATION. MEERLY THEY KINDLY LET US USE THEIR	R

Mrs Eileen Wright Mrs Fiona Barton and Mr Carl Nuttall

We wish to object in the strongest possible terms to the proposed Home Building plan on the Green Belt Land detailed above.

We wish to raise the following points:

Have EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centres? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents these sites should have been prioritised before de – classifying green belt land that abuts DCC.

Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. Surely if houses are to be built there then the housing numbers should be allocated to DCC numbers rather than EBC therefore negating the argument that EBC need this land to meet their housing quotas! DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this. The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents.

As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighbouring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbors and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbours under the Duty to Cooperate.

EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night.

Totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite dumping on them.

Spondon SGA26 has been promoted by EBC without any appraisal of all urban areas in Erewash. How can it be 'inevitable' that this location is inherently more sustainable than others? Or that it's deletion from the Green Belt would have the least harm on the function of that Green Belt? Suburban sprawl cannot be sustainable.

The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents?

Development of SGA 26 will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic.

The local Secondary School, West Park Academy is over subscribed and has had to expand already to meet the needs

of Derby residents. This would be the obvious school of choice for any residents of SGA 26. Again no consultation has taken place with the Academy or with the School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning – this is Derbyshire County Council's role. Have they even been consulted? There are only a few routes out of Spondon and the main one is down through the village, down Willowcroft Road and along Nottingham Road to the A52. This area already has a high level of air pollution and adding a 240 house residential development to the area will increase the air pollution and affect the health and wellbeing of Spondon residents.

SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation?

Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include:

breaking up or destroying connections between woodlands and ancient or veteran trees

reducing the amount of semi-natural habitats next to ancient woodland

increasing the amount of pollution, including dust

increasing disturbance to wildlife from additional traffic and visitors

increasing light or air pollution

increasing damaging activities like fly-tipping and the impact of domestic pets

changing the landscape character of the area

All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there? EBC and the planning department should be challenged to show what assessments have been done on this Ancient woodland that would show that none of the impacts above would happen if a development were to go ahead? This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could not add to this pressure?

To summarise, due process has not been followed and the proposed location for this new build in wholly unsuitable for a new build of housing.

We ask that you look closely at our concerns and reverse this unacceptable situation.

Thank you in advance for your kind attention.

Fiona Barton (Mrs) Concerned Resident

From:	VINCENT sanger
Sent time:	18/04/2022 13:21:23
To:	Planning Policy
Subject:	SGA26

Sir / Madam.

### I wish to strongly resist SGA26 being included in the EBC housing stock.

The local schools are at capacity, as are the doctors surgeries, the roads in and out of Spondon (Sitwell street and Willowcroft road) can be static at busy times and the access to the A52 through Flood Street in Ockbrook is horrendous.

Adding a further six hundred properties would be irresponsible and the increased air pollution and the impact on peoples health would further pressurise the doctors in this area.

This is Green Belt and on Spondon's and the DCC doorstep; It appears that EBC would cream off the gain while DCC has to foot the pain, surely this is not working with other Councils but riding rough shod over them.

Yours Faithfully.

Mrs E Sanger.



Attachments:	Raymond Clayton.docx	
Subject:	FW: Core Strategy Review	
To:	Planning Policy	
Sent time:	22/04/2022 07:48:37	
From:	Planning	

Good Morning,

Please see email below.

Kind regards,



From: Ray Clayton		
Sent: 21 April 2022 19:48		
То:		
Subject: Core Strate	egy Review	

Dear Sir/Madam,

Please find attached Core Strategy Review Representation relating to SGA 26 Land North of Spondon AKA The Spondon Wood Site.

Would you please acknowledge receipt and confirm that the Representation will be forwarded to the Independent Planning Inspectorate in its entirety, (4 pages).

Many thanks Yours faithfully

**Raymond Clayton** 



### **Raymond Clayton**



To The Erewash Borough Council Planning Department for submission to the Independent Planning Inspectorate.

Core Strategy Review Representation relating to SGA26 Land North of Spondon, AKA The Spondon Wood Site.

1 Erewash Borough Council has failed in its duty to co-operate with Derby City Council during the course of this consultation. No consultation was conducted prior to the Spondon Wood site being included in their proposals, and they declined a request to allow a 12 week consultation period for objections, insisting on a six week period. They also refused to engage with the Derby and Derbyshire Housing Strategy and to participate in Derby's Housing Management area, even though Erewash is in Derbyshire, preferring to engage with Nottingham.

I understand that the planning department at Derby City Council was only told of the proposal, relating to "land north of Spondon" approximately two weeks before the Erewash BC meeting in March 2021 but even then the actual location was not Identified.

Derby City Councillors were not allowed to speak at either the March 2021 or the March 2022 Erewash BC meeting.

2 This site was included at a late stage in the proceedings, and other communities were given more than a year longer to consult and consider the proposals. At the March 2021 Erewash BC meeting six weeks were given for Spondon residents to object to the proposals, this being in the middle of a pandemic, when no face to face meetings were allowed. These objections were to be considered for the next Erewash BC meeting in September 2021, but this meeting did not take place. I understand this was due to the fact that documentation had not been completed, presumably as result of problems caused by the pandemic. The meeting eventually took place in March 2022. Six months leeway given for the Erewash BC but no leeway for submitting Spondon's objections.

Properties in Spondon adjacent to the proposed Spondon Wood site obviously overlook the site, and many of the residents were keen to have their views aired and to have spoken to the Erewash BC at the meetings in March 2021 and March 2022, but they were not allowed. It appears that opinions of these residents and Spondon people in general are not worthy of consideration by the Erewash BC.

Ρ

At the Erewash BC meeting in March 2022 an Erewash resident asked a question concerning the Spondon Wood site, but **Second Second** the person designated to give a response did not have one prepared and was instructed through the Chair to provide a written answer within the next 7 days. Another example that Spondon doesn't appear to matter to the Erewash BC (except for the services it may provide).

3 The Spondon Wood site is on green belt land. The Minister of State for Housing has stated that green belt land should only be used in exceptional circumstances. There are no exceptional circumstances in this case, as brown field sites and sites nearer to the Erewash community are available.

Following the unsuitability of a site proposed in Sawley, Locko Park Estates obviously recognised there was a possibility that permission may become available to build on this Spondon Wood site, which would result in significant financial benefits to the land owners and the developers, and so an approach was made to Erewash BC to advise that the piece of land was available. Erewash BC took the easy option, at this late stage, and included the site in their Core Strategy Plan. I understand that no efforts were made at this time to seek and investigate alternative sites. In the past the Erewash Planning Department have been renowned for their strictness in refusing permission to build on green belt land, and they certainly would not have given permission to build on this site. This is proven by the fact that when a number of residents, living adjacent to the site, bought a piece of land from Locko Estates to lengthen their gardens, Erewash Planning Department would not allow them to build anything at all on the plots they had purchased. The plots had to be retained as grassed areas.

The two members of Parliament interested in this matter are

and both are vehemently opposed to any

building on the green belt and have both communicated their views to Erewash BC. In a statement published in the Derby Telegraph on 25 February 2022 States and "I have taken every opportunity to make robust representation to the Borough Council, outlining my concerns about the proposed use of green belt for future housing. In particular I do not believe that Erewash, as a borough, has yet exhausted the potential use of brown field sites or the repurposing of existing buildings".

4 The site is obviously within the boundary of Erewash but it is certainly not near to any Erewash community. There are other sites closer to Erewash residents which would prove much more beneficial for Erewash, both from a community and an economic point of view.

5 Sites previously proposed by Erewash BC have been abandoned because of their proximity to bordering communities e.g between Spondon and Borrowash, yet under this scheme the proposal is to build right up to the Derby City boundary.

6 The site itself consisting of farmland, hedges, ditches, protected oaks and a spinney with pond adjacent to Dale Road, is bordered by Spondon Wood and is a haven for an abundance of wild life including deer, bats, newts, hedgehogs, red listed birds such a lapwings, cuckoos, thrushes, tree sparrows and starlings, birds of prey including owls, buzzards and sparrow hawks and many more.

People who have viewed the site since this process began cannot believe there is a proposal to build on this land. The impact would be devastating.

7 The proposal is to build close to the very established Spondon Wood, categorized as ancient woodland, and this would prove very damaging to the flora and fauna therein. Disturbance from noise and light, vandalism on trees and woodland plants, such as bluebells, and predation by pets would all have a detrimental effect. Erewash BC are proposing to create a buffer zone next to the woodland, but this would be relatively small and give very little protection against the above dangers.

8 There are no Erewash facilities within the immediate vicinity of the site such as schools, general practitioners, dentists etc, and so the development of this site would have a detrimental impact on services available in Spondon. Spondon Park school numbers are already reaching capacity, and doctors surgeries and dental practices are also struggling with numbers.

Erewash BC have accepted, that the residents on this site, would be reliant, for the most part, on the services provided in Spondon/Derby.

9 The road network through Spondon is already inadequate. Up until the 1960s when traffic was relatively sparse, there were three exit routes to the south to gain access to Derby, now there is only one, being via Willowcroft Road. The roads during certain times of the day have now become "car parks".

Currently a food production hub in is course of construction on the old Celanese site in Spondon, and is forecast to create 5,000 jobs. Inevitably a fairly significant number of this new workforce will use the A6096 through Spondon to gain access to the food hub site. Taking this into account, and the increased traffic generated from a Spondon Wood housing development, the situation would become totally unacceptable, the village and Willowcroft Road becoming gridlocked for most of the day. 10 Linked with the above, air pollution is also a problem due to the heavy amount of traffic using the village and Willowcroft Road, and any increase would make the situation even worse.

11 There is only one access to this proposed site for vehicles, pedestrians and cyclists, being from the A6096. Taking account of the numbers expected on the development it would be seriously unsafe for traffic exiting onto a country road with a speed limit of 50mph.

12 At the Erewash BC meeting in March 2021 statements were made relating to "job creation" "improvements to infrastructure" and "increased footfall for shopping in Erewash". None of these statements could be applied to the development of this Spondon Wood site. It will increase the housing by a relatively small number and provide little or no benefits to the Erewash community as a whole. The only major boosts will be to the bank balances of the land owners and the developers, together with a relatively small increase in council tax, payable to Erewash BC.

13 To conclude I would advise that the minimal communication and consultation, and the devious underhand manner in which the Erewash BC has conducted this matter, has left some members of the Spondon community, including myself, wondering as to whether the result of the processes carried out to date, in relation to the Spondon Wood site, was in fact a fait accompli.

Please visit the site, it has to be seen to be really appreciated.

Raymond Clayton.

Email

From:	Evonne Williams (Cllr)
Sent time:	22/04/2022 13:10:34
To:	Planning Policy
Cc:	
Subject:	Core Strategy Review Regulation 19

Dear Sirs/Madam

Please can you consider the points I raise below? plans for SGA26 – Spondon Woods will affect. and represent Spondon Ward which the

Have EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centres? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents these sites should have been prioritised before de – classifying green belt land that abuts DCC.

Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. Surely if houses are to be built there then the housing numbers should be allocated to DCC numbers rather than EBC therefore negating the argument that EBC need this land to meet their housing quotas! DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this.

The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents.

As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighbouring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbours and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbours under the Duty to Cooperate.

EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due

consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3<sup>rd</sup> of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night.

Totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite dumping on them.

Spondon SGA26 has been promoted by EBC without any appraisal of all urban areas in Erewash. How can it be 'inevitable' that this location is inherently more sustainable than others? Or that it's deletion from the Green Belt would have the least harm on the function of that Green Belt? Suburban sprawl cannot be sustainable.

The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents?

Development of SGA 26 will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic.

The local Secondary School, West Park Academy is over subscribed and has had to expand already to meet the needs of Derby residents. This would be the obvious school of choice for any residents of SGA 26. Again no consultation has taken place with the Academy or with the School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning – this is Derbyshire County Council's role. Have they even been consulted?

There are only a few routes out of Spondon and the main one is down through the village, down Williocroft Road and along Nottingham Road to the A52. This area already has a high level of air pollution and adding a 240 house residential development to the area will increase the air pollution and affect the health and wellbeing of Spondon residents.

SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation?

Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include:

breaking up or destroying connections between woodlands and ancient or veteran trees reducing the amount of semi-natural habitats next to ancient woodland increasing the amount of pollution, including dust increasing disturbance to wildlife from additional traffic and visitors increasing light or air pollution increasing damaging activities like fly-tipping and the impact of domestic pets changing the landscape character of the area

All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there?

EBC and the planning department should be challenged to show what assessments have been done on this Ancient woodland that would show that none of the impacts above would happen if a development were to go ahead?

This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could not add to this pressure?

As stated above I represent Spondon Residents and I hope that you will take these points into consideration.

Below is my Councillor address and contact details, however, if needed my home address is

Thank you for your consideration. Please can you confirm receipt and inclusion for the review of my comments. Please keep me informed of any further development of this land and consultation.

Regards

**Evonne Williams** 



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The views expressed in this email are personal and may not necessarily reflect those of Derby City Council, unless explicitly stated otherwise. This email, and any files transmitted with it, are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify me immediately. If you are not the intended recipient of this email, you should not copy it for any purpose, or disclose its contents to any other person. Senders and recipients of email should be aware that under the Data Protection Act 2018 and Freedom of Information Act 2000, the contents may have to be disclosed. This footnote also confirms that this email message has been swept by Microsoft Office 365 for the presence of computer viruses. However, we cannot accept liability for viruses that may be in this email. We recommend that you check all emails with an appropriate virus scanner.

From:	
Sent time:	22/04/2022 15:59:59
To:	Planning Policy
Subject:	Spondon Wood Proposed Housing Development

I would like to make my objections known to the Erewash Planning Committee with regard to the proposed building of houses at Spondon Wood. The infrastructure of the surrounding area is not conducive to the addition of more dwellings for several reasons It is a green belt site which means that any building will be detrimental to plant and wildlife in the area. Access to the site is far from ideal due to the busy roads around Spondon. Schools doctors, dentists and other local amenities are heavily subscribed. In my opinion it shouldn't go ahead and I strongly object to it.

Mrs Christine Pickering

From:	Aneta Richardson
Sent time:	22/04/2022 16:28:24
To:	Enquiries; Planning Policy
Subject:	Appeal against the proposed development at Spondon Wood
Attachments:	Appeal against Spondon Wood development.docx

Hello,

Please find attached my official appeal against the proposed new development at Spondon Wood, as part of the Core Strategy Review.

Many thanks,

Aneta Richardson

My name is Aneta Richardson. My husband Tom and I have recently moved to Spondon, after spending the last 7 years in Kirk Hallam. We were absolutely appalled when we learnt of the news that a proposed housing estate was making its way to the Spondon woods area, after being moved from the original location at Sawley.

What appalled us even more was the sheer lack of communication from the Erewash Borough council with residents of Spondon, and the absolute dishonesty in the way the entire situation had been approached.

Having delved even deeper into the subject, and having joined the Facebook group where thousands of Spondon residents have expressed their disbelief in situation, I decided to do my best to help out in any way I could.

This is my official appeal against the Erewash Borough Council's Core Strategy Review that includes the use of land at Spondon Woods (SGA 26), based on the following:

- 1. Lack of honest communication
  - I feel that communication about the proposed building works has been shoddy from the word go. Erewash Borough Council have not consulted the public, have not carried out enquiries with the local residents, or given us any real chance to stop the proposal until now. Several meetings have been moved and having attended the Council meeting in Long Eaton a few months back, I was disgusted at the lack of preparation or in fact any real cooperation in terms of answering questions specifically about the Spondon Wood development.
- 2. Destruction of wildlife habitat
  - It seems to be a complete joke to me that this site can even be considered, while knowing that many deer use the field as their pastures and frequent the site on a daily basis. Not only the deer, but other species also use this as their habitat. The fact that since the Long Eaton council meeting fences have been erected around the proposed site and cows have been moved to the field, is ridiculous. The council is doing everything in their power to change the status of the land and it is quite frankly disgusting. Many deer have become entangled in the newly erected fencing, and I've seen this first-hand.
  - The councillors seem to give absolutely no consideration to wildlife, so long as it benefits someone's pocket in the end. Many flats are still available for rent around the Ilkeston area. Many houses left unoccupied. But it appears that the most reasonable solution is to get rid of habitats and create more shoddily built new build estates instead. I truly believe the Erewash Borough Council is NOT doing enough in their power to consider other locations, perhaps once that may be more difficult to clear, or build

on, and yes, they may cost a little more, but preserving nature in this fragile climate should be our top priority as decent human beings. It turns out money really talks, doesn't it.

- 3. Stress inflicted upon residents and the community
  - Can the councillors put themselves in the shoes of property owners who are threatened by the prospect of new housing development springing up behind their homes? Homes that have stood in their place for generations. Homes that people paid for due to their location. I cannot imagine the stress of knowing that something you have loved so much over the years will soon be tainted by the prospect of complete destruction.

Will the Erewash Borough Council give residents overlooking the new site money to compensate their stress, which they have endured for the last few months? Will you counter-act the results of this new development on their property values? I highly doubt it. Again, so long as it benefits the council and the targets, right?

- 4. Strain on local resources
  - The EBC have very cleverly proposed a site which is situated as close to its bored as physically possible. Will the EBC bin lorries collect the waste from the new development? Will the EBC support with transportation and strain on the local schools, doctors, dentists, roads? How will the EBC counter-act its latching onto and leaching off the neighbouring County?

I may not be the most well-informed resident of Spondon. I may not have all of my facts absolutely 100% correct and I certainly will not quote every single date, statement or name that has made an appearance during this prolonged battle to save the Spondon Wood. What I am I a resident that is certain the new proposed housing development is not right for the residents of Spondon, or the vast and varied creatures that live on the proposed site and in the neighbouring woodland.

In a time where we're all threated by global warming, reduction of green belt sites, increased pollution etc. is it really so difficult to pay more consideration to wildlife and actually TRY and put some effort into preserving it? What will happen to the deer? What will happen to the hares, the birds? More should be done to preserve nature and more consideration should be placed upon finding derelict sites that require TLC.

Thank you,

Aneta and Tom Richardson

From:	Andrew Cooper	
Sent time:	23/04/2022 14:42:24	
	Andrew Cooper	
T		
To:		
	Planning Policy	,
Subject:	RE: The Core Strategy Review - Plan Publication Version (Regulation 19) - Consultation	

Dear Sir or Madam,

### **Erewash Core Strategy Review**

### Opposition to the inclusion of land north of Spondon - Green Belt - SGA

I am writing to you today to make an objection to the published Erewash Core Strategy Review and specifically the inclusion of green belt land north of Spondon near Spondon wood. There are many reasons for this objection to the proposed development in the Green Belt:

- 1. Where is the evidence to justify that this site be chosen above all other sites within Erewash? The process of substitution of one site for another during the initial consultation process was inherently flawed as it did not suggest other potential alternative sites to the Spondon north site and did not provide any evidence to support that this was the only site available.
- 2. Erewash has aligned itself, for housing planning purposes, with Nottingham City Council rather than Derby City Council. This suggests that Erewash believe that their residents align themselves more towards Nottingham than Derby. If this is the case, how does a development adjacent to Derby benefit Erewash residents? Surely it would make more sense for Erewash to seek to assign housing closer to Nottingham rather than Derby if they believe that their residents are more closely aligned to Nottingham?

This site should therefore be included within Derby City Council's housing allocation, if indeed it is to go ahead, rather than Erewash, where it can be properly assessed by the City Council's planners and due regard paid to the inherent issues, such as traffic, health, and education, which would fall to Derby City Council to remedy. Indeed, this is the reason why a duty to cooperate is required between neighbouring authorities where planning is proposed on an adjacent boundary.

Erewash should therefore be required to seek alternative land for development from an already prepared, maintained and reviewed list of alternatives (it is reasonable to assume that such a list must exist, since a failure to maintain a reserve list would be a failure to adequately plan for the future and anticipate issues with proposed areas of land) within its own geographic area that is not adjacent to its border with a neighbouring authority, perhaps closer to an existing Erewash conurbation, to fulfil its housing allocation requirement.

3. The proximity of the proposed development to Spondon, which is within the boundary of Derby City Council means that it is more likely that any residents on the development will avail themselves of the services provided within Spondon and Derby City.

This is acknowledged in many areas of the Sustainability Assessment (Appendix B5 for SGA26). For the purpose of clarity, the impact of this will be felt on a range of services such as:

a. Schools - there is currently limited availability within West Park School. Such a development is likely to increase the probability that resident's children will want to attend the nearest school, which will be West Park School.

However, education within Erewash is provided through Derbyshire County Council - the nearest senior schools provided through Derbyshire County Council are Kirk Hallam Community School and Sandiacre Friesland School. Both options here would require transport to be provided, either by parents or through the County Council. This would increase the amount of travelling to/from schools with an associated potential impact on the environment.

b. Healthcare - clearly it is probable that residents of the proposed development would want to access healthcare that is geographical close to them. There are only 2 Doctor's surgeries in Spondon to cover the existing 12,000 population. It is currently a challenge to secure a same-day appointment at either surgery, with telephone queues at one surgery regularly exceeding 30 people in the queue trying to book/speak to a doctor. The proposed development would only make this situation worse, with a consequent impact on existing Spondon residents.

This is also likely to be the case with local dentists, with very few NHS places available.

c. Transport - specifically vehicle access and the increased vehicle journeys that would be likely to arise from this development. Access to the site can only be gained from the A6096 on a section that is subject to the national speed limit of 60mph. Since it is highly probable that most residents would work in or around the city of Derby, the increased traffic volumes are most likely to be seen travelling through the middle of Spondon village on the A6096. There is also the question of residents turning right across speeding traffic at peak times.

There are limited exits for Spondon residents heading towards Derby, and most choose to travel on the A6096 down Willowcroft Road passing through the traffic-controlled junction of Willowcroft Road/Nottingham Road.

The volume of traffic at peak times causes queuing traffic beyond the village centre on the A6096, which also restricts traffic movement in the opposite direction heading out of Spondon on the A6096 towards Ilkeston from the A52 junction, due to congestion at the mini traffic island at the junction of Sitwell Street/Willowcroft Road. Despite many years of discussion, there is no answer that can ease this congestion. It is likely that the increased traffic flows to/from this development will only make matters worse, with increased queuing traffic adding further to commuting time for Spondon residents.

Furthermore, this increase in queuing traffic is likely to result in an increase in traffic pollution along the A6096 traffic corridor through Spondon, with slow moving traffic contributing significantly to a deterioration in air quality.

As an alternative, residents of this development could turn left and travel through Ockbrook village to access the A52 to travel to Derby. I am sure that Ockbrook residents would not welcome such an increase in traffic volumes through their narrow access roads. In addition, the access road on to the A52 at Borrowash also is subject to peak-time queues, with only a small slip road onto the A52 and traffic travelling at high speed. Increased traffic volumes here may lead to an increase in accidents where drivers try to gain access to the A52 and misjudge the speed of traffic heading towards Derby with potentially severe consequences.

Most of the consequences of increased traffic volume is likely, therefore, to fall on the City of Derby, in terms of increased cost of highway maintenance, without it receiving any Council Tax from the development. In addition, the problem of increased traffic congestion is passed to the City of Derby where there is no current practical solution to mitigate it.

Whilst the Sustainability Assessment appears to acknowledge the above factors, it is not clear that they have been adequately included within the assessment scores, which appear to suggest favourable scores when those scores should be unfavourable (e.g., Will it improve access to health services? Will it use and enhance existing transport infrastructure? Will it increase levels of air, noise, and other types of pollution?).

- 4. How does this proposed development comply with our local council's public responsibility to maintain green belt land? Does Erewash have a Green Belt policy? And if so, does building on this land comply with that policy? The report seems to suggest that the inclusion of this land is because of objections to other proposed sites. However, the Minister of State for Housing has stated that green belt land should only be used in exceptional circumstances. The reason given in the Core Strategy Review report for its inclusion does not suggest exceptional circumstances.
- 5. It seems strange that there is still land at the old Stanton Ironworks that has not yet been developed to its full potential. Surely it would make sense to build there. Is it because it is easier to build on a green field than a brown field site? Surely, it is Erewash Council's public responsibility to encourage development on brown field sites in preference to green belt land. And if that means providing funding to 'clean the site of contaminants', then it is their responsibility to fund such work? I cannot find any justification in the report that explains why this piece of land needs to be developed for housing in preference to any other piece of land in Erewash so why this piece of land?
- 6. A failure to properly and adequately meet the requirements to cooperate with the neighbouring authority when putting forward plans to develop land on an adjacent boundary. According to our local councillors, Derby City

Council's planners sought clarification over the inclusion of this piece of land in the Erewash Core Strategy Review but were told to simply 'read it in the report when it is published'.

Furthermore, since we live in Derby City Council, we were denied the ability to speak or ask questions at the Full Council meeting where the Core Strategy Review was discussed. This appears to be a denial of our democratic right to speak up and ensure our voice is heard when debating and discussing potential development on our doorstep. Remember, this piece of land does not have any Erewash residents adjacent to it who could object, only the landowner, and was only included because of the level of objections raised by Erewash residents to an area of land near their properties.

Yours faithfully

Andrew G Cooper



From:	Diane Can
Sent time:	24/04/2022 16:27:39
To:	Planning Policy
Subject:	Reference SGA 26 Site. Land North of Spondon Derby.

I strongly want to object to Erewash Borough Councils (EBC) plan to include land north of Spondon into their Core Strategy Review Document. Have EBC undertaken a full and proper Green Belt review to establish if there are more appropriate sites other than SGA 26, site that may be nearer to EBC rather than on the boarder with Derby? As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into adjoining districts and it is the Governments Duty to corporate that governs the decisions between neighbouring authorities to ensure there is joined up thinking to delivering new housing with the right facilities in place. There was no discussion with neighbouring council, Derby City Council (DCC) the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the duty to cooperate with their neighbours and not to just dump some housing on their boarders to meet their own needs. Green Belt land should only be changed through plan making, through a considered and evidence process which includes talking to your neighbours under the duty to cooperate. EBC charged ahead with the very last minute bolt on addition of Site SGA 26 when the site at Sawley was rejected. This was without due consideration for residents outside EBC boundaries. In the report to council on 3rd March 2022, over 700 objections from non EBC residents were dismissed. The first Spondon residents knew of the inclusion into the Core Strategy was just a week prior to it going to full council in March 2021. Spondon residents were therefore not given any time to be able to object to its inclusion. The totally dismissive attitude of the EBC leader was stated in correspondence to Spodon Councillors We are members of the Greater Nottingham planning area so we tend to have more discussions with them as we will not be signing up to the Derbyshire Plannibg Framework. I understand you are not happy with the Spondon site but it is within our Erewash boundary This concours that EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the west, despite dumping on them. The SGA 26 site has been promoted by EBC without any appraisal of all urban areas in Erewash. How can this land being deleted from the Green Belt have the least harm on the Green Belt, how can this site be inevitable thats its location is inherently more sustainable than other sites? The Minister of State for Housing has stated that green belt land should only be used in exceptional circumstances. What exceptional circumstances are there to make SGA 26 acceptable, when it wont even meet the needs of Erewash residents?

The SGA 26 site is on the extreme edge of EBC and the land directly abuts Derby City Council (DCC) land. DCC will have to provide the infrastructure maintenance of roads, schools, shops, doctors surgeries, dentists, etc. but DCC would not get any of the council tax revenue to pay for these services. SGA26 will have a detrimental impact on Spondon. EBC will collect the council tax from any properties built on this site but it will be Spondon and Derby as a whole who will have to provide additional school places, GP and dental services and the upkeep of roads that will be affected by the increased volume in traffic.

West Park Academy, the local secondary school, is already over subscribed and has already had to expand to meet the needs of Spondon residents. This school would be an obvious choice of school for the residents of the SGA 26 site.

There is a threat to the wildlife that are currently on the Green Belt land at SGA 26, boarding the site is a ancient woodland. According to DEFRA an ancient woodland as such is sited as national planning policy as important. Any development can also have a massive impact on ancient woodland and the species its supports.

I appeal for you to challenge EBC, to check what assessments have been done on the ancient woodland and the species that live there. The site is also know to flood, even though it is on Flood Zone 1. In 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains couple not cope. The addition of houses on the SGA 26 site would add to flooding problems in the future. What assessments regarding this flooding problem have EBC carried out?

Finally, I appeal for SGA 26 to be removed from EBCs Core Strategy Document for the reasons shown above.

Kind regards

Diane Carr

From:tracy jacksonSent time:24/04/2022 21:33:09To:Planning PolicySubject:Fw: Objection to development of Land at the rear of Huntley Avenue SGA 26

# From: tracy jackson

Sent: 24 April 2022 20:30

To:

Subject: Objection to development of Land at the rear of Huntley Avenue SGA 26

### 24-04-2022

To whom it may concern,

I am sending this email to express my objection to and deep dismay with regard to Erewash Borough Councils decision to declassify the green belt land at the rear of Huntley Avenue and to build a substantial housing estate on a piece of tranquil and much-loved greenbelt land.

The minister of state for housing himself stated that green belt should only be used in exceptional circumstances. In making their decision EBC have completely ignored any consideration of the damage this development will do to the infrastructure of the surrounding area, mainly Spondon, Ockbrook and Borrowash and the extremely negative impact it will have on the quality of life of the inhabitants of those areas, especially the residents of Spondon. We are already living with oversubscribed schools, congested roads and overstretched local services.

Have the EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centres? If there are other sites that would best suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents these sites should have been prioritised before de – classifying green belt land that abuts DCC.

Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. Surely if houses are to be built there then the housing numbers should be allocated to DCC numbers rather than EBC therefore negating the argument that EBC need this land to meet their housing quotas! DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this.

The inclusion of the land at SGA 26 in any of this process has been ridiculous and deeply unfair. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of the affected areas were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to residents who will be affected by this development.

As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighboring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbours and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbours under the Duty to Cooperate.

The EBC has treated the inhabitants of Spondon, Borrawash and Ockbrook with a total disregard, EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given the courtesy of an answer on the night.

It was also horrific to hear of the totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite dumping on them.

Spondon SGA26 has been promoted by EBC without any appraisal of all urban areas in Erewash. How can it be 'inevitable' that

this location is inherently more sustainable than others? Or that it's deletion from the Green Belt would have the least harm on the function of that Green Belt? Suburban sprawl cannot be sustainable.

The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents?

Development of SGA 26 will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic.

There are only a few routes out of Spondon and the main one is down through the village, down Williocroft Road and along Nottingham Road to the A52. This area already has a high level of air pollution and adding a 240 house residential development to the area will increase the air pollution and affect the health and wellbeing of Spondon residents. Getting out of Spondon regularly means sitting in a traffic jam, new housing will only add to the problem with a detrimental effect on the mental health and well being of Spondon residents.

The local Secondary School, West Park Academy is over subscribed and has had to expand already to meet the needs of Derby residents. This would be the obvious school of choice for any residents of SGA 26. Again no consultation has taken place with the Academy or with the School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning – this is Derbyshire County Council's role. Have they even been consulted?

SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice some of which are protected. What ecological impact surveys if any were completed before bolting on SGA 26 to this consultation?

Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. A housing development will have an indirect impact on ancient woodland and the species they support. These can include:

1 breaking up or destroying connections between woodlands and ancient or veteran trees

2 reducing the amount of semi-natural habitats next to ancient woodland

3 increasing the amount of pollution, including dust

4 increasing disturbance to wildlife from additional traffic and visitors

5 increasing light or air pollution

6 increasing damaging activities like fly-tipping and the impact of domestic pets

7 changing the landscape character of the area

All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there? Who will decide what is an appropriate adequate buffer zone ?

Just what assessments have been done on this Ancient woodland that would show that none of the impacts above would happen if a development were to go ahead?

This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. During the last period of heavy rain (nothing outstanding) there were pools of standing water in many of the gardens backing on to SGA26 and there were great pools of standing water on the land itself. What assessment of this site has been done to prove that this could not prove a significant problem.

Nobody is denying that housing stock needs to be increased but,

Greenbelt land should truly be a last resort when all other brownfield sites have been exhausted.

Erewash should be looking at building on brownfield sites and utilizing the many empty houses which exist in its location Tracy C Jackson



From:PlanningSent time:25/04/2022 07:51:41To:Planning PolicySubject:FW: SGA 26 Land South of Spondon Wood.

#### From

### Sent: 22 April 2022 16:50

To:

Subject: SGA 26 Land South of Spondon Wood.

I am writing to express my strong objection to the development of the land adjacent to Spondon Wood.

I consider that the impact that this development will have on your housing need is far outweighed by the negative impact that it will have on the local area.

The area is green belt which means that any development of this site will have a significant effect on the environment in an era when we hear so much about saving the planet. Any plant life or wildlife is bound to suffer if not be wiped out altogether.

The roads around Spondon are already extremely busy with domestic traffic travelling jn and out of the city of Derby. There is also a large flow of commercial vans and lorries using the village as an access from the M1 to the storage facility at Stanley. This development will just add to the problem which already exists

As far as I can see there is no part of the planned development to provide schools,

shops, doctors, dentists or any of the other amenities which would be required as the existing ones in the village are already over subscribed.

In my opinion this development should not go ahead.

John Pickering

From:	Planning
Sent time:	25/04/2022 07:57:26
To:	Planning Policy
Subject:	FW: Land off Morely road chaddesden/oakwood

#### From:

Sent: 24 April 2022 18:16

To:

Subject: Land off Morely road chaddesden/oakwood

I am writing to protest against the proposal to buil 600 house on this land on the following grounds

1)The infrastructure will not support further development as the nschools and Doctors in the area are already oversubscribed 2) the increase in traffic volume is unsustainable on the local roads and there is no prospect of upgrading them

3) the nusery adjacent to the development would suffer from increased pollution and put very young childrens health at risk

4) a long established public right of way passes through the fields and this social amenity would be disrupted

Please save the open green space amenity for the benefit of future generation and reject the profiteering pof developers of un needed housing

P J Blavins

From: Kevin Carr
Sent: 24 April 2022 17:39
To:

Subject: Reference SGA 26 Site. Land North of Spondon Derby.

### **Reference SGA 26 Site. Land North of Spondon**

-257 ?I wish to object to Erewash Borough Councils (EBC) plan to include land north of Spondon into their Core Strategy Review Document.

I question if EBC have undertaken a full and proper Green Belt review to establish if there are more appropriate sites other than SGA 26, site that may be nearer to EBC rather than on the boarder with Derby? As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into adjoining districts and it is the Government's Duty to corporate that governs the decisions between neighbouring authorities to ensure there is joined up thinking to delivering new housing with the right facilities in place. There was no discussion or joined up thinking with neighbouring council, Derby City Council (DCC) behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the duty to cooperate with their neighbours and not to just dump some housing on their borders to meet their own needs. Green Belt land should only be changed through plan making, through a considered and evidence process which includes talking to your neighbours under the duty to cooperate . EBC charged ahead with the very last minute bolt on addition of Site SGA 26 when the site at Sawley was rejected. This was without due consideration for residents outside EBC boundaries. In the report to council on 3rd March 2022, over 700 objections from non EBC residents were dismissed. The first Spondon residents knew of the inclusion into the Core Strategy was just a week prior to it going to full council in March 2021. Spondon residents were therefore not given any time to be able to object to its inclusion. The totally dismissive attitude of the EBC leader was stated in correspondence to Spodon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework. I understand you are not happy with the Spondon site but it is within our Erewash boundary' This concours that EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the west, despite dumping this housing on them. The SGA 26 site has been promoted by EBC without any appraisal of all urban areas in Erewash. How can this land being deleted from the Green Belt have the least harm on the Green Belt, how can this site be inevitable that's it's location is inherently more sustainable than other sites? The Minister of State for Housing has stated that green belt land should only be used in exceptional circumstances. What exceptional circumstances are there to make SGA 26 acceptable, when it won't even meet the needs of Erewash residents? It will have far more effect on the residents in Spondon, Derby.

The SGA 26 site is on the extreme edge of EBC and the land directly abuts Derby City Council (DCC) land. DCC will have to provide the infrastructure maintenance of roads, schools, shops, doctors surgeries, dentists, etc. but DCC would not get any of the council tax revenue to pay for these services. SGA26 will have a detrimental impact on Spondon. EBC will collect the council tax from any properties built on this site but it will be Spondon and Derby as a whole who will have to provide additional school places, GP and dental services etc. and the upkeep of roads that will be affected by the increased volume in traffic.

West Park Academy, the local secondary school, is already over subscribed and has already had to expand to meet the needs of Spondon residents. This school would be an obvious choice of school for the residents of the SGA 26 site.

There is also a threat to the wildlife that are currently on the Green Belt land at SGA 26, boarding the site is a ancient woodland. According to DEFRA an ancient woodland as such is sited as national planning policy as important. Any development can also have a massive impact on ancient woodland and the species it's supports.

I urge you to challenge EBC, to check what assessments have been done on the ancient woodland and the species that live there. The site is also know to flood, even though it is on Flood Zone 1. In 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains couple not cope. The addition of houses on the SGA 26 site would add to flooding problems in the future. What assessments regarding this flooding problem have EBC carried out?

Finally, I appeal to you to reject SGA 26 from EBC's Core Strategy Document for the reasons shown above.

Kind regards Kevin Carr

From:	Gene Wilson
Sent time:	25/04/2022 14:16:19
To:	Planning Policy
Subject:	Re: Erewash Core Strategy Review - Consultation on Publication version
Attachments:	Erewash draft Core Strategy Review Mar 2020.docx

### Hi

Please find attached our representation in respect of the Publication version of the draft Core Strategy.

I shall be grateful if you would confirm that the representation has been received. We should wish to continue to be kept informed of the progress of the Strategy.

Best regards Gene

On 10 Mar 2022, at 17:03, wrote:

Dear Sir/Madam,

### **RE: EREWASH LOCAL PLAN REVIEW**

We are contacting you as you have previously stated that you wish to be kept informed of Erewash Borough Council's progress in reviewing its Core Strategy local plan document.

At the Full Council meeting held on Thursday 3<sup>rd</sup> March, Erewash councillors approved an eight-week consultation on the draft Core Strategy Review (Publication version). Taking into account previous consultation responses from 2020 and 2021, this document now contains several draft policies covering the following matters:

- Housing strategy and allocation sites;
- Employment;
- Town, Local & Village centres;
- Transport; and
- Green Infrastructure

This consultation is open from **Monday 14<sup>th</sup> March to Monday 9<sup>th</sup> May 2022**. All duly-made responses to the consultation will be forwarded on to the independent Planning Inspector as part of the Council's submission of its Plan to the Secretary of State. More information about the consultation, including key documents and an online representation form, will be available from **Monday 14<sup>th</sup> March 2022** on the Council's website at the following location:

www.erewash.gov.uk/local-plan-section/core-strategy-review.html

Due to data protection, we kindly ask that if you wish to stay updated on the progress of the Local Plan review you respond to this email notifying the Council of your preference. Should you submit a representation as part of this consultation then your details would automatically be retained by the Borough Council until such time that the Core Strategy Review be adopted.

Yours faithfully <image002.png>





The opinions expressed in this e-mail are those of the author and do not necessarily represent the opinions of Erewash Borough Council.

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Erewash Borough Council, Ilkeston Town Hall, Wharncliffe Road, Ilkeston, Derbyshire. DE7 5RP. www.erewash.gov.uk

# Erewash draft Core Strategy Review (Publication Version) March 2022

We are residents of Draycott and Directors of Elephant Rooms Health and Wellbeing Centre a Community Interest Company located in the heart of the village. We have read the draft Core Strategy and have a few comments to make on the Green Infrastructure Policy.

The policy seems heavily weighted towards large Strategic Green Infrastructure Corridors which form swathes across the borough. We would like to see encouragement of smaller scale corridors and infrastructure created at a parish level, which would help link the strategic corridors with local and parish level green spaces and other green infrastructure features. If you believe that this is already addressed through open and green space policies perhaps that could be explained more strongly.

We observe that the eastern extent of the Trent Strategic Infrastructure Corridor ends at the southern edge of Wilne Lane. We would suggest that the strategic corridor could justifiably extend to the outskirts of Draycott Village following the Derwent River on the southern boundary and Midshires Way on the northern boundary. This would bring in St Chad's Water, Angling lakes and a tract of land to the north of the chemical works and around St Chad's Lake that is being extensively rewilded by the land owners. In addition, the village has petitioned Derbyshire Highways Authority to turn Wilne Lane into a Quiet Lane between the village and the chemical works south of Church Wilne in recognition of the extensive use by pedestrians, horse riders and cyclists. Together with the designated and informal footpaths, and bridleways in the area, nature conservation development and recreational use this area clearly meets the Green Infrastructure Corridor objectives and could be a logical part of the proposed Trent Strategic Infrastructure Corridor.

We trust that these comments are of assistance to the Council. Please do not hesitate to contact us should you have any queries or wish to discuss any points.

Yours faithfully

Gene Wilson and Helen Patilla



From:	Planning
Sent time:	26/04/2022 13:20:26
To:	Planning Policy
Subject:	FW: Online Planning Enquiry - Make A Representation

### Good afternoon,

Please find core strategy consultation response below.

Kind regards,

From: Sent: 25 April 2022 20:17		On Behalf Of Sue Ranger

<b>Sent.</b> 25 April 2022 20.17	
То:	
Subject: Online Planning Enquiry - Make A	Representation

New online Planning Enquiry/Make a Representation form submission.

The following information has been submitted online via

# <u>Details:</u>

# **Form Type: Make A Representation**

Name:	Sue Ranger
Email Address:	
Customer Address:	
Phone Number:	
Site Address:	
Customer Correspondence	
<b>** Enquiry Details:</b>	

\*\* File Upload:

\*\* Application Ref / ERE:

**\*\* Case Officer:** 

**\*\*** Customer Views:

\*\*Comments

Objection

Loss of green spaces and the consequences. Other areas of land are available within Erewash Borough Council Boundaries such as outskirts of Sandiacre,Long Eaton, West Hallam and others



From:	Teresa Lee
Sent time:	27/04/2022 11:09:47
To:	Planning Policy
Subject:	EBC Core Strategy Review (Regulation 19) - Spondon Wood -SGA 26

Further to my original objections dated 27th April 2021 I now formally place my objections to the above Core Strategy.

Firstly, after watching the EBC meeting the on 3rd of March 2022 I was of the impression that the views of Spondon residents were not taken into consideration by the EBC Conservative Councillors. It seemed they do not regarded our concerns as important and we were not allowed a representation at the meeting. However, a kind Erewash resident offered to put forward a question on behalf of DCC but this was the only question which could not be answered on the night even though it was on the agenda. The next point which led me to believe that our views are of little importance is the fact that the fact that denied having seen the letter from our legal representation, how can that be?

I reiterate my objections as follows:

The residents of Spondon were only made aware of this inclusion to the Proposed Strategy a week before the full council meeting in March 2021 leaving no time to object to its inclusion. This was because the proposal was slipped in at the last minute to replace another site without consultation with neighbouring DCC.

This site is on green belt land, therefore has EBC done a proper Green Belt Review to establish if there are more appropriate sites that would better suit the needs of EBC residents? As the site is bolted on to DDC (Spondon) the residents of SGA 26 would be reliant on the services within Spondon eg. Schools, Doctors, Dentists not to mention road maintenance which will increase with the extra traffic coming through the village. There are no villages or towns within EBC that are close enough to this site to serve its residents. DCC would not receive the Council Tax and ECB would reap all of the rewards.

The Minister of State for Housing has stated that green belt should only be used in EXCEPTIONAL circumstances. What 'exceptional circumstances have you identified when it doesnt even meet the needs of EBC residents?

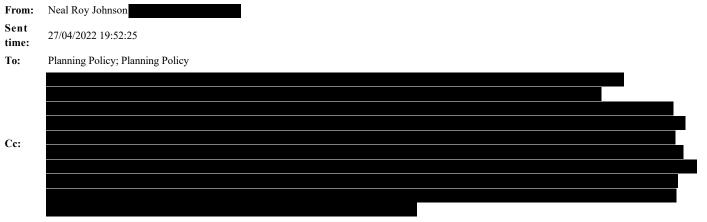
As a resident of Spondon I know the impact this site will have on our village which in parts already suffer from high rates of pollution and traffic congestion at many times of the day not just at rush hour. Again this is unfair as it will be of no consequence to EBC.

According to DEFRA Spondon Wood is ancient woodland and as such is sited in national planning as important. This development will have indirect impact on the woodland and the species within it, eg. deer, lapwing birds, dormice, bats and many more. What ecological impact surveys were completed and what guarantees have been put in place to ensure an adequate buffer zone will protect this important area? How will you stop the residents from fly tipping, dog walking and children playing the wood, something that isnt done at present as there is adequate distance between the housing and the wood.

EBC has a duty to co-operate with its neighbours, something they have not done up to now, so hopefully these next objections will be taken more seriously especially as SGA26 will have the biggest impact of the residents of Spondon.

Teresa Lee

I



Subject: Erewash Draft Core Strategy Consultation Period - 14th March to 9th May 2022.

Please find attached my correspondence in connection with the Draft Core Strategy Consultation.

If you could acknowledge receipt of this e mail and the documents within it I would be most grateful.

Kind Regards

Neal Johnson

Planning Policy

SEP

Long Eaton Town Hall Derby Road Long Eaton NG10 1HU

SEP

SEP

 $27^{th}$  April 2022

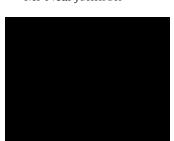
### Reference: Strategic Growth Area Assessment - SGA:26 South of Spondon Wood

### Dear Sir/Madam,

Further to my previous correspondence dated 26th April 2021 (copy attached) which outlined my objections to the above development. I am writing to you again as part of the next consultation process on the Draft Core Strategy Review. Consultation open from 14th March to 9th May 2022.

The following is further to my original objection in April 2021 :-

- With regard to the Statement of Consultation for the Growth Options Consultation Document (Regulation 18, Part 2). Appendix II of that document supposedly gives a full summary of issues raised and the council's responses. Whilst I'm pleased that some, but not all, of the concerns raised in my initial objection letter have been included the response to those concerns, I have to say, are somewhat lacking in detail. Some very important points as far as I can see haven't been addressed at all such as the pollution issue in Spondon, evidence as to how this development will benefit the residents of Erewash, the repurposing of existing buildings etc., These are some of the of the important points that need to be given due consideration!
- As stated in my previous letter of objection this Derby bolt on development will have a massive impact on the residents of Spondon and Derby City as a whole. Whilst the council tax and new homes bonus generated from this development will all be paid to Erewash Borough Council (EBC) the burden of providing the infrastructure and services in Spondon/Derby such as school places, GP services, dentists, and road maintenance etc., could potentially fall on Derby City Council taxpayers. It would appear on the face of it that Derby City Council will not be getting enough tax revenue from Erewash Borough Council to cover all these added pressures. Any infrastructure costs in Spondon/Derby associated with this development should not fall on the shoulders of council taxpayers in Derby City. Will EBC meet the 'full cost' of any infrastructure changes in the Spondon/Derby City area?



Mr Neal Johnson

- With this development being on the extreme edge of Erewash the positioning of it will only add to the housing numbers in Derby. These homes will be bought by Derby people and in no way will they meet the needs of Erewash residents.
- The residents of Spondon only became aware of SGA:26 inclusion in the core strategy a week or so before it went to full council in March 2021. Spondon residents were not given sufficient time to respond or object to its inclusion and it looks as though EBC tried to sneak this through without full and proper consultation. Residents of Spondon deserve to have a say because they are the ones who will be directly affected by this development. I understand Derby City Council Planning were only informed that a site 'North of Spondon' had been identified for development a week before it went public and no other details as to its location were disclosed.
- From the outset those directly effected by SGA:26, including elected representatives in the Spondon area, have been shut out and not allowed to ask questions at council meetings due to the EBC Constitution. This is very convenient as it saves Erewash councillors having to answer awkward questions. I am proud to live in a democratic society where everyone has a voice and on an important issue such as this **everyone** should have an equal voice. The process so far in my eyes has been far from democratic with no sense of fair play. Why should I and many others be shut out of the conversation simply because we live on the very edge of your boundary? Just because we don't fall within your boundary we are clearly not important to you and in the eyes of EBC we are **invisible!** Your conduct towards the residents of Spondon has been disrespectful and discourteous and the only voice we have had is through the written word. On the subject of written word how much notice has actually been taken of the written objections?
- Erewash is a large area geographically and without supporting evidence I refuse to believe that there is no option other than to build on 'green belt' land. According to councillors all brownfield sites have been taken into account. What does taken into account actually mean? How much detailed work has gone into this assessment and has the brownfield option been fully exhausted? If it has then where is the evidence to back this up?
- In a report to EBC on 3<sup>rd</sup> March 2022 over 700 objections from non-Erewash residents were to all intents and purposes disregarded. Having watched the meeting remotely it came over to me that certain councillors were just not listening. Any objections raised on the night were just futile because those councillors had already made their minds up they were going to wave these proposals through. At this meeting around five representatives from Spondon were allowed to sit and observe silently in the gallery. When those people uttered a few quiet words in response to what they were hearing the chair threatened to kick them out. Also, at said meeting a member of the public was allowed to ask a question of the council in accordance with its constitution. The question was specifically about SGA:26. This member of the public wasn't even given the courtesy of a proper reply even though the question was clearly on the agenda. In response to the question Councillor Powell stood up and admitted that he wasn't prepared for the question and he would do his best to ad-lib the answer, which he did. Not being prepared and ad -libbing an answer on the hoof on an important issue such as this is totally unacceptable. Is this incompetence at local council level or does it feed into the notion that Erewash Borough Council are not really interested

in hearing concerns or points of view regarding SGA:26? Councillor Powell did reply by way of letter at a later date but this question should have been properly answered on the night.

• Erewash Conservative Association is part of The Conservative and Unionist Party commonly known as The Conservative Party and I would just like to take this opportunity to remind you of a promise made in The Conservative Party manifesto of 2019. This is what appears on page 31 of that document:-

The Green Belt. We will protect and enhance the Green Belt. We will improve poor quality land, increase biodiversity and make our beautiful countryside more accessible for local community use. In order to safeguard our green spaces, we will continue to prioritise brownfield development, particularly for the regeneration of our cities and towns.

Further to this during Prime Ministers questions on Wednesday 19<sup>th</sup> May 2021 Ed Davey MP (Leader of The Liberal Democrats) asked Boris Johnson a question relating to planning reforms. This was the Prime Ministers reply: -

"We want to protect the green belt. We want to protect our wonderful open spaces. This is a Government that understands the value of the countryside and rural Britain. We also think that young people have been deprived for too long of the ability to get onto the housing ladder and it's not just in the south east, it's across the country and that's why we're bringing forward sensible reforms to allow brownfield sites to go ahead "

Another interview on the Andrew Marr show on Sunday  $20^{th}$  June 2021 Nick Robinson asked Robert Buckland MP about a statement made by Theresa May in The Commons when she said :-

### "There is a potential for building the wrong houses in the wrong places"

Robert Buckland's response to Theresa Mays statement was: -

### "We are listening to voters, at no time has the government proposed building on the green belt or areas of natural outstanding beauty "

So, the Conservative Party stance is clear when it comes to policy on 'Green Belt'. What EBC are doing goes against manifesto promises and flies in the face of statements made by those in high office. Reneging on promises ultimately leads to a public lack of confidence and a mistrust in people who hold public office. If promises are made the voting public expect you to make good on those promises. **Preserve our precious 'Green Belt'**!

• Whilst I accept EBC have a very difficult job in trying to meet government housing targets, if the council think these targets are unreasonable and unachievable then why not challenge the government on it through the appropriate channels? At the EBC meeting of 3<sup>rd</sup> March 2022 I believe councillor Hart raised this very subject of numbers and the possibility challenging it.

Together with my original objection dated 26<sup>th</sup> April 2021 would you kindly forward this correspondence on to the next stage of the process which involves The Independent Planning Inspector. And please also include my details on your correspondence database so I can be kept up to date.

I would be most grateful if you could acknowledge receipt of this letter and please feel free to respond to any of the points I have raised.

Thanking you in anticipation.

Jobbarn.

N R Johnson

Mr Neal Johnson

Planning Policy Long Eaton Town Hall Derby Road Long Eaton NG10 1HU



26th April 2021

### Reference: Strategic Growth Area Assessment - SGA:26 South of Spondon Wood

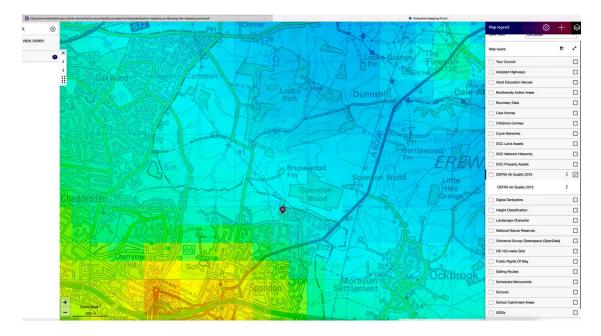
Dear Sir/Madam,

Further to my previous e mail sent to you on 23<sup>rd</sup> March 2021 outlining my initial objections to the above development. I am writing to you again as part of the consultation process to formally register my **objection** to the building of more than 200 homes on **'green belt'** land close to the rear of my property. I have good local knowledge of this area and I speak from experience having lived at the above address for the past 28 years.

My concerns and objections are outlined below: -

- The land to the rear of our house is possibly going to be re designated as being 'not green belt'. We should not be encroaching into open countryside 'Green Belt' land. It is there for a very good reason and should be preserved wherever possible. Have Erewash Borough Council done a green belt review prior to putting these proposals forward?
- o The minister of state for housing has stated that green belt land should only be used in exceptional circumstances. To claim that there were objections to sites elsewhere in Erewash simply isn't a good enough reason to choose green belt. Having listened to the Erewash Borough Council extraordinary meeting on Thursday 25<sup>th</sup> March 2021 it was clear that the council have met stiff local resistance with regard to development in and around the Ilkeston area and because of this they appear to have focused their attention away from that area and picked on a softer target in Spondon. By bolting this (SGA:26) development onto Derby City and the residents of Spondon the council knew there would be little or no objection from people living in the Erewash Borough Council.
- It would appear that there has been an incomplete consultation process with statutory consultees.
- So far there has been insufficient opportunity for public representation at meetings.
- It would appear that Erewash Borough Council has failed to comply with their 'duty to cooperate' with all relevant local authorities. ie: Derby City Council whose area this development bolts onto and they should have consulted with the residents of Spondon who will be directly affected.
- Can Erewash Borough Council provide evidence to prove that, above all other sites, this proposal best meets the needs of and is vital to the residents of Erewash?

- Can Erewash Borough Council prove there are no brown field site alternatives?
- This development wouldn't seem to benefit the residents of Erewash at all. Would other areas closer to Erewash residents be more appropriate or beneficial?
- Housing developments should not severely impact on a neighbouring authority. Have Erewash Borough Council considered this and given it careful thought?
- This bolt on development will have a massive impact on the residents of Spondon and Derby City as a whole. Whilst the council tax and new homes bonus generated from this development will all be paid to Erewash Borough Council the burden of providing services such as schooling, GP services, dentists and road maintenance etc., will fall on Derby City council taxpayers. This can never be right! It is simply unjust and unfair!
- School places in Spondon are very limited and West Park School is already over capacity. Has this situation been given due consideration?
- There will be a detrimental impact on the volume of traffic travelling through the centre of Spondon, along Willowcroft Road and Nottingham Road. This is the only proper route in and out of Spondon and often there is a build up of traffic through the centre at busy times. This new development will only exacerbate the problem resulting in even more air pollution. People who decide to avoid the congestion through the centre of Spondon will circumnavigate it by driving through Ockbrook into Derby which will have the same detrimental effect on those residents in Ockbrook.
- The below screenshot published by DEFRA in 2015 shows that Spondon suffers from quite a high level of air pollution. Air pollution in this country is a hot topic and it is widely recognised that air pollution is associated with a number of adverse health conditions. It mostly effects the vulnerable in society such as the elderly and school children. This map quite clearly shows that schools in and around Spondon are already badly affected by air pollution and this proposed development will only add to the problem at a time when Derby City Council has committed to reducing air pollution levels. I refer you to the **Derby City Council Air Quality Action Plan published in October 2020.**



- I believe there are up to 2000 properties in the Erewash area which are either unused or could be brought back into use. Utilising such properties could possibly go some way into addressing the housing problem in Erewash. It could meet the need for housing over the next 5 years and beyond thereby preserving green belt land. Has this been looked into and explored fully?
- I only have a small back garden and any new development will only be 8 meters away from the conservatory at rear of my house. I am concerned that potentially building to within 8 meters of my conservatory will result in a real loss of privacy and we will be closely overlooked.
- o This development would appear to be boxed in on three sides with only one point of access and egress which is onto the A6096. This is fast road with a 60mph speed limit and with the volume of traffic, cyclists and pedestrians, entering and leaving this large development via this one point it is not acceptable in terms of road safety. I know from experience that vehicles, including motorbikes, driving out of Spondon in the direction of Ilkeston accelerate hard when leaving the 30 mph limit out of Spondon so the access and egress point could potentially be an accident waiting to happen. Again, from experience down the years I know that fatalities have occurred along the A6096 and we don't want to increase that potential. There doesn't appear to be any other route in or out for vehicles, cyclists or pedestrians?
- With the proposed area being 'green belt' land it is environmentally rich with wildlife which is 0 unique to this particular area and this has taken many years to establish itself. In it there is an established large herd of fallow deer who are drawn to the field on a daily basis throughout the whole year. In autumn the rutting season takes place in the field as well as in Spondon Wood itself. Also, numerous Buzzards are believed to nest in the wood and they regularly feed on the ground in the field in the proposed development area. Various birds of prey such as sparrowhawks and owls frequent the area along with numerous other garden birds, some of which are not regularly seen elsewhere. Bats have regularly been seen and they have been known to roost in the area. It is worth noting that almost all european bat species utilise woodland such as Spondon Wood at some stage in their life cycle. Only very recently, and on several occasions, **Lapwing** have been seen in the field. (photographic and video evidence is available) Farmland such as this proposed site is the Lapwings favoured habitat for ground nesting and I would like to bring to your attention the fact that this farmland bird has suffered significant declines in recent years and their conservation status is RED! They are protected under The Wildlife and Countryside Act 1981 and as such we ALL have a duty to protect both them and their habitats. Developing this 'green belt' farmland will remove Lapwing habitat and drive the birds out and this sort of human activity will be partly responsible for the further decline of this wonderful species. Should this housing development eventually get the go ahead I have serious concerns about the impact it will have on the local wildlife I have described and particularly the impact on endangered species. Once they have been driven out they will never return! Wildlife unfortunately doesn't have a say in these matters so it is up to those that care about them to stand up and give them a voice. I have written a letter (with photographic evidence) to the RSPB informing them about the recent Lapwing sightings and the possible removal of their habitat.

## Spondon Wood is designated as Ancient and Semi-Natural Woodland and also Ancient Replanted Woodland.

It is recognised in the national planning policy as important. Ancient woodland such as Spondon Wood covers only 3% of England's land mass and it is our richest wildlife habitat having developed over centuries. It should be highly valued and it is a natural equivalent to our great churches and castles. They are reservoirs of biodiversity and because the resource is limited they and their associated wildlife are particularly vulnerable to development induced changes. Natural England have stated that ancient woodland, the product of centuries of habitat continuity and undisturbed soils is an irreplaceable resource and once lost it cannot be replaced. This proposed development needs of this country can be delivered without having to impact on ancient woodland

According to The Woodland Trust these are just some of the potential impacts of nearby housing development on ancient woodland and they need to be taken into account :-

## Edge Effects:-

- Chemical Effect. Such as chemical deposition from vehicles. Vehicle use so close to the wood is a potential source of air pollution that can negatively impact on this ancient woodland. Also, chemical run off. e.g road salts.
- **Disturbance.** Which includes noise generated by construction, traffic noise, noise from domestic dwellings, trespassing etc., This will all have an impact on the wildlife which is present both in and around the ancient wood. Dust and light pollution. Light pollution from nearby street lighting could have an effect on the timing of breeding and individual mating behaviours.
- **Trampling.** By people who live on the edge of the ancient woodland. This would result in the damage and loss of vegetation within the ancient woodland. From experience and having knowledge of the area I can say that any new residents living close to the ancient wood will naturally be drawn into it and as such they will be trespassing onto private land. The ancient wood would soon become a children's adventure playground, a dog walking route and an area for possible waste disposal/fly tipping. The internal layout of the wood lends itself to this as there are open areas which allow foot and vehicular access for Locko Park estate workers. At certain times of the year the floor of the wood is carpeted with bluebells and these have taken many many years to establish themselves. With the real possibility that over time the wood will become a children's play area, a dog walking route and possible waste disposal/fly tipping area this activity will only serve to desecrate this ancient woodland which is irreplaceable. Even with some type of boundary, encroachment activities will still impact on the ancient woodland edges and its interior. Having spent the last 28 years overlooking the wood, even with the green belt field as it is today forming a large buffer zone between the houses and the wood, I have witnessed numerous members of the public, including children, trespassing in and around Spondon Wood. Children have made dens and some irresponsible individuals have even started campfires in the middle of the wood itself.

I have always had a good relationship and contact with a member of staff who looks after the Locko Park estate and any suspicious activity that needs to be reported I have always rung it through. This relationship has worked well for many years with any incidents reported being dealt with swiftly. I have personally helped to put out campfires myself in the wood and my real concern is that by building a large number of houses right up against the wood this will only increase this sort of activity and it only takes one fire to take hold and get out of hand for it to have dire consequences for the wood itself and people living in close proximity next to it. This also includes farmers who live on the edge of the wood, not to mention the devastating effect it would have on the local wildlife. **How do you intend to stop residents in this new development from trespassing into Spondon Wood?** 

- Invasion by Non-native Plant Species. This could occur if the development goes ahead. Development adjacent to ancient woodland results in great disturbance to the soil within that locality which can then provide ideal conditions for a non-native plant species to establish themselves. Housing developments close to woodland could also act as a reservoir for exotic species that then 'escape' the confines of a garden.
- Impact on The Woodland from Domestic Pets. For example, the predation and disturbance from domestic pets like cats which roam a wide area.
- Reducing the Amount of Semi- Natural Habitats Next to Ancient Woodland.
- Possible Changes to the Water Table or Drainage. This part of Spondon has suffered house flooding in recent years and a lot of this water runs off into the proposed development area which at present is a field. An increase in hard surfaces and associated run off could potentially cause more of a problem in the area.
- **Cumulative Effects**. Roads and urban development include a combination of noise, light and barrier effects which prevents the normal movement of resident animals and woodland birds etc.,
- As it stands at the moment the proposed development **'green belt'** area (SGA:26) provides a good **Buffer Zone** between the current housing in Spondon and Spondon Wood. This buffer zone plays an essential part in protecting this ancient woodland from damaging edge effects. Development and human activity in this area up to Spondon Wood will have serious long term consequences which will be irreversible.
- With this development likely to cause serious harm to the ancient woodland can you provide credible evidence to justify the exceptional need and benefits. Simply saying that you are under pressure from Government to provide housing does not constitute exceptional circumstances.

The above points are all genuinely held valid concerns some of which are based on my 28 year's experience living in Spondon. Some that have no association or connection with this area may look upon the proposed development site as just being an open field there to be exploited.

### It is so much more than that for the reasons stated above!

This letter is forwarded for your attention and careful consideration and I would urge Erewash Borough Council to reconsider its plans to build on this **'green belt land'** and look elsewhere for a better alternative. An alternative that would (a) Better serve the residents of Erewash (b) Not have such a severe impact on council taxpayers in Derby City (c) Have less impact on the environmentally rich local environment.

Finally, would you kindly acknowledge receipt of my letter and please feel free to respond to any of the points I have raised. I look forward to hearing from you in due course.

Kind Regards

VERRA .

N R Johnson

From:	Patricia Hill
Sent time:	27/04/2022 15:17:19
To:	Planning Policy
Subject:	Core Strategy Review - Regulation 19 - Spondon Woods. SGA:26

With reference to the above Core Strategy Review, Regulation 19 - Spondon Woods SGA:26.

I wish to confirm my contact details as follows:-

Mr Christopher Hill



From:	Patricia Hill
Sent time:	27/04/2022 12:30:48
To:	Planning Policy
Subject:	Core Strategy Review - Regulation 19 - Spondon Woods. SGA:26

Regarding the above, I would like to add that I do not feel that some of the conduct of EBC has been sound regarding the 03/03/2022 Council meeting.

My reason for this is I feel that Spondon residents and the second secon

In

reply there are two aspects that I am not satisfied with.

1. Our concern the development would have on Spondon infrastructure including school places. His reply seemed dismissive with proposals had been amended to ensure a choice of travel by sustainable means and make provision for extra school places if necessary. Spondons schools are full to capacity as doctors surgeries are. So would this answer mean a new school would be built on more of our precious Green Belt?

2

answer to the ancient woodland and wildlife was

The land did not have any designated wildlife importance.

Mrs. Patricia Hill



From:	Ken Guy
Sent time:	28/04/2022 21:33:06
То:	Planning Policy
Subject:	Re: Erewash Core Strategy Review - Consultation on Publication version
Attachments:	Objection Letter.docx

Dear Sir/Madam,

I am contacting you with regard to Draft Core Strategy Review consultation.

In my previous email to you on 2<sup>nd</sup> May 2021 I sent in a letter of objection regarding the proposed development in Spondon (SGA:26)

Would you please forward my letter of objection (attached) on to the next stage of the process. I would like The Independent Planning Inspector to have sight of this letter.

And please include me on your consultation database as I wish to be kept up to date on the progress of the Local Plan Review.

Regards

Wendy Guy

From:

Sent: 10 March 2022 17:03

Subject: Erewash Core Strategy Review - Consultation on Publication version

Dear Sir/Madam,

### **RE: EREWASH LOCAL PLAN REVIEW**

We are contacting you as you have previously stated that you wish to be kept informed of Erewash Borough Council's progress in reviewing its Core Strategy local plan document.

At the Full Council meeting held on Thursday 3<sup>rd</sup> March, Erewash councillors approved an eight-week consultation on the draft Core Strategy Review (Publication version). Taking into account previous consultation responses from 2020 and 2021, this document now contains several draft policies covering the following matters:

- Housing strategy and allocation sites;
- Employment;
- Town, Local & Village centres;
- Transport; and
- Green Infrastructure

This consultation is open from **Monday 14<sup>th</sup> March to Monday 9<sup>th</sup> May 2022**. All duly-made responses to the consultation will be forwarded on to the independent Planning Inspector as part of the Council's submission of its Plan to the Secretary of State. More information about the consultation, including key documents and an online representation form, will be available from **Monday 14<sup>th</sup> March 2022** on the Council's website at the following location: <u>www.erewash.gov.uk/local-plan-section/core-strategy-review.html</u>

Due to data protection, we kindly ask that if you wish to stay updated on the progress of the Local Plan review you respond to this email notifying the Council of your preference. Should you submit a representation as part of this consultation then your details would automatically be retained by the Borough Council until such time that the Core Strategy Review be adopted.

Yours faithfully



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Erewash Borough Council, Ilkeston Town Hall, Wharncliffe Road, Ilkeston, Derbyshire. DE7 5RP. www.erewash.gov.uk

Planning Policy Long Eaton Town Hall Derby Road Long Eaton NG10 1HU

2<sup>ND</sup> May 2021

#### Re: SGA:26 - Proposed Development South of Spondon Wood

Dear Sir/Madam,

I am writing to formally object to the building of more than 200 houses on '**green belt**' land in Spondon. I wish to raise the following points: -

- You should not be encroaching into open countryside 'green belt' land. Have Erewash Borough Council carried out a green belt review before putting these proposals forward?
- From what I understand there has been an incomplete consultation process with statutory consultees.
- There hasn't been enough opportunity for public representation at meetings.
- It seems that Erewash Borough Council has failed in its 'duty to cooperate' with all relevant authorities which includes Derby City Council. And this should have included the residents of Spondon who will be greatly affected.
- Can Erewash Borough Council provide evidence to prove that this proposal best meets the needs of Erewash residents, above all other sites? This site doesn't seem to really benefit the residents of Erewash at all.
- Can Erewash Borough Council prove that there are no other brownfield site alternatives?
- New developments should not have a severe impact on a neighbouring authority. Being a council taxpayer in Derby City I should not have to pay to provide services for people in Erewash. Residents on this new development will mainly be using services in Derby City such as schools, doctors, dentists etc., but their council tax and any new homes bonus will all be paid to you. This is very unfair on council taxpayers in Derby City!
- From experience I know that through the centre of Spondon traffic can become very heavy at times due to the fact there is only one proper way in and out along Willowcroft Road and Nottingham Road. According to a DEFRA study in 2015 Spondon already suffers from quite high pollution levels and this new development will only make the problem worse for vulnerable people such as school children in

nearby schools. This doesn't help your neighbouring authority (Derby City Council) who are trying to tackle the problem of pollution. They published an Air Quality Action Plan in 2020.

- I understand that there are up to 2000 properties in the Erewash area which are unused and could be brought back into use. Bringing these back into use could go a long way to solving the housing problem in Erewash. Has this been fully looked into?
- There only seems to be one point of access in and out of this new development. This is on to a road with a 60mph speed limit which clearly presents road safety issues. Fatalities have occurred along this stretch of road in the past. No other route in and out for vehicles, pedestrians or cyclists?
- I have strong feelings with regard to environmental matters and this proposed development area being on 'green belt' land throws up lots of issues. With it being next to a wood which is designated as Ancient and Semi Natural Woodland and also Semi Replanted Woodland it is environmentally rich with all sorts of wildlife such as Fallow Deer, Buzzards, various birds of prey, Bats, and even Lapwing. This type of farmland is ideal for ground nesting Lapwing and there is photographic and video evidence showing them in that field recently. These wonderful birds are protected due to their decline in recent years and their conservation status is RED. We all have a responsibility to protect our valuable wildlife and its habitats particularly those that are threatened. Should this development be allowed to go ahead then it will remove more of the Lapwings favourite habitat. It will drive them away and only add to their further decline! Please think about the consequences of what you are proposing.
- With Spondon Wood designated as **Ancient and Semi Natural Woodland and also Semi Replanted Woodland** it is recognised in the national planning policy as important. Ancient woodland only covers a very small amount of land in England and it is our richest wildlife habitat which has taken centuries to develop. The Woodland Trust have published documents outlining the negative impacts of housing developments next to ancient woodland. The main detrimental impact is 'edge effect' which involves:
- (a) Chemical effect
- (b) Disturbance
- (c) Trampling
- (d) Invasion by Non-native plant species
- (e) Impact on Ancient Woodland by domestic pets
- (f) Reduction in the amount of semi-natural habitats next to Ancient Woodland
- (g) Possible changes to the water table and/or drainage
- (h) Cumulative Effects over a period of time

- The 'green belt' buffer zone as it stands at the moment needs to be left as it is in order to protect this ancient woodland from the damaging effects of 'edge effect'
- Can Erewash Borough Council provide good evidence to prove that this development site satisfies exceptional needs and benefits?

I ask that Erewash Borough Council give careful consideration to what they are proposing bearing in mind the negative impact this development will have on the local environment and the massive impact it will have on the council taxpayers in Derby. This development surely can't benefit the residents of Erewash.

This letter is forwarded for your attention and consideration. If you would kindly acknowledge receipt of my letter I would be most grateful and I look forward to hearing from you in due course.

Yours faithfully,

Mrs Wendy Guy



From:				
Sent time:	29/04/2022 11:58:29			
To:	Planning Policy			
Subject:	RE: Erewash Core Strategy review (Regulation 19 - Publication stage)			
Attachments:	L1SCA - PrO_Ere_2020.xlsx Severn Trent - Erewash Core Strategy Review 2022.pdf			

ST Classification: OFFICIAL PERSONAL

Hi Team,

Thank you for giving Severn Trent the opportunity to comment on your consultation.

We have summarised our comments in the attached document for your viewing.

Please keep us informed as your plans develop and when appropriate we will be able to offer a more detailed responce.

As mentioned in the response, if you are willing to share the housing allocations in GIS format (ShapeFile) we can provide some detailed site commentry around potential drainage constraints which could enhance your evidence base. We have provided something similar in response to an issues and option consultation back in 2020 (see attahced). This data could be reviewed and updated if you find it usefull.

Kind regards



#### From: Sent: 21 April 2022 17:30 Subject: Erewash Core Strategy review (Regulation 19 - Publication stage)

Dear Sir/Madam,

#### **RE: EREWASH CORE STRATEGY REVIEW (REGULATION 19 - PUBLICATION STAGE)**

Erewash Borough Council is making contact with your organisation in order to remind you that the eight-week public consultation over the above ends in just over a fortnight's time on **Monday 9<sup>th</sup> May 2022**.

All information and materials connected to the Council's ongoing Core Strategy review, including details of how representations to the Publication document can be submitted, can be <u>accessed here</u>.

Please disregard this email and accept our sincere apologies if you have already submitted a representation in response to the current consultation.

Kind regards



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## WONDERFUL ON TAP



**29 April 2022** Our ref: Erewash 6

Dear Sir/Madam,

## **Erewash Core Strategy Review Consultation (Reg 19)**

Thank you for the opportunity to comment on your consultation, we have summarised our comments within this document for your viewing. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

## Strategic Policy 1.1 – Strategic Housing Sites

We recognise the policies effort to facilitating sustainable growth on strategic/major housing developments which are greater than 200 dwellings. Point three (3) in the policy wording refers to integrating sustainable drainage infrastructure, which is a positive step in the right direction to managing surface water and minimising impact to both sewer flood risk and spills from overflows into the environment.

The Department for Food and Rural Affairs (DEFRA) has recently consulted on the Government's Storm Overflows Discharge Reduction Plan (<u>https://consult.defra.gov.uk/water-industry/storm-overflows-discharge-reduction-plan/supporting\_documents/Final%20Consultation%20Document%20PDF.pdf</u>). This consultation sets the scene for an increased future effort around reducing storm overflow operation with an aim of improving river quality. The document along with the raft of measures in the Environment Act 2021 plan to tackle discharges from storm overflows, one approach within this is a proposed new duty directly on water companies to secure a progressive reduction in the adverse

impact of discharges from storm overflows. This is best achieved by limiting any new connections of surface water into the sewerage network, something currently only deliverable with support from local plan policy around clear surface water management expectation on new development.

We believe the policy wording within *Strategic Policy* **1.1** *could be enhanced by specifically highlighting sustainable surface water management, the drainage hierarchy and avoiding new connections of surface water to the combined sewerage system*. This would in tun help secure a progressive reduction in the adverse impact of discharges from storm overflows.

## Strategic Policy 1.2 to 1.6 – Housing Allocations

We would like to offer a formal assessment of potential drainage constraints for the housing allocations named within these policies. We believe this type of information way help you site specific policy considerations as the plan progresses, we have provided this type of information to you previously. Please share the housing allocations with us in GIS format (ShapeFile) if you would like detailed commentary on wastewater considerations and potential constraints, we would be happy to assist you with enhancing the evidence base on this subject.

We strongly encourage all developers of major sites to engage with us as early as possible around the proposed drainage strategy to determine where and at what flow rate(s) they are proposing to discharge wastewater. This early engagement is key to ensuring there is sufficient time for any improvement works on the public sewerage system to be made, should they be required, prior to the site being built out. If improvement works are required and we do not anticipate they can be completed in time, we may request a Grampian style planning condition, early engagement can often avoid this.

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

### Wastewater Strategy

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

## Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

## **Drainage Hierarchy Policy**

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

"Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

- 1. into the ground (infiltration);
- 2. to a surface water body;
- 3. to a surface water sewer, highway drain, or another drainage system;
- 4. to a combined sewer."

## Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

## Sustainable Drainage Systems (SuDS) Policy

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.

Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water

quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

## **Blue Green Infrastructure**

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

#### **Blue and Green Infrastructure Policy**

Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

"Planning policies and Decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;"

#### **Green Open Spaces Policy**

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

## Water Quality and Resources

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

## Protection of Water Resources Policy

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment... e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;"

#### Water Efficiency Policy

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

Supporting Text: National Planning Policy Framework (July 2018) Paragraph 149 states:

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, costal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure."

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – <u>link</u>.

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

## Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise

to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

## **Developer Enquiries**

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here - <a href="https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/">https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/</a>

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

Yours Sincerely,

GrowthDevelopment@severntrent.co.uk

From:	Graham Elliott
Sent time:	27/04/2022 18:14:32
To:	Planning Policy
Subject:	RE: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022
Attachments:	EBC Core Strategy Review - G.Elliott's Representation 27.04.2022.docx

Hi

Please see attached my completed Representation Form in Word document, reference the consultation on Erewash Borough Council's Core Strategy Review March 2022.

Could you please confirm that you have received it, it is in a format you can use and it has been logged onto your system as an 'e' mail representation.

Regards,

Graham Elliott

From:

Sent: 25 April 2022 13:32 To: Graham Elliott Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation 2nd Submission

Good afternoon Graham,

Thank you for your email. Unfortunately we have not received your completed representation form. We had website issues over the weekend but we believe these are now fully resolved after working with our ICT team. The online form is our most preferred method of submission as it aids our internal processing. However, as my colleague previously advised, I would recommend submitting your representation by sending a copy of the representation wording directly in reply to this email and we shall log it as an email representation or you can complete the attached word document (you edit the text boxes by right clicking each box and clicking 'add text'). That way we can guarantee no more issues for you completing the online rep form. Hopefully that is clear and sorry for the inconvenience that this has caused.

Thanks,



From: Graham Elliott Sent: 23 April 2022 10:11

To:

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation 2nd Submission

Thank you for your response,

I decided to try again yesterday at 6.00pm (22.04.2022), on the form on your website, which took me 2 hours to retype.

Much to my annoyance I got the same conflicting messages, a red band saying there was an error, the other thanking me for my submission.

I've re-checked everything and can't see an error. Could you please check the PDF version of my submission attached (unfortunately without all of the dialogue which it was not possible to save) and please advise what I am doing wrong.

All I can think of is that I'm putting too much dialogue in the test boxes? Regards,

Graham Elliott

#### From:

Sent: 22 April 2022 15:48 To: Graham Elliott Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation

#### Good afternoon,

I have checked and cannot see a submission in your name although we did receive other submissions on Wednesday 20<sup>th</sup> April.

Do you have a copy of the wording you can send directly in reply to this email and I shall log it as an email representation? I shall also raise this with our ICT department to check for any webpage errors.

Regards,



From: Graham Elliott Sent: 22 April 2022 09:20

To:

Subject: Erewash Borough Council's Core Strategy Review - My Representation

Good morning,

Reference your 'Core Strategy Review'.

I filled in the consultation document and sent it to you on line on the 20<sup>th</sup> April 2022.

There were however two conflicting messages, one saying there was an error, the other thanking me for my submission.

I checked the document, which appeared to be ok and sent it again, but received the same messages.

Could you please confirm that you have received it.

Regards,

Graham Elliott,



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Erewash Borough Council, Ilkeston Town Hall, Wharncliffe Road, Ilkeston, Derbyshire. DE7 5RP. www.erewash.gov.uk

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#### Core Strategy Review Representation

#### The consultation runs between Monday 14 March and May 9 2022.

For representations to be valid, a full name and address must be provided.

If you need to continue with more space for any of your answers, please attach further pages to this form.

All fields marked with an Asterix (\*) must be completed.

Title <b>(*)</b>	Mr.
First Name <b>(*)</b>	Graham
Surname <b>(*)</b>	Elliott
Job Title (where rel	evant)
Organisation (wher	re relevant)
Address <b>(*)</b>	
Postcode <b>(*)</b>	
Telephone number(*)	
Email Address(*)	

Agent's details (if applicable) Include name, address, contact number and email

Not Applicable



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)



Policies Map



Please use the box below to tell us specifically where the representation relates to (a policy, the policies map or other text). Do not use the box to make your comments as this is required further down the form.(\*)

Development in Breaston's Green Belt – SGA 20 - Land North of Draycott & Breaston and SGA31 - Land South of Longmoor Lane, Breaston

Do you consider the Core Strategy Review is Legally Compliant? (\*)

,	Yes	

$\geq$	$\langle$
Ν	ю

Do you consider the Core Strategy Review is sound?(\*)

Yes

$\geq$	$\langle$
Ν	0

Do you consider the Core Strategy Review Representation complies with the duty to operate?(\*)



imes	
No	

Please give details of why you consider the Erewash Core Strategy Review is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible of the legal compliance or soundness of the Core Strategy Review of the core Strategy Rev

#### LEGALLY COMPLIANT -

#### 1. Local Development Scheme –

a) It is at odds and not compliant with BPC, EBC, Nottinghamshire and Derbyshire current policies regarding the protection of our Green Belts to maintain Village identities. Plans SGA31 & SGA20 would both develop large areas of the Green Belt which separates Breaston from Draycott and Long Eaton, hence reneging on EBC's Core Strategy 3.4. Policy 3: Green Belt - 1. 'The principle of the Nottingham-Derby Green Belt will be retained'. This principle pledged to protect our village's identity, which is a major priority for residents of Breaston.

b) It also doesn't comply with the National Planning Policy Framework 2012 – Developments in the areas SGA31 & SGA20 are against National Planning Policy Framework 2012 -

Paragraph 137 - The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 147 - Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. –

Which these aren't!

CONTINUED ON PAGE 4 & 5 BELOW

Please set out the modification(s) you consider necessary to make the Core Strategy Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Core Strategy Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**To address all of the above arguments 1 to 6** – EBC should remove all Green Belt sites from the Plans, particularly SGA31 & SGA20 around Breaston and Draycott. They involve a huge, unjustifiable number of new builds in Breaston and Draycott's Green Belt, which are at odds with Erewash Borough Councils current Core Strategy 3.4. Policy 3: Green Belt - 1. 'The principle of the Nottingham-Derby Green Belt will be retained' and local Borough and National Planning Policies. In which they have pledged to protect our village identity, which is a major priority for Breaston residents. Setting this precedent would be disastrous, with Developers lining up and no credible argument to turn down their Planning Applications. I suggest EBC look for more vacant industrial and Brown field sites.

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modifications). You assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the invited by the invited by the inspector, based on the invited by the invited by

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?(\*)



No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I feel very passionate about maintaining Breaston and Draycott's village identities and not to be exposed to a population explosion which their infrastructure cannot sustain.

Should these plans ever come to fruition I see no future hope of stopping Developers completely surrounding our villages.

On a more personal note, I and many Residents of Heath Gardens bought our Bungalows to look out on horses grazing in an open field not at 300 houses.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in

hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination

Please use this space to continue any of your answers.

#### **CONTINUED FROM PAGE 2**

**2. Whether the appropriate notifications have been made** – I don't believe the residents most affected by the proposals have been directly informed of the Consultation and Sustainability Assessment, as I live on Heath Gardens adjacent to development SGA31 and had to search for the information on line.

#### SOUND -

**3) Positively Prepared & Justified** – Has it been objectively assessed, is it robust and based on credible evidence or is it just fulfilling Government edicts and 'Cherry Picking' green field sites that historically would be a complete no-no and against Local and National Policies and Legislation. Sustainability Assessments – I see little benefit to Breaston except for the additional population boosting local retail businesses and services within the village, albeit likely shared with Draycott and Long Eaton due to their proximity.

With these developments being on the outskirts of the Village, this could have the negative effect of the movement of custom and focus away from Breaston village centre.

#### 4) Effective -

a) I don't believe the required infrastructure for School & Surgery places, retail outlets, services, traffic, parking (currently a major problem), roads, etc., can be provided to support an expansion of Breaston's population by over 30%. Where will the associated finance come from?

b) I don't believe the Erewash Core Strategy Review joins up with the strategies of neighbouring authorities in respect of mass development, particularly in their Green Belts.

c) Planning Approval- There seems to be no consideration of the effect on existing residents at each site. How do they hope to get Planning Approval? –

- Loss of Outlook Currently open recreational and agricultural fields.
- Overlooking & Loss of Privacy Currently open fields with some hedges and trees screening, which are likely to be removed.
- Highways Issues Possibility of Heath Gardens and Hills Road Cul-de-sac's becoming main thoroughfares, with increased traffic, noise, on road parking and road safety issues.
- Natural Environment, Biodiversity, Green & Blue Infrastructure –
   Being long established green field areas, there is likely to be a significant loss of habitat, hedgerows and trees.
- Flooding (Both Plots) There is past history of flooding on both sites from rain water running down from the hills to the North. Changing the field's current natural drainage to a hard landscape is likely to alter the hydrology of the whole area.
- Noise Pollution from the M1 An ongoing complaint from residents for many years.
   Continuous lobbying with the Highways Agency has failed to get a satisfactory solution and this would be significantly worse with dwellings being so close to the motorway.
- Air pollution Another major issue when building so close to the motorway.



### d) Other Residents Concerns -

- Depreciation of Existing Properties Through loss of amenities, village identity and being absorbed into large housing estates
- Crime Quote from the Assessment 'Incidences of crime are very likely to increase and with it the fear of crime in the locality as would be expected with an expanded population'

#### 5) Consistent with National Policy -

As mentioned in Item1, Developing in our Green Belts is completely at odds with EBC's, Local Parish's, Borough Councils and National Policies.

### DUTY TO CO-OPERATE -

# 6) Cooperation between local planning authorities and other public bodies on strategic planning matters –

I can't believe that any of our other local public bodies or residents, will support this Strategy of mass population growth, their villages losing their identity and no future protection of their borders.

I for one will object.

Graham Elliott 27.04.2022

From:	Hilary Farrow
Sent time:	29/04/2022 13:50:10
To:	Planning Policy
Cc:	
Subject:	Greenbelt Kirk Hallam.

As a resident of Kirk Hallam I fully oppose the building of more homes on the greenbelt of Kirk Hallam.

It is currently a constant bottle neck for traffic trying to exit KH via Stanton Road to access Ilkeston. There is NO other optional Road to Ilkeston.

We currently have

- 1 dentist who has not been accepting new patients for at least 2yrs.
- 1 Drs Surgery where it takes over a week to get an appointment.
- 1 petrol station
- 1 convenience store with over inflated prices.
- 2 Primary Schools with waiting lists.
- 1 Secondary school with over 30 pupils in some classes.

Theres facilities are already severely impacted with Kirk Hallam population of approx 7,000 people.

For anything else ie shopping, leisure facilities, hospital appointments, vets, hairdressers, visiting family or friends, or any other reason to leave KH you then have to crawl though the bottleneck of the A6079 pollution created by long lines of traffic.

Thats not to mention refuse collection services, Water supply/Maintenance and sewerage (currently being pumped into the Erewash River)

Crime rates above the national average with a Police Force stretched so thin they cant and wont respond to some crimes.

There are not the facilities to accommodate KH let alone another housing estate.

Its time the health and needs of current residents were a major factor in building more homes rather than the major factor being profit for the investors/contractor/developers etc.

Investment priorities in KH should be the infrastructure, and current need for shopping/dental/Drs/hospital/and other services sorely lacking in the immediate vicinity. Not over burdening an already overwhelmed area.

Is this the sort of area you your children or the future generation would like to live in?

Its already established that conservatism is not in the best interest of the working class, this is just another example of dismissing local needs over profit.

This is not levelling up, It never has been and it never will be. The wealthy get richer and the poorer get levelled over or buried under an already crumbling situation.

Regards

Hilary Farrow

From:	Joanne Johnson
Sent time:	01/05/2022 11:49:35
To:	Planning Policy
Subject:	Erewash Draft Core Strategy Consultation Period - 14th March to 9th May 2022.
Attachments:	Formal Objection 2021.docx

Dear Sir/Madam,

I am writing to request that my original objection letter dated 6th May 2021 (copy attached) regarding the proposed development SGA:26 South of Spondon Wood be passed to the next stage of the consultation process on the Draft Core Strategy Review.

I would like the Independent Planning Inspector to have full access to this objection. I also request that my details are recorded so that I can be fully informed of any updates on this process.

I would be grateful if you could acknowledge receipt this e mail and its attachment.

Kind Regards

Joanne Johnson



Joanne Johnson

6<sup>th</sup> May 2021

## Strategic Growth Area Assessment - SGA:26 South of Spondon Wood

Dear Sir/Madam,

I wish to formally **object** to the building of 240 houses on the land South of Spondon Wood which is on '**Green Belt'** land.

There are several reasons for my objection that I feel Erewash Borough Council should consider: -

I believe that there has been an incomplete consultation with statutory consultees. There has been no opportunity for public representation at meetings regarding this proposed development and it seems that Erewash Borough Council has failed in its 'duty to cooperate' with all relevant authorities, which includes the neighbouring Derby City Council and its residents.

**'Green Belt'** land should be the last option for development after all other available brownfield sites have been considered. Can Erewash Borough Council provide evidence to the effect that they have considered all available Brownfield sites? Have you recently completed a green belt review prior to these proposals?

I understand that a recent planning application for a one storey dwelling at Golden Valley Farm, Derby Road, Risley was refused by planning officers and councillors due to the site being in the '**Protected Green Belt'!** Why is that '**Green Belt'** land any different to the green belt land South of Spondon Wood? The impact on green belt land in Spondon would be far greater with the development of 240 homes. You should not be using the 'green belt' land argument as a reason for refusing development in one area but re designate green belt land in another area just because it suits you. Erewash Borough Council either value green belt land or they don't. Which is it? This smacks of double standards and there needs to be consistency in the decision making process.

The proposed development area (SGA:26) is attached to the Derby City area and Erewash residents would have a massive impact on Spondon and Derby City as a whole, using services such as Schools, Doctors and other local services. The new residents in this development would all be paying their council tax to Erewash Borough Council and as a Derby City Council taxpayer I find this situation totally unacceptable. When deciding on planning issues new developments <u>should not</u> severely impact on a neighbouring authority!

Is SGA:26 the best option for Erewash residents? Are there better options that would better suit Erewash residents?

I do feel that my privacy could be compromised. **Solution** and any new development could result in a real loss of privacy whereby I could be closely overlooked.

and are well aware of the problems getting out of Spondon due to the fact there is only one main route into Derby. This is down Willowcroft Road and along Nottingham Road. The traffic can be very heavy at times causing problems through the village. The proposed new development would only add to the air pollution and congestion. Furthermore, Derby City Council have recently agreed to the development of land on the old Celanese factory site in Spondon. Adding SGA:26 into the mix will have a real detrimental effect on the air we breath at a time when Spondon already has an air pollution issue according to a DEFRA study carried out in 2015.

It seems that there is only one point of access to the proposed site. The whole development would be closed in on three sides so this would cause access problems for emergency services. The only point of access to this site is on a road which has a 60mph speed limit and this in itself presents road safety issues.

The proposed development area SGA:26 is not just a field. It is environmentally rich and this development would completely desecrate it. The land is home to wildlife such as Buzzards, Bats and Lapwing. Lapwing are on the decline and are recognised on the conservation list as RED! Spondon Wood is designated as 'Ancient and Semi Natural Woodland and also Ancient and Replanted Woodland'. In planning terms it is considered important and building up to it would cause it great harm due to 'edge effect' which is explained in documents produced by The Woodland Trust. This 'Green Belt Buffer Zone' needs to remain intact in order to protect this Ancient Wood from damaging 'edge effect'.

I would ask that Erewash Council carefully reconsider their proposals for this development as I feel it does not best serve the residents of Erewash. It will have a massive impact on the residents of Spondon/Derby (a neighbouring authority) as well a detrimental impact on the local environment and its associated wildlife.

Please take into account the important points I have raised and if you would be kind enough to acknowledge receipt of my letter then I would be most grateful.

I look forward to hearing from you in due course.

Yours faithfully,

Joanne Johnson

From:	Hannah Johnson
Sent time:	01/05/2022 12:00:19
To:	Planning Policy
Subject:	EBC Core Strategy Review - Spondon Woods SGA:26
Attachments:	Formal Objection.docx

Dear Sir/Madam,

I'm writing to request that my previous objection letter is forwarded onto the next stage of the process and the independent planning inspector views my letter, regarding the land South of Spondon Wood (SGA:26). I have attached my letter of objection to this email.

In addition, I request for my details to be added to the consultation database, so that I can be updated about the progress.

Please acknowledge receipt of this email and it's attachment.

Kind regards, Hannah Johnson

#### **Planning Policy**

Sunday 2<sup>nd</sup> May 2021

#### Reference: Strategic Growth Area Assessment – SGA:26 South of Spondon Wood

Dear Sir/Madam,

I am writing to **OBJECT** to the proposed development to build 240 homes on the green belt land South of Spondon Wood.

My concerns and objections are outlined below:

- The woodland located next to the greenbelt land that you have proposed to build on is listed as 'ancient' by the Department for Environment, Food and Rural Affairs. Therefore, any building development will inevitably impact the ancient woodland and the wildlife that lives within it. Since ancient woodland covers less than 3% of England's land mass, the country's development needs can be fully delivered without negatively impacting ancient woodland, therefore, this proposed development should not go ahead due to the reasons expressed below.
- Potential road networks that will be built within the housing development will be a source of **air pollution**, which will be dispersed by wind to the neighbouring ancient woodland, where the cocktail of pollutants will be deposited onto plant surfaces, negatively affecting their growth or ability to tolerate environmental stressors. Some of which plants will have taken hundreds of years to grow.
- **Noise disturbance** from both the construction process and the day to day living of potential residents so close to the ancient woodland may have an impact of nesting bird species, potentially causing them to respond maladaptively and prevent them from nesting in the area.
- **Light pollution** will be associated with the potential development as street lights will be placed close to the ancient woodland. This could have negative effects on the timing of breeding and mating birds.
- There is a potential that near by housing may cause an **invasion of non-native plant species** as their will be a disturbance to the nearby soil which can promote invasion of non-native species within the ancient woodland. Disturbances to the soil releases nutrients which can favour the growth of non-native woodland species.

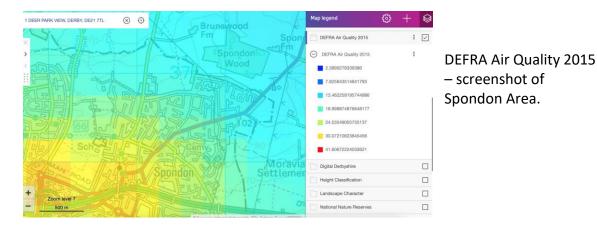
- **Drainage** of water has always been a problem over the recent years. Local houses have flooded in this area and most of this water runs off and soaks away in the proposed development area. An increase in hard surfaces would only increase run off and cause more of a problem in the area.
- Increased recreational pressures as it would be tempting for residents to walk their dogs within the woodland, which would cause trampling of plants and loss of vegetation, many of which take years to grow just a few inches. The layout of the ancient woodland would lend itself to families using it for recreational purpose as there are large natural open areas.
- **Predation and disturbance from domestic pets** would reduce the population of bird numbers which reside within the ancient woodland.
- Houses that are built close to the woods would encourage possible *fly tipping* within the ancient woodland.
- 2. According to the National Planning Policy Framework (2019), green belt should only be altered in exceptional circumstances as the it states green belt provides five purposes: to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns merging into one another, to assist safeguarding the countryside from encroachment, to preserve the setting and special character of historic towns; and to assist the urban regeneration, by encouraging the recycling of derelict and other urban land. What are the 'exceptional' circumstances to build on this land?
- 3. As it stands currently the green belt land that you propose to build on is a buffer zone between housing in Spondon and the Spondon ancient woodland. This plays an important role in preserving the ancient woodland. Any development closer to the woodland would have long term detrimental effects that are irreversible. Have you carried out a green belt review prior to these proposals?
- 4. A successful development is one that is well connected to its surroundings. After reading your proposal it states access is only available from the A6096 to the east of the proposed site. Due to the large scale of the site, the proposed development would be disconnected from both Spondon and communities in Erewash, with no other possibility for access or egress, for pedestrians, cyclists and vehicles. As we are working to reduce climate change, this development would promote the use of vehicles so would do the opposite of reducing pollution.

- 5. Further to this, the A6096 is a 60mph road. This is the only form of access and egress onto the site and is not acceptable in terms of road safety. A number of fatalities have happened along this stretch of road over the years.
- 6. It would appear that Erewash Borough Council has not complied with the 'duty to cooperate' with neighbouring authorities. This should have been carried out due to the development being bolted onto Spondon (Derby City Council). As the residents potentially living on the development would be using Derby City Council services, such as schools which are nearly at capacity within Spondon and use of GP surgeries, yet their council tax will be given to Erewash Borough Council. Developments should not severely impact on a neighbouring authority. Can Erewash Borough Council provide evidence that using this piece of land will best meet the needs of Erewash residents?
- 7. It appears that Erewash Borough Council has not completed a full consultation process with statutory consultees, with Derby City Council residents only finding out of the proposals from the local media.
- 8. According to Erewash Borough Council's Core Strategy Review: Revised Options for Growth (2021), several previous proposed sites have been rejected due to them encroaching onto open countryside. What makes the open countryside South of Spondon Wood any different?
- 9. To my knowledge there are up to 2000 properties within the Erewash area which are either unused or could be brought back into use. Therefore, using these properties would begin addressing the housing problem in Erewash rather than decimating green belt land that is already on the decline.
- 10. The proposed site is 'green belt' that is rich with wildlife. There are numerous buzzards that nest within the wood and regularly feed from the ground within the field where you are proposing the development. There are many other birds that have been spotted within the area, such as, sparrowhawks, owls, garden birds, bats and very recently a Lapwing on several occasions (evidence below). Lapwings favour arable land and are ground nesting birds, so the proposed development would take away their preferred habitat. Lapwings are protected under The Wildlife and Countryside Act 1981 and their conservation status is RED, so they need to be protected at all costs for our future generations.



Evidence of Lapwing sighting in April 2021 on the greenbelt land, where the proposed development will be located. Protected bird under The Wildlife and Countryside Act 1981.

11. The proposed development would have a detrimental impact on the volume of traffic travelling through Spondon. There are already high volumes of traffic along Willowcroft Road and Nottingham Road as this is the only main route out of Spondon onto the A52. Department for Environment, Food and Rural Affairs published a map in 2015 showing that Spondon has high air pollution levels. This is at a time where Derby City Council has committed to reducing air pollution levels with Derby City Council Air Quality Action Plan (2020).



I would urge Erewash Borough Council to reconsider its plans to build on the green belt land South of Spondon Wood and look elsewhere for an alternative that is less detrimental to the environment, makes better use of land and better meets the needs of Erewash residents.

Kind regards,

Hannah Johnson

Attachments:	220429 Erewash LP.pdf
Subject:	Consultation on the Draft Erewash Core Strategy Local Plan Review
Cc:	
To:	Planning Policy
Sent time:	03/05/2022 09:14:23
From:	

#### FAO Planning Policy Team

Hi,

Please find attached the formal response from National Highways in relation to the above referenced consultation.

#### Regards



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Our Ref: Your Ref:



Dear Sir / Madam,

## Consultation on the Draft Erewash Core Strategy Local Plan Review

National Highways welcomes the opportunity to comment on the Erewash Borough Council Draft Core Strategy Local Plan Review, which covers the period to 2037. Following previous consultation and considering responses from 2020 to 2021, we note that this latest review contains several draft policies on matters including housing and employment allocations, and transport needs.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is the role of National Highways to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Erewash Local Plan, our principal interest is safeguarding the operation of the M1 and A52 which route through the Local Plan area.

In May 2021 National Highways responded to the Revised Options for Growth consultation, which set out the strategic growth options for the delivery of housing up to at least 2037 and identified specific sites capable of delivering housing over the next 5 years. The consultation proposed approximately 3,700 dwellings within the Plan period up to 2037, to be mostly delivered around the existing urban areas of Ilkeston and Spondon, as detailed below:

- Stanton Regeneration Site 1,000 homes along with emerging employment proposals for 258,090sqm of B2/B8 use known as New Stanton Park.
- West Hallam Depot 1,000 homes.
- Land North of Cotmanhay reduced from the previously proposed 600 dwellings to approximately 300.
- Land South-West of Kirk Hallam a new relief road, and 1300 dwellings (an increase from the previously proposed 600 dwellings).





- Land West of Acorn Way, Oakwood 600 dwellings.
- Land North of Spondon deleted from green Belt for provision of 240 dwellings.

The current Draft Core Strategy Review consultation proposes to increase the housing allocations to deliver a total of 5,800 dwellings. This update appears to maintain the allocations in the previously proposed locations stated above, with the additional circa 2,100 dwellings to be delivered at the following locations:

- 700 dwellings in Long Eaton
- 1,400 dwellings in Ilkeston

In our May 2021 response, we summarised the results of our initial high-level assessment of the likely traffic impacts on the SRN from the combined proposed allocations. Based on the allocations totalling 3,700 dwellings, this concluded that there would be material traffic impacts on:

- M1 J25 (115 vehicles)
- M1 J26 (185 vehicles)
- The A6005 / Derby Road / A52 junction (440 vehicles)
- A5111 Raynesway (210 vehicles)
- The Stoney Lane / A52 at grade junction (65 vehicles)

As the above forecast traffic impacts were based on the previous lesser growth aspirations, the additional 2,100 dwellings shall result in increased demands on these junctions. There are therefore significant cumulative impacts expected as a result of the proposed site allocations, which considering the existing congestion present in these areas and the existing substandard junctions on the A52, may severely affect highway operation on the SRN. As such, before sites progress through the planning process, we strongly recommend the Local Planning Authority engage with National Highways together with colleagues across the relevant Local Highway Authority teams of Derby, Derbyshire and Nottingham to agree a strategic approach. This may include proportionate transport modelling to support the transport evidence base and identify any future mitigation needed on the SRN and local transport networks to support the delivery of the planned growth.

We note that all proposed highway improvements relate to the local highway network, with a relief road at Kirk Hallam, and improvements to the Lows Lane / Sowbrook Lane / Ilkeston Road junction. Based on the scope of these highway works and proximity to the SRN, we have no comments to make.

We have no further comments to provide at this stage and trust that the above is helpful in the progression of the Erewash Core Strategy.

Yours sincerely,









From:	James Mckeowr
Sent time:	03/05/2022 12:42:49
To:	Planning Policy
Subject:	EBC Core strategy review (Regulation 19) Spondon woods-SGA26

James and Dawn Mckeown

These are our objections to the planned building of houses on land adjacent to Spondon wood.

1, Derby city council were not properly consulted regarding the proposed building of houses.

2, Spondon is very congested and building 240 more houses will only make the problem worse.

3, The secondary School (West Park) is full and cannot take any more pupils.

4, Similarly the Doctors are full and this would only make getting an appointment worse.

5, I am concerned regarding the safe entry and exit of the proposed site with the risk of additional accidents.

6, You have in the past stated that there are Brownfield sites available but builders will not build on them...Why? Is there not a Government fund that you could get access to and help put right the Ground/issue so builders will build on it? This is Green belt land that should remain this way and protect our environment for future generations.

7, Also according to the Government planning policy for protecting Green belt land, it states that Green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Can you provide this evidence and justification for building houses on the land adjacent to Spondoon wood.

Regards

Dawn and Jim Mckeown



Virus-free. www.avg.com

To: Planning Policy	
Subject: EBC Core Strategy Review (Regulation 19) Spondon Woods - SGA 26	10: Planning Policy

-257 ?

I am writing in connection with the above proposal to build houses on the north of Spondon, dividing Derby City and Erewash.

I watched the meeting on the 3rd March and was saddened by the lack of regard shown towards the residents involved with the above proposed development. It was also extremely disappointing that the meeting had apparently not received the Barrister's Report and trust that as this document has been resent, he and other councillors will have had the opportunity to read this report and ensure the Secretary of State is given this document as part of the submission.

We were not allowed to ask questions at the meeting due to the EBC constitution and understand the Planning Department at Derby City Council were only told of "land north of Spondon" a couple of weeks before the initial meeting.

Erewash Borough Council have failed in its legal duty to co-operate with Derby City Council and Spondon Residents and as at todays date am assured that consultation has still not taken place.

Green belt should only be changed through plan making, through a considered and evidenced response which includes talking to your neighbours under the Duty to Co-operate.

Considering the other sites that have been discussed have had over a year, this seems unfair and looks like SGA 26 was added as a bolthole and would be pushed through without any regard for the residents. The residents only found out about the proposed development through the Derby Telegraph on Monday, 21st March 2021, which has left little time or availability to be able to object to its inclusion.

### The Minister of State for Housing has stated that green belt land should only be used in exceptional

**circumstances.** Erewash Borough Council must provide evidence to justify why this site, above others closer to Erewash residents, has been chosen and have **ALL** brownfield sites been assessed in depth? Has a Greenbelt review taken place - such a review would enable them to strategically look at sites that will keep settlements separate but also meet the needs of Erewash residents. This report should also show why other sites were not approved - to claim there were objections to the sites is not good enough. What exceptional circumstances are there that makes SG26 acceptable when it won't even meet the needs of Erewash residents.

Access to the proposed development is to be off the A6096, which is a notoriously dangerous stretch of road with a current speed limit of 50 mph, with no other possibility for access or egress for pedestrians, cyclists and vehicles. This would have an enormous impact not just on Spondon but also traffic going into Derby with extra traffic on Willowcroft Road and also traffic travelling through Ockbrook and Borrowash to join the A52. Even at 200 houses, there is the potential of nearly 400 cars using the access road. Has an air pollution test been made which allows for the extra volume of traffic?

In the report prepared for the Extra-ordinary meeting last year, it stated that the houses would be served by the Ilkeston Flyer bus. However having looked at Government guidelines this states that no new dwelling should be more than 400 metres away from a bus stop and as the new housing extends at least 800 metres from the A6096 with no prospect of the new single access point being part of an modified bus route, the development does not therefore provide a sustainable transport system. Simply adding extra bus stops on Dale Road will not be of any help to residents at the furthest end of the proposed site.

From speaking with local residents at the bottom end of the proposed development (Deer Park View) flooding has occurred in the adjoining fields, in addition to severe surcharging of the stormwater drainage system, which has resulted in a number of houses being flooded - so has a Flood Assessment Report been undertaken that address these issues ?

Whilst Council Tax and the new homes bonus will be paid to Erewash Borough Council, the burden of the extra houses will fall on Derby City Council to provide extra school places, services like doctors and dentists and also cover the road maintenance into and around the village due to the extra traffic. As the local secondary school, West Park Academy, is over subscribed having already been extended to meet the needs of Derby residents. Again, no consultation has taken place with the Academy or with the School Place Planning - this is Derbyshire Council's role. Have they even been consulted?

Biodiversity - there have been sightings of Lapwings, which the RSPB state are protected by The Wildlife and Countryside Act 1981 - RED status. There have also been sightings of Woodpeckers and other birds listed in Schedule 1 of the Wildlife and Country Act on this land - also what impact the development could have on endangered species such as bats that nest in the Wood?. This also affects the hedgerows around the site and the trees in the wood. An 1826 map of Spondon shows Spondon Woods as being an established wood 200 years ago.

Planning permission should be refused for all the above reasons. This proposal will have NO benefit to the residents of Erewash and will be detrimental to ALL Spondon residents / services.

Rita Malpass

 From:
 Planning Policy

 Sent time:
 03/05/2022 07:55:32

 To:
 Image: Ce:

 Subject:
 FW: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27:04:2022

 Him
 Image: Provide the strategy Review - My Representation (Word document) 27:04:2022

Please can you somehow add this to this gentleman's existing representation in the database. It does not form part of his representation which he submitted already, but we should record his confirmation to me (after a number of to and fros) that he wants that representation to stand, despite it not reflecting reality.

### Cheers,

#### From: Graham Elliott

Sent: 29 April 2022 12:31

#### To: Cc:

Subject: FW: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022

#### Hi

I have reconsidered my representation and decided that while ever areas SGA20 & SGA31 remain on your Core Strategy Review web site then my objections should also remain in your records.

Thank you for your co-operation. Regards, Graham (Elliott)

From: Graham Elliott Sent: 28 April 2022 22:28 To: Planning Policy Cc:

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022

#### Hi

Thanks for your explanation.

Whilst I understand why you might want to keep past evidence showing due process, however a note against SGA20 & SGA31 saying they had been rejected at the public consultation carried out in 2021 (Regulation 18 Part 2) would have helped. Let's leave it at that.

As the two areas have been previously been rejected then I need to reconsider my representation.

Regards,

### Graham

#### From:

Sent: 28 April 2022 13:45 To: Graham Elliott

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022

#### Hi Graham,

Whilst I take your point about potential confusion (planning is a complex endeavour despite our best efforts to make it more accessible in the shadows of increasingly complex regulatory and legislative processes), the documents you refer to need to remain as active evidence because they have contributed to the overall consideration of which sites should and should not be supported for future development. These documents are 'policy-off' and are simply stating facts about each of the sites we considered and it would be unwise to erase evidence of the process we have been through to identify preferred sites. Indeed we will undoubtedly get objections from those with an interest in seeing some of those rejected sites developed, and it will in part be this evidence and proof of process we will be able to refer to and respond with when defending our approach. It is critical therefore that the evidence remains.

The key is though, nowhere in the current version of the Erewash Core Strategy Review document, nor the policy mapping, do the two sites you refer to form part of proposals and it is these two documents which are the subject of this public consultation.



From: Graham Elliott Sent: 28 April 2022 12:24

To:

Cc: Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022

#### Hi

Thanks for your response.

The reference to these areas appear in the downloads on your web site page on the Core Strategy Review under -

Strategic Growth Area Assessments, Strategic Assessment Growth Area Map Book and Appendices B4 & B6.

If these areas have been previously rejected, it would have been better to have made that clear and removed them altogether to avoid any confusion. Regards,

Graham

#### Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022

#### Hi Graham,

The sites you refer to are not in the 2022 version of the Local plan Review – see screenshot below of the policies map which is the central component upon which this consultation is based:



I would be interested in knowing where you have seen images of the sites still on the map. If you do choose to change your representation, please can I request that you make very clear in your submission email to us that you wish for your previous representation to be dismissed? It will help us from an administrative perspective.



#### From: Graham Elliott

Sent: 28 April 2022 11:00

#### To: Cc:

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022

#### Hi

Sounds like good news and it would significantly change my representation, however before I do, could you explain why they are still on the new 2022 Review document?

Regards, Graham

From: Sent: 28 April 2022 08:28

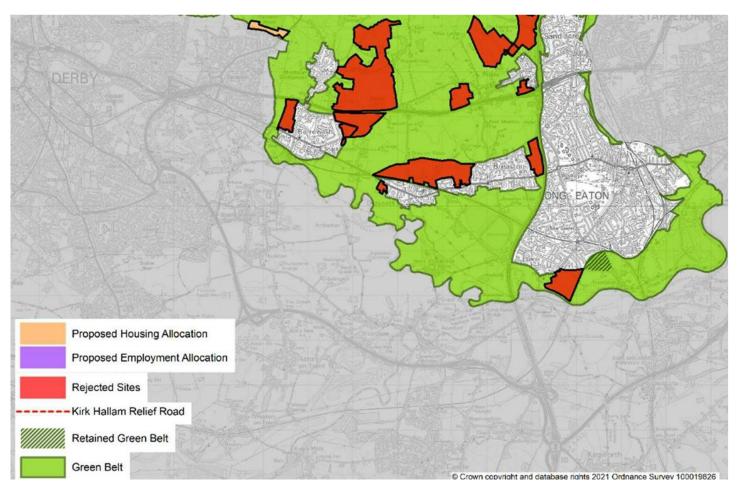
#### To: Graham Elliott

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022

#### Hi Graham,

I can confirm that we have received your representation and it will be logged as an email representation.

Just to note, the specific developments you refer to and which are the focus of your representation are not being proposed as you suggest. Any potential strategic growth in the Green Belt around Draycott/ Breaston was rejected at the start of this process, confirmed in the last stage of public consultation carried out in 2021 (Regulation 18 Part 2). See screenshot of the policies map which was consulted on at the time, below. All the red sites are rejected and are not proposed for development.



This may or may not change how you wish to frame your representation; if so just send any updated version to us and I shall update our records. Notwithstanding this, I will log the representation you have already sent in and it will be processed in the same way as all other representations.

Regards,

From: Graham Elliott Sent: 27 April 2022 18:15 To:

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation (Word document) 27.04.2022

Hi

Please see attached my completed Representation Form in Word document, reference the consultation on Erewash Borough Council's Core Strategy Review March 2022.

Could you please confirm that you have received it, it is in a format you can use and it has been logged onto your system as an 'e' mail representation.

Regards, Graham Elliott

#### From: Sent: 25 April 2022 13:32

To: Graham Elliott

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation 2nd Submission

Good afternoon Graham,

Thank you for your email. Unfortunately we have not received your completed representation form. We had website issues over the weekend but we believe these are now fully resolved after working with our ICT team. The online form is our most preferred method of submission as it aids our internal processing. However, as my colleague previously advised, I would recommend submitting your representation by sending a copy of the representation wording directly in reply to this email and we shall log it as an email representation or you can complete the attached word document (you edit the text boxes by right clicking each box and clicking 'add text'). That way we can guarantee no more issues for you completing the online rep form. Hopefully that is clear and sorry for the inconvenience that this has caused.

Thanks,

#### From: Graham Elliott Sent: 23 April 2022 10:11 To:

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation 2nd Submission

#### Thank you for your response,

I decided to try again yesterday at 6.00pm (22.04.2022), on the form on your website, which took me 2 hours to retype.

Much to my annoyance I got the same conflicting messages, a red band saying there was an error, the other thanking me for my submission.

I've re-checked everything and can't see an error. Could you please check the PDF version of my submission attached (unfortunately without all of the dialogue which it was not possible to save) and please advise what I am doing wrong.

All I can think of is that I'm putting too much dialogue in the test boxes?

Regards,

Graham Elliott

#### From:

Sent: 22 April 2022 15:48 To: Graham Elliott

Subject: RE: Erewash Borough Council's Core Strategy Review - My Representation

#### Good afternoon,

I have checked and cannot see a submission in your name although we did receive other submissions on Wednesday 20<sup>th</sup> April.

Do you have a copy of the wording you can send directly in reply to this email and I shall log it as an email representation? I shall also raise this with our ICT department to check for any webpage errors.

Regards,



#### From: Graham Elliott

Sent: 22 April 2022 09:20 To:

Subject: Erewash Borough Council's Core Strategy Review - My Representation

Good morning,

Reference your 'Core Strategy Review'.

I filled in the consultation document and sent it to you on line on the 20<sup>th</sup> April 2022.

There were however two conflicting messages, one saying there was an error, the other thanking me for my submission.

I checked the document, which appeared to be ok and sent it again, but received the same messages.

Could you please confirm that you have received it.

Regards,

Graham Elliott,



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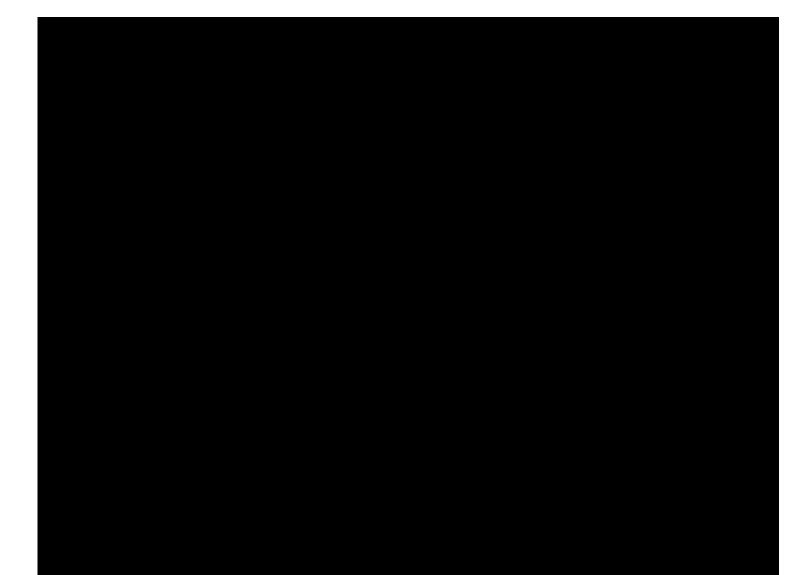
From:	
Sent time:	05/05/2022 08:50:10
To:	Planning Policy
Subject:	CSPR consultation Persimmon Homes
Attachments:	Erewash Reg 19 presubmission Local Plan Rep 05.05.22.pdf

Dear Erewash Policy

I append Persimmon Homes representation with regard the Erewash Core Strategy Plan Review consultation exercise. I note the deadline for reps occurs 9<sup>th</sup> May therefore I kindly request an email confirming receipt of the reps for our records.

Kind Regards









May 5<sup>th</sup> 2022

Dear Sir / Madam

### Erewash Core Strategy Partial Review (CSPR) pre-submission consultation

Thank you for consulting Persimmon Homes on the above. I submit the following responses.

### **Strategic Policy S1: Housing**

The extant Core Strategy Plan 2011-28 planned for delivery of 368 homes per annum over a period measuring 17yrs. However, in practice the borough struggled to meet the required housing growth target. Since the Core Strategy adoption, 2014 the annual housing requirement was achieved <u>once</u> resulting in the borough repeatedly failing the housing delivery test. It is important the CSPR acknowledge the importance setting a housing target in excess of the minimum Local Housing Need requirement. That a positively prepared plan makes allowance for change best accommodated through planned over supply and site contingencies where delays, reduced yields or site failure occur.

The evolution of the Erewash CSPR spatial strategy since the initial 2020 growth options consultation demonstrates a number of site substitutions. Fluctuations in the forecast quantum of homes from individual sites occur through plan making stages. It is notable when 1000 unit scale changes in forecast site yields occur and wholesale site removal for 1000 plots and replacements occur. It is therefore important to understand the basis for site deletions and the rationale behind substitute sites added. In line with government agenda, a clear sequential driver within Erewash involves avoidance of Greenbelt release. Yet a sites none greenbelt status does not in itself constitute the basis for a sites allocation for housing. For example, the West Hallam Depot formerly draft allocated through the January 2020 & March 2021 Growth Options despite extant and comprehensive employment land status. The continued allocation of Stanton Regeneration Site (aka Stanton South) despite known ground issues and site viability concerns, pending commercial applications. The CSPR rationale appears more ad-hoc than considered.

Timeline of the Erewash CSPR spatial strategy

Proposed Strategic Allocations	Homes		Proposed Strategic Allocations	Homes		Proposed Strategic Allocations	Homes	
Santon Regeneration Site	1000		Santon Regeneration Site	1000		Santon Regeneration Site	1000	
West Hallam Depot	1000		West Hallam Depot	1000		West Hallam Depot	<del>1000</del>	
Lock Lane, Sawley	300		Lock Lane, Sawley	300		Lock Lane, Sawley	<del>300</del>	
Acorn Way	600		Acorn Way	600		Acorn Way	600	
Cotmanhay	600		Cotmanhay	250		Cotmanhay	250	
South west of Kirk Hallam	600		South west of Kirk Hallam	600		South west of Kirk Hallam	600	
			Extended Kirk Hallam	700		Extended Kirk Hallam	700	
			North of Spondon	300		North of Spondon	200	
	4100			4450			3350	
Proposed Urban Intensification sites	Homes		Proposed Urban Intensification sit	es Homes		Proposed Urban Intensification sites	Homes	
Growth in Long Eaton Urban Area	780		Growth in Long Eaton Urban Area	780		Growth in Long Eaton Urban Area	700	
Ilkeston Urban Area	1560		Ilkeston Urban Area	1560		Ilkeston Urban Area	1400	
						Rural Area	350	
	2340			2340			2450	
	Homes	P.A		Homes	P.A		Homes	P.A
Local Plan Housing Need 2020-2037	6680	393	Local Plan Housing Need 2020-203	7 6680	393	Local Plan Housing Need 2022-2037	5800	386
Forecast supply from Greenbelt sites	4100		Forecast supply from Greenbelt si	es 4450		Forecast supply from Greenbelt sites	3350	
Forecast supply from urban area sites	2340		Forecast supply from urban area si	tes 2340		Forecast supply from urban area sites	2450	
Total forecast	6440	379	Total forecast	6790	399	Total forecast	5800	387

An indirect consequence of greenbelt avoidance is urban intensification. Urban intensification growth strategies may in part be applicable though its effectiveness is contingent upon the availability of suitable brownfield & employment change of use sites. Urban intensification strategies typically direct development toward playing fields, allotments, incidental open areas or alternatively brownfield sites that can often be biodiverse rich habitat. Such sites within towns are rare and therefore highly valued by residents living in often dense, built up conurbations. Urban intensification can therefore lead to urban cramming which comes at a cost to the environment and detriment to resident's sense of wellbeing.

DEFRAs Environment Bill, specifically the Net-Biodiversity Metric can make building on urban brownfield and open space sites financially unviable due to the amount of biodiversity offsetting credits required to offset for redevelopment of typically medium to high biodiverse rated sites. At present, no SHLAA or accompanying Biodiversity Site Assessment exists that raises questions over the availability, deliverability, suitability of at present undeclared sites within the conurbations of Ilkeston and Long Eaton to accommodate the assumed CSPR target 2100 homes.

Missing evidence 'namely the 2022 SHLAA' makes up to date examination of CSPR claims relating to Ilkeston or Long Eaton impossible however, examination of the 2019 SHLAA provides a good steer.

Examination of the 2019 SHLAA asserts c1540 plots are deliverable within Long Eaton and Ilkeston combined. Of this total, 181 permissions have lapsed, 608 plots are built, 155 plots will be in construction from 2022 and 778 sites considered deliverable are not currently available. Among the unavailable site 110 plots comprise land currently used for residential garage parking, allotments with 431 plots apportioned to Greenfield open space sites.

Based on the 2019 SHLAA evidence available, the combined conurbations of Long Eaton and Ilkeston do not appear to have sufficient, suitable, available sites capable of meeting the CSPR target of 2100 homes. Omitting unavailable and built plots from the 2019 SHLAA leaves a total of c340 plots available for development. The makeup of these remaining sites comprises mostly one, two unit-sized infill sites with limited 8-10 unit redevelopment opportunities. A long way short of the 2100 target declared. An inconvenient truth that highlights a deficit in strategic sites allocated.

Erewash policy (3<sup>rd</sup> March 22) state the 2022 SHLAA is currently under review and should be complete when the REG 19 plan is formerly submitted to the inspector however no firm date for submission is set at present. This raises questions over the soundness of the spatial strategies plot yield assumptions for either conurbation to accommodate 36% of the plan housing numbers given the SHLAA report necessary to inform this target is itself incomplete.

The full council report confirms the Spatial Strategy site addition 'land North of Spondon' arose out of the removal of Lock Lane, Sawley despite the council acknowledging two alternative sites promoted are more sustainable:

- Land north of West Hallam (promoted by Persimmon Homes)
- Draycott and Breaston

The Council determined no exceptional circumstances exist to allocate a further 1000 unit scale site within Greenbelt. However, this in part assumes sufficient sites exist within built up urban conurbations of Ilkeston and Long Eaton to accommodate the forecast 2100 homes. The 2019 SHLAA evidence does not support this claim.

The availability of suitable housing sites within Ilkeston and Long Eaton's existing conurbations is limited. Therefore, exceptional circumstances do in fact warrant the allocation of additional strategic sites. Adherence to the Sustainability Appraisal work dictates Land North of Spondon replacement by more sustainable greenbelt sites identified.

Erewash Council must clarify whether the minimum Local Housing Need (LHN) adequately supports their economic growth aspirations. Where growth strategies aim to deliver major strategic infrastructure improvements, compensate for past under delivery of housing, accommodate neighbouring authority unmet housing need, address shortages in affordable housing provision etc. Increasing the LHN figure above the minimum threshold would significantly boost jobs, secure financial contribution to education, medical centres, open space, leisure, council tax, secure affordable housing, increase money spent in the local economy. The framework supports ambitious councils who plan for growth. The Erewash CSPR like the extant Core Strategy lacks ambition; thereby fails to constitute a positively prepared plan. Lessons of past under supply must be learnt not repeated. Misplaced faith in former allocation sites that have evidently failed to deliver homes are red flags not a blueprint. I urge Erewash Council to consider adopting a housing target that exceeds the mathematically contrived minimum LHN.

Strategic Policy 1 - Housing; sets out the distribution of housing in accordance with the settlement hierarchy as follows:-

a) around 700 dwellings within the Long Eaton Urban Area (conurbation) ;

b) around 1,400 dwellings within the Ilkeston Urban Area (town) ;

c) around 350 dwellings within the Rural Area (villages) ;

d) around 1,000 dwellings in a new settlement on brownfield land not in the Green Belt at South Stanton (former Stanton Ironworks) (Strategic Policy 1.2) ;

e) around 800 dwellings as extensions to the Derby conurbation on land deallocated from the Green Belt, including around 600 dwellings on land west of Acorn Way (Strategic Policy 1.3) & around 200 dwellings on land north of Spondon (Strategic Policy 1.4) ; and

f) around 1,550 dwellings as extensions to the town of Ilkeston, on land deallocated from the Green Belt including around 1,300 dwellings on land south west of Kirk Hallam (Strategic Policy 1.5) & around 250 dwellings on land north of Cotmanhay (Strategic Policy 1.6).

I expect to see a programme or supply trajectory prepared to illustrate when plots are likely to come forward for each site. I would also expect to see a plan identifying available, viable, deliverable sites within the conurbations of Ilkeston and Long Eaton 2100 homes are coming from. The lion share of strategic allocations are large and controlled by individual developer. Acorn Way, and Kirk Hallam both controlled by Redrow. EIA application will be protracted, specifically S106 and subsequent land acquisition contracts. Civilising work involving the construction of relief roads will be complex resulting in 3-4year lead in times. In light of the limited number of active developer (which in itself comprises an inequality of opportunities for competing developers) housing delivery rates will be limited. At present, the lack of tangible deliver evidence makes it impossible to know whether the small assortment of strategic sites identified is capable of assisting Erewash in achieving their annual housing target.

### Strategic Policy 1.1 – Strategic Housing Sites

Applications for strategic housing developments of 200 or more homes shall:

- 1. Establish a coherent and quality design for the proposed new neighbourhood that respects its settlement context;
- 2. Maintain and enhance, where possible, existing hedgerow and tree belt boundaries with the open countryside;
- 3. Integrate sufficient tree planting, sustainable drainage infrastructure, suitable play areas and other safe and functional public open spaces into the layout and design;
- 4. Deliver an appropriate level of biodiversity net gain;
- 5. Be based on a network of streets that prioritise walking, wheelchair use and cycling over motorised transport;
- 6. Provide at least one off-street parking space per new home served by an electric vehicle charging point; and
- 7. Ensure that each parking space provided is well related to the home it is intended to serve, and does so without dominating the street-scene.

Bullet 4 relating to appropriate levels of biodiversity net gain lacks clarity. Policy should not be ambiguous rather the contrary clear and absolute. The Environment bill considers 10% to be a suitable level of BNG mitigation. Use of DEFRA metric establishes a level playing field. The discretionary nature of the current wording should be allied to the corresponding section of the Environment Act.

Bullet 6 – In June 2022, Part S of the Build Regulations will require electric vehicle charge points in residential development. The associated cost of providing EVCPs under part S should be accounted for with Erewash council viability calculations moving forwards. Bullet 6 should be removed.

### Strategic Policy 1.2 – South Stanton

The REG 19 Local Plan follows a similar spatial strategy as that found in the extant Core Strategy, directing homes to the Stanton Regeneration Site (South Stanton) despite nil homes delivered in the intervening 8yr period. At present an application to redevelop approximately half the Stanton Regeneration Site for hybrid Employment, B2 and B8 uses is pending ref: ERE1221/0002 for c60ha located immediately south of the Nut Brook Trail. This live application presumably accounts for the reduction from 2000 homes target set within the January 2020 Growth Options Consultation compared to 1000 homes within the REG 19 draft plan.

Known ground contamination issues affect the land subject to allocation for housing at the South Stanton site situated south of Lows Lane. These range from Mine Shafts, Bell Pits, Aesbestos Tip, buried Slag and foundry landfilling across large areas generating significant volumes of contaminated made ground that bring into question the viability and indeed suitability of the South Stanton Site for residential. Approval of the extant ERE1221/0002 application will expand existing commercial operations from the Quarry Hill Industrial park southward increasing HGV traffic, dust, noise, air

pollution unsuitable for residential uses. Indeed the scale of remediation necessary to achieve suitable CBR rating for roads and services alongside plot foundation solutions leaves significant question marks over the sites overall deliverability. If a scheme were to come forward, it would likely be subject to viability arguing reduced or nil affordable, reduced s106, CIL. The scale of ground remediation work necessary could drive land values down below minimum price contract thresholds meaning the commercial argument for change of use falls away. Similarly, the scale for offsite highway infrastructure improvements necessary to service the site are considerable and placing an overreliance upon third party LLEP or Government pinch point funding / loans bringing into question the sites actual sustainability appraisal scores awarded on for example matters relating to 'providing required infrastructure'.

### Conclusion

The prevalence of mining legacy issues affecting Erewash, specifically South Stanton, Cotmanhay, Kirk Hallam and Flood Risk Issues affecting Long Eaton brings into focus the absence of detailed Viability Assessment work regarding each draft strategic allocation. A key element critical to determining soundness of any plan on matters of deliverability and broad assumption used to determine sustainability within the Sustainability Appraisal. The viability of allocation sites should be subject to rigorous testing at plan making stage. To my knowledge, this has not been undertaken bringing into question the soundness of CSPR.

Assumptions in relation to Ilkeston and Long Eaton conurbations to absorb 2100 homes are at present unsubstantiated. Examination of the 2019 SHLAA indicates available sites capable of accommodating c340 plots, which indicates a significant shortage of strategic site allocations. Therefore, exceptional circumstances exist to review land north of West Hallam as an additional site allocation. The inclusion of additional allocations will provide opportunities for additional plots to come forward in the short term to assist Erewash in meeting its 0-5yrs housing target.

Persimmon Homes trust this representation assists the Councils with its Local Plan preparations. At present Persimmon Homes do not find the plan sound due to an absence of critical evidence. Persimmon Homes therefore welcome the opportunity to attend EIP hearings in due course.

### Yours faithfully

### for and on behalf of Persimmon Homes Nottingham



From:	Planning
Sent time:	05/05/2022 09:02:08
To:	Planning Policy
Subject:	FW: Emailing: Core_Strategy_Objection
Attachments:	Core_Strategy_Objection.pdf

Hello,

Please find objection attached for you.

Kind regards,



From: Diane Flanagan
Sent: 05 May 2022 08:26
То:
Subject: Emailing: Core_Strategy_Objection

**Dear Sirs** 

Please find attached our completed objection form (4 pages) for the planning inspectorate.

Yours faithfully Diane and Michael Flanagan



Your message is ready to be sent with the following file or link attachments: Core\_Strategy\_Objection

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



### Core Strategy Review Representation

The consultation runs between Monday 14 March and May 9 2022.

For representations to be valid, a full name and address must be provided.

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Organisation (where rel	levant)	
Address(*)		
Postcode(*)	1	12
Postcode(*)	1	
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To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

P

Policies Map

Other text

Please use the box below to tell us specifically where the representation relates to (a policy, the policies map or other text). Do not use the box to make your comments as this is required further down the form.(\*)

Other text			
			Trest Parent
Do you consider	the Core Strategy	Review is Legally Compliant? (*)	
Yes	No		
Do you consider	the Core Strategy	Review is sound?(*)	
Yes	No		
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### www.erewash.gov.uk EREWASH



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#### \*(continued from page 2)

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Core

From:	Planning
Sent time:	05/05/2022 09:02:18
То:	Planning Policy
Subject:	FW: Core Strategy Objection - Erewash greenbelt
Attachments:	Core-Strategy-Objection.pdf

Hello,

Please find objection attached for you.

Kind regards,



Sent: 05 May 2022 08:26 To: Subject: Core Strategy Objection - Erewash greenbelt

Please find attached my objection form.

Kind Regards Victoria



### Core Strategy Review Representation

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Title(*)		
First Name(*)		 
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Job Title (where relevant)		
Organisation (where relevant)		
Address(*)		
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Agent's details (if applicable) Include name, address, contact number and email

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Core-Strategy-Objection.pdf

## www.erewash.gov.uk EREWASH



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From:	Planning
Sent time:	05/05/2022 09:02:27
To:	Planning Policy
Subject:	FW: Planning objection
Attachments:	Core_Strategy_Objection.pdf

Hello,

Please find objection attached for you.

Kind regards,

From: Kate Felce			
Sent: 05 May 2022 (	)8:27		
To:			
Subject: Planning c	bjection		



### Core Strategy Review Representation

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Address	(*)	
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Email Ad	ddress(*)	

Agent's details (if applicable) Include name, address, contact number and email

1

Core\_Strategy\_Objection.pdf



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Policies Map

Other text

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From:	Planning
Sent time:	05/05/2022 09:03:16
To:	Planning Policy
Subject:	FW: EREWASH GREENBELT
Attachments:	Core_Strategy_Objection.pdf
Hello,	

Please find objection attached for you.

Kind regards,



From: OVERTON BRYAN
Sent: 05 May 2022 08:58
То:
Subject: EREWASH GREENBELT

Please see attached.



### Core Strategy Review Representation

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Job Title (where Organisation (where Address(*)				
Postcode(*)		1		
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Email Address(*)				
Agent's details (i	f applicable) Include	name address co	ontact number and email	

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P

Policies Map

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#### \*(continued from page 2)

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Core

From:	Planning	
Sent time:	05/05/2022 09:29:10	
То:	Planning Policy	
Subject:	FW: Planning housing development	
Attachments:	Core_Strategy_Objection.pdf	

Good morning,

Please find objection attached.

Kind regards,

-----Original Message-----

From: Russ Draper

Sent: 05 May 2022 09:26

To:

Subject: Planning housing development

Sent from my iPad



### Core Strategy Review Representation

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To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

P

Policies Map

Other text

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Other text			
			Trest Parent
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Do you consider	the Core Strategy	Review is sound?(*)	
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Core

From:	Planning
Sent time:	05/05/2022 09:29:23
То:	Planning Policy
Subject:	FW: Planning
Attachments:	Core_Strategy_Objection.pdf

Good morning,

Please find objection attached.

Kind regards,

From: Julie Hopkinson Sent: 05 May 2022 09:28 To: Subject: Planning



### Core Strategy Review Representation

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All fields marked with an Asterix (\*) must be completed.

$\rightarrow$	Title(*)
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$\rightarrow$	Surname(*)
	Job Title (where relevant)
	Organisation (where relevant)
→	Address(*)
$\rightarrow$	Postcode(*)
>	Telephone number(*)
>	Email Address(*)

Agent's details (if applicable) Include name, address, contact number and email

1

Core\_Strategy\_Objection.pdf



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

P

Policies Map

Other text

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Core

From: Sent time: To: Subject: Attachments: Planning 05/05/2022 09:47:17 Planning Policy FW: Core\_Strategy\_Objection.pdf Core\_Strategy\_Objection.pdf

From: Chris Pollarc Sent: 05 May 2022 09:37 To: Subject: Core\_Strategy\_Objection.pdf

-257 ?



### Core Strategy Review Representation

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Agent's details (if applicable) Include name, address, contact number and email



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P

Policies Map

Other text

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Core

From: Planning 05/05/2022 10:07:10 Sent time: To: Planning Policy Subject: FW: 0B6626E0-6131-4FA9-9E0D-1DFE51A8BEC5.pdf Attachments: 0B6626E0-6131-4FA9-9E0D-1DFE51A8BEC5.pdf

From: Jacqueline Fisher Sent: 05 May 2022 09:59

To:

Subject: 0B6626E0-6131-4FA9-9E0D-1DFE51A8BEC5.pdf



### Core Strategy Review Representation

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All fields marked with an Asterix (\*) must be completed.

Title(*)			
First Name(*)			
Surname(*)			
Job Title (when			
Address(*)	where relevant)		
Postcode(*)			
Telephone nur	mber(*)		
Email Address	(*)		

Agent's details (if applicable) Include name, address, contact number and email



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

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Policies Map

Other text

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Other text Do you consider the Core Strategy Review is Legally Compliant? (*)				
Yes	No 🖌			
Do you conside	the Core Strategy Review is sound?(*)			
Yes	No 🖌			
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Yes	No 🗹			
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\*Please see remaining points on page 4 (continuation sheet)

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bdf



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#### \*(continued from page 2)

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From: Sent time: To: Subject: Attachments: Planning 05/05/2022 10:07:43 Planning Policy FW: Save the Greenbelt Core\_Strategy\_Objection.pdf

From: Susan Rowlands Sent: 05 May 2022 09:59 To: Subject: Save the Greenbelt

To whom it may concern,

Please find attached my objection to the building of houses in Kirk Hallam.

Yours faithfully

Susan Rowlands

#### Susan Rowlands







### Core Strategy Review Representation

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Title(*)	
First Name(*)	
Surname(*)	
Job Title (where relevant)	
Organisation (where relevant)	
Address(*)	
Postcode(*)	
Telephone number(*)	
Email Address(*)	

Agent's details (if applicable) Include name, address, contact number and email

Core\_Strategy\_Objection.pdf



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

P

Policies Map

Other text

Please use the box below to tell us specifically where the representation relates to (a policy, the policies map or other text). Do not use the box to make your comments as this is required further down the form.(\*)

Other text			
			Trest Parent
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Yes	No		
Do you consider	the Core Strategy	Review is sound?(*)	
Yes	No		
Do you consider	the Core Strategy	Review Representation complies with the duty to oper	rate?(*)
Yes	No		
unsound or fails If you wish to sup	to comply with the port the legal cor	ider the Erewash Core Strategy Review is not legally co e duty to co-operate. Please be as precise as possible. Inpliance or soundness of the Core Strategy Review or it erate, please also use this box to set out your comment	ts
address key obje communicate or unprecedented g and often unable the proposals or congregate to for of whom aren't t website is difficul	ctions or issues. The engage with all re- lobal pandemic w to access media is where to find ther rmulate a collective echnologically mir It and confusing to	ion 18 consultation is in place to engage with local resid is process was flawed as Erewash Borough Council didn sidents and also gave a short objection time during an hen people were locked down, frightened, sick, lost love formation sources, so weren't (and many still aren't!) a n. Public libraries and places of information where peop e response were closed or restricted and for many 'local ded or have no internet access – the Erewash Borough C navigate and finding and completing the complex consu- barrier for many to attempt.	i't fairly ed ones ware of le ls' – some Council
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Core

From:PlanningSent time:05/05/2022 10:08:45To:Planning PolicySubject:FW: Building on Kirk Hallam green belt

From: jacqueline fisher	
Sent: 05 May 2022 10:00	_
То:	
Subject: Fwd: Building on Kirk Hallam green	belt

Sent from my iPhone

Begin forwarded message:

From: jacqueline fisher
Date: 31 March 2021 at 08:48:21 BST
To: 
Subject: Building on Kirk Hallam green belt

-257 ?To whom it may concern,

I want to say that we strongly appose the proposed housing development at Kirk Hallam.

I live on Stanton road and the traffic congestion, air pollution and traffic noise is becoming already unbearable. Adding further traffic from this proposed site will bring our road network to a stand still! I am extremely worried about all our healths and the healths of our children, walking to school in standstill traffic should be a concern to us all. We should be thinking of how to reduce traffic and pollution going up and down Stanton road not adding to it! I would welcome someone to come and do a pollution assessment.

Also the Increase in demands on schools, doctors and dentists which anyone local will already know are overstretched and underfunded.

Also what about environmental damage! We should be so proud that we have such beautiful nature reserves around our area, most people can walk from their doorsteps, why would we put these at risk? The pollution, increase in people using these areas and cutting nature areas off will surely have an impact on these areas of beauty!

I am not against development and of course affordable housing will always be needed, but are there better sites and areas that could be developed across Erewash to prevent this constant bottleneck of traffic from challons way all the way to Kirk Hallam? We have the Elkas rise housing estate recently built in that area, and the Stanton ironworks site is soon to be used by Wards! Furthering traffic and environmental pollution, we can not cope with more traffic pollution, something needs to be done about this!

Yours sincerely Mrs Jacqueline Fisher 
 From:
 Planning

 Sent time:
 05/05/2022 10:10:05

 To:
 Planning Policy

 Subject:
 FW: Petition

 Attachments:
 0B6626E0-6131-4FA9-9E0D-1DFE51A8BEC5.pdf

From: david fisher Sent: 05 May 2022 10:02 To: Subject: Petition



## Core Strategy Review Representation

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All fields marked with an Asterix (\*) must be completed.

Title(*)		
First Name(*)		 
Surname(*)	Phone in the	
Job Title (where relevant)		
Organisation (where relevant)		
Address(*)		
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Postcode(*)	1	
Telephone number(*)		
Email Address(*)		
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Core Strategy Objection-1.jpg



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

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Policies Map

Other text

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Other text Do you consider the Core Strategy Review is Legally Compliant? (*)				
Yes	No 🖌			
Do you conside	the Core Strategy Review is sound?(*)			
Yes	No 🖌			
Do you conside	the Core Strategy Review Representation complies with	the duty to operate?(*)		
Yes	No 🗹			
If you wish to se	to comply with the duty to co-operate. Please be as pre- oport the legal compliance or soundness of the Core Stra the duty to co-operate, please also use this box to set or	ategy Review or its		
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From: Sent time: To: Subject: Attachments: Planning 05/05/2022 11:12:03 Planning Policy FW: Kirk Hallam House Build Core\_Strategy\_Objection.pdf

From: Stephen Harbon Sent: 05 May 2022 11:00 To: Subject: Kirk Hallam House Build

-257 ?



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	Job Title (where relevant)
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Agent's details (if applicable) Include name, address, contact number and email

[

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Core\_Strategy\_Objection.pdf



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

P

Policies Map

Other text

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Other text			
			Trest Parent
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From:	Planning
Sent time:	05/05/2022 11:12:13
To:	Planning Policy
Subject:	FW: Objection to building on Erewash Green Belt land
Attachments:	Core Strategy Review Representation.pdf

## From: Lauren Perry Sent: 05 May 2022 10:48 To:

Subject: Objection to building on Erewash Green Belt land

Good morning,

I have only very recently been made aware of plans to build a large number of new homes on green belt land near my home in Kirk Hallam. This is via an organisation and not through any notification from yourselves.

I feel that the consultation process should be declared invalid as this has been rushed through and there will be many, like myself, who are only just learning of this or are not even aware of these plans to destroy land which should be protected.

Please find attached the relevant paperwork to declare my objection to these works. I can only hope that plans to destroy green belt land do not go ahead, this land deserves protection, not destruction for capital gain.

Regards

Lauren Perry



Core Strategy Review Representation

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All fields marked with an Asterix (\*) must be completed.

	Title(*) MISS
+	First Name(*)
$\rightarrow$	Surname(*) PERRY
	Job Title (where relevant)
	Organisation (where relevant)
$\rightarrow$	Address(*)
$\rightarrow$	Postcode(*)
$\rightarrow$	Telephone number(*)
$\rightarrow$	Email Address(*)

## Agent's details (if applicable) Include name, address, contact number and email



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

Po	licies	

Policies Map

Other text

Please use the box below to tell us specifically where the representation relates to (a policy, the policies map or other text). Do not use the box to make your comments as this is required further down the form.(\*)

Other text	
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Yes	No 🗹
Do you consider the Co	re Strategy Review is sound?(*)
Yes	No 🖌
Do you consider the Cor	re Strategy Review Representation complies with the duty to operate?(*)
Yes	No 🗹
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\*Please see remaining points on page 4 (continuation sheet)



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From:	Planning	
Sent time:	05/05/2022 11:12:20	
To:	Planning Policy	
Subject:	FW: Erewash Green Belt	
Attachments:	Attachment information	Core_Strategy_Objection.pdf

-----Original Message-----

From: Gary Siddall

Sent: 05 May 2022 10:33

To:

Subject: Erewash Green Belt

Please see attached.

Regards,

Gary Siddall

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This email has been checked for viruses by AVG.

https://www.avg.com



### Core Strategy Review Representation

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To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

P

Policies Map

Other text

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From: Sent time: To: Subject: Attachments: Planning 05/05/2022 11:23:05 Planning Policy FW: Kirk Hallam House Build Core\_Strategy\_Objection.pdf

From: Stephen Harbor Sent: 05 May 2022 11:01 To: Subject: Kirk Hallam House Build

Please see attached -257 ?



#### Core Strategy Review Representation

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Agent's details (if applicable) Include name, address, contact number and email



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P

Policies Map

Other text

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Core

From: Sent time: To: Subject: Attachments:

05/05/2022 11:51:11 Planning Policy Core strategy review representation Core\_Strategy\_Objection.pdf

Sent from the all-new AOL app for iOS



#### Core Strategy Review Representation

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Address(*)	
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Telephone number(*)	
Email Address(*)	

Agent's details (if applicable) Include name, address, contact number and email

1

Core\_Strategy\_Objection.pdf



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

P

Policies Map

Other text

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#### \*(continued from page 2)

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From:PlanningSent time:05/05/2022 13:01:23To:Dlanning PolicySubject:FW: Core strategy objectionAttachments:Core\_Strategy\_Objection.pdf

-----Original Message-----

From: Denise Harborne

Sent: 05 May 2022 12:59

To:

Subject: Core strategy objection



#### Core Strategy Review Representation

The consultation runs between Monday 14 March and May 9 2022.

For representations to be valid, a full name and address must be provided.

If you need to continue with more space for any of your answers, please attach further pages to this form.

All fields marked with an Asterix (\*) must be completed.

$\rightarrow$	Title(*)
$\rightarrow$	First Name(*)
$\rightarrow$	Surname(*)
	Job Title (where relevant)
	Organisation (where relevant)
$\rightarrow$	Address(*)
$\rightarrow$	Postcode(*)
$\rightarrow$	Telephone number(*)
>	Email Address(*)

Agent's details (if applicable) Include name, address, contact number and email

1

Core\_Strategy\_Objection.pdf



To which part of the Core Strategy Review does this representation relate? (one or more must be ticked)(\*)

P

Policies Map

Other text

Please use the box below to tell us specifically where the representation relates to (a policy, the policies map or other text). Do not use the box to make your comments as this is required further down the form.(\*)

Other text			
			Trest Parent
Do you consider	the Core Strategy	Review is Legally Compliant? (*)	
Yes	No		
Do you consider	the Core Strategy	Review is sound?(*)	
Yes	No		
Do you consider	the Core Strategy	Review Representation complies with the duty to oper	rate?(*)
Yes	No		
unsound or fails If you wish to sup	to comply with the port the legal cor	ider the Erewash Core Strategy Review is not legally co e duty to co-operate. Please be as precise as possible. Inpliance or soundness of the Core Strategy Review or it erate, please also use this box to set out your comment	ts
address key obje communicate or unprecedented g and often unable the proposals or congregate to for of whom aren't t website is difficul	ctions or issues. The engage with all re- lobal pandemic w to access media is where to find ther rmulate a collective echnologically mir It and confusing to	ion 18 consultation is in place to engage with local resid is process was flawed as Erewash Borough Council didn sidents and also gave a short objection time during an hen people were locked down, frightened, sick, lost love formation sources, so weren't (and many still aren't!) a n. Public libraries and places of information where peop e response were closed or restricted and for many 'local ded or have no internet access – the Erewash Borough C navigate and finding and completing the complex consu- barrier for many to attempt.	i't fairly ed ones ware of le ls' – some Council
		hat initially appeared a fairly shared housing proposal w referred proposals lacked an obvious unbalanced appro	

No Equitability & fairness – after what initially appeared a fairly shared housing proposal within Erewash, things changed and new preferred proposals lacked an obvious unbalanced approach towards housing delivery throughout the region. Cotmanhay, Kirk Hallam and Spondon in the North of the Borough alone now unfairly continuing to be disproportionately targeted to absorb the borough's housing quota. This is made more apparent by the fact that over the last 30 years, new postcodes in Erewash have almost exclusively been within Cotmanhay and Kirk Hallam.

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Core

From:	
Sent time:	05/05/2022 12:12:31
То:	Planning Policy
Cc:	
Subject:	Erewash Core Strategy Review - Submission of Representations
Attachments:	Erewash Core Strategy Review - Representations to Local Plan Reg 19 Consultation (May 2022).pdf

Good afternoon,

On behalf of our client Network Rail, please find attached representations in regard to the Regulation 19 Erewash Core Strategy Review consultation.

If someone could please confirm receipt that would be much appreciated.

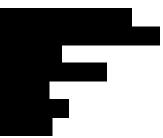
Should you have any queries, please don't hesitate to get back in touch with either myself or of Network Rail (cc'd).

Kind regards,









### Dear Sir / Madam

## Representations to Regulation 19 Consultation on draft Erewash Core Strategy Review (2022) -Representation on behalf of Network Rail

We write on behalf of Network Rail in response to Erewash Borough Council's consultation (under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended) on the draft Erewash Core Strategy Review (2022).

Network Rail (NR) is the statutory undertaker for railway infrastructure in England, Scotland and Wales, reinstating and protecting the infrastructure for the operational railway. NR's focus is on maintaining (and ensuring the safety of) the railway and railway-related uses.

We hope that the comments on the individual policies that are of relevance to NR's role as statutory undertaker for railway infrastructure. Proposed policy changes or requests for amendments are underlined in the paragraphs below.

## Strategic Policy 2.1 - Stanton North

The draft site allocation policy allocates c. 80ha of brownfield land for employment use (55ha of which would be to deliver industrial development with the remaining 35ha towards transport and green infrastructure priorities).

Part 2 of the policy states 'The development shall include: Reconnection of the site to the national rail network via the Stanton Branch Line to widen options for the movement of freight to and from the site'

The supporting text further states: 'The reconnection of a direct rail spur linking Stanton North to the national rail network will be required. The utilisation of the rail spur by freight services would help to minimise the number of HGV movements to and from the site, reducing pressure on the local road network.'

From an NR perspective, we would like to confirm our in-principle support for the inclusion of the proposed rail spur into the Stanton North allocation site, which we note NR are aware about and which we continue to discuss with the site promoters.

Notwithstanding, we believe there should be a requirement within the draft site allocation policy that requires any future applicant to agree to safeguard sufficient land to provide the rail link, and that proposals should be supported by a site-wide masterplan and/or phasing strategy which would enable delivery of the rail prior to full build-out.



These modifications are considered necessary to ensure applicants are fully aware of the need to safeguard land for the rail spur which includes, but is not limited to the need to accommodate the following:

- a physical size of area capable of accommodating sidings and headshunt, preferably up to 775m in length for modern freight trains;
- facilities for inter modal exchange of goods (sufficient area for laydown and storage as well as HGV accessibility); and
- the network requirements which may involve some off-site works to signalling and other infrastructure on the network but have yet to be determined.

We also note that the ability to deliver the proposed rail spur would be subject to future detailed design, but note that any future rail spur would require a network agreement with NR that would include detailed discussion on the type and frequency of rail traffic.

### Suggested revisions to draft policy:

We consider the proposed site allocation policy and supporting texts be amended as follows:

Land at Stanton North as shown on the Policies Map is allocated for strategic employment development across 80 hectares of land. The development shall include:

- 1. Appropriate site remediation to safeguard human health and the environment;
- 2. <u>Safeguarding of land to allow for the</u> reconnection of the site <u>prior to full build out</u> to the national rail network via the Stanton Branch Line to widen options for the movement of freight to and from the site;
- 3. Preservation and enhancement of the existing green infrastructure features on site through integration with the adjacent Nutbrook and Erewash Strategic Green Infrastructure Corridors;
- 4. Offsetting measures as necessary to achieve appropriate biodiversity compensation; and
- 5. Safeguarding of land to allow the installation of a new roundabout to replace the existing junction of Sowbrook Lane, Lows Lane and Ilkeston Road, and off-site works as appropriate to safeguard the amenities of Stanton-by-Dale, Risley and Sandiacre from increased traffic.

To ensure sufficient land is safeguarded to deliver the site requirements listed above, development of the site must be brought forward in accordance with a site-wide masterplan and phasing strategy that has been consulted on with relevant statutory bodies (such as Derbyshire County Council, Network Rail, Natural England, or others) and subsequently approved by the Council prior to commencement of development.

### Strategic Policy 4 - Transport

We note the draft strategic transport policy (SP4) does not provide any reference to safety at level crossings. Level crossing are the largest operational risk to NR and therefore we seek to address risk reduction by addressing within local plans where possible.

The safety, reliability and efficiency of the rail infrastructure are of paramount importance to Network Rail and NR cannot agree to any proposals which jeopardise these requirements. Level crossings are safe if used correctly. Most level crossing risk has resulted from user error or abuse. NR are committed to reducing the risk at level crossings where reasonably practicable and will seek to close and/or divert crossings or enhance their safety through the provision of improved safety features or



equipment. NR will work with local councils to take a holistic approach to reducing level crossing risk and will encourage planning authorities to co-operate in securing level crossing closures or improvements in connection with new developments.

We would encourage the inclusion of a policy statement which makes it clear to developers that no new crossings will be permitted, that proposals which increase the use of level crossings will generally be resisted and where development would prejudice the safe use of a level crossing an alternative bridge crossing will require to be provided at the developers' expense.

EBC site assessments must take cognisance of the impact of development proposals on level crossings. Transport assessment and developer contributions policy and supplementary guidance must ensure infrastructure risks are identified and mitigation secured.

There are several level crossings in the EBC area, however, if there is an intensification of use through the allocation of land for traffic-intense uses (both pedestrian and vehicular) nearby, it would give NR cause for concern. Although we note this is a strategic policy which sets out key proposed transport infrastructure priorities it would be helpful to include a specific reference to level crossings in the supporting text was incorporated, emphasising that "highway safety" also extends to the safe operation or, preferably, the elimination of level crossings if at all possible.

### Suggested revisions to draft policy:

The council recognises that all new development can potentially impact on the highway network, it is important that the extent of these impacts are fully understood and considered when determining planning applications. As such, development proposals that compromise the safe or effective operation of any part of the Borough's transport network will be resisted. In the context of highway safety this also applies to railway level crossings, where the safety of both rail and road users is paramount.

### Next Steps

We thank you for the opportunity to be involved in the on-going preparation of the Erewash Core Strategy Review and trust that our representations are helpful when preparing the next version of the Plan. Network Rail is keen to engage with Erewash Borough Council and wish to continue to be involved in subsequent consultations.

