

Erewash Core Strategy Review – Public Examination Hearings

Main Matter 1: Procedural/Legal Requirements

Date: 7th December 2023

Name: Liane Dodd

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 Main Matter:

1.2 How did the Council engage with interested stakeholders on the allocation of land?

Consultation

The Council's consultation process has been opaque to the public across the Borough. The consultation time periods began during the time of Covid-19 restrictions, preventing the ability for any representatives opposing the SGA7 (Land North of Cotmanhay) to engage face to face with the public of the area concerned.

Whilst the Council published a variety of information on its website about the growth options, there was little or no information readily available or accessible in the public domain, such as libraries, particularly for those individuals without access to a computer.

Many of the SGA7 residents I engaged with on a campaign to raise awareness, appeared to believe after the first round of consultation that the development proposals had gone away following the Council's response to objections raised in 2020. The response led many to erroneously believe that the Council had listened to their concerns by removing the SGA7 site from growth options. The entirety of the SGA7 had not been removed, only a part, and only because the landowner of land east of Cotmanhay was not prepared to sell his land. The landowner personally and in public (at a public exhibition at the Ilkeston Football Ground) instructed the Planning Team to remove his land from the growth options. The Council's response at 2.32.12 of the *Statement of Consultation Version Core Strategy Review November*

2022 reports about consultation of the North of Cotmanhay site that all comments have been taken into account. It appears that in this case, the Council has not listened to the residents, only the landowner who refuses to sell.

Information Accessibility and Availability

I contacted the Council regarding access to the Representation Form and EBC's supporting documents. A representative advised that these had been made available for the public at the Ilkeston Council Office, as well as Ilkeston and Heanor libraries. No information was available at Heanor library despite several staff searching for me. I telephoned the Ilkeston library and was informed that an employee had a vague knowledge of the consultation form and associated documents. I attended the library, second floor, where the Representation Form and documents were eventually retrieved for me by a member of staff, from a box stored behind a reception area. These documents were only made available to me because I asked and were not on display such that any member of the public could see or access them.

There did not appear to be any information openly available, such as leaflets through the letter box, communication mainly being via the Council's difficult to navigate website, even for someone with reasonable technical skills let alone older members of the community or indeed those without access to a computer.

Access to EBC documents regarding the CSR has only become easily available on the website during the Public Hearing process via the Inspector's Programme Officer. Whilst the Council provides images of posters and a media release in the *Statement of Consultation*, it would have been more transparent if the key information, including the delivery of the CSR to the Planning Inspector last year, *Statement of Consultation* etc., had been disseminated to respondents to the Consultation process in accordance with wishes to be updated with progress; this was not the case.

Intervention with Local Democratic Process

An Extraordinary Meeting was called by the Erewash Labour Led Council on Thursday 30 November 2023, which set out to discuss the possibility of amendment or withdrawal of the CSR, in accordance with their mandate to create a fairer housing plan.

The Meeting was immediately adjourned following the receipt of a letter from Lee Rowley Minister of State for Housing at 3.00pm 30 November 2023 advising that action would be taken should the Labour Council exercise their mandate for change on which they were elected by the residents of Erewash in May 2023. Now that Conservative Central Government

has seen it fit to intervene with the local democratic process, it diminishes further the opportunity for residents to be heard in this regard.

1.5 (b) Sustainability What Options were Considered for Broad Distribution of Development Across the Borough?

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. I fail to see how this is fair and not disadvantageous to areas such as Ilkeston.

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. In the case of North Cotmanhay it is also reported that there would be exceptional development costs.

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 road A6007, even during non-peak times. This road being the egress and exit road for all traffic from the proposed Cotmanhay site. Why add to this already failing, over-burdened road network, which will be further compromised by more traffic adjoining the A6007 from an ongoing extensive small town-like development at Shipley Lakeside?

Taking cognisance of the above concerns alone, brings into question why development considerations are not fairly and equally distributed across the Borough rather than placing the burden onto the residents of Ilkeston.

End.