

Erewash Core Strategy Review – Public Examination Hearings

Matter 6: Housing Allocations

Date: 21st December 2023

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Respondent number: 337

This written submission is for consideration by the Planning Inspector during her independent examination of Erewash Borough Council's (EBC) Core Strategy Review (CSR) at the Public Enquiry with reference to Matters, Issues and Questions. This accompanies my attendance at some of the Hearing Sessions.

This written submission is made in support of objections previously submitted to include written statements (Core Strategy Review Representation Form Submission) via the Erewash Borough Council (EBC) website April 2022.

I write to raise concerns specifically about the following points of the above Matter and Issues:

Issue: Whether the proposed housing site allocation are justified, effective and consistent with national policy.

9. Strategic Policy 1.6 North of Cotmanhay

9. B. Green Belt Land

This site is the last Green Belt land to the north of the Borough, being the last piece of Green Belt separating the Borough of Erewash from Amber Valley. It also serves to maintain separation between the towns of Ilkeston and Heanor. The development of this site would narrow the key gap of the two Boroughs as well as resulting in unacceptable encroachment of the countryside. This site has been previously rejected for development on this basis.

This development proposal includes section 106 contributions of £125,000 from any developer towards woodlands provision for the Cotmanhay Wood. *Report EBC05 Green Belt* sets out that development at this site 'could enable the Wood itself to be brought into public use as community woodland linked by an east-west multiuser trail to give recreational access to Erewash Valley and Shipley Country Park'. The recreational use of the woodland is already underway without the need for the development of housing. The development of housing would have a negative impact on the woodland and its wildlife inhabitants.

As the woodland has no known ownership, does the proposed potential developer contribution of £125k to improve the woodland mean that EBC will take responsibility for its care and maintenance as well the anti-social behaviour issues?

9.G Highways

Report ETB1.1 SYSTRA Erewash Local Plan Development Assessment V5.2 at 3.1 refers to the CSR including several residential and employment developments that are mainly concentrated in the eastern part of the Borough in around Ilkeston and Kirk Hallam.

In these areas the road network already more than exceeds effective capacity. Traffic grinds to a halt along the main Heanor to Ilkeston Road A6007, even during non-peak times. This road being the egress and exit road for all traffic from the proposed Cotmanhay site. Access to this site is proposed via Woodside Crescent with traffic lights planned to be at the junction to the main road A6007. This will only introduce more congestion, noise and air pollution for existing residents. This development proposal has previously been rejected twice on the basis that the point of access was considered inadequate. The introduction of traffic lights will not adequately address this issue.

Why add a significant additional traffic burden to this already failing, over-burdened road network, which will be further compromised by more traffic adjoining the A6007 half a mile away from an ongoing extensive ten-year small town-like development at Shipley Lakeside?

Additionally, to the South of Ilkeston there is ongoing vast industrial development at Stanton Business Development Park, which will result in heavy traffic flow to the junction between the A6096 and Quarry Hill Road. It was reported at a Council meeting on March 3rd 2022 that a detailed traffic flow analysis would be undertaken as part of local planning permission. Surely this is far too late, and should form part of the core consideration to any development proposal before it is proposed, not at the planning stage? The highways are crumbling in this area, without the addition of more significant traffic volumes.

9.H Infrastructure

The local schools are already oversubscribed. General practitioners and dentists are difficult to access due to the number of patients trying to subscribe to such services.

Section 106 contributions are proposed for school places for new residents of the proposed Cotmanhay site whose children will be expected to go to school in Kirk Hallam. How are children expected to get there? Again, whatever the method of the journey to school be it

public bus or by car, will increase the volume of traffic on the overly burdened road structure in this congested part of the Borough.

The development proposals for Land North of Cotmanhay, raise fear of this area being bereft of green space, having congested roads, and insufficient medical facilities. Who would want to live in this area if the Council's unfair and unequitable proposals succeed?

The broad distribution of development across the Borough does not appear to have been thoroughly considered. The Council's response in the *Statement of Consultation* is that the infrastructure network in built up areas is far better placed and resilient to cope with sizeable new growth than if development were dispersed out to villages or open countryside. If this is the Council's position it implies that that overly populated high-density sites will always be the first choice for development. This is unfair and unjust.

The unequal distribution of housing is also evidenced in document *EBC04 Viability Assessment September 2023 by Andrew Gollard Associates*. Dr Andrew Gollard reports at 5.1 that that the analysis of small sites was not a remit of this work. At 7.8 it is also reported that the sites of SW Kirk Hallam and North Cotmanhay in particular, have significant infrastructure loadings. I ask where is the justification in exacerbating these loadings?

Taking cognisance of the above concerns alone, brings into question the justification and consistency of the Council's development proposals which place the burden onto the residents of Ilkeston.

End.