

I, **Beverley Anne Harrison** [REDACTED]

**Respondent Ref No. 481**

Wish to make a written Statement in Connection with

## **The Erewash Core Strategy Review Examination January 2024**

Contents of this statement are as follows:-

**Main Matter 3: The Spatial Strategy**

and

**Main Matter 4: The Green Belt**

My name is Beverley Harrison and I've lived in Kirk Hallam my entire life. From an early age I was taught that, despite its modern estate, Kirk Hallam is an old village with a history 'as long as your arm' and part of 4 Hallams referred to in the domesday book. It also has ancient monks pathways through the surrounding green(belt) countryside, (much being within Dale Abbey Parish) that led to Dale Abbey. On questioning this, it was explained if you stand on Ilkeston Market Place and look towards Wharncliffe Road there was a 'Hallam to the West' and a 'little Hallam' on your way to the 'Hallam with the Church' which stood beyond the 'Hallam where fields' were. Very quaint and medieval sounding – but true nonetheless, with Kirk Hallam's Grade 1 listed present (Victorian renovated) parish church - which has records of vicars dating back to Simon de Radford in 1298 - still standing.

### **Matter 3: The Spatial Strategy**

Over time, Little Hallam and Hallam Fields were accepted as part of Ilkeston, leaving West Hallam and Kirk Hallam as unconnected, though large inhabited villages - both separated and divided from the town of Ilkeston by the Nutbrook - and, though both with busy main through roads, apparently still retaining village status which protects the remaining greenbelt of these villages from overintensifying urban sprawl and merging with local villages, towns or towards cities whilst retaining essential, historically established biodiversity, health giving and pollution reduced green areas.

On looking at the revised Core Strategy's spatial portrait, I was dumbfounded to find the historic village of Kirk Hallam described as within the Ilkeston Urban area as part of freestanding town, thus implying our historic rural village has been urbanised and had its village status quashed. Perplexed by this, I asked several locals if they were aware, whereupon I found that no-one knew of or had been informed about this and on later searching the internet I also couldn't find anywhere this had been declared, instead discovering the following definitions for Kirk Hallam :-

- [www.visitpeakdistrict.com](http://www.visitpeakdistrict.com) 'a small village situated on a branch of the Erewash Canal, near Ilkeston;
- [mapcarta.com](http://mapcarta.com) 'Kirk Hallam is a village in the Erewash district, in the South-East of Derbyshire';
- [wikishire.co.uk](http://wikishire.co.uk) 'Kirk Hallam is a village in the south-east of Derbyshire, narrowly separated from becoming absorbed by the neighbouring town, Ilkeston';
- Wikipedia 'Kirk Hallam is a village in the Erewash district' and
- [Landscapebritain.co.uk](http://Landscapebritain.co.uk) 'Kirk Hallam is a village in the County of Derbyshire.

On also discovering the respected, well earned historic 1000 plus year village of Kirk Hallam had been omitted from most modern-day maps, a recent freedom of information request I submitted (please see appendix 1) reveals an ambiguous response which doesn't properly answer when or which council legally or democratically decided upon and instigated Kirk Hallam's village cessation. Thus, as EBC themselves never designated it a village, to use current terminology it appears Kirk Hallam the village is 'cancelled' and the public weren't even informed!

So with inequality, unfairness and undemocratic ideals (over 10 years after changing from Ilkeston Municipal Council) it's possible that around 1988 (appendix 1 – question 1 answer) Erewash Borough Council effectively deregulated the village, changing it to part of freestanding urban town without any public announcement or consultation with the over 6000 Kirk Hallam residents the council themselves represent. As a result Kirk Hallam has unjustly been left with an urban status which takes away village protection 15 other Erewash villages enjoy – thus allowing the manipulative process of destroying our precious, historically established greenbelt for urban development and possible eventual sprawl. In less than 40 years it appears they may have covertly and quietly achieved what couldn't be done in around a thousand years by crusades, armadas, civil war, plague or two world wars, especially considering there are 2 large villages located as closely (both border around the Straws Bridge area) with the same Nutbrook division from Ilkeston. Surely, within a democratic society we're worthy of better than being treated in such a secretive and devious manner and have a right to equality and a freedom of choice referendum. If this had been in a country with a different political ideology it could well be considered invasive annexation.

In addition with the emergence of the current Core Strategy, which - after several drafts and updates - has managed to reduce its initial 6,680 allocation of homes by central government in 2014 down to its current figure of 5,800 (by providing the bulk of that reduction of allocated dwellings around Ilkeston and the surrounding area - as shown on Appendix 2 - and in addition to Strategic Policy 1 housing allocations).

It seems that by urbanising Kirk Hallam, as it's no longer recognised as an Erewash Village or receives the protection 15 other villages get, it has become an obvious target for urban regeneration within Core Strategy. As a result, along with Ilkeston, Cotmanhay, Spondon and nearby conurbations, Kirk Hallam's greenbelt is unjustly being irretrievably destroyed to allocate a massively unfair proportion of that, given that the original 2014 government allotment of 6,680 was allocated to all EREWASH. We only have to look at a map of the actual nominated developments (appendix 3) to see and witness the unbelievably unfair, inequality of the division of the allocation proportions across the borough, especially bearing in mind there's almost 4 times the amount of allocated development - along with a huge perpetual industrial and all traffic bypass road (plus nearby industrial New Stanton Park development) being proposed on the beautiful, biodiverse, historic 'Jewel of Erewash' greenbelt at just the single, overstretched village of Kirk Hallam - than the total allocated to the combined figure (of 350) within 15 other villages (which also excludes any development on their greenbelt land) when most of their reasons for rejection of development such as:-

- Reduce the separation of ..... (in our case 'Kirk Hallam from Stanton, Stanton by Dale and Dale Abbey')
- Development here would encroach into the open countryside contrary to the purposes of the greenbelt
- Development here could harm the setting of ..... (in our case 'the Pioneer Meadows Conservation Area')

could easily be adopted for the precious greenbelt around what is historically and still proudly considered by both residents and many others as the village of Kirk Hallam.

**Erewash Borough Council**

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**Environmental Information Regulations 2004 - Request for Information**

I am writing in respect of your recent enquiry for information held by the Authority under the provisions of the Environmental Information Regulations.

Having consulted our Planning Policy department on your specific request they inform me:

1. Precisely when, in what circumstances or documents, for what reasons and by what authority did Kirk Hallam cease to be designated as a Village by Erewash Borough Council?

Erewash Borough Council, across the course of its time as the responsible plan-making authority for the Kirk Hallam area, has never designated Kirk Hallam as a village for the purposes of plan-making in the Borough. Throughout the adoption of several Erewash Local Plans dating back as far as 1988, there is no planning policy (past or present) which sees Kirk Hallam defined specifically as a village. Across this period, for planning policy purposes, Kirk Hallam has consistently formed part of the Ilkeston Urban Area.

2. Why was there no consultation, referendum or other notification to the village before Kirk Hallam ceased to be designated and was cancelled as a Village by Erewash Borough Council?

As a consequence of the answer to 1, there has been no need to consult, arrange referendum or provide notification to anyone within Kirk Hallam as it has never been designated as a village by Erewash Borough Council.

3. How can the residents of Kirk Hallam Village seek to democratically restore its Village designation by way of appeal or otherwise?

As Kirk Hallam has never been designated as a village within Erewash's adopted Local Plans, which now span several decades, there are no clear mechanisms in place to designate Kirk Hallam as a village. The current strength of relationship between Kirk Hallam and Ilkeston for everyday employment, education, retail, and recreational purposes (coupled with Kirk Hallam's extremely close geographic proximity to Ilkeston) would make Kirk Hallam's identification as a village, insofar as planning policy in the Borough's Local Plan is concerned, very difficult to justify and achieve.

You may find further information of interest in our disclosure logs.

## Appendix 2

### List of local Allocation reducing dwellings (and site locations) developed since 2014 government quotas

In 2014 the Borough of Erewash was allocated around 6680/6800 homes for development by 2037. Since then almost 1,000 dwellings have been built or developed within existing brownfield/other land or renovated buildings, reducing the quota to 5800 against an already updated 2020 total of 6680 (as on the revised Core Strategy 2022 which was voted on by the then majority EBC). Following research and collation of figures it was revealed that these are the following development figures for around Ilkeston and surrounding local areas which, shows most of these to be located in and around Ilkeston – as listed below. A few of the figures given are approximated as some are still under construction and may vary very slightly (as shown in brackets)

|  |                     |
|--|---------------------|
| Elka's Rise  | 350 houses          |
| Stringer Close & Great Northern Close (inc some fronting Cotmanhay Road) over  | 100 houses/flats    |
| Nicholas Close inc some fronting Cavendish Road                                | 65 houses           |
| Scholar Close  | 20 houses           |
| Field Road (not yet completed) but so far approx                               | 45 houses           |
| Cotton Lace Close (former Cox Moore)+1 on Birdcroft Lane                       | 18 houses           |
| Bulls Head (near pub)  | 8 houses/flats      |
| Gallows Inn Close  | 26 houses           |
| Concorde Close   | 15 houses           |
| Triangle (former Coal business under construction) so far around               | 8 houses            |
| Former Poplar pub Bath Street  | 31 homes            |
| Rutland Mills (12 houses and 37 flats)   | 49 total            |
| Maypole Close, Kirk Hallam   | 7 houses            |
| West Hallam (former White Hart pub + 2 station road)                           | 10 houses           |
| Around New College (Pimlico area)  | 14 house            |
| Ilkeston Co-Op (1&2 bed apartments)  | 69 apartments       |
| Swanwick Rd/Fenton Close (inc some fronting Skeavingtons Lane) approx          | 35 flats and houses |
| Beauvale Drive (new road opposite school + more under construction) approx     | 21 houses           |
| Church St (inc 9 proposed flats + houses at former Rose & Crown)+ other approx | 20 houses/flats     |
| Tunncliffe Court   | 12 flats            |
| Former Hillcrest Nursing Home, Kirk Hallam                                     | 44 rooms/flats      |
| Windsor Crescent (former asbestos garages 5 proposed) + 7 around Kirk Hallam   | <u>12 houses</u>    |
| <b>Total</b>   | <b><u>979</u></b>   |

**Figures displaying Undemocratic Inequality of development across the Borough** - The table below highlights the undemocratic inequality and sharing of allocation across the borough giving over 80% of the development to less than 20% of Erewash, with Kirk Hallam not only getting the highest individual amount but also - in a borough with over 70% greenbelt - having its last greenbelt destroyed, increasing future flood risk, and destroying health giving, historically established biodiversity. Add also the industrial and all traffic bypass road with each Roundabout having right of way over traffic exiting an estate which is home to 2 of the 3 Ilkeston secondary schools, already heaving congestion plus the New Stanton Park industrial development and an infrastructure already to capacity along with a further reduced Public Transport system. Also 1300 houses (4290 bedrooms) increasing an already overintensified community by over 50% which all exacerbate and add further to existing health and anxiety issues.

*(nb: house figures have been checked with public, media and internet sources or/and site visit counts. Percentages and figures have been calculated from council documents and collated in conjunction with the above table)*

Revised 2022 Allocation 5800 (pre-revision originally 6680)

Key: North South Rural Developed(since 2014)

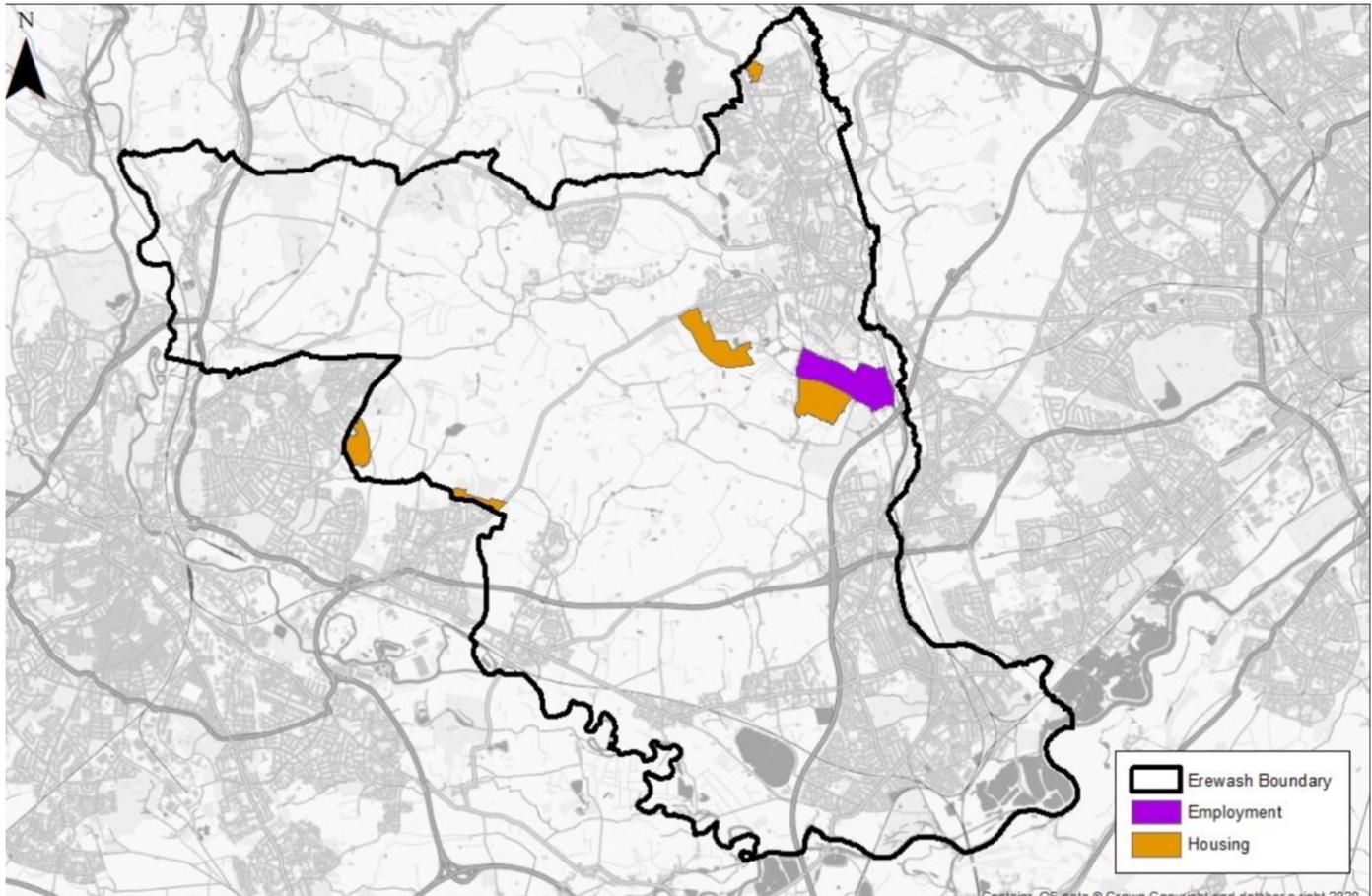
|  |             | % of<br>total amount |
|--|-------------|----------------------|
| Allocated + completed                                      |             |                      |
| Stanton  | 1000        | 14.75%               |
| Acorn Way  | 600         | 8.85%                |
| Spondon  | 200         | 2.95%                |
| Kirk Hallam(Greenbelt)                                     | 1300        | 19.18%               |
| Cotmanhay (Greenbelt)                                      | 250         | 3.69%                |
| Ilkeston Urban   | 1400        | 20.65%               |
| Rural  | 350         | 5.16%                |
| Long Eaton Urban   | 700         | 10.33%               |
| Developed (completed)<br>(All in Ilkeston and local areas) | 979         | 14.44%               |
| Total above  | <b>6779</b> |                      |

Erewash Region %

|                  |        |
|------------------|--------|
| North (combined) | 70.07% |
| Developed        | 14.44% |
| (As shown above) |        |
| South            | 10.33% |
| Rural            | 5.16%  |

|                                   |
|-----------------------------------|
| Combined total<br>North/Developed |
| <b>84.51%</b>                     |

## Appendix 3 – Proposed Erewash Local Plan Developments



### Matter 4: The Greenbelt

In simplest terms, what is greenbelt? Well, according to:-

- greenly.earth, 'The Green Belt Policy is an environmental method that strives to keep a portion of available land open and free from urban development'
- dictionary.cambridge.org, defines it as 'a strip of countryside round a city or town where building is not allowed' and
- StudySmarter UK, 'The Greenbelt is a ring of land around a city or town to stop urban sprawl. It is seen as an open green space for recreation, agriculture and wildlife habitats'

The Erewash Borough has over 70% of greenbelt around its towns and enswathing its villages and hamlets. However, looking at the small amount of environmentally friendly, biodiverse, established, ancient greenbelt which is left at Kirk Hallam (mainly down the South West edge of the historic village), Greenbelt there represents only around 1% of that huge figure and, as stated by SmarterStudy UK above, provides not only an open, health and recreational green space for the residents within the community, it is also a vital, supporting home to so many species of wildlife and flora as well as essential clean, fertile open space for continued growth of the arable crops for which the Canons of Dale Abbey had part of the ancient forests cleared many hundreds of years ago. (as shown in appendices 4 and 5 on the next page)



Appendix 4



Appendix 5

Add too, the protection it purveys to towns and villages to prevent overintensive urban sprawl merging them with other towns or cities. In short greenbelt and the air supporting trees and biodiversity the greenbelt gives is not only land engulfment protection, it provides mental health improving 'green' freedom, physical health improving and pollution soaking clean air and, in cases like this, ensures continuation of historical heritage that exists within the area – like the landmarks, ruins and much used 'Monks Way' footpaths, strewn across the greenbelt which historically and intrinsically link Kirk Hallam's historic Church to Dale Abbey and other villages.

Other natural environment and biodiversity quotes which must be pointed out are:-

- The Natural History Museum's article dated 26<sup>th</sup> September 2020 by Josh Davis states the UK 'has led the world' in destroying the natural environment and 'while countries such as Canada and Finland have 89.3 and 88.6% of their biodiversity left in tact, the UK has 50.3% remaining'
- Bluepatch.org 'The UK has lost almost half of its biodiversity since the 1970's.
- nationaltrust.org.uk from the 'State of Nature report 2023: UK wildlife continues to decline' article also dated 26<sup>th</sup> September 2023 includes 'UK now has less than half of its biodiversity remaining because of human activity' and the same article also states 'The UK is currently classified as one of the world's most nature-depleted'

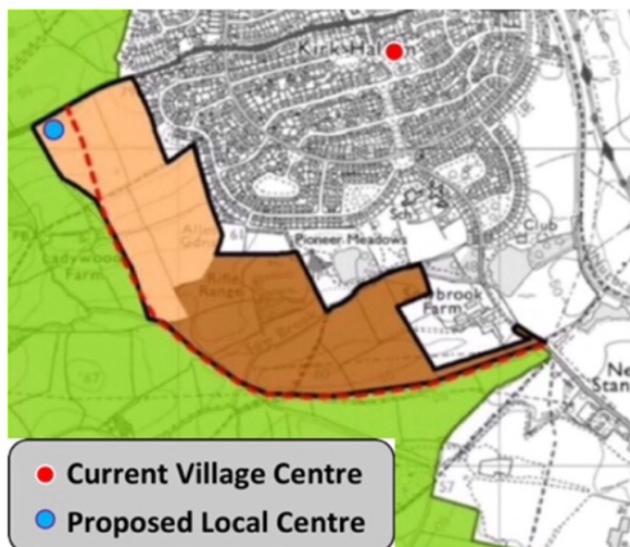
In December 2022 at COP15 the UK also signed up to the biodiversity agreement, so thought has to be given regarding the negative environmental, biodiverse and ecocidal result such irreversible and wanton man made destruction will cause.

Also, bearing in mind climate change increases rainfall and flood risk, surely such violation of mother nature's, natural greenbelt 'sponge' to swap it with impermeable, hard surfaces and concrete may cause water run off resulting in flood devastation to the older houses lower down the estate which, because the soft soil has always soaked up most of the water, will increase chances of flooding to homes which have never previously suffered major flood damage. As that water drains it may then run downstream to Erewash River, further increasing flood risk elsewhere in the borough.

Kirk Hallam presently has about 2700 dwellings with around 6000 residents of all demographics. It is home to 2 of only 3 already oversubscribed secondary schools for Ilkeston and because of this takes pupils (who travel daily through dangerous, pollutive bumper to bumper, heaving congestion) not just from Kirk Hallam but also West Hallam, Ilkeston and Cotmanhay. This in itself puts additional strain on existing placement availability. So it must be considered that the 1300 planned 2, 3, 4 and 5 bed roomed luxury houses with 4290 single or double bedrooms on this greenbelt may increase and overintensify the area and population by over 5,000, equating to a 'people' increase of over 80%. These dwellings which, prejudicially, don't include single storey disabled or elderly homes – are 'family' houses which will dramatically increase required school places!

Additionally, as stated in the proposed Core Strategy, the 10% affordable new home quota will be viably limited by the 'abnormal costs of the relief road' bypass and will instead use the 'relatively low cost' already occupied 50 to 70 year old existing homes in the area for this. As a result the development itself will consist of high-cost housing ranging from one fifth to almost half a million pounds in price. By comparison of much of the existing property within Kirk Hallam it's feasible that this could result in conflicting social division and a possibility of gentrification between the new and existing estate.

The clever and thoughtful design of the present estate carefully plotted for elderly and disabled residences to be fairly local to its shops and village centre amenities as if to assist in ease of accessibility. Relocation of that Village centre to a 'local centre' on the edge of the greenbelt development (see appendix 6 below) would create difficulty for many of the most vulnerable as - due to poor public transport within the present estate - to reach the new centre would involve arranging possible costly transport (noting that since submission of Core Strategy, Kirk Hallam has lost yet another public transport bus service and now has only 2 bus services one of which only runs straight through the main Ladywood Road area of this already large estate). Some have also questioned, why would a centre be sited at the edge if further sprawling regeneration isn't a possibility to spread like a developmental rash further across beautiful greenbelt.



Appendix 6

Alongside the unfair share of 1300 houses comes the huge 'relief road' – the relief of which seems to be achieved by reducing enforced allocation targets whilst generating revenue from the development to fund the road's in excess of £10,000,000 cost. It creates an industrial HGV and 'all traffic' bypass road - which eradicates and conveniently carves its way through Kirk Hallam's last precious fragment of greenbelt - to New Stanton Park and beyond. The road itself is sited such that, despite several large roundabouts, Highway Code priority is given to traffic from outside the estate over all exits from Kirk Hallam and, given the horrendous bumper to bumper congestion already experienced when traffic light controls are added to local roads - along with the anticipated traffic increase – it may further exacerbate the current congestion problem. This leaves Kirk Hallam itself sitting like a hugely overwhelmed residential mire enclosed within the centre of a heavily used perpetual 24/7, health destroying noise and emission (with a host of multi fuel, health damaging emissive air pollutants) polluting road - which will actually be a relief for no-one. Even the local MP for Erewash dubbed it 'a road to nowhere'! Combine this with green loss, relocating the local village centre, a huge population increase, loss of public transport services and a further fractured infrastructure and the result seems devastating.

Also planned adjacent to the 'relief' bypass road and cycle track - to quantify the devastating amount of greenbelt loss in an area that will increase from near 2700 to 4000 or more houses - is a 'strategic green corridor' which in this case is a fairly narrow green pathway dividing the existing and proposed new housing development and which travels down and on towards a further extension of that proposed 'strategic green corridor' and cycle path onto land on the corner fields opposite the 180 year old 'Twelve Houses' Grade II listed heritage site at Sowbrook Lane. This land which - given wet weather conditions - often floods, is an integral part of the Core Strategy which is planned to keep a division between Kirk Hallam and Stanton. However, to further confuse the issue this land is already awaiting the decisive results of an inspector for the Secretary of State of an inquiry between the local council and developers who wish to build 196 houses on it .... And that's before decisions to incorporate it as an integral part of Core Strategy have even taken place!

In conclusion, whilst being aware that dwellings are needed, it is felt both essential and fair they should be equally and fairly distributed across the borough. This not only allows overall growth within all localities, if required it also enables many ideals, including allowing adults and their children who've grown up within these local communities to remain fairly localised within the area they know and can use services and help – including own family care – which they know and trust. There are many other local places available for housing or flats – by utilising pre-used land enveloped within the green belt. For example the spent, run-down area known locally as the 'coal screens' (land between West Hallam and Mapperley sidings) or renovate older buildings within brownfield industrial and other sites around or within towns such as the listed derelict industrial factory opposite Weleda on Heanor Road, Ilkeston. We are also informed there are several other areas across the whole borough, both small and larger scale which, if investigated may be used, without destroying the premium, nature rich land protective green belt such as that proposed at Kirk Hallam and other nearby areas.