



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

Policies 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

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 operate?(*)

Yes 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.

If you wish to support the legal compliance or soundness of the Core Strategy Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Consultation Process – the Regulation 18 consultation is in place to engage with local residents to address key objections or issues. This process was flawed as Erewash Borough Council didn't fairly communicate or engage with all residents and also gave a short objection time during an unprecedented global pandemic when people were locked down, frightened, sick, lost loved ones and often unable to access media information sources, so weren't (and many still aren't!) aware of the proposals or where to find them. Public libraries and places of information where people congregate to formulate a collective response were closed or restricted and for many 'locals' – some of whom aren't technologically minded or have no internet access – the Erewash Borough Council website is difficult and confusing to navigate and finding and completing the complex consultation forms were too much of a technical barrier for many to attempt.

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.

*Please see remaining points on page 4 (continuation sheet)



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.

The Regulation 18 consultation process was flawed by EBC's insufficient communication methods during pandemic, so the Core Strategy Consultation should be declared void as places of information, letterbox leaflets or active media weren't obvious or easily accessible and are essential to raise awareness to the public as people don't internet search subjects they're unaware of. EBC should then research, reevaluate and reassess housing shortfall and needs across Erewash to unbiasedly level up the whole region and share new housing fairly and equally across South, North, East and West Erewash. Whilst also considering the importance of retaining greenbelt in all areas it should look for brownfield (ie Stanton site) or greenfield where excessive development hasn't caused great congestion or already bursting infrastructures and places already overburdened by excessive development of past industrial, social and brownfield sites over the last 30 years. Negotiation and talks with neighbouring authorities could also reveal useful ideas. Once done, a revised, more equitable, fairer core strategy could be resubmitted.

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not 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 matters and issues he or she identifies for examination.

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:

(This area is intentionally left blank for the respondent to provide reasons for their participation request.)

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)

Disproportionate Greenbelt Removal – loss of over 1% of Erewash's 73% greenbelt total represents almost the entirety of Ilkeston's tiny remainder of greenbelt, whilst the remaining 70+% of greenbelt retains protected status and remains plentiful and untouched throughout the rest of Erewash.

Viability of infrastructure - road networks in and around Ilkeston and Kirk Hallam are beyond point of technical failure with the town of Ilkeston and Village of Kirk Hallam enduring bumper to bumper volumes of traffic and ever increasing polluting emissions which their bursting infrastructures are already unable to support.

Cotmanhay (Derbyshire's most deprived area) and Kirk Hallam schools are already beyond capacity to deliver and the EBC's proposed core strategy will only further aggravate these issues.

The Council's core strategy proposals don't include a costed programme of infrastructure development and have few to no available obvious expansion sites which means that, once again, both town and village have been left to struggle by the decisions of their council who are supposed to represent their health welfare and social care.

Housing Assessment Needs & Levelling Up – Despite repeated requests to the council, no evidence of a needs based assessment has been provided within the strategy and still continues to be unavailable. This doesn't accurately show housing needs for all areas in Erewash and leaves a lack of rural housing – thus depriving, fragmenting and displacing communities and means that despite a policy of (equally & fairly) levelling up north/south divides within the country (including housing requirements), it's not even being fairly achieved to cover just one Borough. This development allocation was given to the whole of Erewash- not just Kirk Hallam, Cotmanhay and North Erewash.

Political Protectionism – The Core Strategy appears politically driven as the controlling Conservative group's rural parishes within the Borough are sharing none of the housing burden or greenbelt loss as the Core Strategy almost exclusively loads the development onto the Kirk Hallam and Cotmanhay areas in North Erewash.

Utilisation of Existing Properties – The Borough of Erewash currently has 1800 vacant properties which have not been highlighted by the Council but are not yet considered as contributing numbers within the Core Strategy.

Joined-Up Strategy and Lack of Duty to Cooperate - The Old American Adventure development site at Pit Lane is just across the border in Amber Valley (which is a part of the neighbouring Derby Core development housing area) and being just 0.3 miles from the Cotmanhay SGA7 will contribute even more to traffic levels. Engagement to cooperate could have addressed the issue. Similarly, additional traffic from 1300 houses at SGA25 in Kirk Hallam, the Elka's Rise development and New Stanton Park industrial development less than a mile away (even with a relief road) will greatly increase congestion at Twelve houses and reroute it back up to Bulls Head roundabout – so encircling Kirk Hallam and making it more difficult for those exiting the present Estate at all 3 access roads.

Also regarding Lack of duty to cooperate, Councillor John Frudd was assured by the local Planning Policy office that these guidance forms would be available in both Town Halls and the main borough libraries for public collection. However, when he and Councillor Linda Frudd visited the Ilkeston Town Hall the next day, the staff at Ilkeston – though very nice and helpful – had to inform him there weren't any available.