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REF: Objection to Planning Reference 0923/0024: Proposed residential development of 263 dwellings, associated landscaping, open space, infrastructure and enabling earthworks at land west of Dale Road, Spondon

Dear Sirs

I am writing to express my objections to the proposed plans contained in planning number 0923/0024 – the development of Spondon Wood **Green Belt land** west of Dale Road.

These objections are:

Land is identified as Green Belt land – Development does not meet very special circumstances

From a quick review of the NPPF (National Planning Policy Framework) I have obtained what would be deemed suitable for very special circumstances. These are:

- agriculture and forestry – **Not the purpose of this proposed development**
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries – **Not the purpose of this proposed development**
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building – **Not the purpose of this development**
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces – **not the purpose of this development**
- limited infilling in villages, and limited affordable housing for local community needs; or limited infilling or the partial or complete redevelopment of previously developed sites which would not have a greater impact on the openness of the Green Belt and the purpose of including

land within it than the existing development – **This development is not adjacent to any other residences within Erewash borough council. The neighbouring environment juts onto Spondon, Spondon Wood and agricultural land. Therefore, this development does not meet these conditions either.**

I would like to object on the grounds that, in this instance, the development of Green Belt land is not compliant with these special circumstances.

Within the plans, open spaces are proposed. These are not sized sufficiently (due in part to the constant increasing of the number of houses on the location (195 on previous surveys and plans, to 263 in this one), to preserve the openness of the Green Belt space.

This development instead creates an urban sprawl. This would be an urban sprawl which could alter and affect the shape of Spondon's boundary – the identity of Spondon was one of the reasons we moved to the town 12 years ago. I'll go on to cover the impacts on Spondon's utilities and infrastructure further down, but I can't see any other reason, other than urban sprawl which is not a good reason for eroding Green Belt land. I understand from wider reviews of Borrowash and Ockbrook residents, that they are also aligned with these views. ([Ockbrook, Borrowash & Spondon Woods Greenbelt Development - YouTube](#) - [Ockbrook, Borrowash & Spondon Woods Greenbelt Development - YouTube](#) - <https://www.youtube.com/watch?v=vlbxBbZtmHs>) Approving these plans will enable developers to push into the developments cited within this video by challenging any refusals using this as a precedent to push into. This would be a dangerous precedent, at a time when our green spaces are of vital and paramount importance.

Erosion of Spondon Wood as a nature habitat

Spondon Wood has continued to appear on maps since the 1800s. Ancient woodland such as this has been flagged in the national planning policy as important. The recent State of Nature Report identified that one in six species of plant and animal life in the UK is at risk of extinction due to climate change and modern farming methods. Preserving our green corridors, for me, is considered vital if we are to play our part in not causing further erosion of wildlife.

The other thing that concerns me in this space **is the apparent rushing** of submitting these plans. The NPPF guidelines have been updated in September, and come into force in January 2023, with a **legal requirement for the developer to demonstrate mitigating environmental work to create a biodiversity net gain of 10%**. There are some mentions of things in plans, but likely to be covered off by conditions and not being legally enforceable if submitted before this date. This feels underhand and is yet another way planning guidelines have been implemented and relaxed in favour of the developers. Not in favour of residents or councils. If this plan is approved and this net gain is not enforced, what does this do for Erewash councils' overall contribution to net zero? Particularly when things such as transport and utility plans and the impacts this has on Spondon is factored in? Spondon Wood is already bordered by farmland on two sides and Dale Road on another. This development would be on the remaining border. Therefore, the woodland would be surrounded on all

sides and the movement of wildlife would be impacted. Despite this development not being approved, a wire fence has been erected between the woodland and the adjacent field (where the development is proposed) and the speed limit on Dale Road, beyond Pheasant Field Drive into Ilkeston, has been reduced to 50 mph. There have already been incidents of deer becoming caught in the fence or being struck by traffic on the A6096. We are harming wildlife in this space currently. Further development would continue to do that.

The plans also show leveraging paths to provide easier access to Spondon Wood from Dale Road and adjacent footpaths, which would greatly increase the risk of irreparable damage to this ancient woodland from antisocial behaviour, vandalism including arson and littering. This is quite likely. There are already insufficient things in Spondon for teenagers and young adults to do – people would be unlikely to walk the 2000m to Spondon village to congregate. With the volume of people likely to reside in this development – 500 people under the age of 21? – this this would be likely and is already seen in spots nearby. This week alone, the EE mast at Dale Road / Sandringham Road junction has been vandalised with expanding foam being squirted into the cooling vents, risking fire and electrical malfunction. In secluded pathways and woodland, this will be a more favoured spot to do this unhindered.

The above represents my main reason for objections. This seems ill thought out, rushed, hurried, to avoid a developer needing to demonstrate ways to mitigate the harm it will cause. Right at a time when planning guidelines are thankfully beginning to catch up.

Further objections and points of note follow:

Drainage studies are incomplete

- attenuation ponds built in but the resolution is by condition. That means this could be eroded and not maintained as part of the completion of the development
- Pump the dual waste out onto dale road and meet the existing drainage - Sancroft road, Sandringham Road, and even some of Huntley Avenue and Deer Park View with regard overflow water from arable surfaces, often leads to these struggling with water volume. This can be seen by potholes continuing to occur in these routes
- Severn Trent don't think this proposal is tenable. From a Spondon meeting on this issue (4th October), it was highlighted that pressure on Victorian services would mean (in first surveys conducted for 160 houses, then the second for 195 houses) that this development was a high-risk pollutant.
- Brook overflows - Severn Trent are supposedly pumping this out once per month already,
- If the proposed two drainage ponds and pumping system become overwhelmed due to extreme rainfall, what will safeguard existing residents that are naturally more downhill than this development? There are insufficient recommendations in place to deal with this, with the drainage report commenting primarily around the existing topography of the land. Reality is, with concreting this portion of land, tree roots and naturally occurring protections to limit

impact will be eroded, leading to increased water runoff in a freak event. Derby City Council (who I note has also not been consulted as of yet with these plans) has actions already to address water build up issues in and around Sandringham Road. This has been made public too but does not appear to have been mentioned.

Environmental impact from traffic

- Alternative routes to Spondon village require walking 2 km. This will be unlikely for most residents. Most will want to use own transport and space is being provisioned for up to 3 cars per household. This could be 750 extra cars just from this site.
- Single lane access is proposed for this location – would seem insufficient
- Most of the users of the road network, especially when I leave for work in the morning, when joining from Pheasant Field Drive, turn right out of their roads. This is the best route out of the village in the morning. This development will increase that traffic volume, with single lane entry and exit, increase the environmental issues presented for people sitting and waiting with engines running, plus the impact to this roadway at the end of a working day. This would be akin to the Kingsway Island example – that is not free flowing!
- Traffic issues for schools – West Park is the only secondary school in Spondon. With no bus links to West Park, pupils (of which there could be circa 400 from this development) would either have to walk 2000m (unlikely) or be driven to the school. The roads surrounding West Park already struggle with traffic volume, which will also increase pollutants at this time as well as increase the likelihood of an incident of harm caused to a child due to excess traffic volumes. Bollards have been put along West Road to control traffic volumes with limited effectiveness. People already park over people's driveways to support getting their kids to school.
- Traffic data from Thursday 16 March 2022. Is this statistically relevant? I'd be interested to see whether the survey could be conducted at speed run times (evenings and weekends between Dale Road Park and the turning for Ockbrook) when it appears to most people that 50 is just a number! Combine that with no footpaths for people leading them safely to bus stops and refuge areas, seems premature to me.
- A quick review of 'crash map data' website shows what happens when issues arise on the A38, A52 or M1 – the route up through Dale Road is heavily leaned on during those times by road users who wish to avoid the delays. This development will increase that burden.

Broader Development Reviews

- Submission has been done assessing future developments in Spondon which is a different county council. Why not Erewash? - Stanton, Kirk Hallam not identified - why not assessed?

Impact on Spondon Amenities

- Spondon Flyer bus service is no longer being run. Ilkeston Flyer is the only bus service that runs through the centre of Spondon

- Already at peak times this is overburdened with passengers. Often those wishing to join in the village have to wait for 2 or 3 buses to come along before they have a space.
- This development also allows Erewash Borough to collect council tax from 'Woodside' residents, even though these new 'Erewash' residents will frequently be using Spondon and Derby's much closer services and amenities, for which Derby City Council will then suffer the extra cost. Spondon's roads are already uneven and pot-holed in many places – which will only get worse with the increase in traffic – and therefore need more investment to maintain.
- GP services are already struggling in Spondon. Existing patients are being sent to St Marks Road Doctors due to not being able to be seen at Chapel Street Medical Centre. Putting this volume of people into an already oversubscribed service will worsen waiting times and impact on existing provision. Same can be said for dentists – Spondon's dentist is not currently taking NHS patients.
- Spondon's only secondary school is already oversubscribed. The Year 7 intake this year was 304 pupils, exceeding the planned capacity of 290 after successful appeals. If this adds an additional 400 pupils needing places at the school, this will increase competition for places. This could result in those living within Spondon itself not being able to retain a space for their children. There is no view within the plan how to mitigate this.

Sincerely yours

Paul Phillips (BEng, CEng, MRAS)