

Regulation 19 Representation

Representation Number: 230

Name: John Hickling

To which part of the Core Strategy Review does this representation relate?

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Kirk Hallam. Pioneer Meadows

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Not qualified to comment about the legalities., No consideration appears to have been given to the increased level of traffic on roads which are already overburdened.

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With regard to the Kirk Hallam development, 1) I feel it is imperative that more consideration is given to the effects infrastructure such as roads, schools, shops etc., 2) Little has been mentioned about the effects this will have on Pioneer Meadow and it's flora and fauna. The opinion of councillors will not do. It needs an independent in depth study by environment experts.

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)

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

Regulation 19 Representation

Representation Number: 231

Name: John Hickling

To which part of the Core Strategy Review does this representation relate?

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Kirk Hallam Pioneer Meadow

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

With regard to the Kirk Hallam development, 1) I feel it is imperative that more consideration is given to the effects infrastructure such as roads, schools, shops etc., 2) Little has been mentioned about the effects this will have on Pioneer Meadow and it's flora and fauna. The opinion of councillors will not do. It needs an independent in depth study by environment experts.

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See above

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Regulation 19 Representation

Representation Number: 232

Name: Vince Brotherton

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Green Belt Review

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

No

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1 - Has EBC undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centres such as Ilkeston or Long Eaton. A development on SGA 26 would be completely standalone to existing EBS conurbations with no links to anything other than Spondon, using Spondon schools, Doctors and shops. This cannot possibly be seen as enhancing Erewash in any way other than the collection of tax. 2 - As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighbouring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbours and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbours under the Duty to Cooperate., 3 - The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26

acceptable, when it won't even meet the needs of Erewash residents?, 4 - SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation?. Also it looks like a path is planned through what is know locally as Crow wood at the bottom of this field given access to Sancroft Road. As the name suggests Crows next in this wood and will no doubt be disturbed by any work to construct any path but also and more importantly the fallow deer often sleep in this wood and again any construction would greatly disturbed this habitat. In addition to wildlife concerns any path through these woods would lead to the ridicules situation of Erewash residents having quicker access to Spondon Schools then those living in Spondon and paying for them!. Totally unacceptable.,

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EBC must re-evaluate this plan and provide evidence, which so far they have not, that all options within Erewash have been exhausted, including greenbelt next to Erewash geographical centres.

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Regulation 19 Representation

Representation Number: 233

Name: Roslyn Deeming

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Omission of policy guidance on Biodiversity Net Gain, relates to Policy 17: Biodiversity of the adopted strategy

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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Natural England considers that the Erewash Core Strategy should include policy guidance for Biodiversity Net Gain to ensure that the Plan reflects the Environment Act 2021 and the government's 25 year Environment Plan. This should be included either as an addition to the saved Policy 17: Biodiversity, or as a separate policy. Biodiversity Net Gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. Natural England considers that without the inclusion of policy guidance on Biodiversity Net Gain that the Core Strategy would not be compliant with national policy and therefore unsound.

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The Erewash Core Strategy approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF. The policy wording should ensure that biodiversity net gain is not applied to irreplaceable habitats and should also make clear that any mitigation and/or compensation requirements for European sites should be dealt with separately from biodiversity net gain provision. It should be clear that decisions should first consider options to avoid adverse impacts on biodiversity from occurring. When avoidance is not possible impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation required to mitigate or compensate for impacts. It is also important to note that net gains can be delivered even if there are no losses through development., The policy wording for net gain, or its supporting text, should highlight how losses and gains will be measured. The Biodiversity Metric 3.0 can be used for this purpose as a fully tested metric that will ensure consistency across the plan-area and Natural England would encourage its use. Policy wording should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan., Further detail could be set out in a supplementary planning document. The policy wording could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure.,

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Regulation 19 Representation

Representation Number: 234

Name: Roslyn Deeming

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 5: Green Infrastructure

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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Whilst Natural England generally welcome the new policy on Green Infrastructure we suggest that it should make reference to Natural England's recently launched Green Infrastructure Principles and Standards and the accompanying GI mapping resource.

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Regulation 19 Representation

Representation Number: 235

Name: Jennie White

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Policy

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

No

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There has been no consideration for how the local area I.e spondon which is not part of erewash, will accommodate all the additional residents in terms of providing school places, doctors care or how the main road out of Spondon will cope with the additional traffic as frequently there is queuing traffic from willowcroft Road, through the village and up past dale road and this is not accounting for the additional population from the new housing estate. It feels like the planning application is from erewash Council but they are not the council that will see the impact on amenities as derby city provide those for Spondon yet it will be the nearest provision for the new home owners who would have to travel further to get to the amenities in ilkeston . There is also the issue of the wildlife and local deer herd that live on the land .. where will these be relocated to if the new development takes place?

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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.

Provide schooling, doctors and dentists as part of the new development Protection of wildlife..ensure these have a safe and sustainable place to relocate

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Regulation 19 Representation

Representation Number: 236

Name: David Chilton

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

The representation relates primarily to the lack of consultation and the inadequacy and inaccuracy of supporting information

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There has been a total lack of meaningful consultation with regard to this proposal. The first that residents of Spondon were aware of the inclusion of this site in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to its inclusion. Residents living just over the border in Derby City were not allowed to ask questions at the council meeting, apparently due to Erewash Borough Council's constitution. Over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night., As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts. It is the Government's 'Duty to Cooperate' that governs the discussions between neighbouring authorities to ensure there is joined up thinking in delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of a

housing sites in Erewash, immediately on the Derby city boundary. The site is on the extreme edge of EBC and directly abuts land in Derby City. Development of this site will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic. There are only a few routes out of Spondon and the main one is through the village, down Willowcroft Road and along Nottingham Road to the A52. This area already has a high level of air pollution and traffic congestion and adding a 240 house residential development to the area will increase pollution and result in traffic gridlock at peak times. The local Secondary School, West Park Academy is oversubscribed and has had to expand already to meet the needs of Derby residents. This would be the obvious school of choice for the residents of any new development, No consultation has taken place with the Academy or with School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning, this being the responsibility of Derbyshire County Council. There is no evidence that the County Council been consulted.,

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The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. There is no evidence that EBC has undertaken a Green Belt Review to establish if there are more appropriate sites that are nearer to EBC geographical centres, particularly to ascertain whether there are other sites that would better suit the housing needs of EBC residents. The site is adjacent to Ancient Woodland and is home to a variety of wildlife. There is no evidence of any ecological impact surveys being completed. These omissions should be rectified to make the Core Strategy Review legally compliant and sound.

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Regulation 19 Representation

Representation Number: 237

Name: Paul Rood

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Policy

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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Regulation 19 Representation

Representation Number: 238

Name: Janet Rood

To which part of the Core Strategy Review does this representation relate?

Policies Map

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Policy

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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Regulation 19 Representation

Representation Number: 239

Name: Christine Hunt

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

SGA26

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

No

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There has been no communication between Erewash Council and the residents of Spondon who this greatly going to effect.

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A discussion needs to take place to discuss the effects this development will have on the infrastructure of the Spondon area.

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Yes, I wish to participate in hearing session(s)

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I would attend any meeting to discuss all of the issues regarding this development.

Regulation 19 Representation

Representation Number: 240

Name: David Arrowsmith

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policies 1.2 and 4

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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I applaud the commitment to pedestrian and cycle ways in Policies 1.2 and 4 but would like to see attention given to providing better access to both cyclists and pedestrians when using Ilkeston Road (between Lows Lane and Quarry Hill Rd) where it crosses the bridge over the Nutbrook Trail. This bridge has no pavement and it bends at the summit, meaning it is dangerous and unsuitable for safe use by either cyclists or pedestrians. I would like to see either a cyclist/pedestrian only bridge constructed alongside or a hard path constructed through the adjacent undergrowth., The Nutbrook trail is a fine west/east artery for cyclists and pedestrians but there is no equivalent for north/south route between Ilkeston and the beautiful countryside around Stanton-by-Dale

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Regulation 19 Representation

Representation Number: 241

Name: Rachel Bury

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Policy 1: Housing. Specifically 1.6, North of Cotmanhay.

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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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.

I do not believe the proposal to build in excess of 200 homes on Greenbelt land to the North of Cotmanhay to be sound for several reasons. Indeed, I find the proposal itself to be contradictory in respect of:

1. Destruction of Green Belt habitat, and associated impact on wildlife. This includes proximity of homes and gardens to ancient woodland, which cannot be replaced. Despite the reference to community woodland, public access and footpath improvements, as it stands today, footpaths in the area are fenced off and inaccessible. Improving access for local people to the woodland and footpaths can be achieved without a large and damaging building project.
2. Please advise how you will create sufficient biodiversity increases to offset the significant erosion of greenbelt land. Please also advise how the existing hedgerow boundaries and corridors will be maintained, especially in light of the need to such significant foundational work.
3. Insufficient local infrastructure to accommodate c.200 additional families, recognising for example that local schools are likely to be able to accommodate the additional pupils.
4. Inability to include affordable housing in the scheme.
5. Inconsistent application of rules, guidance and decision making. For example, declining a site next to the M1, because it would damage the outlook from Breaston, but pursuing this site even though it will impact the outlook from Shipley. Is this because by building at this site, many of the people

negatively impacted will be outside of Erewash? 6. Please advise how the impact on climate change resulting from the destruction of greenbelt land to accommodate further housing will be offset?

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.

Remove proposal to build on Green Belt land North of Cotmanhay. Instead, invest proper energy in locating and developing brownfield sites as well as bringing back into use empty property right across the borough.

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)?

Yes, I wish to participate in hearing session(s)

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

Because I do not have confidence that the submission of this form alone will be sufficient.

Regulation 19 Representation

Representation Number: 242

Name: Joseph Frost

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Removal of Greenbelt status of site SGA 26 and consideration for housing development

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be able to object to it's inclusion. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents., As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighboring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbors and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to

your neighbors under the Duty to Cooperate., EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night., Totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite wanting to dump housing developments on their doorsteps.

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.

Spondon SGA26 has been promoted by EBC without any appraisal of all urban areas in Erewash. How can it be 'inevitable' that this location is inherently more sustainable than others? Or that it's deletion from the Green Belt would have the least harm on the function of that Green Belt? Suburban sprawl cannot be sustainable., The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents?, Development of SGA 26 will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic., The local Secondary School, West Park Academy is over subscribed and has had to expand already to meet the needs of Derby residents. This would be the obvious school of choice for any residents of SGA 26. Again no consultation has taken place with the Academy or with the School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning " this is Derbyshire County Council's role. Have they even been consulted?, There are only a few routes out of Spondon and the main one is down through the village, down Williocroft Road and along Nottingham Road to the A52. This area already has a high level of air pollution and adding a 240 house residential development to the area will increase the air pollution and affect the health and wellbeing of Spondon residents., SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site

is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation?, Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include: - breaking up or destroying connections between woodlands and ancient or veteran trees, - reducing the amount of semi-natural habitats next to ancient woodland, - increasing the amount of pollution, including dust, - increasing disturbance to wildlife from additional traffic and visitors, - increasing light or air pollution, - increasing damaging activities like fly-tipping and the impact of domestic pets, - changing the landscape character of the area, All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there?, EBC and the planning department should be challenged to show what assessments have been done on this Ancient woodland that would show that none of the impacts above would happen if a development were to go ahead?, This site often floods, despite only being in a Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could not add to this pressure?, I believe until thorough assessments of all these things and a legitimate consultation with Spondon residents then site SGA 26 should not be considered to have it's Greenbelt status revoked and be removed from the core strategy review as a potential site for development.

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)

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

Regulation 19 Representation

Representation Number: 243

Name: Lucie Archibald

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Housing Policy

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The Policy to use green belt land (SGA 26) at the edge of the borough boundary is unsound due to the impact on wildlife, road traffic, neighboring councils and their amenities. There has also been a failure to co-operate with local residents of the area and even local council representatives. SGA 26 is at the very edge of EBC area and will mean that facilities used are within Derby City but revenue from council tax will go to EBC, this will impact directly on the residents of Spondon as the proposed plan does not include schools, doctors surgery's, dentists or any other required facilities. West Park school in Spondon will be the catchment but is already over subscribed. Currently there is are only a few routes out of Spondon, Willowcroft road is regularly at a standstill at peak times. The additional traffic will have a major environmental impact, especially to the residents of Willowcroft road, this goes against basic urban planning where it is meant to be that environmental impacts are considered for the surrounding area., SGA 26 borders Spondon wood which Defra have stated is an ancient woodland and is in the national planning policy as a site of importance. Nearby development will impact on this habitat due to noise, light pollution, environmental pollution, traffic and removing the current buffer area between the housing and the wood. During building you are also likely to cause local wildlife to flee which in all likely hood will cause accidents on the A6096., There is

guidance that Green Belt land should only be select in exceptional circumstances, what are these circumstances and what brown field sites have been excluded? The policy is being forced through due to it having the least impact on Erewash borough council but raising them revenue.

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.

Remove the use of green belt land (SGA 26) from the core strategy completely as it is an unsuitable location that will negatively impact the environment.

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)?

Yes, I wish to participate in hearing session(s)

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

At present residents of Spondon are being ignored as it is seen to be a nimby issue, this is untrue as the concerns are valid and there are already issues with deer being hurt due to the fences that have now been erected. I would like the opportunity to q

Regulation 19 Representation

Representation Number: 244

Name: Andrew Dodd

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Seriously flawed SGA proposal which is inequitable and unjust

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

1. Brown field sites. Erewash Borough Council have a brown field land register which they proudly inform is available on their web site. After downloading this document over two years ago (and the latest version as I prepared this objection), it is still surprising to see two of the largest brownfield sites in the borough missing from the register, namely the Oakwell brickworks site and the West Hallam Colliery and brickworks sites; two large bone fide brown field sites. Erewash Borough Council are keen to tell anyone who will listen that these sites are not viable due contamination. However, that issue has not prevented neighbouring Amber Valley and Broxtowe Borough Councils developing several equally contaminated brown field sites. Erewash Borough Council also own the Pewit municipal golf course, a facility paid for by taxpayers in Erewash for the benefit of some twenty-six or so members. This site is adjacent to the Oakwell brickworks sites and would provide opportunity for a linear development with a major road bisecting the total development opportunity., 2. Sustainability. EBC continuously tell us that the green belt they propose to subsume is 'only 1 to 2% of the total green belt in the

borough'. How can this proposal offer long term sustainability? What happens next time there is a requirement for more homes will it be 'it's only (another) 1 to 2% of the green belt'. The policy is not sustainable long term and lacks viability. The UK is already facing food security issues in the years to come, how can use of green belt farmland for housing be justified when we face these issues? Green belt farmland cannot be seen as a payday for non-farming generations of landowners at the expense of the majority. Somewhat ironically, the fields in SGA7 are at present home to a flock of sheep, correct and proper use of this land., 3. The use of green belt and inequitable distribution of housing development. The use of green belt land is predominantly based on subsuming green belt to the north and the south of Ilkeston. This further exacerbates overloading of infrastructure (particularly the existing road networks) and services. It is hard not to see this as an overtly political exercise whereby the Tory represented parishes see no development whatsoever at the expenses of placing the overwhelming burden of development on green belt land adjacent to two of the most socially deprived areas in the borough. Furthermore, where social and low-cost housing is required in the south of the borough, none whatsoever is proposed. This is somewhat ironic when most of the business and commercial development growth is towards the south of the borough, not the north. The proposals as they exist are inequitable and unjust., 4. Overwhelming of local services and infrastructure. The primary traffic transit route from north to south and vice versa is already heavily congested to the point of complete standstill at peak traffic movement in the morning and late afternoon. The current proposal will inject a significant additional traffic burden into an already overwhelmed system. This doesn't consider the ten-year development 1/3 of a mile away in neighbouring Amber Valley from the proposed SGA7 site, which will generate very significant additional traffic volume before any additional development in this area. Likewise, to the south of Ilkeston (Stanton Industrial Park), there is a very significant industrial development taking place which will inject heavy traffic flow to the critical junction point between the A6096 and Quarry Hill Road. We were informed at a council meeting on March 3rd that detailed traffic flow analysis would be undertaken as part of detailed local planning permission. This seems to be closing the stable door after the horse has bolted. Living in this area will become deeply unpleasant for existing residents as a result. Local schools are already oversubscribed and doctors, dentists etc. are already very difficult to access easily due to overwhelming patient numbers / workload. How can burdening an already overstretched town possibly be sensible other than to a political system determined to keep development out of the parishes. We have been told repeatedly by Erewash Borough Council that 'developer contributions' would be used to support additional services growth, however, in the past this is a promise that has failed to materialise. 5. Opaque and deliberately low key roll out of the SGA proposal. Erewash Borough Council couldn't have been less low key or visible in this process if they tried. We know this from knocking on doors locally and speaking to people. The majority are totally unaware of what is happening. Erewash Borough Council publish a quarterly magazine EBC Today, during this process the SGA has barely warranted a couple of column inches per issue. An issue as important as this should have warranted a full page at least to explain and outline in detail the proposals and the objection process. Instead,

Erewash Borough Council have relied on information published on their web site. Not only is this information far from straightforward to access but those in the borough without the necessary skill set or access to computers, will have no access whatsoever to this information other than the local library. Even then, this relies on them knowing what is going on and where to look. It is hard not to think that this quite deliberate, no real effort has been made to keep the people of the borough informed of the process. Additionally, at each stage of objection to the SGA, the very valid (citing NPPF clauses) objections have been roundly ignored, the SGA remaining largely unchanged except for a tranche of land removed from SGA7 because the landowner had no interest in selling. Added to these serious concerns is the very nature of this objection form and process. There are people I have spoken to who are put off, even frightened by, the apparently technical nature of this level of objection. They want to object but don't or can't understand what is required. Not everybody in the Erewash is educated to the level necessary to deal with such processes. The whole process is deeply flawed and prejudiced and should be summarily rejected by the Planning Inspectorate.

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.

1. Brown field sites. Independent investigation of the brown field sites mentioned above, the Pewit golf course site and closely adjacent brown field sites (the ex-coal screening yards adjacent to the railway on the edge of Ilkeston, located in neighbouring Broxtowe) with the cooperation of neighbouring councils must be utilised before any green belt is subsumed. To do otherwise is contrary to central government planning policy in the form of NPPF Section 13 'Protecting Green Belt Land'. If necessary, Erewash Borough Council should be removed from the development process to permit an independent body to adjudicate and undertake the due process properly.
2. Sustainability. Green belt, where it is viable farmland, should retain green belt status and landowners should either farm it or sell to those that want to farm. Use of green belt farmland is not a long-term sustainable solution.
3. The use of green belt and inequitable distribution of housing development. If, and only if, the proposal to build new homes cannot be achieved on the existing brown field sites then development on sacrificed green belt land should be equitable and fairly distributed across the borough, including the parishes, notably where it is required most, in the south of the borough.
4. Overwhelming of local services and infrastructure. The road network in the south of the borough is far better served to support development, notably the A52 corridor linking Nottingham and Derby and providing access to the M1 and the proposed freeport around Castle Donington, by far the largest area of employer development in the area. Local services will need to be bolstered wherever development occurs, but equal distribution of this growth is

paramount to avoid overwhelming one town in the borough., 5. Opaque and deliberately low key roll out of the SGA proposal. Erewash Borough Council MUST make far greater effort to be visible, transparent, and fair in this process. There are people in the town of Ilkeston that are completely unaware of what is happening around them and how these proposals will adversely and negatively affect their lives. Erewash Borough Council have a duty of care to inform those that may not have access or means of access to the necessary information. The process looks overtly political, which it should not be. These policy decisions must be apolitical, if they are not then they are inherently biased and should be dismissed forthwith.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

I do not believe my views, or those I have spoken to, will be fairly or justly considered unless I am able to speak face-to-face with the Planning Inspectorate.

Regulation 19 Representation

Representation Number: 245

Name: Nicola MERTENS

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Sustainability Appraisal 3 (Housing Allocations Options) (2021)

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

I consider EBC have failed to comply with the duty to co-operate. First and foremost, there has been a severe lack of communication with Derby City Council and the residents of Spondon about this proposed development. I fail to understand how this site will meet the needs of Erewash residents, surely it is going to be Derby residents who would benefit because the land adjoins Derby City and not Erewash. I consider the Erewash Core Strategy Review is not legally compliant, as the consultation regarding the land north of Spondon (SGA26) has not been carried out to the same standard as consultations over other areas in Erewash., I consider the Erewash Core Strategy Review is unsound, based on the following reasons:., 1) Erewash will not have to provide GP's, Dentists, Schools etc. this will also be down to Derby City Council although the Council tax for the new development will be paid to Erewash Council, meanwhile Derby City Council tax will increase. Also, schools, GP's etc. in Spondon are already massively overstretched. 2) The extra traffic coming from this housing development will add to an ever-growing volume of traffic using Willowcroft Road, the only exit road out of Spondon. Traffic will spend longer queuing on Willowcroft Road adding to an increase in air pollution, something that everyone should be trying to avoid for our future generations. Are the council going to be looking at building cycle paths to limit pollution? 3) I would like to see evidence that

EBC have undertaken a proper Green Belt Review to establish there are no more appropriate sites other than SGA26 that are nearer to EBC geographical centres. The Minister of State for housing has stated that Green Belt should only be used in exceptional circumstances. I fail to see what exceptional circumstances there are for building here when it won't even meet the needs of Erewash residents. I would like to save Green Belt land for my children and future generations so they don't grow up in concrete jungles without any countryside to walk in and enjoy the wildlife. 4) This particular site backs onto ancient woodland. Our ancient woodlands are under threat and need to be preserved. Are the residents of the new houses going to respect this woodland? 5) This development is going to impact greatly on the many forms of wildlife that are present on this land and their habitats. This includes buzzards, bats, owls and woodpeckers. 6) Building on Green Belt should be a last option when all other sites have been exhausted. I don't think this is the case. Once this land is gone it's gone for good and I believe it is morally wrong to use it for development. Erewash Council, I would ask you to re-think your proposal to build on this land and to do the right thing by the residents of Spondon.

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.

EBC should carry out a comprehensive Green Belt Review to determine what the exceptional circumstances are that would result in permission to build on Green Belt land., EBC should identify land within EBC for new homes where the existing EBC infrastructure and services are available to support the new developments, so there is no need to put additional burden on Derby infrastructures and services., EBC should undertake a proper communication with Derby City Council such that both councils would agree that the Duty to Cooperate has been met.

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)

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

Regulation 19 Representation

Representation Number: 246

Name: Wayne Thompson

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Acorn Way policy 1.3

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

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.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

Against the ridiculous proposal for housing at Acorn Way/Morley Road;, Morley Road is far too busy now we have lived here 35 years and the current traffic is horrendous due to the school where it becomes gridlocked, the academy traffic and if acorn way is

Regulation 19 Representation

Representation Number: 247

Name: Andrew Watkins

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Development of 600 houses on green belt land off Acorn Way / Morley Road

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

* Current road infrastructure would not support the excess traffic created by the development. * Negative environmental impact this development would cause, with loss of green spaces and risk of more severe flooding in the area. * Schools, Doctors Surgery and other essential facilities already under strain and don't have the capacity for existing residents let alone a development of this proposed magnitude.

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.

Other more suitable area's of land on the outskirts of Long Eaton or West Hallam would be more suitable for housing development.

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)

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

Regulation 19 Representation

Representation Number: 248

Name: S Johnson

To which part of the Core Strategy Review does this representation relate?

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Acorn way/Morley Road SGA1

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

N/A

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.

N/A

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.

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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)

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Please use this space to continue any of your answers

N/A

Regulation 19 Representation

Representation Number: 249

Name: Philip Mertens

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

This representation applies to the whole Core Strategy Review including its policies, associated documents and maps.

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

I do not consider the Core Strategy Review to be legally compliant. The basis for this claim is that I consider the Core Strategy Review has failed to undertake sufficient community consultation and has not met the requirements of the Duty to Cooperate. Therefore I consider the requirements of the relevant Regulations have not been satisfied., Erewash Borough Council (EBC) have behaved unreasonably in undertaking a consultation period of only 6 weeks compared with the previous consultation period which was 6 months. The community consultation is considered insufficient for the area SGA26 North Spondon as this area was added late in the process when the Land North of Lock Lane, Sawley proved unviable. The efforts afforded to the consultation on SGA26 (6 week consultation during COVID restrictions) fall considerably short of residents expectations and fall short of the first consultation for other proposed areas that were carried out over a 6 month period between Monday 27th January and Monday 20th July 2020. To undertake a foreshortened consultation of only 6 weeks duration during a global pandemic is grossly unreasonable, particularly when there had been no prior cooperation with either residents or Derby City Council regarding SGA26. Furthermore, the 6 week

consultation period coincided with the period prior to local elections. The associated restrictions on communicating during the pre-election period (previously known as 'purdah') has limited the activities of Spondon and Derby Councillors as well as media organisations in supporting the actions being undertaken by Spondon residents to object to this development., Despite the short consultation period it is understood over 700 objections were made regarding the proposed site SGA26; however, the EBC leaders noted that the objections mostly originate from residents outside Erewash and the inference is that these objections can be disregarded. This is clear demonstration of NIMBYism and political self-protectionism, whereby the location of sites at North Spondon and Acorn Way have been selected in preference such that the opinions of neighbours can be ignored and those same neighbours have no influence on the elected members of EBC., I consider EBC to have failed to meet the requirements of the Duty to Cooperate. Details of my reasons for considering failure in the Duty to Cooperate are provided to the specific question on that issue in this response (see later)., If the community consultation is deemed insufficient and the requirements of the Duty to Cooperate have not been met then it can be concluded that the requirements of the relevant Regulations have also not been satisfied and the Core Strategy Review is not legally compliant., I do not consider the Core Strategy Review to be sound. The rationale for this claim is stated in the paragraphs below:., Firstly the Core Strategy Review (CSR) has not been positively prepared. The CSR has not objectively assessed the need for homes, instead it has assumed the top-down target for new homes set by the Government as a simple quantity of new homes with no understanding of the needs of the people who will live in these homes. The CSR has then adopted a tactical approach of assessing potential areas of land for new homes in order to achieve the target number of homes. These areas have been identified by site promoters/developers and land owners and hence are not necessarily in the locations where new homes are really needed. No consideration has been given as to the needs of current and future Erewash residents in determining where the new homes should be located. There is no evidence presented of a 'needs analysis' to determine what the requirements are for the new homes e.g. are they to assist in allowing growth of the existing communities in Erewash or to enable the migration of new residents into the borough? The former would result in expansion of towns and villages to allow families to live in close proximity. The latter point would be influenced by the location of the new employment opportunities. Strategic Policy 2 " Employment, in the CSR indicates that there has been no strategic assessment of the future employment growth in Erewash. There is no mention of the proposed East Midlands Freeport which is proposed to be located close to the southern border with Erewash. This is likely to be a significant source of new employment for which workers migrating into the area will require homes in close proximity in the south of the borough. The proposed sites of North Spondon and Acorn Way are in the far west of the borough and are considerable distance from the 4 areas of strategic employment (see Strategic Policy 2) which are in the east of the borough i.e. three locations in Ilkeston and one in Long Eaton. The new employment opportunities at the Stanton North site (see Strategic Policy 2.1) are also some distance from the North Spondon and Acorn Way sites. This shows that the location of homes and location of employment are not

joined up which indicates that this is not a strategic assessment, but is a tactical solution., The consideration of services and infrastructure for the land North of Spondon (SGA26) does not present a credible solution. According to the Consumer Data Research Centre (CDRC) the land proposed for site SGA26 is in one of the most unhealthy neighbourhoods in Erewash when considering the Access to Healthy Assets & Hazards (ref: https://mapmaker.cdrc.ac.uk/#/access-healthy-assets-hazards?d=0111000&m=ah2ahah_pc&lon=-1.3276&lat=52.9368&zoom=11.68) yet this area is considered sustainable by EBC. The 'Access to Healthy Assets & Hazards' is a multi-dimensional index developed by the CDRC for Great Britain measuring how 'healthy' neighbourhoods are. This independent assessment confirms the fact that some of the services required to support a development at SGA26 do not exist in that area of Erewash., A development at SGA26 would cause an adverse impact on Spondon services provided by Derby City Council (DCC). The location of a new settlement in EBC on the border with DCC is unethical in that the provision of the majority of the services, and the additional load placed on local infrastructure, would be borne by DCC; however, EBC would benefit from the new homes contributing to their Strategic Target, they would also benefit from the 'new homes bonus' and they would benefit from additional Council Tax contributions from the residents of the new homes. There would be little work for EBC to do in servicing these new homes; instead DCC would pick up the additional load in terms of providing schools, medical services and policing, all of which would be at additional cost to DCC with no additional income, resulting in an increase to Council Tax for DCC residents. What contribution will EBC make year on year to DCC for the cost of the local services that the new homes would require? Furthermore the Strategic Policy 1.4 states that the North of Spondon site 'will form a natural and logical extension to the community of Spondon', likewise Strategic Policy 1.3 states that the Acorn Way site 'will form a natural and logical extension to the Derby neighbourhood of Oakwood'. Hence developments in these locations will simply result in an expansion of Derby City rather than a solution to provide homes that are considered to be part of the Erewash borough., Document 'Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021' page 177 identifies that the impact of SAG26 on West Park School, West Road, Spondon would result in a 12% overcapacity. Strategic Policy 1.4 " North of Spondon, states that '...financial contributions from the new development will be required to increase the capacity of the receiving schools'. However, there is no evidence that it is physically possible to expand the schools to cater for the overcapacity., Document 'Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021' page 178 identifies that the General Practice that the residents of the new homes would access is Chapel Street Medical Centre, Chapel St, Spondon. However, it is understood that this practice and also the Derwent Valley Medical Practice (Sitwell Street) are both oversubscribed in terms of the ratio of patient numbers to number of Doctors. As a result waiting times for appointments are excessively lengthy. Anecdotally current residents of Spondon have reported that they have been unable to join the Chapel Street Medical Centre practice as new patients. The assessment is clearly misleading in identifying the nearest medical practice with no commentary on the capacity of that practice and its ability to accept new patients in the expected

volume from a development at SGA26., It can be concluded that the development of site SGA26 would result in an adverse impact on Spondon services provided by Derby City Council and an increase in council tax for Derby City residents., A development at SGA26 would cause an adverse impact on air quality from increased pollution. Plans for the development of new homes must consider the impact on nearby Air Quality Management Areas. One such area is the corridor of the A52 where it passes through Spondon (between Kirk Leys Avenue North and Kirk Leys Avenue South) and Nottingham Road on the approach to/from the Asda roundabout, as shown in the map ref:

<https://maps.derby.gov.uk/webmap/Map.aspx?MapName=PublicMaps>, Traffic leaving site SAG26 would contribute to the pollution in these areas if travelling to/from Derby, either via Willowcroft Road/Nottingham Road or using the A52 via Ockbrook., The documents provided by EBC for the proposed development at SGA26 fail to recognise the impact on this AQMA and hence offer no mitigations., Document 'Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021' page 174 proposes a new roundabout on the A6096 may be required to enable the residents of the new site to exit the site. This would result in additional pollution not just from residents' vehicles, but from every vehicle using the A6096, both in terms of exhaust emissions and pollution from brake and tyre wear products., The documents provided by EBC for the proposed development at SGA26 fail to recognise the additional source of air pollution from the inclusion of a roundabout on the A6096 and hence offer no mitigations., It can be concluded that, a development at SGA26 would cause an adverse impact on air quality from increased pollution in an area that already suffers poor air quality., Development of SGA26 would cause an adverse impact on Ancient Woodland. The woodland that borders the area SGA26 known as Spondon Wood has been confirmed by DEFRA as comprising Ancient & Semi-Natural Woodland, and Ancient Replanted Woodland, see map below, reference:https://naturalengland-defra.opendata.arcgis.com/datasets/a14064ca50e242c4a92d020764a6d9df_0/data?geometry=-1.428%2C52.926%2C-1.373%2C52.935, UK Government guidance advises that 'Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It's important for its: wildlife (which include rare and threatened species), soils, recreational value, cultural, historical and landscape value. It's any area that's been wooded continuously since at least 1600 AD. It includes: ancient semi-natural woodland mainly made up of trees and shrubs native to the site, usually arising from natural regeneration.plantations on ancient woodland sites - replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi. They have equal protection in the National Planning Policy Framework (NPPF).', UK Government guidance also identifies that 'development can affect ancient woodland, ancient and veteran trees, and the wildlife they support on the site or nearby. Direct impacts of development on ancient woodland or ancient and veteran trees include: damaging or destroying all or part of them (including their soils, ground flora or fungi), damaging roots and understorey (all the vegetation under the taller trees), damaging or compacting soil around the tree roots, polluting the ground around them, changing the water table or drainage of woodland or individual trees, damaging archaeological

features or heritage assets. Nearby development can also have an indirect impact on ancient woodland or ancient and veteran trees and the species they support. These can include: breaking up or destroying connections between woodlands and ancient or veteran trees, reducing the amount of semi-natural habitats next to ancient woodland, increasing the amount of pollution, including dust, increasing disturbance to wildlife from additional traffic and visitors, increasing light or air pollution, increasing damaging activities like fly-tipping and the impact of domestic pets, changing the landscape character of the area'. A development at site SGA26 has the potential to destroy the connection between Spondon Wood and the adjacent areas of woodland., The National Planning Policy Framework (NPPF), includes a provision that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons' (paragraph 175c). Strategic Policy 1.4 " North of Spondon does identify that the adjacent Spondon Wood includes areas of ancient woodland however the proposed mitigation of 'a suitable interface' lacks any detail and therefore the impact that the development would cause cannot be quantified. The Woodland Trust have recently published a paper which identifies that UK woodland is in a state of crisis (reference: State of the UK's Woods and Trees 2021). The report identifies that 'Developments, such as roads, railways, housing, agriculture and leisure activities, can destroy ancient woodland, both directly through conversion of land use and indirectly through damage to the woodland'. The Woodland Trust guidance states: 'As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice'. As site SGA26 is less than 200m wide a 50m buffer zone would significantly impact the viability of the site., It can be concluded that Spondon Wood, an Ancient Woodland on the border of site SGA26, would be irreversibly impacted by the building of new homes on the site and the precautions required to protect the woodland from the development would significantly impact the viability of the site. Secondly the CSR is not justified as the plan is not based on robust and credible evidence., Erewash comprises a large proportion of Green Belt. Paragraph 140 of the NPPF states that 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified..'. The CSR has not explained what exceptional circumstances exist (if any) and have not justified these. A Green Belt Review should have been undertaken, however, to my knowledge no such review has been carried out. EBC have failed to provide evidence to demonstrate that all options for utilising the Brownfield sites have been exhausted. Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021 page 179 makes the claim that the location of SGA 26 increases the distance between Spondon and Ockbrook (distance 2 on 'SGA26 - Green Belt map'). This is clearly erroneous as the construction of this site would in no way increase the existing separation of Ockbrook and Derby City. Furthermore, if permitted, this development would set a precedent for further development on the Green Belt area, and further reduction of the separation of Derby from Ilkeston., The Erewash Core Strategy Review Revised Options For Growth March 2021 states 'The presence of Spondon Wood to the north

of the site provides a robust Green Belt boundary'. This is both a dichotomous and erroneous statement. Firstly the proposal to build on Green Belt in order to provide a robust Green Belt boundary to prevent further building on Green Belt is a contradiction and confirms EBC recognise the negative impact of building on Green Belt. Secondly Spondon Wood only borders part of the proposed site (as can be seen from the maps EBC have published of the site) hence rather than providing a hard physical boundary it is more likely to open up access to further developments on Green Belt adjacent to site SGA26 and the A6096 around Spondon Wood Farm., A development at SGA26 would cause a reduction in the area of productive local farmland, which is contrary to statements made in EBC documents. Document 'Strategic Growth Options Draft Sustainability Appraisal For consultation January 2020', page 93 states under SA Objective 5 Health & Wellbeing 5 that the land 'is not thought to be farmed directly for crop production'. Whilst this may be true for other locations in the category 'Extension of the conurbations into the Green Belt' it is not true for site SGA26. The farmland has been actively farmed for crop production for at least the last 30 years (to my knowledge). Similarly document 'Strategic Growth Options Draft Sustainability Appraisal For consultation January 2020' page 104 states that the land 'is classified as Grade 3 agricultural land - none is identified as Grades 1 or 2'. However, farmland in Erewash borough is predominantly Grade 3 and 4 farmland, with insignificant amounts of Grade 1 & 2 farmland - reference: Agricultural Land Classification Map East Midlands Region (ALC005) map: <http://publications.naturalengland.org.uk/publication/143027?category=59414853204736>, Hence Grade 3 farmland is the best available farmland in Erewash and the impact of building on SGA26 would be to remove quality land from agricultural use. Why when the UK is striving to be more self-sufficient in terms of locally sourced food and aiming to reduce food-miles would it be considered acceptable to sacrifice productive local farmland?, It can be concluded that by deleting site SGA26 from the Green Belt there would be a reduction in the area of productive local farmland in Erewash and this is contrary to generic statements made applicable to Extension of the conurbations into the Green Belt in 'Strategic Growth Options Draft Sustainability Appraisal For consultation January 2020'. Thirdly, the Plan contained within the CSR is not effective. As stated above the plan is a tactical approach to the objective of identifying areas in which to develop a total of 5800 homes. Instead the Plan should provide a strategic assessment that identifies the needs for homes, jobs, transport and green infrastructure and then present a strategic solution that satisfies these interlinked objectives. EBC's Plan addresses these objectives in isolation and fails to present a joined-up approach. The piecemeal assessment carried out in the CSR has attempted to demonstrate that each of the proposed sites for housing is viable; however, the collective impact of the Plan on the whole borough, on surrounding boroughs and on Derbyshire county has not been considered. For example what assessment has been performed to determine the additional collective traffic access and egress to the borough of Erewash on the main arterial routes? Had such an assessment been performed then it may have indicated that congestion and pollution are likely to increase in existing bottle-neck areas (i.e. Spondon Village centre and Willowcroft Road) and hence mitigations would be necessary., The Sustainability Appraisal Appendices Appendix C1, Table 2 " Assessment of Total,

Cumulative and Synergistic Effects acknowledges that for Sustainability Assessment Objective 11, Pollution and Air Quality, there will be a 'slightly negative' effect; however, the proposed mitigations of the Kirk Hallam relief road and the Green Infrastructure will provide no benefit to the North Spondon and Acorn Way sites. Strategic Policy 4 - Transport, states that 'To provide for high quality walking and cycling networks and widen transport choice, the Borough Council will utilise funding opportunities, including developer contributions, to accommodate the improvement of the Trent Valley Way and Great Northern Greenway to multi-user standard'. The proximity of these two routes are completely dislocated from any of the proposed sites for new homes. Therefore these cannot be claimed as 'widening transport choice' and further illustrates the lack of joined-up thinking in this review and presentation of erroneous information., The single Access Point to the proposed site SGA26 is unsuitable for the size of development. Document 'Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021' page 174 identifies that 'the relatively narrow frontage the site shares with Dale Road suggests only a single point of access/egress is possible. Options to formulate access with the adjacent residential roads would not be suitable given the specification of these highways'. A mitigation proposed to address this issue is '...to create a mini-roundabout or signalised junction arrangement should be explored in order to allow suitable exit from SGA26 onto the local road network. Given the site's proximity to Derby City, it is likely that more traffic will wish to turn right out of SGA26 that could give rise to delays for those wanting to exit the site.', Site SGA26 would in effect be one large cul-de-sac with a single vehicular access point. With an assumed number of 240 homes and 240 cars (which is considered a gross underestimate) it is unrealistic to expect the smooth flow of traffic onto and off the development at peak times. Site SGA26 would become a potential contender for being named the 'longest cul-de-sac in Europe'. Furthermore, a single access would result in congestion when refuse collection vehicles are operating and presents a risk that any block to a single road access (e.g. following an accident) may prevent emergency service vehicles accessing the site., Document 'Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021' page 174 states that 'In order to create an acceptable access, it is likely that the line of trees which line Dale Road would need to be scaled back to allow for the necessary visibility for vehicles exiting SGA26'. Removal of trees in this area is in direct conflict with the Strategic Policy 1.1 Strategic Housing Sites objective which states 'Applications for strategic housing developments of 200 or more homes shall: Maintain and enhance, where possible, existing hedgerow and tree belt boundaries with the open countryside'. It can be concluded that a single Access Point to this site is unsuitable for the size of the development. The narrow frontage of the site prevents the inclusion of a second Access Point and access via adjacent roads to the site would not be suitable., Strategic Policy 1.1 Strategic Housing Sites states that 'Applications for strategic housing developments of 200 or more homes shall: Be based on a network of streets that prioritise walking, wheelchair use and cycling over motorised transport'. The proposed site North of Spondon fails to meet this policy objective in that this site is located so far from any Erewash services, infrastructure and locations of employment that it will force residents to use motorised transport., The proposed site

SGA26 has no provision for green transport links with Erewash. Document 'Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021' indicates the closest place of work is EELS site 004 - West Hallam Storage Depot, Cat & Fiddle Lane, some 5.5km away. However, there is no public transport link between site SGA26 and this identified place of work. There are no existing safe cycle routes accessible from the A6096 in the proximity of the site of SGA26. The A6096 is not a cycle friendly route and so residents would have no option other than to use private vehicles to travel to work, to services and to facilities in Erewash., It can be concluded that EBC should have given due consideration to the provision of green transport links to places of work, services and facilities in Erewash before proposing site SGA26 in the CSR., A development at SGA26 would cause an adverse impact on the volume of road traffic and specifically on vehicular access and egress, to and from Spondon. Traffic egress from Spondon, in the direction of Derby is via the single route on Willowcroft Road. This egress route suffers significant congestion at peak periods and when Derby County Football Club have a home game. Document 'Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021' page 176 identifies the constraints associated with this egress route, yet fails to identify the congestion nor any mitigations for this issue. Traffic from site SGA26 may also access and egress the site via Ockbrook. Document 'Strategic Growth Area Assessments Revised Options for Growth " Erewash Local Plan March 2021' page 176 identifies that 'Ockbrook Village that has a limited, local road network not suited to accommodating additional vehicular movements'. However, it is inevitable that a development at site SAG26 would result in an increased volume of traffic passing through Ockbrook Village and EBC have identified no mitigations for this issue., It can be concluded that a development at SGA26 would cause an adverse impact on the volume of road traffic and specifically on vehicular access and egress, to and from Spondon and Ockbrook., Strategic Policy 1.1 Strategic Housing Sites states that Applications for strategic housing developments of 200 or more homes shall 'â€¦ Deliver an appropriate level of biodiversity net gain'. The proposed development at SGA26 fails to satisfy this policy objective and a development on this site would cause an adverse impact to Environment and Biodiversity. The land identified for site SGA26 is Green Belt and links Spondon Wood and the woodland to the west of Deer Park View. There are many species inhabiting the two areas of woodland and the farmland in between (earmarked for the SGA26 development). These include (but not limited to) Buzzards, Sparrow Hawks, Lapwings, Woodpeckers, Jays, Rooks, Owls, Pheasant, Bats, Hares, Rabbits, Foxes, Fire Salamanders, Badgers and Fallow Deer. The fallow deer sleep overnight in the woodland to the west of Deer Park View and forage on the farmland identified for SGA26. It is no coincidence that one of the roads bordering SGA26 is named Deer Park View, and another Pheasant Field View. Spondon Wood is an ancient woodland and provides habitat to many species of wildlife, flora and fauna. The impact to the wildlife, flora and fauna from a development at SGA26 would be significant and irreversible., Strategic Policy 5 - Green Infrastructure proposes four Strategic Green Infrastructure Corridors. The location of these Green Infrastructure Corridors are significant distances from the North Spondon and Acorn Way sites and so will provide no benefit to the wildlife

impacted by development of these sites. It can be concluded that the deletion of the SGA26 land from the Green Belt for housing would cause an irreversible impact on the environment and biodiversity of the Green Belt., Fourthly the Plan is considered not to accord with the National Planning Policy Framework (NPPF). The NPPF states in paragraph 133 'The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'. The proposed development of land identified as SGA26 directly disregards paragraph 133 of the NPPF as the development would not maintain the 'openness and permanence' of the land and increases the urban sprawl of Derby City., National planning policy framework also states in paragraph 134 'Green Belt serves 5 purposes:, (a) to check the unrestricted sprawl of large built-up areas;, (b) to prevent neighbouring towns merging into one another;, (c) to assist in safeguarding the countryside from encroachment;, (d) to preserve the setting and special character of historic towns; and, (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.', The land identified in SGA26 is a designated Green Belt and the protection that is afforded to Green Belt areas for the 5 purposes (listed above) has been disregarded in this proposal. The proposed development would increase the built-up area on the border of Derby City and hence increase the 'sprawl of large built-up areas', which directly contradicts purpose (a) in paragraph 134 of the NPPF. The proposed development places a new EBC settlement on the border with DCC and hence is a development that fails the purpose 'to prevent neighbouring towns merging into one another' (purpose (b) in paragraph 134 of the NPPF). The proposed development requires the area to be deallocated from Green Belt which is directly against purpose (c) in paragraph 134 of the NPPF which is 'to assist in safeguarding the countryside from encroachment', Point (d) in paragraph 134 of the NPPF states that one purpose of greenbelt is 'to preserve the setting and special character of historic towns'. The proposed development is on land within the Locko Park Estate. Whilst Locko Park Hall and its estate is not a 'historic town', it is however, it is a privately owned country house and the hall is a Grade II listed building. The development of new homes on this land is directly against purpose (d) in paragraph 134 of the NPPF and fails the purpose 'to preserve the setting and special character..' of Locko Park Hall and its estate., Point (e) of paragraph 134 of the NPPF states a purpose of Green Belt is 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. Within Erewash there are areas of Brownfield and many vacant properties that could be redeveloped. The EBC CSR that has led to the proposal to build on Green Belt does not adequately address the subject of why Brownfield and vacant properties cannot be developed? Indeed at the EBC council meeting on 29 March 2021, Councillor Mrs Carol Hart stated that '..we don't want to build on Green Belt, you tell me where else we can build, the problem we've got is that Brownfield sites, owners of Brownfield sites probably don't want to sell them, or even if they want to sell them will the developers want to build on them?..'. It is clear that EBC have failed to adequately demonstrate that they have exhausted all Brownfield site options before considering Green Belt options. Furthermore, the Government have established a Â£100 million Brownfield Land Release fund to

support brownfield development, however, there is no information presented in the CSR to inform what steps EBC have taken to secure funding from this fund in order to address the difficulty they may have experienced in re-developing brownfield sites., It can be concluded that EBC have disregarded the 5 purposes in the NPPF that Green Belt serves on the boundary with Derby City and therefore the CSR does not accord with the National Planning Policy Framework., I consider the CSR fails to comply with the Duty to Cooperate., UK Government guidance on the statutory duty for authorities making plans states (Par

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.

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)

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

Regulation 19 Representation

Representation Number: 250

Name: Robert SEWTER

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

The policies map for houses alongside Acorn Way

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The excess carbon emissions caused from exacerbated queuing traffic especially on Morley Rd and Acorn Way. Loss of green spaces and rain water absorbing land potentially exacerbating the risk of flooding of lower houses. Educational impact on children in overcrowded schools as no new schools are currently proposed to be built. On the plans the Bridle Way opposite Morley Gardens to be used as an exit on to Morley Rd belongs to the 5 householders and the owners of the fields along side it. I do not think Erewash know this. Other areas of land are available within Erewash Borough council's boundaries such as the outskirts of Sandiacre, Long Eaton, West Hallam and others.

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.

There are areas of land available to Erewash Borough

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Please use this space to continue any of your answers

Part of the plans are to build ab exit on the Bridle Path where I liveAlso note of the 5 houses on the Bridle path 2 are in derby city council and 3 in Erewash borough

Regulation 19 Representation

Representation Number: 251

Name: Ronald and Jacqueline Lomas

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

proposed development between Morley Road and Acorn Way.

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The proposed development between Morley Road and Acorn Way. This development would not be a too serious problem providing no access under any circumstances was onto Morley Road., however if access was on Morley Road then this would be serious danger to foot traffic using Morley Road, as at various times because of schools onto Morley Road, and disabled/elderly people using this road the footpaths and road are not wide enough to cope with any further traffic coming onto it. Also, existing public sewers would not cope with anymore connections to it (i.e. this development onto it). Acorn Way was originally meant as a relief road to take traffic from Morley Road, otherwise Oakwood would not have gone ahead.

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.

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)

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

Regulation 19 Representation

Representation Number: 252

Name: David Dickson

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Relates to what is a strategy, consideration of impact of development on each other and neighbouring communities, quality of greenbelt,

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Dear Planning, I am not qualified to say if the Core Strategy Review (CSR) document is legally compliant but it is unsound. The CSR document is not strategy document but a tactical response that offers a potential and unsound solution that satisfies the numerical requirement. A strategy should say how it intends to determine a solution that meets the requirement. This is demonstrated by the section 'Strategy Policy 1 Housing' where a hierarchy is stated but solutions i.e. the named developments are embedded in the hierarchy., The strategy should address how the new developments interacts and impacts not only with each other but also with neighbouring communities within the borough and also neighbouring boroughs such as Derby City., For example, the Kirk Hallam extension and the new South Stanton developments are both geographically close and substantial, so the volume of traffic will impact on each other, Kirk Hallam, Ilkeston, Sandiacre, and Spondon. In particular, vehicular access will be through Sandiacre, Spondon, Ockbrook, and Ilkeston all of which will be unable to meet the demand from thousands of additional cars and HGVs. The proposed Kirk Hallam relief road whilst providing improved access to the new developments does nothing to address the impact Ilkeston, Sandiacre and Spondon. Similarly, the Oakwood and North Spondon developments

will not only impact each other, but also the existing communities of Ockbrook, Oakwood and Spondon. Spondon is already compromised by traffic Spondon itself, traffic from the A6096 and Oakwood, particularly in the morning, as traffic heads toward Derby and is funnelled down Willowcroft Road., A consequence of increased congestion is the resulting air pollution which is already unacceptably high in Spondon and will only get worse. The CSR document does not address air pollution, pollution or waste management., Traffic is not the only issue here as both Oakwood and North Spondon developments are adjacent to Derby city and will draw on their resources for health care, education, waste management, highway maintenance, policing etc. without the revenue. The hierarchy within "Strategy Policy 1 Housing" is also questionable. It places Erewash green belt below greenbelt adjacent to Derby City. Surely its position in the hierarchy should be based upon the quality and merits of the greenbelt rather than just its location. Land is designated greenbelt to protect the Land from urban sprawl, preserve the character of existing settlement and encourage the development in existing built up areas. The Northern Spondon land is adjacent to Spondon Wood which is designated ancient woodland. North Spondon land is therefore greenbelt of high quality and merit. Spondon wood and the Northern Spondon land, which is farmed, forms an integrated habitat for wildlife which includes deer, a rookery, buzzards, sparrow hawks, pheasants, partridges, jays, spotted woodpeckers, green woodpecker, herons, lapwings, hares, rabbits, squirrels, mice, dormice, bats, frogs, toads and newts. The surrounding hedgerows are also home to robins, tits, wrens, blackbirds, sparrows etc. The CSR document states that a semi-natural buffer zone should be created to protect the bio-diversity of the wood. It does not however specify the size of the buffer zone. The recommendation by Woodland Trust is 50m; if adopted this would result in a significant reduction in the size of the development questioning its viability. Related to this is the recommendation woods should be joined to allow migration of bio- diversity. The North Spondon development would isolate the wood at the western end of the development site. Presumably because this wood is in Derby city it has been ignored, but as stated earlier the impact on neighbouring boroughs needs to be considered., Summary, Whilst the CSR document does make a number of significant points it does need to be revisited to become strategy document rather than a tactical solution that meets to numbers. The CSR should then be used to select the development site, It needs consider the impact and interaction on both themselves and neighbouring communities of 3 substantial developments geographically close to each other. Stanton North, Stanton South and Kirk Hallam., It needs to address the interaction with and impact on neighbouring communities where the sites adjacent to eg Derby City, Spondon North and Oakwood including who provides and pays for what., It needs to address green belt quality in the decision making, Waste Management and Air pollution should be addressed,

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.

Included in the box above

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)?

Yes, I wish to participate in hearing session(s)

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

To confirm representation has made transparently correctly

Regulation 19 Representation

Representation Number: 253

Name: Chris Waumsley

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Policies, policies map and other text in relation to strategic policies

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

There is concern that the soundness of the plan may be questioned with regard to the need to fully evidence the justification for exceptional circumstances that established the need for review of green belt boundaries as required by paragraph 141 of the NPPF. The constraints to meeting the Borough's development needs on non green belt sites (given that 70% of the Borough is within the green belt) is acknowledged. Whilst the evidence contained in the Strategic Growth Area Assessment, Sustainability Appraisal and SHLAA point to need for changes to the green belt to accommodate development needs, it is not clear how these are explained in strategic policies as required by paragraph 140 NPPF which also requires all other reasonable options to green belt for meeting development needs to be assessed. It is also not clear where the assessment of the various options for green belt review have been assessed and compared against the 5 purposes of the green belt set out in paragraph 138 of the Framework. it is also suggested that the SHLAA of 2019 is reviewed and updated to ensure the evidence base for such review is robust and up to date., Policy SP1 is supported specifically 1-3 f the

provision of around 1300 dwellings on land South West of Kirk Hallam. This is a sustainable location for development in accordance with paragraph 142 of the Framework. The land proposed for allocation under this policy is not necessary to keep permanently open and does not contribute significantly to the purposes of green belt. The need to meet development needs in sustainable locations and the delivery of a significant infrastructure project in the form of the Kirk Hallam Relief Road are considered. Policy SP 1.5 South West of Kirk Hallam is supported. Preliminary evaluation of key factors involved in the development of this site, including flood risk and drainage, ecology, landscape impact and highway considerations have established that the development, including the Kirk Hallam relief Road, can be delivered without undue impact and viably. All the land required to deliver this allocation is under the legal control of the promoters Lambert Limited who are collaborating with Redrow Homes To deliver the development envisaged by the allocation.

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.

Clarify strategic policies to comply with para 140 of the Framework and better explain how the options for green belt review have been considered in the context of para 138 of the Framework., Longer term development needs should be considered and additional land in sustainable locations removed from the greenbelt to avoid having to review greenbelt boundaries again in the foreseeable future.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

I represent the promoters of the strategic allocation South West of Kirk Hallam.

Regulation 19 Representation

Representation Number: 254

Name: Andrew Christopher Hind

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

1.4 Land south of Spondon Wood

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

"Whether community consultation was carried out in accordance with the Statement of Community Involvement". My property borders this proposed development and Erewash Borough Council have not contacted me at all., "Whether the requirements of the relevant Regulations have been followed;" Having not been contacted i believe that the regulations have not been followed., "Whether the appropriate notifications have been made"- Spondon Wood was added late to this plan but we were not even given any notice of this ., "Whether a Sustainability Appraisal assessing social, environmental and economic factors has been carried out and made public" This has been done and then not followed correctly. There are other sites that are assessed as lower impact under the above criteria and yet are not part of the plan., "Whether the requirements of the Duty to Cooperate have been met" . I am told by our own Derby City councillors that this has not been met and that DCC will be making an official representation to that effect., I also would like to mention that this is UNSOUND because the use of this land for building does not help in the strategic growth of Erewash. Indeed Erewash BC have put this in the review "Land north of Spondon as shown on the Policies Map is allocated for strategic residential development of around 200 homes across 12.3 hectares of land that will extend the community of Spondon." Please explain how extending the community of Spondon

helps with the strategic growth of Erewash. Planners should be looking at the land in the very south of Erewash which will be close to the new development of a Freeport at East Midlands Airport where several thousand jobs will be created in the very near future.

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.

It is pretty obvious that this plan has not been positively prepared if it had, they would not be planning on building on this land south of Spondon wood Acorn Way Cotmanhay and Ilkeston. There is no evidence to justify the use of this land for building. It will not be effective - how does extending Spondon help Erewash grow? It is NOT consistent with national policy which states green belt should only be used as an absolute last resort. See National Planning Policy framework published 27/03/2012 paragraphs 137 to 151., Paragraph 138. Green Belt serves 5 purposes

1. to check the unrestricted sprawl of large built-up areas
2. to prevent neighbouring towns merging into one another
3. to assist in safeguarding the countryside from encroachment
4. to preserve the setting and special character of historic towns
5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

To make the Core Strategy Review legally compliant and sound it should start by looking what Erewash needs for growth., Brown field sites in Erewash have not been exhausted and more should be included in this strategy., Housing in the very south of Erewash should be considered due to the creation of several thousand jobs at the East Midland Airport Freeport. Having people living near to jobs is both practical and environmentally sound. If greenbelt has to be used then the housing should be added to the following villages Risley, Breaston, Ockbrook, Draycott and Borrowash. These areas all share the following features, very few houses for sale and very little or no affordable housing. The other main area the planners have included is Cotmanhay and Ilkeston. These have a lot more houses for sale much of which is affordable. Ilkeston has houses for sale from £120,000. The cheapest available in the following areas is Ockbrook £275,000 Risley £299,950, Breaston £225,000 Borrowash £200,000. (figures from Rightmove 25/04/2022), The other alternative would be the creation of a new village with the infrastructure needed. School shops pub village hall GP branch surgery etc. This could be in the very south of Erewash as already mentioned. An alternative would be near to Hopwell Hall and the A52 / B5010. This could be either north or south of the A52. A new junction could be added to the A52 allowing easy access to "Hopwell" and actually reducing traffic congestion in nearby villages. I also would like to mention that this is UNSOUND because the use of this land for building does not help in the strategic growth of Erewash. Indeed Erewash BC have put this in the review "Land north of Spondon as shown on the Policies Map is allocated for strategic residential development of

around 200 homes across 12.3 hectares of land that will extend the community of Spondon." Please explain how extending the community of Spondon helps with the strategic growth of Erewash? Planners should be looking at the land in the very south of Erewash which will be close to the new development of a Freeport at East Midlands Airport where several thousand jobs will be created in the very near future. This is also GREEN BELT and government policy has stated that green belt should only be used as an absolute last resort. When questioned on the use of brown field sites the council have said "owners of brown field sites probably don't want to sell them and developers don't want to develop them." This indicates to me that the council/planning committee have put these developments in any area that does not affect their own village / district. NIMBYism at its most blatant.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

We have not been allowed to be represented at any of the planning / consultation meetings. Erewash have said this is because we do not live in Erewash. At the most recent Erewash full council meeting to consider this strategy we had a question tabled by a

Regulation 19 Representation

Representation Number: 255

Name: James Pemberton

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

SA2, SA3 and the overall Core Strategy Review

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

- There has been a failure in the Duty to Cooperate with Derby City Council. Derby City Council raised multiple concerns in a letter to Erewash Borough Council on 19/05/21 (EBC/RevGrowthOpt_May_21) stating that there was 'no prior discussion' to understand the local context with 'implicit assumptions' made in terms of the level of housing and the City infrastructure required to support this (schools, healthcare, transport network etc), with Growth Options based on 'broad categories of settlement hierarchies and assumptions rather than on hard evidence'. This is clear evidence that Erewash Borough Council has failed to consult Derby City Council sufficiently to inform decisions relating to SGA1, leading to a lack of effective decision making., - Derby City Council have also raised concerns regarding the assumption that the proposed sites would be served by schools located in Derby City. They have not seen evidence that Erewash Borough Council have liaised with Derby County Education before selecting these sites for significant growth. This further demonstrates the failure in the duty to cooperate with Derby City Council., -

We recognise the Core Strategy Review has been communicated via various means within the Erewash Borough, however we do not accept that fair consideration has been given to residents of Morley Road that are directly opposite the planned SGA1 development. We have not received any formal notification of the

Core Strategy review and were only made aware by word of mouth and we are aware this is the case for other residents on Morley Road. As detailed in the 'Statement of Consultation for the Growth Objectives Consultation' document, notifications of the Core Strategy review were placed for viewing in Erewash Town Halls, which we do not access and we were not aware of social media publishing of the strategy. We therefore believe that there has been a failure to communicate the Core Strategy Review to residents of Morley Road, whom will be directly impacted by increased traffic and load on local services. - We agree with the view of Derby City Council (letter 19/05/21 (EBC/RevGrowthOpt_May_21) stating 'that we do not consider that the approach taken through the Revised Options for Housing Growth and to SGA1 and SGA26 are part of a coherent strategy that has been soundly arrived at'. 'The proposed housing sites do not spatially relate well to the existing transport and social infrastructure needed to underpin their sustainability and without improved/new local amenities, accessible social infrastructure or additional public transport infrastructure both these sites would result in developments that will be largely car dependent and therefore unsustainable extensions to the City'. - There has been a lack of consultation with Derby City Council to understand the issues affecting the proposed sites, meaning that the Core Strategy Review is not effective or sound. In the letter on 19/05/21 (EBC/RevGrowthOpt_May_21), the Chief Planning Officer states that 'Earlier engagement with the City Council would have given a clearer understanding of issues affecting the proposed sites' and 'Growing your own existing settlements would better meet local housing needs and provide further critical mass to support local facilities in those settlements'. - The selection of the proposed sites is not sound from a road infrastructure perspective. We agree with the concerns raised by Derby City Council, that the proposed development sites (including SGA1) are located within a network of unclassified local roads that experience queues and congestion as a result of local traffic, and traffic from the wider area that avoids the A38/A61/A52 and has destinations in the eastern half of the city such as the employment locations around Raynesway. For example, there are known congestion problems at the junction of Derby Road/Lime Lane and the junctions on the A6005 Derby Road/Nottingham Road Corridor. The lack of strategic road connection around the north eastern quarter of the city, between the A52 and A38, results in a number of rat running routes. Such bolt-on allocations (e.g. SGA1) are not sustainable and will only add to vehicular use which is contrary to climate change aspirations. - The requirement of visibility of at least 90m is mandated by Highways Specifications for roads of 30mph speed limit. The 'Strategic Growth Area Assessments' document states that 3 access points will be provided to allow vehicles to access the proposed development (SGA1). Can it be demonstrated that all site access points provide at least 90m of visibility in each direction (the 'y' distance) from the centre line of the junction? This is a particular issue at AP1 which has visibility of 40m when heading towards the roundabout junction with Acorn Way (AP1 is situated on a bend on Morley Road which will affect visibility). - Morley Road has frequent speed humps, demonstrating that it is already considered to be an unsuitable distributor road. Having the only vehicular accesses onto Morley Road is not reasonable for the distribution of traffic or from an

environmental aspect., - The assessments seem to assume that all traffic wishes to go to the Derby City centre. This is not reasonable as many users will also use routes via Acorn Way to the A52 & A50., - Sending more traffic down Morley Road, Reginald Road and Chaddesden Lane is environmentally disastrous because of the very high number of houses on these roads. Whereas Acorn Way has no houses and therefore a better route for traffic wishing to go to the south and east which could be assumed to be up to about 50%. This is further evidence that the proposals are not sound., - The additional traffic usage, as outlined on page 5 of the 'Strategic Growth Area Assessments' document, will be at times when children are walking/being dropped off by car at Lees Brook School and White House nursery. The volume of traffic currently using the road already causes difficulties at these times (cars are frequently parked on both sides of the road close to Lees Brook School, which causes difficulties for other road users in using the road). A better access route to SGA1 would be from Acorn Way. This is further evidence that the local context has not been considered (as raised by Derby City Council) and that the proposal is not sound., - The plans recognise the need for the enhancement of the current roundabout facilities (both at the junction of Morley Road, Chaddesden Lane and Wood Road and the junction of Acorn Way, Oakwood Drive and Morley Lane). However, it is outlined that enhancement will be difficult and significantly costly, due to the tight form of built development at the existing junctions. What modifications will be completed to ensure that the junctions remain safe, taking into account the increased vehicle usage and will Erewash Borough Council/the developer cover this significant cost (not Derby City Council)?, -

The 'Strategic Growth Area Assessments' document (page 8) states that the surface water risk is low. However, Gov.uk states that there is a high risk of surface water flooding for the postcode DE21 4QY (which is for properties on Morley Road - adjacent to SGA1), and a medium risk of flooding from rivers. How will the developer ensure that this risk is not increased further, i.e. retaining the existing hedgerow to mitigate the flood risk? We believe that the SGA1 development would increase the surface water flood risk to surrounding areas (i.e. Morley Road " already high risk) and therefore the development is not sound without significant mitigations., -

The 'Strategic Growth Area Assessments' document (page 8) states that the foul drainage flooding risk is high. How will the developers mitigate this high risk of foul water discharge? - There is also an ongoing issue with flooding on Acorn Way, which will only be increased further with development on the green field site. - The development site (SGA1) is located within an SSSI impact risk zone. How will any risks be mitigated?, - The 'Strategic Growth Area Assessments' document states that under the 'Green Belt' section that the development should 'assist in urban regeneration by encouraging the recycling of derelict and other urban land'. However, the proposed development (SGA1) is on green belt land which is also a working farm and therefore does not assist in urban regeneration., -

The proposal states that there is an expectation that the existing schools within the Derby City Council area would be used rather than new educational facilities being provided by Erewash Borough Council. Did Erewash Borough Council consult with Derby County Education before making the assumption that Derby City Schools would accommodate this over capacity (concern raised by DCC Chief

Planning Officer in letter on 19/05/21)? - The new development (SGA1) will also not include provision of additional health facilities (e.g. a doctors surgery). What extra provision will be provided by Erewash Borough Council to accommodate the additional demands on facilities in the Derby City Council area?, - We agree with the view of Derby City Council (letter dated 19/05/21) that both preferred sites are on the edge of the urban area, with a poor relationship to existing facilities such as schools, shops and employment areas. The summary tables provided in the SGA assessment show distances to community facilities that clearly demonstrate that no local amenities are within easy walking distance (800 metres or 10 minutes). -

The development site (SGA1) will not include any bus stops within the site and users will be expected to use existing bus stops located on Morley Road. SGA1 is a proposed development of 600 houses and the nearest bus stop has a service of once per hour. This is not an effective or sound proposal and will lead to increased vehicle usage and pressure on heavily utilised local roads.,

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.

- We have raised concerns about the speed of vehicles travelling on Morley Road with our Councillors, as vehicles frequently exceed the 30mph speed limit which increases the need for good visibility at any necessary junctions. The proposed junctions (AP1, AP2 & AP3) are also located either side of White House nursery, which will therefore pose increased risks to both car and pedestrian users of the nursery, a better access route would be via Acorn Way., - Acorn Way is quoted as having a 60 mph speed limit but a long section up from Derby Road roundabout has a 40mph limit, because of the pedestrian crossing facility. There is no reason why the 40 mph limit could not be extended and a suitable junction provided from the development on to Acorn way. Indeed the Strategic Policy 1.3 (3) advocates multi user crossings of Acorn Way which will likewise require a 40 mph limit on Acorn Way. This is not ruled out but considered undesirable because of the effect on the belt of trees. We submit that this disadvantage is far outweighed by the reduction in traffic that would otherwise be passing many houses on Morley Road, Reginald Road and Chaddesden Lane, and thus less pollution, noise, accidents and visual harm. - A junction on to Acorn Way would not provide a rat run, via a junction on Morley Road to the Oakwood development, as this is served off Oakwood Drive., - SP 1.3 text mentions "additional pavements and crossings on Morley Road" - This should not extend to providing a pavement throughout the development side of Morley Road, causing the removal of the hedge line. -The hedge beside Morley Road should be maintained and green open space provided adjacent to the hedge within the development, so as to mitigate the effect of the new housing being on higher ground and dominating the existing housing. This is a

significant concern due to the elevation of the proposed development (SGA1)., -

The "Strategic Growth Area Assessments" document states that the schools within the proposed SGA1 development area would be 15% (infants and junior) and 7% (secondary) over capacity. What additional physical facilities would be provided to accommodate this over capacity and are the schools willing and able to provide this? It would seem to make more sense to request that the developer provide an infant/junior school at the site as this would reduce the impact on the Cavendish school and also reduce car journeys. - The shopping facilities in the Oakwood district shopping centre are heavily utilised and parking facilities are frequently at capacity. There is currently no provision for local amenities in proposals which is not sound. Residents of the new development are likely to drive to the Oakwood shopping centre due to it's distance, therefore a shop at the new development site (SGA1) would reduce traffic and impact on the Oakwood shopping centre.

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)?

Yes, I wish to participate in hearing session(s)

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

To have the opportunity to participate in any hearing session and have the opportunity to express our concerns as residents who will be directly impacted by the proposed SGA1 development.

Regulation 19 Representation

Representation Number: 256

Name: Angela Parrott

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Land between Lees Brook School, Morley Road and Acorn Way

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The excess carbon emissions caused from exacerbated queuing traffic especially on Morley Road and Acorn Way., Education impact on children in over crowded schools as no new school is currently proposed to be built., Loss of green spaces and rain water absorbing land, potentially risking flooding of lower lying houses and roads., Other areas of land are available within Erewash Borough Council's boundaries such as the outskirts of Sandiacre, Long Eaton, West Hallam and others., Acorn Way was designed as a cut-through between Spondon and Oakwood and it was not designed to have houses built on it.,

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.

Not build on green spaces on Morley Road and Acorn Way.

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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 257

Name: Christopher Whittle

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Acorn way development

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

Building 600 houses on land that is on the extreme Limits of Erewash Council's boundaries is nothing but a shift of response ability by the Authority to another, The land in question is of prime Agricultural land and should remain so., The access road (acorn way) was built in 1983 as relief road for the east side of Oakwood and was never constructed to accommodate the amount of traffic that uses today let alone adding another 1000 plus vehicles daily. As a resident of Morley Road if the road network cannot be improved significantly the education needs and medical facilities increased then this planning proposal needs to be put on the back burner.

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.

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No, I do not wish to participate in hearing session(s)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 258

Name: Robert Wilks

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Proposed use of green belt land off Acorn Way/Morley Rd Oakwood

Do you consider the Core Strategy Review is Legally Compliant?

Yes

No

Do you consider the Core Strategy Review is sound?

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.

Proposals within the core strategy in respect of using green belt locations to meet future housing growth should be reconsidered for a number of reasons. Particularly I have concerns as a resident of Oakwood, Derby which is directly affected by proposals to allocate land off Acorn Way/Morley Rd for provision of approximately 600 homes. I understand this proposal has been developed without sufficient consultation or collaboration with the neighboring authority (Derby City Council) and as a result very little or an insufficient level of consideration has been given to some key issues which will have widespread impact; - Direct impact on amenities and services outside EBC boundaries (where no council tax will be directed to mitigate this impact), - Specifically, the impact on school places which are already overcrowded, in particular schools which should serve the oakwood community., - Current infrastructure is not designed to take the extra construction and impending

residential traffic a proposed development of this size and scale will create., - Loss of green space in immediate vicinity of Derby city/Oakwood/Spondon area and subsequent impact on or loss of biodiversity, nature, wildlife which are key to nature recovery strategies and health and well-being., - fundamentally EVC should have explored in greater detail, and worked more collaboratively with land owners/developers to bring forwards alternative sites which are adjacent to and feed the economy and infrastructure of existing settlements within their own local authority area, which the subsequent s106/CIL agreements and resources will fund by way of growth and development.,

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.

I'm not a planning expert (same as the majority of the population) therefore I'm unable to be precise in what modifications I would want to see. However, in broad terms I would like to see proposals which allocate the use of land next to areas of Derby City fundamentally reviewed and greater care and collaboration taken to develop alternative proposals which would see future housing supply being delivered adjoining existing settlements within EBC boundaries, where the infrastructure required and council tax/s106/CIL contributions could be used for the direct benefit and improvement for any new residents of the area., If this isn't reviewed, the additional pressure created (without extra resources) on Derby City will be unsustainable. I think EBC are taking the easy way out - develop a plan which delivers their obligations but without due care, consideration or consultation with those who it fundamentally affects.

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)

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

Regulation 19 Representation

Representation Number: 259

Name: Teresa Howard

To which part of the Core Strategy Review does this representation relate?

Policies

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Housing

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

The Core Strategy Review with regard to Housing does not appear to be based on robust evidence of need with regard to affordable housing, or needs of elderly/disabled people, so I assume it is not legally compliant., The Core Strategy is not Sound, as:, It is not Positively prepared -the review does not objectively assess the need for homes to be delivered to meet the needs of local residents who need affordable or specialist homes.. It is not Justified, The Plan is not based upon a robust and credible evidence base. The evidence provided in the Greater Nottingham and Ashford Housing Needs Assessment October/November 2020 highlights the need to 271 rented affordable housing units per year in Erewash, the majority of these needed for Social Rent. The proposals would provide for a maximum of 11 affordable rented housing units per year via commuted sums - only 4% of the affordable rented units needed. The proposals restrict the levels of affordable provision on the basis of viability, but there appear to be no up to date viability assessment to justify this. Information from the 2012 Disabled Housing Research indicates a need for homes for disabled and elderly people, but no provision has been made for this., National policy, Whilst the National Planning Policy Framework does prioritise "affordable" home ownership, the 2020 Housing

Needs Assessment cannot provide any evidence of need for this, and indicates that such models may not be affordable locally. So there is an identified and justified local need to ensure that Social Rented Housing is provided and prioritised, and that home ownership products are genuinely affordable to those who could not otherwise afford to buy., EVIDENCE AND SUPPORTING INFORMATION, THERE APPEARS TO BE NO EVIDENCE TO JUSTIFY THE REQUIREMENT FOR ONLY 10% AFFORDABLE HOUSING ON THREE OF THE FIVE STRATEGIC HOUSING SITES, The 2014 Core Strategy Policy 8, stated that up to 30% affordable housing would be sought. Whilst it indicated lower levels might be viable in some areas, this was based on viability assessments carried out over 8 years ago. House prices have increased considerably since then, so the viability assessments would also be expected to have changed considerably., Even then, Policy 8 indicated that viability for the Stanton site, may be restricted to 10 to 20%, so why is only the lower figure required? If viability, or Policy 8 is reviewed at a later date, the policy will already have been set for the Strategic sites. THE AFFORDABLE HOUSING SECURED ON-SITE IS ONLY "AFFORDABLE HOME-OWNERSHIP". THERE IS NO EVIDENCE OF LOCAL NEED FOR THESE PRODUCTS., Whilst it is appreciated that the NPPF currently expects 10% home ownership nationally, 2020 Housing Needs Assessment does not provide any evidence of need for low-cost home ownership in Erewash., The NPPF could change over the next couple of years, but the policy on the Strategic sites would have been secured., People with a local connection to Erewash would have no priority for low-cost home ownership products currently " so it is very difficult to see how this would meet any identified needs in Erewash at all., THE PROPOSALS DO NOT APPEAR TO MEET IDENTIFIED HOUSING NEEDS IN EREWASH, The 2020 Housing Needs Assessment indicates a need for 271 rented affordable housing units per year in Erewash. (the majority of these needed for Social Rent), The proposals suggest that financial contributions (commuted sum) in lieu of a maximum of 160 units may be secured on two of the Strategic sites (subject to viability) This would possibly provide for 10.66 affordable rented units per year over the 15 year plan period (4% of the affordable rented units needed)., These are commuted sums (and subject to further viability testing, so may not be secured at all), rather than on-site provision. Therefore, alternative sites have to be found in the borough on which to build the affordable units. This may be difficult/not possible to secure. THE PROPOSALS WILL NOT MEET IDENTIFIED HOUSING NEEDS IN EREWASH, - The 2020 Housing Needs Assessment identified a need for 271 affordable rented units to be provided each year., - The housing register has over 2,000 households wanting to secure an affordable rented home., - Around 1,500 households approach the Council's Housing Options team each year, of which around 1,100 are deemed to be homeless or potentially homeless. The majority will be seeking an affordable rented home. The 2012 Disabled People's Housing Needs Study indicated that between 255 and 937 new homes for people with physical disabilities were needed as at 2020., If affordable homes to meet any of these needs are not provided on the Strategic sites, then it is reliant on:, - Windfall sites " developer contributions. Wouldn't developers be likely to argue that the same levels/types of affordable housing provision as on Strategic sites be required? (i.e. no affordable rented

housing), - Windfall sites " purchase by housing associations with public funding from Homes England. I understand that there are currently no such developments secured post 2022 " so this cannot be relied upon. Future funding from Homes England cannot be guaranteed, particularly in an uncertain national economic climate. - Use of commuted sums " if sites were available, then possibly the commuted sums from the two Strategic sites could be used to encourage developers/housing associations to provide the affordable housing needed, but, as stated, this would only provide for a maximum 10.66 affordable rented units per year over the 15 year plan period.,

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 provisions and requirements for affordable housing and homes for disabled/older/vulnerable people should be based on the evidence of need provided by the 2020 Housing Needs Assessment, 2012 Disabled People's Housing Needs Study, or any further research commissioned., If financial viability issues are used to justify lower levels, then this should be based on robust and up-to-date independent viability assessments, and should be adaptable to take into account changing viability issues over the plan period., Clear Design and size Standards, should be adopted to ensure homes are of a good quality for families and individuals. Private developers will are unlikely to build to these standards voluntarily.,

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)

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Please use this space to continue any of your answers

I would not be able to participate in hearing sessions, as there would be likely to be a conflict of interest in my professional position., I am commenting in this consultation in a personal capacity

Regulation 19 Representation

Representation Number: 260

Name: Lois Partridge

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 2

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Strategic Policy 2 identifies our client's site, Stanton North, to provide at least 40 hectares of high quality employment development at Stanton North to meet the identified needs for new and relocating industrial and warehousing/logistics uses (use classes B2 and B8). We confirm that there is an extant planning application which proposes to deliver a mix of B2, E(g) iii and B8, providing a total development area of 50.99 hectares. The planning application was validated on 2nd December 2021.

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.

N/A

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 261

Name: Lois Partridge

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 2.1

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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Strategic Policy 2.1 notes that Stanton North will provide:, Appropriate site remediation to safeguard human health and the environment;, Reconnection of the site to the national rail network via the Stanton Branch Line to widen options for the movement of freight to and from the site;, Preservation and enhancement of the existing green infrastructure features on site through integration with the adjacent Nutbrook and Erewash Strategic Green Infrastructure Corridors;, Offsetting measures as necessary to achieve appropriate biodiversity compensation; and, Safeguarding of land to allow the installation of a new roundabout to replace the existing junction of Sowbrook Lane, Lows Lane and Ilkeston Road, and off-site works as appropriate to safeguard the amenities of Stanton-by-Dale, Risley and Sandiacre from increased traffic., An extant application (ref ERE/1221/0002), validated on 2nd December 2021, provides for all the requirements set out above. A site investigation, decontamination and remediation strategy has been submitted in support of the application. The site already benefits from an operational railway line which has been used on several occasions since 2021 for freight trains. The proposed plan for the site includes the retention of the line, and the delivery of a logistics and warehousing rail hub, covering 3.49ha. A Biodiversity Enhancement Area, covering 19.55ha is proposed to be retained and enhanced alongside the fishing lakes and incorporates

the existing woodland along the Nutbrook Trail. A Habitat Management Plan has been submitted in support of the application, which identifies the biodiversity enhancements which will be delivered in this area., The application proposes to provide a financial contribution to enable off site biodiversity enhancements to be delivered. This will be secured through a S106 agreement with EBC. The parameter plan submitted as part of the application identifies an area in the south west corner of the site adjacent to Lows Lane and Ilkeston Road which is proposed to be safeguarded for future highway improvements. This is required to be delivered by both Policy 2.1 and Policy 4 (transport). Offsite highway works are proposed to mitigate the impacts of traffic on the local highway network.

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.

N/A

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No, I do not wish to participate in hearing session(s)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 262

Name: Lois Partridge

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 5 - Green Infrastructure

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Strategic Policy 5 - Green Infrastructure - designates four strategic green infrastructure corridors, including the Nutbrook Trail and the Erewash Corridor. The policy seeks enhancement to the green infrastructure in these corridors, including natural flood management, biodiversity improvement, new recreational facilities and improved and extended recreational route ways., The Erewash Corridor lies on the eastern boundary of our clients' site at Stanton North, and the Nutbrook Trail runs within the site, along the northern boundary. The National Cycle Route 67 provides a link through Stanton North, between the two Green Infrastructure corridors. The extant planning application on Stanton North proposes to retain the National Cycle Route through the site, and to divert a section of the cycle way so that the link between the Erewash Corridor and the Nutbrook Trail provides a more convenient and potentially safer route for cyclists, avoiding the need to cross Crompton Road. An additional benefit of the diversion is that the existing section of the cycle way which will no longer be required will be subject to biodiversity enhancements, to create open mosaic habitat and to provide a bat house. These measures, if approved as part of the planning application, will contribute to two of the objectives of the Green Infrastructure Corridor policy, which are to provide for biodiversity improvement and active travel in these corridors.

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.

N/A

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 263

Name: Hilary Moore

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

SGA7 SGA25 SGA26

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The original consultation was flawed. It occurred during the pandemic, and therefore meetings of any description were banned. In addition doorstep canvassing was virtually impossible. Many local residents do not have internet access, and navigating the Erewash website would present a challenge to many. Even when the consultation was over, documents were not available in the Town Hall for perusal., This is the second attempt at submitting this document. Despite a message displayed on the web page stating "Thank you, your representation has been successfully submitted" when I contacted the council to confirm they informed me that it had not been received. I wonder how many other electronic submissions have been lost in this way., The proposed development will remove the last greenbelt land to the north of the borough. The Government's preferred strategy is the use of brownfield sites, and I believe that there are available sites in Ilkeston and Long Eaton. In particular, development at the West Hallam storage depot has been "is no longer available for housing" and I would like to ask why. This site could have provided 1000 new homes., Access to the development would be via Woodside Crescent, I understand such access would be controlled by traffic lights. This will cause problems for local residents, since there will inevitably be queues at the lights. Access onto the Heanor Road could be impeded for residents of The Copse and

customers of The Mallard., Heanor Road already suffers from severe congestion at times. It is not unusual for traffic queues to extend from the lights leading from Kedleston Drive back to beyond the hospital, and in the evenings the queue up the road to Kedleston Drive can extend back from the Tesco Island up Chalons Way and Manor Road. The proposed development can only add to these problems, and there is also the development at Shipley Lakeside to be considered. Besides the planned 307 new homes traffic would also be generated from the business and leisure facilities. Much of this extra traffic would use Heanor Road and approach Ilkeston in order to access the M1 rather than have to go through Heanor and Langley Mill., The aforementioned problems with the sheer numbers of vehicles passing up the Heanor Road can be clearly seen between 8.00am and 8.45am and later between 3.00pm and 3.45pm at Granby Street School. The children walking along the pavement by the school are subjected to unavoidable and unacceptable levels of pollution., Strategic policy 1.6 states that "This site is suitable and available for housing. In an area characterised by 3-bed social and privately rented houses the new neighbourhood here would provide additional opportunities for aspirational residents to stay in the area." The plans show the designated area to be approximately a quadrilateral, with well under half of its perimeter being composed of "3-bed social and privately rented houses." One short side borders an open field and the second short side borders Cotmanhay Wood. One long side is composed of "3-bed social and privately rented houses." The final side, (and the longest,) has a selection of twenty 3,4 &5 bedroomed detached houses, all with a value between £24000 and £500000, (approximately.) I would suggest that the whole area is not characterised by "3-bed social and privately rented houses." , Erewash is supposed to provide 5800 new homes, spread across the borough. 26 sites were originally considered, but there remain only 5 development sites put forward for final consideration. These are all in the north of the borough, concentrated around Ilkeston, Kirk Hallam and Spondon. It is noticeable that the development in area SGA7 is projected to have a density of 35 homes per hectare. This is by far the densest development of those areas which have been put forward for this consultation. If the figure of 19.5 homes per hectare provided for SGA26 was used for SGA7, there would be a reduction of 110 homes, (44%,) on the Cotmanhay site. There seems to be a very uneven distribution of projected housing across the designated areas and certainly an extremely unbalanced distribution across the borough as a whole., The north of the borough is expected to absorb approximately 3950 new households, (71% of the required total,) but I would suggest that many people moving to Ilkeston would have employment in Nottingham or Derby. These cities are more easily accessed via the A52 in the south of the borough. I believe the 5800 homes should be distributed evenly across the borough. In particular, the proposed 5 developments will remove green belt land in the north of the borough, and yet the south remains untouched., In addition to the proposed developments in the core strategy, Ilkeston has absorbed several other new developments such as 312 homes at Elka's Rise.,

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.

Since the consultation process was severely impeded by the pandemic, I think the whole process should be declared void. Information was not readily available in written form and negotiating the Erewash Borough Council web pages was difficult. For many people with limited internet skills, the task proved too daunting to be attempted. Consultation meetings need to be held, and written information distributed to homes. Doorstep discussions and meetings should have occurred but were impossible during the pandemic. If the process was started again, informed discussion would be enabled so that residents can properly evaluate the effect on themselves and their neighbourhood., An unbiased assessment of housing needs should be undertaken, and the new housing shared fairly and equally between all areas in the borough. The core strategy review shows no consideration of housing developments in areas adjoining the borough or any evidence that discussions have taken place with neighbouring authorities. These developments will impose additional stresses upon Erewash.

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)

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

Regulation 19 Representation

Representation Number: 264

Name: Joshua Turney

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other Text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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

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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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 265

Name: Marcus Smith

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

EBC Core Strategy Review (Regulation 19) - Spondon Woods - SGA 26

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

, 1. The Erewash Core Strategy Review is not legally compliant and fails to comply with the duty to co-operate as there has been insufficient consultation and co-operation with Derby City Council, the body most affected by SGA 26., a. EBC have not undertaken a proper Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centres., b. there has been no consultation whatsoever with Derby City Council prior to the Extraordinary Council Meeting on 25 March 2021 and/or the inclusion of SGA 26 in EBC's proposals c. The Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the Extraordinary Council Meeting on 25 March 2021 and not its actual location. d. Section 33A of the Planning and Compulsory Purchase Act 2004 imposes upon EBC a statutory duty to co-operate with other local planning authorities, in this case Derby City Council, in its preparation of development plan documents and/or other local development documents so far as they relate to 'strategic matters'. This consultation/co-operation has not occurred, Green Belt should only be changed through plan

making, through a considered and evidenced process which includes talking to your neighbours under the Duty to Cooperate " no consultation has been made as to the declassification of SGA26 as green belt, From National Planning Policy Framework para 137: "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land;; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and, c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."

2. The Erewash Core Strategy Review is unsound as a. EBC's approach to this consultation exercise is inherently flawed, in circumstances where SGA26 has been identified in substitution for another site (SGA17) and consulted upon separately from those in the original Growth Options Consultation in 2020 (the 2020 Consultation); S, b. In order to justify potential interference with the five stated purposes of Green Belt land at paragraph 134 of the National Planning Policy Framework, EBC has conducted an assessment as to how far any of the proposed sites encroach into the open countryside . The measurement for SGA26 meanwhile was taken from the centre point of the city of Derby, with the result that the site would contribute to a relatively modest enlargement of Derby of 2.4% . As Spondon is a distinct area with green belt down to Nottingham Road near as ASDA, the centre of spondon should be used leading to a much greater impact, c. I have seen no evidence that Derbyshire County Council have been consulted over the increased demand for already over subscribed schools., d. Because of this lack of consultation/co-operation no joined up consideration of the traffic impact, doctors (all over-subscribed) have been made with Derby City Council including such new sites as the SmartParc food manufacturing campus, which has its entrance on Nottingham Road. This campus has a car park for 2100 cars. A main part of the planning application was for jobs in the Spondon area. Spondon has 3 main ways to get in out and the Nottingham road/Willowcroft road is the main entrance. SGA26 will further will increase traffic, congestion over this site, hence pollution in Spondon .Willowcroft road is very sensitive to congestion in Nottingham Road " similar events frequently gridlock in Spondon centre. Similar no evidence of joined up planning over schools with Derbyshire County Council. The results of these consultation should have been considered at the beginning of the core strategy review, along with the inclusion of SGA 26 in the beginning of the review not halfway.,

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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.

Substantive Consultation should now take place with Derby City council, the body most affected by SGA26, and should be assessed along with the other sites in the original Growth Options Consultation in 2020 to ensure the best option is selected considering all factors equally. Otherwise best sites may have discarded without consideration of the results of the Derby City consultation, which are key to this assessment., Similar consultations should be made with Derbyshire County Council areas of responsibility e.g. schools.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

There has been a failure to engage with adequately, as Spondon residents as we are not in Erewash - with limited access to council meeting, with tabled meeting question not being answered. We are the community most affected by SGA26, so our voice needs t

Regulation 19 Representation

Representation Number: 266

Name: Daniel Seabridge

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Please see a separate submission letter dated 5 May 2022 sent by email in relation to Strategic Policy SP1

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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To assist the appointed Inspector in addressing MIQ's that touch upon the issues we have raised in our representations.

Regulation 19 Representation

Representation Number: 267

Name: Sean Reynolds

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

?

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Regulation 19 Representation

Representation Number: 268

Name: Christine Bamford

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other Text

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 269

Name: Susan Green

To which part of the Core Strategy Review does this representation relate?

Policies

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policies SP1, 1.1 (Bullet Points 4 & 6), 1.2 - 1.6

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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Strategic Policy SP1 - Housing Under Strategic Policy SP1, the Council will make provision for a minimum of 5,800 dwellings (386 dwellings per annum) between 2022 - 2037., As set out in the 2021 National Planning Policy Framework (NPPF), the determination of the minimum number of homes needed in Erewash should be informed by a Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 61). There are no exceptional circumstances to justify an alternative approach for Erewash., The latest National Planning Practice Guidance (NPPG) sets out the standard methodology for calculating the LHN figure (ID 2a-004-20201216). Using the standard methodology, the minimum LHN for Erewash is 386 dwellings per annum based on 2014 SNHP, 2022 as the current year and 2021 affordability ratio of 6.28. As set out in the NPPG, the LHN is calculated at the start of the plan-making process, but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (ID 2a-008-20190220). The minimum LHN may change as inputs are variable. The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. It is noted that the Council has proposed no uplift from the minimum

LHN starting point., The Council should confirm that economic growth in the Borough will be adequately supported by the minimum LHN. The NPPG explains that "circumstances" may exist to justify a figure higher than the minimum LHN. The "circumstances" for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology (ID 2a-010-20201216). The Council should also be mindful of the economic benefits of housing development in supporting local communities as highlighted by the HBF's latest publication "Building Communities - Making Place A Home (Autumn 2020)". The Housing Calculator (available on the HBF website) based on "The Economic Footprint of House Building (July 2018)" commissioned by the HBF estimates for every additional house built in Erewash, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops. The Council should also confirm that the affordable housing needs will be met (see HBF representations under Viability & Deliverability). The NPPG sets out that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. An increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). The HBF acknowledge that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing., As set out in the 2021 NPPF, the Council is under a Duty to Co-operate (DtcC) with other Local Planning Authorities (LPA) and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the DtcC, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate its co-operative working by the preparation and maintenance of one or more Statements of Common Ground (SoCG), which identify the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. The 2021 NPPF expects effective joint working to be evidenced by a signed SoCG, which deals with rather than defers cross-boundary matters (para 35c). The NPPG explains that a SoCG sets out where effective co-operation is and is not happening throughout the plan-making process. As set out in the 2021 NPPF, the Erewash CSPR should be positively prepared and provide a strategy, which as a minimum seeks to meet its own housing needs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). A SoCG forms part of the evidence required to demonstrate compliance with the DtcC (ID 61-010-20190315). At Examination, the Inspector will use all available evidence including SoCG to determine whether the

DtoC has been satisfied (ID 61-031-20190315). The Erewash CSCR pre-submission consultation is not accompanied by SoCG. To provide communities and other stakeholders with a transparent picture of collaboration, the NPPG sets out that authorities should have a SoCG available on their website by the time of publication of their Draft Plan. Once published, the Council will need to ensure that any SoCG continues to reflect the most up-to-date position of joint working (ID 61-020-20190315). The HBF may submit further comments on the Council's compliance with the DtoC and the soundness of the Erewash CSCR either in written Examination Hearing Statements or orally during Examination Hearing Sessions., The NPPG sets out the Government's commitment to ensuring that more homes are built and supports ambitious Council's wanting to plan for growth (ID 2a-010-20201216). The NPPG states that a higher figure "can be considered sound" providing it "adequately reflects current and future demographic trends and market signals". The NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government's objective of significantly boosting the supply of homes set out in the 2021 NPPF remains (para 60). In Erewash, a housing requirement above the minimum LHN would support the Council's economic growth ambitions, deliver more affordable housing and contribute to any unmet housing needs from neighbouring authorities. Before the Erewash CSCR is submitted for Examination, the Council should consider a higher housing requirement., The HBF also note that if the CSCR is submitted for examination in 2022, at the soonest it will be adopted in 2023. On adoption there will not be a timeframe of at least 15 years remaining. The 2021 NPPF sets out that strategic policies should look ahead over a minimum 15-year period from the date of adoption, to anticipate and respond to long-term requirements and opportunities (para 22). Before the Erewash CSCR is submitted for examination, the Council should consider extending the plan period by one or more years beyond 2037., Housing Land Supply (HLS), Strategic Policy 1 "Housing sets out the distribution of housing in accordance with the settlement hierarchy as follows :-, - a) around 700 dwellings within the Long Eaton Urban Area (conurbation) ; - b) around 1,400 dwellings within the Ilkeston Urban Area (town) ; - c) around 350 dwellings within the Rural Area (villages) ; - d) around 1,000 dwellings in a new settlement on brownfield land not in the Green Belt at South Stanton (former Stanton Ironworks) (Strategic Policy 1.2) ;, - e) around 800 dwellings as extensions to the Derby conurbation on land deallocated from the Green Belt, including around 600 dwellings on land west of Acorn Way (Strategic Policy 1.3) & around 200 dwellings on land north of Spondon (Strategic Policy 1.4) ; and - f) around 1,550 dwellings as extensions to the town of Ilkeston, on land deallocated from the Green Belt including around 1,300 dwellings on land south west of Kirk Hallam (Strategic Policy 1.5) & around 250 dwellings on land north of Cotmanhay (Strategic Policy 1.6)., The Erewash CSCR should ensure the availability of a sufficient supply of deliverable and developable land to meet housing needs, maintain a 5 Year Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements., The HBF have no comments on individual residential sites. The HBF's representations are submitted without prejudice to any comments made by other parties. However, the HBF note that there is no headroom between the Borough's minimum LHN and overall HLS, which provides no

contingency if housing delivery does not happen as envisaged by the Council. There is no numerical formula to determine an appropriate amount of headroom but where HLS is highly dependent upon one or relatively few large strategic sites and / or localities, greater numerical flexibility is necessary than where HLS is more diversified. In Erewash, 58% (around 3,350 dwellings) of HLS is proposed on land allocated in Strategic Policies 1.2 " 1.6. On these strategic allocations, there may be long lead in times before the commencement of on-site development and build up to optimum delivery rates. To ensure a continuous short to medium term HLS, such allocations should be complimented by smaller non-strategic sites. As set out in the 2021 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 69a). For Erewash, 10% of the LHN is approximately 580 dwellings., To optimise housing delivery, the widest possible range of sites by both size and market location will be required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of development opportunities including both strategic and non-strategic residential sites will provide the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is optimised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. The spatial distribution of housing development should meet the housing needs of both urban and rural communities. As set out in the 2021 NPPF "œto promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services"• (para 79)., There is no housing trajectory set out in the Erewash CSPR. The 2021 NPPF sets out that Local Plans should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 74). There is insufficient detailed background information on individual site allocations to allow a rigorous check of the Council's HLS and its delivery assumptions. To satisfy the 2021 NPPF Glossary definition of deliverable, clearer evidence is needed. An accurate assessment of the availability, suitability, deliverability, developability and viability of residential sites included in the Council's HLS should be provided. The Council's assumptions on lead in times / delivery rates should be correct and supported by parties responsible for the delivery of housing on each individual site., The Council should also provide a 5 YHLS Statement demonstrating a 5 YHLS on adoption of the CSPR, which is maintainable throughout the plan period. As set out in the 2021 NPPF, if the Council is seeking to formally fix its 5 YHLS through the Local Plan Examination process then a 10% buffer should be applied (para 74b)., Before the Erewash CSPR is submitted for examination, a housing trajectory should be provided together with supporting evidence on delivery assumptions. The Council should confirm that 10% of the housing requirement will be accommodated on sites of less than one hectare. The Council should also

confirm if formal fixing of the 5 YHLS is sought and provide an up to date 5 YHLS Statement., Viability & Deliverability, The HBF note that the Erewash CSPR pre-submission consultation is not accompanied by a Viability Assessment. In plan-making, viability is inseparable from the deliverability of development. At Examination, viability will be a key issue in determining the soundness of the Erewash CSPR. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2021 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the Local Plan (para 34). Furthermore, the 2021 NPPF states that development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). Viability assessment should not be conducted on the margins of viability especially in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. Without a robust approach to viability assessment, the Erewash CSPR will be unsound, land will be withheld from the market and housing delivery targets will not be achieved. There is a tipping point beyond which the land value cannot fall as the landowner will not be sufficiently incentivised to release their site for development. The Council's Viability Assessment should accurately account for all costs for affordable housing provision, CIL, S106 contributions and policy requirements sought. Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact. Most sites should be deliverable at planning application stage without further viability assessment negotiations. Viability negotiations should occur occasionally rather than routinely. If the viability of sites is overstated, policy requirements will be set at unrealistic levels. Under such circumstances, trade-offs between policy requirements, affordable housing and infrastructure provision will be necessary and the Council will have to accept site specific viability assessments at development management stage. Such uncertainty causes delay to housing delivery and may even result in non-delivery. An updated Viability Assessment should include the full costs of policy requirements set out in Strategic Policy 1.1 Bullet Points 4 and 6., Under Bullet Point 4, housing sites of 200 or more dwellings shall deliver an appropriate level of biodiversity net gain (BNG). This policy requirement is somewhat ambiguous. As set out in the 2021 NPPF policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (para 16d). The 2021 Environment Act requires development to achieve a mandatory 10% BNG. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. The mandatory requirement provides a level playing field across England for developers and reduces the risks of unexpected costs and delays. 10% is not a cap on the aspirations of developers who want to voluntarily go further but a requirement for more than 10% should not be sought by the Council under Strategic Policy 1.1. Before the Erewash CSPR is submitted for examination, Bullet Point 4 should be clarified. There are significant costs associated with BNG, which should be tested in an updated Viability Assessment. The

Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that biodiversity net gain does not prevent, delay or reduce housing delivery. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies : Impact Assessment Table 16 : Net gain delivery costs per greenfield development (residential) East Midlands estimates a cost of £1,011 per dwelling (based on 2017 prices and the central estimate) and Table 17 : Net gain delivery costs per brownfield development (residential) East Midlands estimates a cost of £287 per dwelling (based on 2017 prices and the central estimate). However, costs for off-site delivery under Scenario C increase to £3,562 and £943 per dwelling respectively., Under Bullet Point 6, housing sites of 200 or more dwellings shall provide at least one off-street parking space per new dwelling served by an electric vehicle charging point (EVCP). This policy requirement is unnecessary because from June 2022, Part S of the Building Regulations will require EVCPs in residential developments as set out in the Department of Transport Consultation Response : Electric Vehicle Charging Points (EVCP) in Residential & Non-Residential Buildings dated November 2021. Before the Erewash CSPR is submitted for examination, Bullet Point 6 of Strategic Policy 1.1 should be deleted. Additional costs associated with the provision of EVCPs under Part S of the Building Regulations should be accounted for in an updated Viability Assessment. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers., Even without an updated Viability Assessment, the Council has acknowledged that viability will be challenging and development is unlikely to achieve full compliance with policy requirements. The Council has identified viability challenges on 44% of its overall HLS, which are :-, - South Stanton (former Stanton Ironworks) (Strategic Policy 1.2) - low housing values in Ilkeston, the abnormal development costs imposed by the mining & industrial legacy and the need to provide other infrastructure / facilities ;, - South West of Kirk Hallam (Strategic Policy 1.5) - low housing values in Kirk Hallam, the abnormal development costs of providing the new Kirk Hallam Relief road and the need to provide other infrastructure / facilities ; and, - North of Cotmanhay (Strategic Policy 1.6) - low housing values in Ilkeston, the abnormal development foundation costs involved in redeveloping this former opencast site and the need to provide other infrastructure / facilities., Before the Erewash CSPR is submitted for examination, the Council should publish an updated Viability Assessment. The HBF may submit further comments on the viability and deliverability of the Erewash CSPR either in written Examination Hearing Statements or orally during Examination Hearing Sessions., Conclusion, To be found sound under the four tests of soundness as defined by the 2021 NPPF, the Erewash CSPR should be positively prepared, justified, effective and consistent with national policy (para 35). The Erewash CSPR is unsound because of the deficiencies identified above.

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.

See comments above.

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)?

Yes, I wish to participate in hearing session(s)

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

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small local builders. In any one year,

Regulation 19 Representation

Representation Number: 270

Name: Jon Watkin

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Policy uses Green Belt as a reason not to develop and develops Green Belt. Also uses impact on communities not develop and makes a major impact

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

I believe that the the core strategy as presented is unsound because the strategy rejects possible alternatives because they are less sustainable and the reason given for 4 options is that it would encroach on open country side yet the proposal for land SW of Kirk Hallam has plans for 1500 plus houses is indeed the very important part of the open countryside in the area and is to be swamped as a convenient planning dumping ground with a significant size development. The overall impact on the Stanton / Kirk Hallam area of all the proposed development will be significant with at this stage only vague infrastructure plans are "suggested". In fact no development should be allowed to start until the funding is properly in place and guaranteed for the essential road works / traffic management for Ladywood Road, Sowbrook Lane Twelve Houses junction and Bulls Head junction. Also the impact on Stanton by Dale., It is difficult to be able to agree to development with out the details. Too many examples of development starting and then it is discovered that the promises made at the planning stage cannot be delivered because they are too expensive which usually means not enough profit for the developers shareholders and staff bonuses!! This development at Kirk Hallam is over bearing to the estate and should be reduced in the light of the other proposals in the area.

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.

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)?

Yes, I wish to participate in hearing session(s)

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

Regulation 19 Representation

Representation Number: 271

Name: Dawn Hallam

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

planning of 1300 house in Kirk Hallam.

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The roads in Kirk Hallam can not support at least another 2600 cars which will come with these houses. The proposed New road is ALREADY an existing road, and will not help ease the already severally congested roads, we as residents already face and that is before anymore new houses are built. We cannot turn left outside of our drive during rush hours, or if there is work going on on any connecting roads nearby. Green belt land is being used and can never be gotten back., It is strange how all the non affluent areas in the borough are not getting plans for this many house to be past!

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.

If you do not live in an area, how can you know, the problems that will come with the building of this many new houses. The extra pressure on the Drs, Dentist and Schools, who cannot accommodate all the extra residents.

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)

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

Regulation 19 Representation

Representation Number: 272

Name: Barry Sinclair

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Development green belt land off Acorn Way/Morley Road Oakwood

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

1) Increased traffic queues on Morley Road/Acorn Way leading to excess pollution.
2) Increase flood risk owing to loss of green space and rainwater absorbing land., 3) Increased population will put further strain on Oakwood schools, doctors/dentist surgeries etc. These facilities are funded by taxes paid to Derby City council whereas the residents of the new development will pay to EBC., 4) Other areas of land within EBC boundaries would be more suitable for development e.g. West Hallam, Long Eaton, Sandiacre and would not impact on Oakwood facilities.

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.

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)

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

Regulation 19 Representation

Representation Number: 273

Name: Gwyn Stubbings

To which part of the Core Strategy Review does this representation relate?

Policies

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Please refer to accompanying representations by IcenI on behalf of GLP

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

Please refer to accompanying representations by IcenI on behalf of GLP

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.

Please refer to accompanying representations by IcenI on behalf of GLP

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)?

Yes, I wish to participate in hearing session(s)

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

We consider that it would be beneficial to discuss in further detail the points made in our representations and to assist the Inspector with providing information and responses to questions raised at the Hearings.

Regulation 19 Representation

Representation Number: 274

Name: Gareth Barton

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 1 - Housing, Strategic Policy 5 - Green Infrastructure

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Strategic Policy 1 - Housing, Tata Steel UK Limited ('Tata Steel') fully supports the strategic option of locating new housing development within the Ilkeston Urban Area. The consultation document rightly acknowledges the importance of growth in the Ilkeston Urban Area, placing it second in the hierarchy (after growth within the Long Eaton Urban Area). Notwithstanding the above, it is important that the role played by sites within the existing Ilkeston Urban Area is not underplayed as part of the wider spatial strategy. The Core Strategy must place sufficient importance on bringing forward appropriate sites within the defined urban area (both brownfield and greenfield). Such sites should be recognised as an essential component of delivery. The revised Core Strategy must include policies that proactively support, and seek to maximise, development on appropriate sites within urban areas. The revised Core Strategy should therefore be explicit that there will be a 'presumption in favour of sustainable development' for new housing development within the urban areas, taking into account relevant material planning considerations. Whilst proposals will need to be considered on a site by site basis, the starting point should be a clear presumption in favour of new housing development within existing urban areas. This should also be reflected in the interpretation / application of other relevant policies

within the Core Strategy. Putting a positive policy framework in place to support such development will ensure that all appropriate sites within existing conurbations can come forward, particularly those within settlements at the top of the identified hierarchy. This should be applied to both brownfield and greenfield sites within the defined Urban Area. Doing so will ensure that the Council adopts a positive approach to decision making for such sites. It is also important that other policies within the plan do not unnecessarily restrict the delivery of new housing within areas such as the Ilkeston Urban Area. This includes Strategic Policy 5 (Green Infrastructure), which is addressed in more detail below. Strategic Policy 5 - Green Infrastructure Tata Steel UK Limited (Tata Steel) has land interests at / adjoining the former Oakwell Brickworks site, which falls within the Ilkeston Urban Area (as currently defined). Two parcels of land within Tata's ownership are identified in the 2019 SHLAA as being deliverable in the first five year period of the plan Ref: 184 and 185). The SHLAA confirms that both parcels of land are suitable, available, achievable, deliverable and developable for new housing., Both sites are within the settlement boundary, within walking distance to Ilkeston town centre and local services, and benefit from good public transport. A full planning application for residential development has recently been submitted for one of the parcels of land (off Little Hallam Hill). A separate full application is currently being prepared for the second parcel (off Derby Road). It is important that the revised Core Strategy provides a policy framework that supports sites such as those being brought forward by Tata Steel " both of which can play an important part in delivering the required number of new homes in Erewash. The draft Policy Map appears to designate the southern portion of land to the south of Derby Road (SHLAA Site ref. 184) within the 'Nutbrook Strategic Green Infrastructure Corridor'. The plan is hard to interpret in PDF form, but the boundary of the Strategic Green Infrastructure Corridor appears to be arbitrary and does not follow the red line of the Site shown within the SHLAA. Given that the Site is considered to be available, achievable, deliverable and developable for new housing in the SHLAA, it should be entirely outside of the proposed Strategic Green Infrastructure Corridor. The Site is readily available and deliverable and will play a key role in the delivery housing in the first five years of plan period. It is important that the ability of such sites to deliver housing is not unduly impeded by other policies, such as the proposed Strategic Green Infrastructure Corridor. As set out in our previous representations, the revised Core Strategy should avoid blanket or overly restrictive policies in relation to green infrastructure. It is more appropriate for green infrastructure to be addressed as part of a wider policy (or policies), which sets out criteria applicable to all relevant sites. This enables proposals to be considered on a site-by-site basis, with the provision of appropriate green infrastructure being informed by detailed assessment and technical work. This approach allows for greater flexibility for appropriate sites to come forward, whilst still ensuring that green infrastructure is considered and integrated into development proposals.

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.

Strategic Policy 1 - Housing, The revised Core Strategy should include policies that proactively support development on appropriate sites within urban areas. The revised Core Strategy should therefore be explicit that there will be a 'presumption in favour of sustainable development' for new housing development within the urban areas, taking into account relevant material planning considerations. This should be applied to both brownfield and greenfield sites within the defined Urban Area. Whilst proposals will need to be considered on a site by site basis, the starting point should be a clear presumption in favour of new housing development within existing urban areas. This should also be reflected in the interpretation / application of other relevant policies within the Core Strategy. Strategic Policy 5 - Green Infrastructure Should the Nutbrook Strategic Green Infrastructure Corridor be taken forward, the boundary should be amended to reflect the development potential of Tata Steel UK's land at Derby Road, Ilkeston. The draft Policy Map should be amended to ensure that the entirety of SHLAA Site ref. 184 is outside of the Strategic Green Infrastructure Corridor., The revised Core Strategy should avoid blanket or overly restrictive policies in relation to green infrastructure. Green infrastructure should be addressed as part of a wider policy (or policies), which sets out criteria applicable to all relevant sites. This enables proposals to be considered on a site by site basis, with the provision of appropriate green infrastructure being informed by detailed assessment and technical work. This approach allows for greater flexibility for appropriate sites to come forward, whilst still ensuring that green infrastructure is taken into account and integrated into development proposals.

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)?

Yes, I wish to participate in hearing session(s)

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

Our client has significant landholdings in the Ilkeston area and considers it necessary to participate in relevant hearing sessions to ensure that its interests are reflected in the Core Strategy Review.

Regulation 19 Representation

Representation Number: 275

Name: Gareth Barton

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 1 - Housing, Strategic Policy 5 - Green Infrastructure

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Strategic Policy 1 - Housing, Tata Steel UK Limited ('Tata Steel') fully supports the strategic option of locating new housing development within the Ilkeston Urban Area. The consultation document rightly acknowledges the importance of growth in the Ilkeston Urban Area, placing it second in the hierarchy (after growth within the Long Eaton Urban Area). Notwithstanding the above, it is important that the role played by sites within the existing Ilkeston Urban Area is not underplayed as part of the wider spatial strategy. The Core Strategy must place sufficient importance on bringing forward appropriate sites within the defined urban area (both brownfield and greenfield). Such sites should be recognised as an essential component of delivery. The revised Core Strategy must include policies that proactively support, and seek to maximise, development on appropriate sites within urban areas. The revised Core Strategy should therefore be explicit that there will be a 'presumption in favour of sustainable development' for new housing development within the urban areas, taking into account relevant material planning considerations. Whilst proposals will need to be considered on a site by site basis, the starting point should be a clear presumption in favour of new housing development within existing urban areas. This should also be reflected in the interpretation / application of other relevant policies

within the Core Strategy. Putting a positive policy framework in place to support such development will ensure that all appropriate sites within existing conurbations can come forward, particularly those within settlements at the top of the identified hierarchy. This should be applied to both brownfield and greenfield sites within the defined Urban Area. Doing so will ensure that the Council adopts a positive approach to decision making for such sites. It is also important that other policies within the plan do not unnecessarily restrict the delivery of new housing within areas such as the Ilkeston Urban Area. This includes Strategic Policy 5 (Green Infrastructure), which is addressed in more detail below. Strategic Policy 5 - Green Infrastructure Tata Steel UK Limited (Tata Steel) has land interests at / adjoining the former Oakwell Brickworks site, which falls within the Ilkeston Urban Area (as currently defined). Two parcels of land within Tata's ownership are identified in the 2019 SHLAA as being deliverable in the first five year period of the plan Ref: 184 and 185). The SHLAA confirms that both parcels of land are suitable, available, achievable, deliverable and developable for new housing., Both sites are within the settlement boundary, within walking distance to Ilkeston town centre and local services, and benefit from good public transport. A full planning application for residential development has recently been submitted for one of the parcels of land (off Little Hallam Hill). A separate full application is currently being prepared for the second parcel (off Derby Road). It is important that the revised Core Strategy provides a policy framework that supports sites such as those being brought forward by Tata Steel " both of which can play an important part in delivering the required number of new homes in Erewash. The draft Policy Map appears to designate the southern portion of land to the south of Derby Road (SHLAA Site ref. 184) within the 'Nutbrook Strategic Green Infrastructure Corridor'. The plan is hard to interpret in PDF form, but the boundary of the Strategic Green Infrastructure Corridor appears to be arbitrary and does not follow the red line of the Site shown within the SHLAA. Given that the Site is considered to be available, achievable, deliverable and developable for new housing in the SHLAA, it should be entirely outside of the proposed Strategic Green Infrastructure Corridor. The Site is readily available and deliverable and will play a key role in the delivery housing in the first five years of plan period. It is important that the ability of such sites to deliver housing is not unduly impeded by other policies, such as the proposed Strategic Green Infrastructure Corridor. As set out in our previous representations, the revised Core Strategy should avoid blanket or overly restrictive policies in relation to green infrastructure. It is more appropriate for green infrastructure to be addressed as part of a wider policy (or policies), which sets out criteria applicable to all relevant sites. This enables proposals to be considered on a site-by-site basis, with the provision of appropriate green infrastructure being informed by detailed assessment and technical work. This approach allows for greater flexibility for appropriate sites to come forward, whilst still ensuring that green infrastructure is considered and integrated into development proposals.

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.

Strategic Policy 1 - Housing, The revised Core Strategy should include policies that proactively support development on appropriate sites within urban areas. The revised Core Strategy should therefore be explicit that there will be a 'presumption in favour of sustainable development' for new housing development within the urban areas, taking into account relevant material planning considerations. This should be applied to both brownfield and greenfield sites within the defined Urban Area. Whilst proposals will need to be considered on a site by site basis, the starting point should be a clear presumption in favour of new housing development within existing urban areas. This should also be reflected in the interpretation / application of other relevant policies within the Core Strategy. Strategic Policy 5 - Green Infrastructure Should the Nutbrook Strategic Green Infrastructure Corridor be taken forward, the boundary should be amended to reflect the development potential of Tata Steel UK's land at Derby Road, Ilkeston. The draft Policy Map should be amended to ensure that the entirety of SHLAA Site ref. 184 is outside of the Strategic Green Infrastructure Corridor., The revised Core Strategy should avoid blanket or overly restrictive policies in relation to green infrastructure. Green infrastructure should be addressed as part of a wider policy (or policies), which sets out criteria applicable to all relevant sites. This enables proposals to be considered on a site by site basis, with the provision of appropriate green infrastructure being informed by detailed assessment and technical work. This approach allows for greater flexibility for appropriate sites to come forward, whilst still ensuring that green infrastructure is taken into account and integrated into development proposals.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

Our client has significant landholdings in the Ilkeston area and considers it necessary to participate in relevant hearing sessions to ensure that its interests are reflected in the Core Strategy Review.

Regulation 19 Representation

Representation Number: 276

Name: James Hope

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

The green belt land off of Acorn Way / Morley Road to be used for the construction of up to 600 homes

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

This land is on the border with Derby City and as such this Core Strategy Review should be agreed with Derby City. These new houses would be to cater for increases in Erewash's population with Council Tax being paid to Erewash Borough Council. There is no doubt the residents of these planned new properties will use the Derby City facilities namely, Schools, Doctor's medical facilities and Shops and amenities. This unagreed usage of the Derby City facilities would place intolerable excess pressure on the facilities within Oakwood, Chaddesden and Spondon., There would be excess carbon emissions caused form exacerbated queueing traffic, especially on Morley Road and Acorn Way, Acorn Way was designed as a cut-through between Oakwood and Spondon. It was not designed to have houses built on it., Morley Road which takes the road traffic and bears the pick up and drop off for Lees Brook Community School children would encounter significant difficulty in being able to support associated traffic re the in-flux of children from this proposed development., There would be a significant adverse educational impact on children in over-crowded schools as no new school is currently proposed to be built., There would be a significant loss of green space and rain water absorbing land, potentially exacerbating the risk of flooding of lower lying houses, Other, more appropriate,

areas of land are available within Erewash Borough Council's boundaries such as the outskirts of Sandiacre, Long Eaton, West Hallam and others.,

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.

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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)

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

Regulation 19 Representation

Representation Number: 277

Name: John Ydlibi

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

This relates to Strategy Policies 1.4, 1.51.6 and 4 Transport

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The main comments on the Erewash Core Strategy review are as follows:-, The NPPF states that Green Belt boundaries can only be altered in 'exceptional circumstances'. Local authorities in areas constrained by Green Belt should not set planning targets for levels of growth beyond that which can be accommodated without harm to the Green Belt. Erewash District council have failed to protect the Green Belt in its current Local Plan proposal. Local reviews of Green Belt should only take place if: , - they are part of a broader, Green Belt-wide development plan or policy., - they are primarily based on the five purposes of Green Belt as well as any additional local criteriawhere relevant and agreed locally and seek to minimise harm to the Green Belt., The Green Belt boundaries did not significantly change in the previous Erewash Local Plan period. Erewash has been successful till now in previous plans to resist allocations of housing development in the Green Belt. This is due to allocation of large brownfield sites such as Stanton and a balanced approach to housing provision in the wider Nottinghamshire area covering other boroughs. However, Erewash is now struggling to deliver the housing supply targets set by government and in its proposed Core Strategy Review has put forward a number of proposed developments on the edges of its' Green Belt, which would reduce its Green Belt by 2% .CPRE's policy stance is to protect Green Belt land areas from

development by maximising the use of brownfield site redevelopment first . In view of the national requirements laid out in the NPPF where development is to be allowed on Green Belt land only in exceptional circumstances, we don't believe that the current proposals by Erewash District Council to build on sites in Green Belt areas meet these exceptional criteria. In our opinion not enough work has been done by the Council and its planning officers to justify why some of these proposed site allocations in the Green Belt meet the "exceptional" criteria, nor have the Council done enough work with other Borough and District Councils to determine whether they can meet some of Erewash's housing targets. In the Erewash Council Report it states that none of the Council's have responded to date, which is not in our view meeting the spirit of co-operation. The planning officers should be following up with these other councils. Though we have some sympathy with Erewash, with the high % of its area outside of the urban conurbations being Green Belt, they need to create more opportunity within the existing urban areas and maximise use of brownfield sites first to meet the proposed housing targets . Strategically, the Green Belt area in Erewash is more essential for the purposes of protecting the gap between Nottingham and Derby than other areas of Green Belt in the south and east of Nottingham. Long Eaton is constrained and forms a ribbon of development westward of Nottingham that needs to be safeguarded from joining up and leading to coalescence of settlements between Nottingham and Derby., We consider that the previous core strategy in line with protecting the Green belt was the correct stance for Erewash to take. The lack of stronger evidence-based assessments from a more recent Strategic Green Belt review than the 2006 Nottinghamshire/Derbyshire review, detailed site LVIA's and landscape character assessments on the impacts on the countryside, then CPRE will maintain its strong objection to the inclusion of 3 of the 4 proposed Green Belt sites in the proposed local area plan (Kirk Hallam, South of Spondon Wood and North of Cotmanhay) as we have not seen any evidence justifying the "exceptional circumstances" for planning to build houses in this area of the Green belt. ,

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"With respect to the 3 proposed Green Belt sites:-, Strategic Policy 1.5 Kirk Hallam-we have major concerns regarding the size of the proposed increase to the estate by 50% (1300 additional houses). This will have significant impact on the village of Kirk Hallam, will significantly impact traffic levels on the roads which are already very busy at peak times of the day with traffic queuing in and out of Ilkeston, will need to build new primary schools and extend the senior schools, and will need further capacity in primary healthcare too . It also has significant impact on the landscape and landscape character which the local population enjoys today. The

Pioneer Meadows nature reserve and Sow Brook green corridor will be potentially cut off from surrounding countryside by housing which will lead to fragmentation of the existing green infrastructure. There are a number of concerns that surrounding the Pioneer Meadows nature reserve with housing will lead to a loss of habitat and the loss of wildlife. The publicly accessible recreational footpaths have poor legibility with narrow paths and could be lost in any subsequent development, affecting the enjoyment of the countryside for existing residents of Kirk Hallam. In addition the proposed Kirk Hallam relief road (Transport Policy 4) is a "road to nowhere" as it won't ease the traffic situation as it reroutes most of the traffic back to the Bulls Head roundabout on Ilkeston/ Kirk Hallam junction, where most of the congestion is today at peak times. It would be a total waste of taxpayers money., Strategic Policy 1.4 - In respect of the land South of Spondon Wood, this site is a long linear site between existing housing and Spondon Wood. Although, there are limited views of the countryside and therefore limited impact on the openness of the greenbelt, we wish to support residents in their objections to this site on the basis that it will impact on natural habitat, and also be a poor result on the pattern of development by bringing the urban edge directly up to the edge of the woodland, again potentially impacting wildlife and their habitats., Strategic Policy 1.6- Similarly the proposal to extend Cotmanhay by a further 250 houses, puts incremental pressure on local infrastructure, schools, primary healthcare and public transport. The Council should not be proposing further eradications of the Green Belt and its needs protecting, as the area around Cotmanhay Woods is an important wildlife habitat and the main area of green space that the residents of Cotmanhay enjoy for walking their dogs and for helping with their mental wellbeing. The proposal would also adversely impact the landscape and the views towards Shipley., Including some of the other proposed housing proposals including Stanton Works circa 70% of the housing growth will be around Ilkeston, which is disproportionate to the rest of Erewash District., There are a number of options which Erewash District Council should consider to avoid planning to allocate future housing on these 3 sites, highlighted above., - To build more houses on existing brownfield land., By increasing densities, building more townhouses and more social housing on the proposed Stanton site it would increase housing numbers from 1000 to 1300 homes., Additionally instead of building new houses on Green Belt land Erewash could propose instead to build 1000 houses on the West Hallam storage depots, an existing brownfield site. This was the plan in the last Core Strategy and needs revisiting. This would offset the need to build 1300 houses in Kirk Hallam's Green Belt., - Look to other boroughs to meet demand through the duty to cooperate., Erewash District Council have failed to fully cooperate with other local authorities in the provision of future housing. They did not take part in the Greater Nottingham Strategic Plan Growth Options Consultations July 2020, between Broxtowe, Gedling, Nottingham City Council and Rushcliffe, even though Erewash is part of the same housing market., In view of not being able to meet housing targets a more strategic approach needs to be taken between neighbouring councils with a regional approach to housing delivery. One that respects green belt policy to preserve land between towns. The last full and comprehensive greenbelt review was in 2006 and we consider this should be the first stance. The Strategic Growth Assessments documents produced by Erewash

assesses options for growth and on each site only in relation to its own portion of greenbelt, not on the overall impact to the Green Belt. Erewash and the other local authorities need to undertake a more up-to-date assessment of the Nottingham/Derby Green Belt., - To increase housing density by building more town houses and low level apartment blocks, Increase densities within brownfield allocations or urban conurbations. Where urban extensions into the Green Belt are decided through the local planning process to be the most sustainable option, CPRE would want them to meet the Smart Growth criteria set out in our Housing Policy Guidance note. In particular any new urban extensions should have medium or high densities and be well linked to public transport and other social infrastructure so that car use can be minimised. There should also be a significant contribution to meeting social housing need in the local area. By increasing densities we believe that both Ilkeston and Long Eaton could absorb a further 100 houses each in their allocations, which would mitigate the need to build 200 houses in Spondon's Green Belt., - To meet more of the need through the building of smaller developments, Look towards smaller sites to have less overall impact on the countryside. Exception sites have always been acceptable on a small scale. Build an additional 15 to 20 house development outside the main urban areas each year. This would remove the requirement to build an additional 250 houses in the Green Belt around Cotmanhay., Appendix 1, Future Housing Growth Proposals " Erewash Local Area Plan,

	Proposed	Alternative, Long Eaton
Urban	700	800, Ilkeston Urban
	1400	1500, Rural Areas
	350	600, Brownfield Stanton
	1000	1300, Greenbelt- Derby Area 800
		600, Greenbelt- Ilkeston Area 1550
		0, Brownfield West Hallam 0
1000, Total	5800	5800,

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)

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

If needed to explain in further detail my representation, I would be more than. happy to meet with the Inspector if required

Regulation 19 Representation

Representation Number: 278

Name: Nicholas Duncan

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

House building programme in Kirk Hallam

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

Ilkeston cannot cope with traffic, and failing roads, now. New bypasses need to be built before any new building takes place. Lows Lane in Stanton, is the only outlet to the M1, and Challons Way, although relieving Bath Street, still causes traffic jams at the top and bottom. A relief road needs constructing from Furnace Road to The Awsworth bypass.

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.

As above, build new relief roads from Lows Lane to the M1, and from Furnace Road to the Awsworth bypass

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

The people need to have a say on the massive building plans, and our already failing infrastructure

Regulation 19 Representation

Representation Number: 279

Name: Carolyn Duncan

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

House building

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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Because the majority of residents object to further built in this area.

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Public hearings needed

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If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

To hear residents opinions

Regulation 19 Representation

Representation Number: 280

Name: Daniel Waring

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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., 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 the 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.

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 281

Name: Louise Waring

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

No

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Regulation 19 Representation

Representation Number: 282

Name: Anastasia Cosma

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

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Regulation 19 Representation

Representation Number: 283

Name: Helen Russell

To which part of the Core Strategy Review does this representation relate?

Other text

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Regulation 19 Representation

Representation Number: 284

Name: Mike Cundell

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Erewash Borough Council's Core Strategy Review Document for land north of Spondon known as SGA 26

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The EBC have not undertaken a proper and unbiased Green Belt Review to establish if there are more appropriate sites other than SGA 26, that are nearer to EBC geographical centers? If there are other sites that would suit the immediate needs of EBC residents rather than Derby City Council (DCC) residents, these sites should have been prioritised before de " classifying green belt land that abuts DCC., Site SGA 26 is on the extreme edge of EBC and directly abuts DCC land. If houses are to be built there, then the housing numbers should be allocated to DCC numbers rather than EBC, therefore negating the argument that EBC need this land to meet their housing quotas. DCC would after all have to provide the infrastructure maintenance, roads, schools, shops, doctors, dentists etc but would not get any of the Council Tax revenue to pay for this., The inclusion of the land at SGA 26 in any of this process has been ridiculous. The first that residents were aware of its inclusion in the Core Strategy was a week prior to it going to full council in March 2021. Residents of Spondon were therefore not given any time or availability to be

able to object to it's inclusion. This was local politics at it's most cynical. We were not allowed to ask questions at the council meeting due to the EBC constitution and I understand that the Planning Department at DCC was only told of 'land north of Spondon' a couple of weeks before the meeting and not it's actual location. This is very poor consultation and total disregard to Spondon residents., As Derby is largely built up to its boundaries, further growth will inevitably spill across boundaries into the adjoining districts and it is the Government's 'Duty to Cooperate' that governs the discussions between neighboring authorities to ensure there is joined up thinking to delivering new housing with the right facilities and in the right place. There was, however, no discussion or joined up thinking behind the proposed allocation of housing sites in Erewash, immediately on the city boundary. EBC are still obliged to meet the Duty to Cooperate with their neighbors and not just dump some housing on their borders to meet their own needs. Green Belt should only be changed through plan making, through a considered and evidenced process which includes talking to your neighbors under the Duty to Cooperate., EBC unilaterally charged forward with a last minute bolt on addition of Site SGA 26 just north of Spondon without due consideration of residents out of EBC Boundaries. Even in the subsequent report to Council on 3rd of March 2022, over 700 objections from non EBC residents were summarily dismissed and a member of the public who asked a question of the Council in accordance with the constitution was not even given an answer on the night., Totally dismissive attitude by the EBC Leader who has stated in correspondence to Spondon Councillors 'We are members of the Greater Nottingham planning area so we tend to have more discussions with them and we will not be signing up to the Derbyshire Planning Framework, I understand you are not happy about the Spondon Site but it is within our Erewash Boundary'. So EBC appear to be looking towards Nottingham and will not acknowledge or engage with their neighbours to the West, despite dumping on them., Spondon SGA26 has been promoted by EBC without any appraisal of all urban areas in Erewash. How can it be 'inevitable' that this location is inherently more sustainable than others? Or that it's deletion from the Green Belt would have the least harm on the function of that Green Belt? Suburban sprawl cannot be sustainable., The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents?, Development of SGA 26 will have a detrimental impact on Spondon and Derby. EBC will collect the council tax from any properties developed. However, it will be Spondon and Derby who will have to provide school places, GP and dental services and the upkeep of roads that will be affected by an increase in the volume of traffic., The local Secondary School, West Park Academy is over subscribed and has had to expand already to meet the needs of Derby residents. This would be the obvious school of choice for any residents of SGA 26. Again no consultation has taken place with the Academy or with the School Place Planning on Derby City Council. EBC do not actually have responsibility for school place planning " this is Derbyshire County Council's role. Have they even been consulted?, There are only a few routes out of Spondon and the main one is down through the village, down Williocroft Road and along Nottingham Road to the A52. This area already has a high level of air pollution and adding a 240 house

residential development to the area will increase the air pollution and affect the health and wellbeing of Spondon residents., SGA 26 site is home to a herd of fallow deer, these deer are both locally and historically important to Derby. This will be threatened by development. The site is also home to lapwing birds, bats and dormice all of which are protected and some of which are protected. What ecological impact surveys were completed before bolting on SGA 26 to this consultation?, Bordering SGA 26 is Spondon Wood. This is, according to DEFRA, an Ancient woodland and as such are sited in national planning policy as important. Nearby development can also have an indirect impact on ancient woodland and the species they support. These can include:, breaking up or destroying connections between woodlands and ancient or veteran trees, reducing the amount of semi-natural habitats next to ancient woodland, increasing the amount of pollution, including dust, increasing disturbance to wildlife from additional traffic and visitors, increasing light or air pollution, increasing damaging activities like fly-tipping and the impact of domestic pets, changing the landscape character of the area, All that the consultation says is that an 'adequate buffer zone' will protect the wood. What guarantees are there? Other potential sites would not have these environmental impacts but this has been conveniently ignored by EBC., EBC and the planning department should be challenged to show what assessments have been done on this Ancient woodland that would show that none of the impacts above would happen if a development were to go ahead?, This site often floods, despite only being in a Flood Zone 1. However, in 2014, major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that this could not add to this pressure?

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Like most members of the public, I do not have the specialism to make modifications to, "make the Core Strategy Review legally compliant and sound, in respect of any legal compliance or soundness matters." This should not preclude me from making this representation or it being taken seriously. Put simply, the Core Strategy Review is totally unsound for the above reasons and the objections should again be considered and this time, properly addressed

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Regulation 19 Representation

Representation Number: 285

Name: Louise Scattergood

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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within Cotmanhay and Kirk Hallam., 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 the 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.,

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, re-evaluate 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

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Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

To make sure local voices are heard and understood by the council.

Regulation 19 Representation

Representation Number: 286

Name: Steven Bunn

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

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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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 287

Name: Richard Moore

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

SGA7

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The consultation process was flawed. The process started in 2021 immediately preceded lockdown precautions due to the pandemic. Public meetings and discussion groups were banned, and doorstep canvassing was virtually impossible due to the fear and uncertainty at that time. The consultation started in March 2022 has been poorly publicised, and relevant documentation difficult to find in libraries etc. Navigation of the pages on the Erewash website is extremely difficult for residents without the necessary computer skills, or access to suitable hardware., The proposed developments utilise greenbelt areas. The government has stated that brownfield sites should be used in preference to greenbelt land, and there are brownfield sites available in Erewash. The proposed developments are all in the north of the borough, clustered around Ilkeston, Kirk Hallam and Spondon. This is an unfair distribution of the required 5800 houses, since I believe the allocation should be spread equally across the borough. In particular, many commuters work in Derby or Nottingham, and these cities are more easily accessed via the road network around the A52 in the south of the borough., The last vestiges of greenbelt land will disappear in the north of the borough, yet remain untouched in the south. There does seem to be an element of bias in the proposals, whether politically motivated or from NIMBYism., Ilkeston and its surrounding areas have already absorbed several

new developments, but the existing infrastructure remains the same. The road system in and around Ilkeston cannot support the volume of traffic already occurring, and the proposed developments can only add to the chaos and pollution. As far as health service provision is concerned, for SGA7 the Old Station Surgery, of which the Cotmanhay surgery is an offshoot, is already stretched, and it is not unusual to have to wait at least 3 weeks to obtain a face-to-face consultation with a preferred GP., The proposed development in SGA7 is to be accessed via a widened junction from Woodside Crescent onto Heanor Road, controlled by traffic lights. Heanor Road is a busy main road, and it is frequently congested. It can take 15 minutes to travel the 1.5 miles to the Chalons Way island from the start of the borough at certain times. Additional traffic and another set of lights will add to the journey time. No consideration has been given in the proposals for SGA7 to the development at Shipley Lakeside. This is a large development of residential housing, business units and health and leisure facilities and will be accessed via Pit Lane, 0.5 mile away from Woodside Crescent, and hence onto the Heanor Road. The pollution and nuisance generated by the increased traffic flow will rise markedly, and at certain times of the day will rise to unacceptable levels. The area will become a far less desirable place to live.,

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The consultation process was flawed because of the difficulties encountered disseminating information, sharing ideas via formal and informal meetings and doorstep canvassing during the pandemic. The whole consultation should be declared void and restarted so that local residents can be adequately informed and proper discussion enabled., The proposals are biased, and the required housing allocation is not shared equally. The proposals need to be reassessed to enable a fair and equitable distribution of houses across the whole borough., There are brownfield sites available and the use of these should be prioritised over the destruction of greenbelt land as per government requirements., The proposals take no account of developments in other areas of Derbyshire. Discussion with neighbouring authorities may yield innovative solutions to infrastructure problems.,

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Regulation 19 Representation

Representation Number: 288

Name: Tracy Mcfadden

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Greenbelt Policy namely Title DY130925 & DY33259

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

Erewash have not considered anomalies in their review process. I.e Greenbelt anomalies. There are a number of sites that are Greenbelt, however, do not serve the five principals of land that attributes Greenbelt. A full review of the Greenbelt is required and one that can endure the timescales of a new plan. Erewash should consider smaller sites however politically sensitive., I need to see documents that convince me that Erewash have fully complied with the duty to co-operate. Indeed this notion extends to the public.

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Designation of land as Greenbelt is a matter for LPA's having regard to the advice PPG2. Advice on designation of land as Greenbelt has not changed since the publication of the January 1995 edition of PPG2. See Hansard Green Belt Volume 367. Debated on Monday 23rd April (a) (158702) Ms Beverley Hughes., When LPA's alter Greenbelt they are required to provide the exceptional circumstance argument. Erewash have omitted this whether purposefully or otherwise. Refer title DY334259, refer 13.08.2001 a new title plan based upon revision of OS Map showing release of land from Greenbelt and title DY130925 showing no addition of this land to Greenbelt. Why change one and not the other? However DY130925 was allocated to the Greenbelt again without reason nor justification. These two examples show anomalies. EBC have confirmed no records exist to this change to date. This is a current saved GB policy under existing EBC core strategy. Now is the time to eradicate such instances via a review.

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Please use this space to continue any of your answers

Much documentation is apparent and cannot be delivered by this request. Too much information to provide to support.

Regulation 19 Representation

Representation Number: 289

Name: Ellie Scattergood

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

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Regulation 19 Representation

Representation Number: 290

Name: Richard Hubbard

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

The green belt land off Morley road to be used for 600 houses

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

This land is on the border with Derby City and as such this Core Strategy Review should be agreed with Derby City. These new houses would be to cater for increases in Erewash's population with Council Tax being paid to Erewash Borough Council. There is no doubt the residents of these planned new properties will use the Derby City facilities namely, Schools, Doctor's medical facilities and Shops and amenities. This unagreed usage of the Derby City facilities would place intolerable excess pressure on the facilities within Oakwood, Chaddesden and Spondon., There would be excess carbon emissions caused form exacerbated queueing traffic, especially on Morley Road and Acorn Way, Acorn Way was designed as a cut-through between Oakwood and Spondon. It was not designed to have houses built on it., Morley Road which takes the road traffic and bears the pick up and drop off for Lees Brook Community School children would encounter significant difficulty in being able to support associated traffic re the in- flux of children from this proposed development., There would be a significant adverse educational impact on children in over-crowded schools as no new school is currently proposed to be built., There would be a significant loss of green space and rain water absorbing land, potentially exacerbating the risk of flooding of lower lying houses, Other, more appropriate,

areas of land are available within Erewash Borough Council's boundaries such as the outskirts of Sandiacre, Long Eaton, West Hallam and others.

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.

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Regulation 19 Representation

Representation Number: 291

Name: Gillian Genever

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Housing Allocations, in particular greenbelt land off Acorn Way & Morley Road

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

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The location of the proposed new housing on land off Morley Road and Acorn Way has minimal impact on the residents of Erewash and maximum impact on the residents of Morley Road. Erewash Borough Council have notified Erewash residents of their proposals and given opportunity for comment, but not residents of Morley Road as they fall under Derby City. Erewash Borough Council will likely receive little objection to this proposal from Erewash residents as they will not be affected and the Review therefore does not provide an accurate representation., There are many brownfield sites within Erewash (such as the outskirts of Sandiacre, Long Eaton and West Hallam) that are more suitable for redevelopment than developing on greenbelt land, which we can never recover. Building on this land will have several negative impacts, for example:, 1. Loss of green spaces and rain water absorbing land, potentially exacerbating the risk of flooding of lower lying houses. Morley Road has already experienced flooding in heavy downpours and this proposal will only make things worse. 2. Excess carbon emissions caused by an

increase in queuing traffic, particularly on Morley Road and Acorn Way, both of which already have issues with queues and will make it extremely difficult for residents of Morley Road to exit their properties especially at peak times., 3. No additional infrastructure, such as schools, doctors surgery, dentist, etc. are being proposed to be built, which will have a negative impact on existing and potential new residents. Existing infrastructure in the area is already overwhelmed., 4. Local wildlife will be negatively affected if this proposal goes ahead as their habitats will be destroyed., 5. Trees and hedgerows will be lost if the proposal goes ahead, some of which have been present for many, many years. 6. Increased noise pollution and disturbance of a quiet area during the build stage and when residents move in to up to 600 new houses. 7. Privacy will be lost for the majority of residents on Morley Road as Morley Road is lower lying than the proposed build area. Light will be lost and houses on Morley Road will be overlooked.

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Residents of Derby City that will be affected (specifically Oakwood, Chaddesden and Spondon) by this proposal, should it go ahead, should be provided the same notification and opportunity to object as those in Erewash. The views of these residents should be equally considered by Erewash. There are many brownfield sites within Erewash (such as the outskirts of Sandiacre, Long Eaton and West Hallam) that are more suitable for redevelopment than developing on greenbelt land, which we can never recover.,

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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)

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

Regulation 19 Representation

Representation Number: 292

Name: Isabella Genever

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Housing Allocations, in particular greenbelt land off Acorn Way & Morley Road

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The location of the proposed new housing on land off Morley Road and Acorn Way has minimal impact on the residents of Erewash and maximum impact on the residents of Morley Road. Erewash Borough Council have notified Erewash residents of their proposals and given opportunity for comment, but not residents of Morley Road as they fall under Derby City. Erewash Borough Council will likely receive little objection to this proposal from Erewash residents as they will not be affected and the Review therefore does not provide an accurate representation., There are many brownfield sites within Erewash (such as the outskirts of Sandiacre, Long Eaton and West Hallam) that are more suitable for redevelopment than developing on greenbelt land, which we can never recover. Building on this land will have several negative impacts, for example:, 1. Loss of green spaces and rain water absorbing land, potentially exacerbating the risk of flooding of lower lying houses. Morley Road has already experienced flooding in heavy downpours and this proposal will only make things worse. 2. Excess carbon emissions caused by an

increase in queuing traffic, particularly on Morley Road and Acorn Way, both of which already have issues with queues and will make it extremely difficult for residents of Morley Road to exit their properties especially at peak times., 3. No additional infrastructure, such as schools, doctors surgery, dentist, etc. are being proposed to be built, which will have a negative impact on existing and potential new residents. Existing infrastructure in the area is already overwhelmed., 4. Local wildlife will be negatively affected if this proposal goes ahead as their habitats will be destroyed., 5. Trees and hedgerows will be lost if the proposal goes ahead, some of which have been present for many, many years. 6. Increased noise pollution and disturbance of a quiet area during the build stage and when residents move in to up to 600 new houses. 7. Privacy will be lost for the majority of residents on Morley Road as Morley Road is lower lying than the proposed build area. Light will be lost and houses on Morley Road will be overlooked.

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.

Residents of Derby City that will be affected (specifically Oakwood, Chaddesden and Spondon) by this proposal, should it go ahead, should be provided the same notification and opportunity to object as those in Erewash. The views of these residents should be equally considered by Erewash. There are many brownfield sites within Erewash (such as the outskirts of Sandiacre, Long Eaton and West Hallam) that are more suitable for redevelopment than developing on greenbelt land, which we can never recover.

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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 293

Name: Paul Genever

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Housing Allocations, in particular greenbelt land off Acorn Way & Morley Road

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

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Regulation 19 Representation

Representation Number: 294

Name: Rachel Kirkpatrick

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

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 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 some to attempt., no eligibility and 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 through out 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 made apparent by the fact that over the last 30 years, new

postcodes in erewash have almost exclusively been within cotamanhay and kirk hallam.

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.

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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.

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No, I do not wish to participate in hearing session(s)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 295

Name: michael kirkpatrick

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 296

Name: Abigail Kirkpatrick

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

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hallam., 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, letter box 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 objects they are unable of EBC should then research, revalidate and reassess housing shortfall and needs across erewash to unbiasedly level up the while region and share new housing fairly and equally across south, north, east and west erewash. Whilst also considering the importance of retaining green belt in all areas it should look for brown field(ie stanton site) or green field where excessive development hasn't caused great congestion or already bursting infrastructures and places already overburdened by excessive development of past industrial,social and brown field sites over the last 30 years. Negotiation and talks with neighbouring authorities could also useful ideas. once done, a revised, more equitable, fairer core strategy could be resubmitted.,

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No, I do not wish to participate in hearing session(s)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 297

Name: Geoffrey Pink

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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, 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 the 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.

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 298

Name: Nicola Pink

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

No

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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., 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 the 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.

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, re-evaluate 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.

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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)

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

Regulation 19 Representation

Representation Number: 299

Name: David Ellicott

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Core Strategy Review fails to meet legal requirements and inadequate consultations made and objections not addressed

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The Core Strategy review failed to consult adequately with those most directly affected with its suggested planned, namely the residents of Spondon and Ockbrook for the SGA 26 Spondon woods planned inclusion. Despite hundreds of objections to the Core Strategy review and representations magpie to councillors the full council voted to approve the revised document ignoring the objections on legal and environmental grounds., A legal opinion was sent to the Council in a document which the planning lead admitted at the Council meeting in a March he had not read., EBC have therefore failed to undertake a proper Green Belt review and failed to make sufficient efforts to identify alternative more appropriate sites for future housing which are not designated currently as Green Belt., The cynical and potential illegal designation of Site 26 for development abuts DCC land but no consultation was made with DCC councillors or residents. The designation of this land owned by Locko Park estate would increase the value of this land for them considerably and what discussions were had with Locko estates prior to this designation has never been disclosed. Full disclosure of any discussions should be made by Erewash councillors specifically those involved in the writing and approval of the Revised Core

Strategy. The land identified in SGA 26 borders ancient woodland and there is currently considerable biodiversity and wildlife. However only a matter of weeks after the approval of the Draft Core Strategy the deer that lived in this area were effectively evicted by the erecting of fencing, this caused deer to be harmed who tried to get to their normal grazing areas. Recently cattle have been introduced in an attempt to further destroy the habitat and remove traces of wildflowers The minister of state for housing has stated that Green belt land should only be used in exceptional cases, there has been no evidence provided to support the fact that this is exceptional., The development of SGA 26 and others currently designated Green let areas in Erewash eg Kirk Hallam will increase traffic on already stretched roads and infrastructure and will cause even more traffic to pass through Ockbrook village and Borrowash, causing further traffic issues and erosion to the currently poor roads, Increased pressure would be caused to local education and health services by an increase in population through housing and there is no coherent plan in the Core Strategy as to how this would be addressed

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.

No building on designated Green belt land in Erewash and no redesignation of current Green Belt. Work with owners of current Brownfield sites in Erewash to explore alternative housing options, Concentrate on the current unoccupied housing to meet needs for housing, Build sustainable affordable housing not luxury homes which will be the case in Spondon Woods, Do not line the pockets of Locko Park estates through cosy deals with them to redesignate their land so they can develop with housing

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)?

Yes, I wish to participate in hearing session(s)

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

Regulation 19 Representation

Representation Number: 300

Name: Samantha Legg

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Inadequate consultation, failure to identify and consult in relation to brown field sites.
Destruction of greenbelt boundary between villages.

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The Core Strategy review failed to consult adequately with those most directly affected with its suggested planned, namely the residents of Spondon and Ockbrook for the SGA 26 Spondon woods planned inclusion. Despite hundreds of objections to the Core Strategy review and representations magpie to councillors the full council voted to approve the revised document ignoring the objections on legal and environmental grounds., A legal opinion was sent to the Council in a document which the planning lead admitted at the Council meeting in a March he had not read., EBC have therefore failed to undertake a proper Green Belt review and failed to make sufficient efforts to identify alternative more appropriate sites for future housing which are not designated currently as Green Belt., The cynical and potential illegal designation of Site 26 for development abuts DCC land but no consultation was made with DCC councillors or residents. The designation of this land owned by Locko Park estate would increase the value of this land for them considerably and what discussions were had with Locko estates prior to this designation has never been disclosed. Full disclosure of any discussions should be made by Erewash councillors specifically those involved in the writing and approval of the Revised Core

Strategy. The land identified in SGA 26 borders ancient woodland and there is currently considerable biodiversity and wildlife. However only a matter of weeks after the approval of the Draft Core Strategy the deer that lived in this area were effectively evicted by the erecting of fencing, this caused deer to be harmed who tried to get to their normal grazing areas. Recently cattle have been introduced in an attempt to further destroy the habitat and remove traces of wildflowers The minister of state for housing has stated that Green belt land should only be used in exceptional cases, there has been no evidence provided to support the fact that this is exceptional., The development of SGA 26 and others currently designated Green let areas in Erewash eg Kirk Hallam will increase traffic on already stretched roads and infrastructure and will cause even more traffic to pass through Ockbrook village and Borrowash, causing further traffic issues and erosion to the currently poor roads, Increased pressure would be caused to local education and health services by an increase in population through housing and there is no coherent plan in the Core Strategy as to how this would be addressed

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No building on designated Green belt land in Erewash and no redesignation of current Green Belt. Work with owners of current Brownfield sites in Erewash to explore alternative housing options, Concentrate on the current unoccupied housing to meet needs for housing, Build sustainable affordable housing not luxury homes which will be the case in Spondon Woods, Do not line the pockets of Locko Park estates through cosy deals with them to redesignate their land so they can develop with housing

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)?

Yes, I wish to participate in hearing session(s)

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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

Regulation 19 Representation

Representation Number: 301

Name: Jane Cockcroft

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

EBC Core Strategy Review for land north of Spondon SGA26

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

EBC have not undertaken a proper and unbiased Green Belt Review to see if there are appropriate brown field sites that could be used first. The National Planning Policy Framework (February 2019) has clear guidelines around Protecting Greenbelt Land (Chapter 13 page 40) and it doesn't appear that Erewash planners have considered a number of these before deciding to earmark the land near the ancient woodland of Spondon Woods. The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. What exceptional circumstances are there that makes SGA26 acceptable, when it won't even meet the needs of Erewash residents? The councillors voting on this do not live anywhere near the proposed development so it won't affect them or the residents in their constituency. Homes here will be for Erewash residents who will pay to have their bins emptied by Erewash but use schools, roads, doctors and parks paid for by Derby City Council. I understand that Spondon residents have not been allowed anyone to represent them or their views and Derby City council haven't been consulted about the proposal so Erewash Council has failed to comply with their

"duty to cooperate" with all relevant local authorities. This land is greenbelt and you have brownfield sites but I understand that developers are less likely to want these because of the remediation works needed before they can start to build so basically, you are looking for a quick way to get your housing quota without impacting on Erewash residents or considering pollution and the environmental impact. I would have thought consideration needs to be given to rewilding and keeping the greenbelt and respecting nature rather than planning to bulldoze greenbelt and build houses. I understand that Erewash Borough Councillors prefer to keep greenbelt areas and have turned down other planning applications because it is proposed in the greenbelt. Sections of the A52, Derby Road and Nottingham Road in Spondon are already included as Derby Air Quality Management Areas in the Derby City Council Air Quality Action Plan 2020. Additional homes off Dale Road would lead to additional cars which will inevitably travel through Spondon to access Derby and down Willowcroft Road, Derby Road, Nottingham Road and onto the A52. Often cars, lorries and buses can be queued all the way through the village and up beyond Moor End (about 1 mile) so this will impact and increase air pollution for the people living in that area. Have you considered the impact of traffic on the access to the site? The A6096 is a very busy road used by lots of lorries as well as cars. People from your proposed new development at Spondon are unlikely to shop in Ilkeston because it is further away so this will mean additional traffic travelling through Spondon towards Derby and Nottingham. The traffic monitoring system was set up when more people were working from home so won't be a true reflection of what traffic actually passes through Spondon every day., Roads and houses close to the field flooded a few years ago with water and sewage going into the ground floors of people's homes and I know that Lees Brook runs along the bottom of the field that you propose to use and alongside the current houses and can make the field and gardens boggy, so additional houses and hard standing will have an impact and potentially increase flooding.

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.

Carry out an unbiased green belt review and consider alternative brown field sites. If you must use green field sites, have them near the towns and villages of Erewash - Spondon has already had a lot of infill with housing. Is there an environmental impact assessment that led to you deciding on this site above any others in Erewash, particularly relating to traffic, pollution, the impact on the ancient woodland and flooding., You have a duty to co-operate with Derby City Council because the biggest impact for services will fall to them. West Park Secondary school has already turned away catchment area pupils this year because they are so over-subscribed. All of the primary schools in Spondon are full. This site often floods, despite only being in a

Flood Zone 1. However, in 2014 major floods affected Spondon, Ockbrook and Borrowash as the sewer drains could not cope. What assessment of this site has been done to prove that it would not add to this pressure?, You must consider the additional air pollution impact which will unduly affect Spondon residents., Properly consider the impact on the ancient woodland. The deer that lived in the field and the wood have already been displaced, stressed and split up since the farmer put up fencing to be able to demonstrate that it was a field for livestock-there are no longer any cows in there now. Ancient woodland can be impacted by major disturbance during construction as well as on an ongoing basis by housing development and the transport that will be used. This can affect bird and animal breeding and tree and plant growth and health. I have seen bats, dormice, woodpeckers, and heard owls. I have seen lapwings in the field and these have been designated red by the RSPB which is the highest conservation priority, with species needing urgent action. They nest on the ground in the field so building houses there would eliminate their nesting ground., The Woodland Trust have written a document detailing the negative impacts of nearby developments on ancient woodlands [Impacts-of-nearby-development-on-the-ecology-of-ancient-woodland-addendum.pdf](#) (woodlandtrust.org.uk)

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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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 302

Name: James Archer

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Sustainability Assessment (All), Core Strategy (All)

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

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.

1. It is engineering backwards, rather than asking the question how much housing can Erewash support, it has proceeded from an external target for growth.,
2. It does not take into account the borough's commitment and the national commitment to achieve net-zero emissions by 2050.,
3. The consultations were used only to identify insurmountable obstacles to the proposed development rather than to consult on whether residents want the developments proposed.,
4. There is only one community plan incorporated into the borough plan, and that local this plan fails to deliver the areas fair share of the proposed growth in housing.

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The strategy should recognise the limits placed on growth by the net-zero targets and by the ability of local areas to provide sustainable growth and then bring forward within those limits a plan which is compliant with those limits. This may require no alterations to the content of the strategy as it may well be compliant however currently the evidence and the assessment is absent.

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.

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No, I do not wish to participate in hearing session(s)

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Regulation 19 Representation

Representation Number: 303

Name: Alex Breene

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

SGA7 and SGA25

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The Core Strategy for SGA7 Cotmanhay and SGA25 for Kirk Hallam is unsound and unethical. There are 1,800 vacant properties in Erewash. Stimulus packages for the regeneration of these should make up the vanguard of the Council's strategy for housing regeneration in the area. The core strategy does nothing to address the utilisation of these & simply maintains a troubling status quo; a lack of creative thinking & ambition in the face of challenging issues., Bold and ambitious agendas for the future of Ilkeston are a thing of bygone eras. In their place, mismanagement, stagnation, decline and a very real sense that communities are once again left to struggle on their own. Not just left behind, but knowingly discarded and ignored by an out of an out of step local politics which they see as prioritising retention of power before the interests of its of local residents. Added to this, EBC have failed a vital test of democracy. In response to the original core strategy, 1,700 local residents objected to the council's proposed SGA7 Cotmanhay site. The council subsequently took the site forwards with a largely unchanged plan into the second consultation round, ignoring concerns highlighted by residents. The only changes, that the site

was reduced from 600 to 300 homes as one of the landowners was angered to learn their land was included in the proposals and Kirk Hallam's burden was further increased. In the second round, over 400 local residents again objected to SGA7 Cotmanhay but were again ignored in March 2022 when the council again voted through the SGA7 and SGA25 proposals. The fact is, a reduction in the levels of objection is a direct result of an exercise in failed local politics. Residents in Ilkeston view the consultation as little more than tokenism, a process in which their views play no part. Consultation response forms are viewed as deliberately inaccessible to the point of obstructive. Residents feel powerless to shape their own communities and futures. As a result they disengage from the process. The council's core strategy represents some of the worst facets of politics today. It is a purely protectionist strategy, politically driven at its core and designed to ensure votes for the controlling group are retained in Conservative parishes where nearly all developments have been refused. Once more, Ilkeston bears the cost of this protectionism, having almost exclusively supplied the borough with the majority of its new postcodes over the last 15 years. I call on the council to reconsider their proposals and implement a policy of equitable distribution. Local services and commerce in Cotmanhay and Kirk Hallam have been gradually stripped away in recent years and in the vacuum created, anger and anti-social behaviour have become dominant ideologies. Despite these issues, the council relentlessly pursues a policy which will take Ilkeston's already broken infrastructure to complete failure. Road networks are already beyond technical failure along with GPs, schools (Cotmanhay Infant school operating 30% above capacity), dentists and a police service who are already struggling to serve their local community. Vital programmes to develop Ilkeston's infrastructure are simply omitted from the council's plan. Instead, vague investment sentiments which offer no commitment or hope for the area litter this core strategy. Without substantial investment and regeneration in Ilkeston, the outlook is indeed a bleak one. The town cannot possibly be expected to shoulder even more of the borough's burden. It should also be recognised that despite repeated requests, the council has so far failed to provide any evidence of a needs based assessment to demonstrate why 300 houses in Cotmanhay and 1,300 houses in Kirk Hallam are needed. The Member of Parliament for Erewash and the Erewash Labour Party shares my concern that the council are not acting in the best interests of Ilkeston. These are red flags the council are simply walking past and choosing to ignore. Erewash council also has a record of delivering poor deals and broken promises to their local community. The Shipley View development encapsulates this perfectly. The council selected a development strategy which in practice enabled developers to limit their builds to under 50 homes, the point in which developer 106 infrastructure contributions would have been triggered. Developer profits as a result remained untouched at the cost of a new school for the site. The open playing field left behind on Shipley View is a symbol of self-interest at the expense of better outcomes for local children. Ilkeston has a proud history. Through its mining, it is a history which helped the UK to drive and shape all other industries, its global trade, its urbanisation, its reputation and prosperity. Ilkeston's community deserves better than the bad deal this core strategy offers them and far better than a council which does not represent them.

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This is not my core strategy but EBC's. It is their duty of care to address these issues and revise their strategy.

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If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

The voice of local residents should be heard and the council held accountable

Regulation 19 Representation

Representation Number: 304

Name: John Walker

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Acron Way/Morley Road Green Belt

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

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Green belt land is that - Green Belt Land, It should not be built on, period. If it is, the increase in traffic, the load on local doctors, dentists, schools would be vast, to say nothing of the increase in emissions from queuing traffic., Would you want it ?

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.

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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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

People should be heard, especially from the directly proposed area. All good that so called councils have the final say. We should be listened too.,

Regulation 19 Representation

Representation Number: 305

Name: Melanie Lindsley

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Policies

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

N/A

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.

It is noted that this review appears to relate to housing and allocations, employment, town and village centres, transport and green infrastructure. The Coal Authority records indicate that there are recorded coal mining features present at surface and shallow depth in the Erewash area including; mine entries, shallow coal workings and reported surface hazards. We provide the LPA with downloadable GIS data in respect of Development Risk Plans and would expect any sites being proposed for future development, including allocation, to be assessed against this data in order to identify any coal mining features and potential constraints present. Where coal

mining features are recorded as being present which may pose a risk to surface stability and public safety it would be prudent to identify this within the plan policies.

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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 306

Name: Hannah Wade

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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 included 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., 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 those 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 county (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 180 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 Stantor Park industrial development less than a mile away (even with a relief road) will greatly increase congestion at Twelve houses and reroute is 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.,

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The Regulation 18 consultation process was flawed by EBC's insufficient communication methods during the 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.

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Regulation 19 Representation

Representation Number: 307

Name: Fred Davies

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 1- Housing

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Firstly, regarding the 'Objectively Assessed Housing Need of 5,800 net new homes, for the time period 2022 to 2037, it is not evident as to how that figure was arrived at. Consequently, we are not able to support the figure nor object to it. Secondly, we object to the settlement hierarchy, because it ignores extensions to the Long Eaton and Ilkeston Urban Areas on sites not in the Green Belt. These sites should be given priority over the release of Green Belt sites. These non-Green Belt sites have not been considered as potential locations for the delivering of housing/employment growth. This includes our client's site at the junction of Ilkeston Road and Sowbrook Lane, which has not been assessed for its potential to deliver housing. Unless, of course, these non-Green Belt sites are considered to be part of the Ilkeston Urban area. Regardless, these sites should take priority over Green Belt sites and should have been assessed for their potential to deliver development to meet the need identified. We consider that not including non-Green Belt sites on the edge of Long Eaton and Ilkeston is a fundamental flaw in the proposed settlement hierarchy, which has clear implications on identifying the appropriate distribution of housing. Land at Ilkeston Road/Sowbrook Lane, Ilkeston, The site being promoted by Wulff Asset Management Limited is identified in figure 1 below. It is non-Green Belt site located within the urban area of Ilkeston and adjoins the western boundary of the Stanton

Regeneration Site. The Stanton Regeneration Site is a de facto urban extension to Ilkeston within the adopted Local Plan, and whilst the emerging Plan seeks to adjust the balance of uses within the site to increase the level of employment land relative to housing, the principle of regenerating this previously developed site remains consistent., Figure 1: Location Plan, The site is one of the few undeveloped areas within the urban area of Ilkeston that does not fall within the Green Belt and should be considered for its potential to deliver development before Green Belt sites are released as per the explicit policy set out in the National Planning Policy Framework(2019). The site is located between Kirk Hallam and the Stanton regeneration site, both of which form part of the Ilkeston urban area, and therefore forms a natural infill within the existing urban area. It is also contained with development to the east and south and by the existing green corridor to the north. Consequently, it would not put pressure on for continued expansion into the open countryside and is an obvious location to deliver additional housing growth to complement the additional employment land that is being proposed at Stanton Regeneration Site., Outline Planning Application, An Outline Planning Application has been prepared for the residential development of this site in the context of the Council's 5-year housing land supply shortfall, and because there are no policies in the plan that resist the principle of residential development in this location. In producing the Outline Planning Application detailed site work has been undertaken and as a result we can confirm the site is deliverable and that there are no technical or environmental constraints which would prevent it from delivering the quantum of housing proposed., A summary of the work undertaken to support the Outline Planning Application is set out below:., - Highways " A transport assessment has been prepared by MAC Consulting. This confirms that the proposed accesses to the site would meet the required standards. It has also reviewed the junctions required by the Local Highway Authority, concluding that all but one of these junctions would continue to operate within capacity following the proposed development and that the remaining junction is already being upgraded by another committed development. The transport assessment also demonstrates that the site has good access to services, facilities and employment opportunities. This, of course, being before the development of Stanton Regeneration Site which will see large amounts of floor space and additional services/facilities being developed next to the site., - Flood Risk " Approximately 95% of the site is in Flood Zone 1. There is an element of Flood Zone 2 at the northern end of the site, but the Masterplan clearly shows how a scheme could be delivered whilst leaving the flood plain undeveloped., - Drainage " An outline drainage strategy has been prepared. For surface water this includes a couple of balancing ponds, as shown on the Masterplan, and results in water being discharged to the brook that runs along the western boundary of the site., - Heritage " A heritage assessment has been prepared by The Jessop Consultancy. This considers the potential for any archaeological remains on site and concludes that no further investigations are required. It also considers the impact of the development on the setting of the listed cottages that are located to the south of the site on the opposite side of Sowbrook Lane. In doing so, they conclude that the setting of these cottages would be preserved by the design led approach taken within the indicative Masterplan., - Ecology " A preliminary ecological

assessment has been undertaken by Harris Lamb, along with the required species specific surveys for those species identified as potential receptors of the proposed development. It is concluded that the scheme can be delivered in a way that would not have an adverse impact on any potential protected species and would deliver Biodiversity Net Gain on site., - Noise " Two noise sources are identified. The surroundings roads and the electricity sub-station to the south of the site on the opposite side of Sowbrook Lane. It is concluded that by employing the measures proposed in the indicative Masterplan that an acceptable living environment could be achieved for all future occupiers of the site., - Ground Conditions " A coal mining risk assessment was undertaken, which identified previous quarrying on the site and the presence of a bell pit towards the north-eastern corner of the site. More detailed ground investigations have been undertaken and these have not identified any fundamental issues with ground stability which would inhibit a residential development. The proposed Masterplan shows how the bell pit could be accommodated within the public open space that would wrap around the site., In undertaking these detailed investigations, we can have confidence that the site is deliverable and that there are no reasons why an allocation should not be forthcoming., Masterplan, As part of the Outline Planning Application an indicative Masterplan has been prepared to demonstrate how the site can deliver sustainable development. The Masterplan has been prepared taking into account the opportunities and constraints identified through the site survey work and investigations. The Masterplan is set out in Figure 2 below. The net area would be approximately 54% of the site and at a density of 35 dwellings per hectare within the net developable area would deliver approximately 196 dwellings. The Masterplan demonstrates how existing boundary features can be retained, Biodiversity Net Gain achieved, an offset provided to the noise source and the existing green corridor to the north of the site integrated and enhanced. Overall, it would create a high-quality residential development, which would be a desirable and attractive place for residents to live. We, therefore, consider that the site should be allocated for residential development within the emerging Core Strategy.

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.

It should be made clear where these non-Green Belt sites sit within the existing and proposed settlement hierarchy. Alternatively, they should be added as a new tier to the proposed settlement hierarchy. In either case, these sites should be assessed for their development potential as per planning policy set out in the National Planning Policy Framework(2021). When assessed, we consider that our client's site should be allocated for housing development for the reasons set out elsewhere in our

representations. Our client's site should be included as a residential allocation in the Erewash Core Strategy/ Local Plan.

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.

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Yes, I wish to participate in hearing session(s)

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Regulation 19 Representation

Representation Number: 308

Name: David Revill

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 1- Housing

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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Exceptional circumstances to release the amount of Green Belt land need to be clearly demonstrated Harris Lamb considers that the National Planning Policy Framework (NPPF) policy on protecting Green Belt land is explicit (paragraphs 137 to 146 refer). Whilst Green Belt boundaries can be reviewed and changed through a review of a Local Plan, there are clearly prescribed steps for doing so. Here it appears that the Council have simply said that to accommodate 5,800 new dwellings the release of Green Belt is necessary. However, the fact that around 70% of the land within Erewash Borough is Green Belt does not in itself provide an 'Exceptional circumstance'. To be able to demonstrate that 'exceptional circumstances' apply here, all other reasonable development options for meeting the minimum target of 5,800 dwellings need to have been explored. It is not evident that they have. For example, Harris Lamb cannot find where the available and suitable urban capacity of Ilkeston and Long Eaton has been set out. Further it is evident that the Council has not considered the planning merits of non-Green Belt urban extensions to Ilkeston or Long Eaton. The NPPF also requires plan making authorities to explore the potential for neighbouring councils to accommodate some of the outstanding requirement before releasing Green Belt Land. Whilst the Council has stated that they have spoken to neighbouring councils those conversations and outcomes need to be

evident. From the limited information that we have, it seems likely that some Green Belt land will need to be released to deliver the development needs identified, but it is not clear whether the extent of Green Belt release proposed is justified. Green Belt boundaries should endure beyond the plan period, Separate to the above and if exceptional circumstance can be justified for the release of some Green Belt land, the NPPF is clear at Paragraph 140 that "strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period". Harris Lamb have not been able to identify any consideration of the development needs beyond the plan period and whether additional Green Belt land needs to be released/safeguarded at this time to ensure that the Green Belt boundary can endure beyond the plan period. A comprehensive review of the Green Belt In presenting a plan that seeks to review the Green Belt boundaries, a comprehensive review of the Green Belt should have been undertaken. This should have included a review of existing sites within the Green Belt to understand what role they now play in fulfilling the principal objective of the Green Belt in this location, which was to prevent coalescence between Nottingham and Derbyshire. In our previous submissions, we have identified two sites controlled by our client, Wulff Asset Management Limited, that make no contribution to this objective and that should be released from the Green Belt for alternative uses. These sites are: - Land to the North of Lows Lane, - Land to the West of Seven Oaks Road, The former is surrounded by industrial buildings and M1 Motorway and would form a natural addition to the existing employment estate in this location. The latter is located to the east of the Stanton Regeneration Site and projects no further into the countryside south, and would allow for additional housing to help rebalance the mix of uses being proposed on the Stanton Regeneration Site.

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As required by the National Planning Policy Framework (2021) Erewash Borough Council should present a clear case for exceptional circumstances to justify the release of Green Belt land. As part of this, it should be clearly demonstrated that all other sources of supply have been exhausted and that there are no other deliverable or developable sites that could assist in delivering the development needs identified. A review of how the revised Green Belt boundaries will endure well beyond the plan period should be undertaken and presented., A comprehensive Green Belt review published that considers the role of existing sites in the Green Belt in terms their contribution toward the principal objective of preventing coalescence between Nottingham and Derbyshire, along with the other purposes of including land within the Green Belt.,

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To assist the Planning Inspectorate in the consideration of this matter if needs be.

Regulation 19 Representation

Representation Number: 309

Name: David Revill

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 5- Green Infrastructure

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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Harris Lamb considers this Policy is not sound for the following reasons. Harris Lamb object to the inclusion of our client's site within the Nutbrook Green Infrastructure Corridor. The land controlled by our client is the agricultural field on the northern western side of the junction of Ilkeston Road and Sowbrook Lane, which extends to 10 hectares and for which we have made separate submissions to promote this site as one of the few non-Green Belt sites that can accommodate housing growth. Strategic Policy 5 sets out that the "Strategic Green Infrastructure Corridors designated here provide multiple natural assets including functional flood plains, land of designated wildlife importance, recreational facilities and recreational route ways. Due to their location adjacent urban areas these assets have a high social value, and the capacity for further enhancement" (our emphasis). Our client's site is an agricultural field and does not include any of the natural assets listed above, other than a very small amount of flood plain at the northern end of the site and a public right of way. The Masterplan that we have submitted in our other representations demonstrates how these features can be accommodated within a residential scheme and the canal corridor to the north of the site enhanced. The inclusion of an agricultural field in the Green Infrastructure Corridor that holds very little ecological

value and that offers one of the few non-Green Belt locations to deliver housing on the edge of Ilkeston is not justified. Removing this field from the proposed Green Infrastructure Corridor would do nothing to undermine its integrity or the objective of identifying this Green Infrastructure Corridor in the first place.

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 Nutbrook Green Infrastructure Corridor should be focused along the Nutbrook Canal, Nut Brook and the Nutbrook Trail. All three of these features run south-east to north-west just to the north of our client's site. None of these features are within our client's site and combined would still form a substantive Green Infrastructure corridor, which as a minimum would be 150 metres wide at the narrowest point immediately to the north of the site. Therefore, the requested change is that the Strategic Green Infrastructure Corridor designation be removed from our client's site.

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.

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Regulation 19 Representation

Representation Number: 310

Name: Terence Nottingham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

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No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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within Cotmanhay and Kirk Hallam., 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 the 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.

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, re-evaluate 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)

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

Regulation 19 Representation

Representation Number: 311

Name: Tamsin Cottle

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 1

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Please see submitted representations on behalf of Green 4 Developments, in respect of Ockbrook Cricket Club., We do not consider that the Core Strategy review as currently proposed can be found sound, as there is insufficient evidence to support the deliverability of the Plan in respect of the identified need for rural housing.

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.

See submitted representations on behalf of Green 4 Developments., Green Belt review is required in order to identify sites to accommodate the 350 new dwellings needed in the rural areas.

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)?

Yes, I wish to participate in hearing session(s)

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

Further evidence needs to be developed to support the proposals, and that, as part of this, a clearer and more defined approach to meeting the housing need must be provided. We do not believe that there is sufficient land or sites available within the
tig

Regulation 19 Representation

Representation Number: 312

Name: David Revill

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy1.5- South West of Kirk Hallam.

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Harris Lamb Planning Consultancy has been instructed by Wulff Asset Management to prepare this representation to the Publication Version of the Core Strategy Review plan. Harris Lamb considers this Policy is not sound for the following reasons. Harris Lamb objects to the proposal to allocate an additional 27ha of open land between Kirk Hallam and the former Stanton Ironworks as Green Belt. This area includes our client's land at the junction of Ilkeston Road and Sowbrook Lane. Paragraph 139 of the National Planning Policy Framework states that Green Belts should only be established in exceptional circumstances. No such circumstances have been presented in the revised Core Strategy or the supporting evidence base. The only reason provided by the Council to allocate this land as Green Belt is 'to ensure the continued separation of Kirk Hallam from Stanton'. The Council does not state that this represents exceptional circumstances. Nor does it acknowledge that Kirk Hallam and Stanton are both part of the Ilkeston Urban Area as defined by the Spatial Portrait, which states "The Ilkeston Urban Area, including Kirk Hallam and the former Stanton Ironworks, is a freestanding town". Consequently, the development of this land would not result in two towns merging but would instead form an infill development on the edge of the existing town., The adoption of

additional Green Belt is an exceptional measure and there has been no change in circumstance that would justify the designation of this land as Green Belt. When the wider Green Belt was adopted in this location, the principal reason was to prevent the coalescence of Derby and Nottingham. The 27 hectares identified does nothing to contribute to this objective, with this area of land surrounded by existing development.

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 proposal to allocate an additional 27 hectares of Green Belt should be removed from the draft Core Strategy/Local Plan as it does not comply with Paragraph 139 of the National Planning Policy Framework (2021).

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)?

Yes, I wish to participate in hearing session(s)

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

To assist the Planning Inspectorate in their consideration of this matter if needed.

Regulation 19 Representation

Representation Number: 313

Name: David Revill

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Spatial Portrait

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

Yes

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

Harris Lamb considers the Spatial Portrait provides a useful and succinct planning context for the Core Strategy Review. It is evident that approximately 75% of the current population live in the two urban areas i.e., Ilkeston and Long Eaton. These two broad locations provide the greatest range of local services and job opportunities, greatest accessibility to the Nottingham Conurbation and therefore, given 70% of Erewash Borough is Green Belt, should be the focus for new growth, in the first instance on land that is not in the Green Belt. The Spatial Portrait underpins Harris Lamb' more specific representations on housing and our client's land at Ilkeston Rd / Sowbrook Lane, which is a non-Green Belt site on the edge of Ilkeston, Harris Lamb also agrees that the principal objective of the Green Belt in Erewash Borough is to prevent the merger of the two conurbations of Derby and Nottingham. It is clearly evident that our client's land, at the junction of Ilkeston Road / Sowbrook Lane, makes no material contribution to the aforementioned objective nor indeed would it serve any of the defined Green Belt purposes as the land is within the urban area of Ilkeston,

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.

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)?

Yes, I wish to participate in hearing session(s)

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

To assist the Planning Inspectorate in their consideration of this matter.

Regulation 19 Representation

Representation Number: 314

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Whole Plan

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The current Development Plan comprises the adopted Core Strategy from 2014, which in turn relies on saved policies from the 2005 Local Plan. Both documents were prepared in different legislative, regulatory and policy frameworks (at the highest level, the Local Plan predates even the first NPPF, which was adopted in 2012, and the Core Strategy pre-dates both the 2019 and 2021 NPPF as well as the change to National Planning Practice Guidance). The presentation of a third document containing primary policy, produced in yet another planning policy context, raises questions about transparency for all users of the Development Plan. Although both the NPPF and the PPG allow for flexibility in plan making, advising that policies can be contained in more than one document, in future, when looking to the development plan in order to prepare or determine an application one will have to begin with a Core Strategy Review document and then consult the Core Strategy followed by the 2005 Local Plan at each stage cross-checking to see whether policies have been saved or superseded. This does not lend itself to clarity in decision making. Erewash Borough Council should be looking to bring everything together in a consolidated Local Plan., It is for Erewash Borough Council to decide what they call their Local Plan but most authorities are now following the convention of 'Local Plan' as detailed in the national guidance and regulations. We worry that

the convoluted suite of documents that would result from the adoption of this current review proposal would be unfamiliar to both the development industry and the wider public, and so positive engagement with the plan and decision making would be very much poorer as a result. It is unclear to us what advantage is gained, especially in respect of clarity of understanding, from adding continual layers of primary policy documents. The more troubling point is whether the historic policies have actually been reviewed as part of this Core Strategy Review with respect to their on-going compliance with national policy. We can find no evidence to suggest that such an assessment has been made as to their compliance with the new policy framework. The NPPF requires a review of Local Plans every five years and paragraph 062 of the PPG states, "Most plans are likely to require updating in whole or in part at least every 5 years." We can find no evidence that the policies contained in both previous development plan documents have been reviewed. It may be that this exercise has been undertaken, as we note that there is a further list of saved policies, but we cannot find any document demonstrating or explaining compliance with the NPPF, Planning Practice Guidance or regional growth studies. Since 2014, and certainly since 2005, the industry has witnessed two further revisions to the National Planning Policy Framework as well as the launch of the Planning Practice Guidance. There have also been significant spatial changes at a regional level inter alia, the launch of the Midlands Engine in 2017, the Greater Nottingham Growth Options Study in 2020, significant job growth created by the confirmation of the East Midlands Freeport (projected to be c.85,000 jobs) and the stopping stations on HS2 up to East Midlands Parkway and its associated planned feeder stations proposed to the north. We would also reference the proposed "Smart Parc" food manufacturing campus at Spondon, which, with HS2 and the Freeport, will have a significant economic effect on the southern side of the District in particular. These all constitute significant changes in circumstances and should have triggered an opportunity for fresh thinking about the spatial portrait of the Borough, presented in a new Local Plan. Erewash Borough Council are silent on all of these regionally important changes and we must draw the conclusion that they have therefore had no influence on the presented spatial portrait. The consideration of a Borough's place and function in the wider geography should be at the heart of plan making and we can find no evidence of this being the case. Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 requires that consultation at this stage should be on a proposed submission document. The Core Strategy Review that is presented falls short of what would be considered to be an industry standard, and well short of the examples available from immediately adjoining local authorities. Page 5 of the adopted Core Strategy 2014 sets a list of the evidence that underpins the Strategy. These documents date from 2003 to 2012. We have had a helpful email response from the planning policy team explaining that further evidence will be provided at the submission stage, which we would argue is too late. It seems to us unhelpful, at best, and incomprehensible at worst to be consulting on a Plan for which the evidence has not yet been published. Our understanding is that the Plan should be developed based on the best evidence available " yet in this case the plan has been produced, but the evidence is yet to emerge. Hence, it is difficult to see how the evidence has led the Plan, rather than the other way round. The

opportunity should have been taken to draft a new Local Plan with the necessary evidence prepared in a timely way to underpin a consequent and justifiable spatial strategy. As part of this, a review of the deliverability of historic allocations should have been undertaken to ensure that the Council can move forward with confidence in their growth strategy., A specific example of the poor, or non-existent evidence base, relates to the calculation of housing need. The historic growth strategy is clearly not delivering even the modest housing numbers that Erewash Borough Council have calculated necessary to meet local need. They are the only Derbyshire authority to be underperforming on their Housing Delivery Test, with this year's score only reaching 79%, resulting in the Council needing to provide a buffer to their housing numbers. We have not been able to trace how the Council have calculated their housing need and whether the buffer has been applied. Where is the Housing Topic Paper or Annual Monitoring Report as part of the suite of evidence? We can find no such document and it is certainly not presented as part of the short list of documents currently out for consultation., Our principal objection to the Core Strategy Review is that it is either based on an historic evidence base or, worse, on no evidence at all. There is little regard for the changing spatial context or an objective assessment of deliverability of historic allocations. Subsequent objections amplify this fundamental position.

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.

It is not considered that text changes would be appropriate in this instance. The plan needs to be prepared on the basis of robust evidence and with consideration for an authority's role in a wider spatial context. This CSR has not and it is not work that should be retrofitted, or, in our view, is capable of being retrofitted to produce a robust and properly prepared Plan.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

If the Inspector is satisfied that the CSR has been properly prepared and decides to move to Examination, then we wish to attend to establish where the evidence has been presented and to scrutinise its robustness and legitimacy.

Regulation 19 Representation

Representation Number: 315

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Whole Plan - Duty to Cooperate

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The Council has not provided any evidence to demonstrate that the duty to cooperate has been satisfied. Paragraph 3.13 of the 3rd March 2022 committee report talks of approaches to neighbouring authorities to ask if they can accommodate any of Erewash's growth requirement but no correspondence or minutes of meetings, Annual Monitoring Reports or even Statements of Common Ground have been provided. All we have to go on is an assurance that approaches have been made. Indeed, the paragraph concludes that, "this lack of response from neighbouring local planning authorities should not act as an impediment to the progress of the Erewash Core Strategy Review". We disagree with this position, as the Planning Practice Guidance on Plan Making states that "authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process. Local planning authorities are also bound by the statutory duty to cooperate". It seems inconceivable to us that none of the adjoining authorities would have chosen to meet their statutory obligation in this regard " especially as most of them have produced comprehensively evidenced plans, and are regularly reviewing them. We would expect, at the very least, that there would be comprehensive evidence of correspondence at the most senior levels of the Council between Authorities to evidence the adjoining Authorities' refusal to

engage. Without this evidence it is unclear where the fault may lie in there having been no effective cooperation " with Erewash Borough Council, or with all of the adjoining Authorities. We consider that this is an extremely serious matter " and that Erewash Borough Council should be seeking to raise the lack of statutory engagement with PINS before progressing with the Plan if, as is suggested by the committee report, none of the adjoining authorities would meet their statutory obligations to meet and discuss the issues. This is highly unusual, and we would have expected the Council to raise this as a key issue rather than seemingly deciding to therefore simply ignore the obligation themselves., In order to determine whether or not the duty to cooperate has been met by Erewash Borough Council, surely we should have sight of the efforts made to communicate with the cross boundary authorities? Correspondence between the Authorities, even if it is an agreement to disagree, must be made available to evidence the statutory requirements., Paragraph 10 of the PPG states, "A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate." , The duty to cooperate relates to the preparation of the plan and cannot be rectified post submission.

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.

Erewash Borough Council should publish an audit trail of the correspondence with neighbouring authorities where they have sought to reach agreement on cross border issues, particularly in relation to accommodating housing need.

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)?

Yes, I wish to participate in hearing session(s)

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

It is anticipated that attendees at this session will largely be representatives of neighbouring local authorities. Whilst we would not be able to add to the discussion in terms of whether or not duty to cooperate discussions had taken place, we hope to

Regulation 19 Representation

Representation Number: 316

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Whole Plan - Evidence Base

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The 3rd March 2022 Committee Report limits discussion on the evidence base to the further transport modelling that is currently being prepared to inform the examination. It also explains that a Borough wide review of playing pitches is underway. It goes on to suggest that more detailed matters have been addressed through the Strategic Growth Area Assessments and Sustainability Appraisal Process., No mention is made of Strategic Flood Risk Assessments, Housing Land Availability Assessment, Growth Study, Green Belt review, Employment Land Study, Office and Employment Provision Background Paper, Retail Needs Study, Sustainable Community Strategy, Strategic Housing Market Needs Assessment, Affordable Housing Study, Viability Assessment, Infrastructure Delivery Plan, Water Cycle Study etc. Whilst evidence will quite rightly vary between authorities, depending on the location and different concerns and priorities, all of the above cited documents formed part of the 2014 Core Strategy and do not seem to have been updated. Reliance on historic documents cannot now form the basis of a robust evidence base., Following a helpful email exchange with the planning policy team, we understand that evidence underpinning the allocation of employment land comes from the 'Nottingham Core and Outer HMAs Employment Land Needs Study' produced by Lichfields in May 2021 but this is neither referenced in the Policy Document nor made available on the

Council's Core Strategy Review website. The Regulations are clear that the Council must make all documents available on their website and this has not been done., Paragraph 068 of the PPG states, "Proportionate, relevant and up-to-date evidence should be used to justify a decision not to update policies." , Erewash Borough Council have overly relied on the Sustainability Appraisal and Strategic Growth Assessments as their evidence base. Separate representations are made on each of these.

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.

If the evidence base has been updated and reviewed then it needs to be made part of the Regulation 19 consultation and available for scrutiny at the same time as review of the Local Plan. However, if the evidence base has not been updated and reviewed then, in our view, the draft Plan cannot be considered sound or properly prepared.

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)?

Yes, I wish to participate in hearing session(s)

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

All participants have the right to review and challenge the evidence that underpins the Local Plan and in this case the evidence base is either absent, out-dated or hidden.

Regulation 19 Representation

Representation Number: 317

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Whole Plan - Green Belt Review

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The regional changes influencing the spatial portrait of Erewash Borough Council have not been properly considered in the preparation of this Core Strategy Review. In other parts of our representation, we have cited the significant spatial changes at a regional level inter alia, the launch of the Midlands Engine in 2017, the Greater Nottingham Growth Options Study in 2020, significant job growth created at East Midlands Freeport and Smart Parc, Spondon and the effect of stopping stations on HS2 and its associated feeder infrastructure. These should all have influenced the spatial portrait and have not., When combined with the absence of an agreed 'duty to cooperate' position with neighbouring authorities, it is unclear how EBC have reached a conclusion about the level of growth, the configuration of that growth and consequently the most sustainable locations. Regardless of these fundamental points, they have nevertheless concluded that they are facing Green Belt releases and new Green Belt designations., We urge caution in proceeding down this route - St Albans City Council were unable to proceed with their Local Plan as the balance of duty to cooperate agreements and Green Belt releases had not been properly justified. This position had emanated from an earlier Plan submission that was rejected due to inadequate evidence of the Duty to Cooperate being met. We consider that Erewash Borough Council could be falling into the same trap, of

unjustified Green Belt changes and insufficient evidence of both this and the Duty to Cooperate (the two issues being linked, as positive DtC could alter the requirement for Green Belt changes). We consider that pressing ahead in the current context would be likely to be costly and fruitless should the Council proceed to submission and examination., There is also inconsistency in the messaging. In the Statement of Consultation at p.15, EBC state, "The Plan's selection of green belt sites originates from its supporting Sustainability Appraisal (SA), which demonstrates the most sustainable locations for strategic green belt housing sites were adjacent to cities (Derby & Nottingham) and towns (Ilkeston inc. Kirk Hallam)." However, in their 3rd March 2022 report to committee at paragraph 4.2 we are told, "Sustainability Appraisal is not the only tool for site selection, as it does not take account of impact on the Green Belt (which is a policy, rather than an environmental issue), or the deliverability of sites." , There appears to have been some confusion as to where the review of Green Belt has been undertaken. The NPPF tells us that Green Belts can be reviewed and justified through the spatial policies of a Local Plan but we do not consider that this has been properly carried out or reported., Green Belt releases should not be entertained until the need for growth and the most sustainable locations for growth have been established. Similarly, once the need for Green Belt release has become inevitable, the sustainability of different approaches to Green Belt release should properly be considered. Piecemeal releases may result in smaller "bites" being taken out of the Green Belt, which may be more politically expedient, but larger scale settlements and strategic allocations may deliver greater environmental, societal and amenity benefits to the community and the District. In either case, with similar likely density levels, the proportion of Green Belt release will be the same " but the justification around the benefits that can accrue could be markedly different. However, the assessment of neither the need or location has been completed in this instance and the Green Belt evidence is confused at best., This consultation involves the release of Green Belt land which requires a separate assessment which is absent from this consultation. The NPPF states Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. This needs to be done in the form of a comprehensive Green Belt Review that assesses all Green Belt sites against how they serve the five purposes of the Green Belt. In the absence of such a review the Council fails to demonstrate the exceptional circumstances necessary to release sites from the Green Belt.

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.

Erewash Borough Council need to establish their growth needs and sustainable growth strategy prior to releasing Green Belt. They then need to be clear about

where the justification for re-drawing Green Belt boundaries is set out, and what benefits will accrue to the community and the wider District as a result.

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)?

Yes, I wish to participate in hearing session(s)

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

If the CSR proceeds to Examination on the basis of the current evidence then we reserve the right to scrutinise whatever further evidence is presented and for the Inspector to hear our concerns.

Regulation 19 Representation

Representation Number: 318

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Whole Plan - Deliverability of Allocated Sites

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

No evidence is presented as to the status of sites allocated in the 2014 Core Strategy. We understand that a 2022 SHLAA and 5 year Housing Land Supply paper will be published alongside the submission version of the CSR. The Council also anticipate publishing their 2020/21 Annual Monitoring Report at the same time. We contend that a Housing Topic Paper and Annual Monitoring Report should have been prepared in advance of, and presented alongside, the Reg 19 CSR., There are currently no housing numbers for us to appraise as part of our review. At the very highest level, we are unable to scrutinise whether the stated housing target of 5,800 homes to 2037 includes the 20% buffer demanded by the Government's most recent Housing Delivery Test. Should EBC actually be targeting 6,960 net new homes?, Pursuing a low key review which allocates some additional sites presupposes that the 2014 Core Strategy is deliverable and no evidence has been presented in this regard. Indeed, looking at the Inspectors report (Mike Moore, 14th January 2014) in respect of that Plan is revealing in the context of the current review:, - The Inspector required the Council to produce a Housing Delivery Action Plan if they didn't maintain housing supply in 2015. We don't believe that supply was maintained during this period, as the Council has not delivered as envisaged, but no Housing Delivery Action Plan has been published. This undermines the suggestion that this

Plan can be easily and straight-forwardly updated now. - The Inspector notes that the Core Strategy doesn't make any site allocations, except for Stanton, and that the Council is intending to produce a Local Plan for adoption in 2017. There is no evidence or further commentary or narrative to explain why the Council did not follow through on the development of a more comprehensive Local Plan. This creates a concern that the Council has been unable to properly plan for and manage growth in the absence of the more prescriptive approach and allocations adopted by the majority of planning authorities. Hence, we consider that Erewash should return to the path that they themselves proposed in response to the 2014 Core Strategy., -

With regard to delivery of the 2014 plan, the Inspectors report states that the SRS (Stanton site) needs to be delivering housing by the end of the first five year period of the CS - which would have been 2017/18. This has not happened " and there is no immediate prospect that housing delivery will start on this site. - The Inspector goes on to state that it is essential that Stanton comes forward at the earliest opportunity, and the Inspector removed the provision that it would not deliver any homes in the first five years of the Plan. We now know, of course, that it didn't - and indeed still hasn't., Our local knowledge suggests that the Stanton Regeneration Site is no more likely to be brought forward now than it was in 2014 " and hence, it has provided a false impression of housing provision for eight years now. We would suggest that, having been in previous plans and not yet delivered, there should be a far stronger evidence base to support its coming forward now if it is to be included in the Plan going forward. We also note that there is no activity at West Hallam either, and furthermore that the landowner has little intention of making the site available for housing in the foreseeable future. Again, if this is not the case then the Plan should have a clear commitment and evidence supporting the deliverability of this site against a defined trajectory that is supported by the landowner and / or a suitable promoter. Together these sites account for almost 40% of the Council's anticipated housing need., Green 4 Development's proposal for Hopwell Village and Maywood Place could plug the gap left by these undeliverable sites. This proposal would deliver against the shortfall in sites, and can point to a range of energy, transport and environmental gains that can readily offset the need for Green Belt release to achieve the scheme. It is the Council's responsibility to demonstrate deliverability and viability of their Local Plan and this must now be called into question and alternative growth strategies considered that better align with a revised spatial portrait for the Borough.,

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.

Erewash Borough Council need to publish the evidence that underpins the deliverability of their housing strategy. If they do not have this evidence, or are

unwilling to publish it for it to be appropriately scrutinised, then it is difficult to see how the Plan could be found sound.

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)?

Yes, I wish to participate in hearing session(s)

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

We must have the opportunity to scrutinise and challenge any new evidence that is presented and to draw any issues to the Inspector's attention.

Regulation 19 Representation

Representation Number: 319

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Statement of Consultation

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

It appears that the Statement of Consultation is not a true reflection of all the submissions that were duly made in response to previous consultations., Agents acting for Green 4 Developments submitted representations in respect of Hopwell Village (SGA27) in response to the 'Revised Options for Growth' consultation and these are neither summarised nor responded to in the Statement of Consultation. In addition, the Planning Practice Guidance states that "The Inspector will consider the evidence provided by the LPA to support the plan and any representations which have been put forward by local people and other interested parties." . In our view the published summary in this case does not accurately reflect the representations that were submitted., In particular, the proposals and indicative masterplan for the Hopwell Village scheme had been substantially amended since the early submission stages, and this was not reported at all in the Statement of Consultation., If these, and any other relevant representations submitted during the plan making process, are not now included in the evidence base, then the Plan cannot be considered to be properly prepared., The responses of respondents have not been made publicly available and neither has the Council responded to any attempts by the promoters to establish how these representations have been considered. We are left wondering about the range and scope of other representations that might have been made, and

which respondents are unaware of. It must be assumed that the Hopwell Village representations are not an isolated case., Of more concern to us though is that there may have been a great number of representations on a particular issue that have not been published, but together would make clear the strength of feeling on a particular topic. As it is, with none of these potentially having been published, it is entirely possible that respondents are unaware that they may be speaking in concert with many other respondents, and the extent to which the Council has taken proper regard to this weight of representation.

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.

We urge the Inspector to further scrutinise this matter with the Council prior to proceeding to the Examination in Public, and to require the representation evidence base to be published.

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)?

Yes, I wish to participate in hearing session(s)

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

If the Inspector has not had the benefit of considering previous representations then we would like the opportunity to plug any information gaps as part of the Examination process.

Regulation 19 Representation

Representation Number: 320

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Whole Plan

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

It is unclear what is intended to be policy and what is supportive text. This is important as Local Plans should "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals" (NPPF Paragraph 16 d).

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 Policy Document should be properly formatted prior to being re-issued for consultation.

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)

**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

Regulation 19 Representation

Representation Number: 321

Name: Ian Long

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 1; Strategic Policy 1.2; Strategic Policy 3

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

Strategic Policy 1 - Housing, 3.1 This Representation broadly supports the proposed settlement hierarchy and distribution of housing as contained in Strategic Policy 1. Principally, this Representation supports the direction of a portion of the overall housing requirement to 'Rural Area Settlements', otherwise referred to as villages., 3.2 Nonetheless, this Representation advocates for the direction of a greater proportion of the overall housing requirement to 'Rural Area Settlements', in particular those that benefit from a strong base of services and facilities and relate well to the conurbations and towns as defined in emerging Strategic Policy 1. In particular, we advocate for Breaston to make an increased contribution towards the housing land supply for the Borough, reflective of the comparably strong base of services and facilities when considered against other villages of a similar scale. Further to this, Breaston benefits from excellent accessibility into both Derby and Nottingham by way of the A6005, with frequent bus services enabling residents to access the primary regional urban centres without requiring the use of a private vehicle. 3.3 From a review of the most recently published Housing Delivery Test results (2021), it can be seen that Erewash has been unable to meet the target delivery rates over the last three years, with the measurement determining that the Council delivered 79% of their housing requirement and was therefore required to

add a 20% buffer to their housing land supply. 3.4 The spatial strategy employed in the adopted Core Strategy is broadly similar to the proposed spatial strategy contained in the draft Core Strategy Review, whereby the housing needs of the Borough will be primarily met through urban concentration with regeneration of brownfield sites being a core aspect of this. 3.5 This Representation, therefore, questions whether it is prudent policymaking to employ a similar spatial strategy which has been demonstrated in this Borough to be sub-optimal and inconsistent at delivery. As such, this Representation advocates for a spatial strategy which makes provision for a greater distribution of housing land to the defined 'Rural Area Settlements' (villages) of the Borough. This will enliven the housing delivery rate in Erewash by delivering houses in a greater diversity of locations, thereby offering better choice to the market. 3.6 Through reducing the reliance of the proposed spatial strategy on the timely delivery of complex brownfield sites such as Stanton Ironworks and increasing the reliance on deliverable housing sites in sustainable villages, the housing delivery rate will likely be more consistent and not subject to central government measures such as the 20% buffer. 3.7 Beyond this, it is unclear in the consultation document what level of contribution that the Borough will make towards the unmet housing needs of both Nottingham and Derby, with Erewash Borough being part of the wider housing markets for both cities. Due to this, it should be made clear in the emerging Core Strategy Review how these market areas are being provided for. Additionally, it should be shown how a diverse range of sites brought forward can make a more immediate positive impact upon unmet housing need than cumbersome comparatively less deliverable strategic scale brownfield sites, such as South Stanton., Strategic Policy 1.2 " South Stanton, 3.8 Further to our comments above, this Representation advocates for the reduction in contribution the Stanton Ironworks, otherwise known as South Stanton, would be expected to make towards the housing land supply within the emerging Core Strategy Review plan period. Per the subtext of the draft Policy, despite the site being considered to be suitable and available for housing by both the Local Planning Authority and the current landowner for over 10 years, development has yet to come forward. Further to this, the subtext states that delivery is not expected on site in the first 5 years of the emerging Core Strategy Review. 3.9 The subtext acknowledges that slow progress of the delivery of the site has been largely due to market uncertainty over the cost of mitigating land stability issues from its mining legacy, and land contamination from its industrial legacy. We consider that it is not sound plan-making to direct approximately 1,000 units of the Borough's housing land requirements towards a site which has unquantified, acute and complex site constraints that have and will continue to preclude development. 3.10 This Representation questions the deliverability of the site, including beyond the first 5 years of the emerging Core Strategy Review as the comprehensive remediation of the land prior to the delivery of any residential development on site is inherently required to facilitate the implementation of the development, as is required by the emerging Strategic Policy. As such, a considerable and material investment would be required by a development partner long in advance of the receipt of any returns by way of house sales. Additionally, land values are comparatively low in this part of the Borough, which in turn further impacts upon the viability of the site and its ability

to deliver the scheme as contained in the draft emerging Strategic Policy. 3.11

Further to this, the emerging Core Strategy Review appears to pin the deliverability of South Stanton upon the successful development of North Stanton for employment development, which would be considered to be sufficient to "establish the degree of market challenge posed by historic mining and industrial activity at the former Stanton Ironworks, and thus increase market confidence in this site" (South Stanton). We consider that this further dilutes the ability for South Stanton to make the stated contribution towards the housing land supply as there are additional extraneous factors that would require meeting in order to make the site deliverable, by which we mean the introduction of the requirement for North Stanton to come forward in a timely manner to provide the necessary market conditions to bring South Stanton, and therefore approximately 1,000 dwellings, forward. 3.12 As we have considered previously in this Representation, we advocate for the proposed Spatial Strategy contained in Strategic Policy 1 to be updated to include a greater distribution of housing by way of reducing the quantum directed towards a new settlement at South Stanton and increasing the role of the 'Rural Area Settlements' (villages), with particular reference to Breaston., Strategic Policy 3 " Town, Local and Village Centres, 3.13 Breaston is proposed for designation within emerging Strategic Policy 3 as a Village Centre, with the emerging Strategic Policy noting that Breaston has a well established village centre which provides essential services to local residents. 3.14 Enabling additional development in Breaston, such as through allocating the above-mentioned 'Land at Risley Lane, Breaston', would inherently increase the footfall in the centre of Breaston and thereby serve to further protect the Village Centre, in support of the aspirations of emerging Strategic Policy 3.,

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.

Please see above comments and accompanying Representation Statement.

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)?

Yes, I wish to participate in hearing session(s)

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

In order to adequately represent our clients interests we would request to participate in the hearing session(s) as this will allow us to further expand upon our comments relating to this consultation and also aid in the ongoing promotion of 'Land at Risk'

Regulation 19 Representation

Representation Number: 322

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Missing Evidence - Review of Saved Policies

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

We query whether the saved policies have actually been reviewed as part of this Core Strategy Review and we suggest that no assessment has been made as to their compliance with the new policy framework. The NPPF requires a review of Local Plans every five years and paragraph 062 of the PPG states, "Most plans are likely to require updating in whole or in part at least every 5 years." We can find no evidence that the policies contained in both previous development plan documents has been properly reviewed against the latest guidance and NPPF.

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.

Erewash Borough Council need to prepare a document outlining the review of their saved policies from both 2005 and 2014 to demonstrate compliance with the current policy framework.

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)?

Yes, I wish to participate in hearing session(s)

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

We must have the opportunity to scrutinise and challenge any new evidence that is presented and to draw any issues to the Inspector's attention.

Regulation 19 Representation

Representation Number: 323

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Growth Area Assessment

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

It is unclear why Erewash Borough Council have assessed 7,504 homes at 'Land around Hopwell Hall'. This is an unrealistic dwelling target for a site of this size and does not take into account all of the supporting infrastructure that would be necessary to support a sustainable urban extension in this location., Green 4 Developments presented a series of technical reports for Hopwell Village (or the 'Land around Hopwell Hall') to the Council's 'Revised Options for Growth' consultation. This included assessments of access and movement, landscape, ecology, hydrology, ground conditions and heritage. It concluded that Hopwell Village could deliver circa 2,080 dwellings by 2037. Moreover, it identified a range of energy, transport, environmental and community amenities that would provide benefits beyond the site itself, and which would significantly justify the release of this site from the Green Belt. The Council have chosen not to revisit the Strategic Growth Area Assessment in light of the presented information, choosing to proceed with a blanket housing density coverage of 35 dph across the whole site, despite that fact that the indicative masterplan and supporting representations submitted at the time made clear that this was not what was proposed by the site promoter. The Council hint at some of the supporting land uses that would be required such as education and community facilities but no reduction in dwelling numbers is made to

accommodate these uses, thus, even setting aside the promoters information, the Council's assessment is flawed. The same incorrect assumptions are carried forward into the Sustainability Appraisal but this is dealt with under a separate representation.

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.

Erewash Borough Council should revisit their Strategic Growth Area Assessment of SGA27 and consider the inclusion of a new allocation at Hopwell Village. The draft policy could seek to be considerably more aspirational than the policy requirements drafted for the current allocations. An example is offered below:

Land at Hopwell Village as shown on the Policies Map is allocated for residential led development of approximately 2,080 new homes, 4 hectares of mixed employment, and a village centre across 104 hectares of land. The development will form a new community adjacent to Ockbrook and an extension to Borrowash. Development shall provide the following:

- New junctions from Cole Lane and a bridge over the A52, -
- Financial contributions towards flexible and targeted bus services, -
- Provision of a travel hub with electric vehicle charging points, -
- Integrate bus only connections to the A52, -
- Enhanced and new bus halts with safe pedestrian access, including suitable pedestrian crossings where appropriate, -
- Priority infrastructure for walking, cycling and micro-mobility modes, -
- A new village centre including shops and community uses, -
- Extensive green infrastructure to avoid coalescence and prevent further encroachment into the Green Belt, -
- Zero-carbon energy initiatives, -
- A new primary school well located within the site to encourage access by active travel, -
- Affordable homes in accordance with policy, subject to viability

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)?

Yes, I wish to participate in hearing session(s)

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

If the Strategic Growth Area Assessments have determined the growth strategy then it must be right that we have the opportunity to correct factual inaccuracies. In addition, as the representations submitted in response to the "Revised Options for Growth

Regulation 19 Representation

Representation Number: 324

Name: June Nottingham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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., 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 the 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.

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, re-evaluate 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.

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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)

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

Regulation 19 Representation

Representation Number: 325

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 1 - Housing

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

No evidence is presented as to the status of sites allocated in the 2014 Core Strategy. We understand that a 2022 SHLAA and 5 year Housing Land Supply paper will be published alongside the submission version of the CSR. The Council also anticipate publishing their 2020/21 Annual Monitoring Report at the same time. We contend that a Housing Topic Paper and Annual Monitoring Report should have been prepared in advance of, and presented alongside, the Reg 19 CSR (i.e. the evidence should lead the plan making process rather than being prepared post hoc to justify rolling forward historic policies)., The historic growth strategy in the form of the adopted Core Strategy is self-evidently not delivering even the modest housing numbers that Erewash Borough Council have calculated necessary to meet local need. They are the only Derbyshire authority to be underperforming on their Housing Delivery Test, with this year's score only reaching 79% resulting in the Council needing to provide a buffer to their housing numbers. We have not been able to trace how the Council have calculated their housing need and whether the buffer has been applied. As at 3rd May 2022 the Council's website states, 'Authorities Monitoring Report: Page under review' Erewash's latest Authorities Monitoring Report will be made available on this page. Its production provides the Council with an opportunity to consider the effectiveness of the

monitoring framework underpinning each of the Core Strategy's 20 policies. The release of a further AMR helps Officers to better understand the impact of its local and strategic policies. In the same way, the Councils' website in respect of Housing Supply states: "Housing Supply: Page under review" The National Planning Policy Framework requires all local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. Erewash's most recent SHLAA was its 2014 version. There is then a separate page containing the SHLAA from 2019. Neither are presented as evidence to support the drafting of the Core Strategy Review. This same page also references this 2014 SHLAA as the source of the Council's assertion that it has a 5-year supply of housing land. This seems highly unlikely, and, in the absence of this information or the publication of an up to date and current SHLAA, it is impossible to ascertain whether the housing numbers identified in the draft Core Strategy (5,800 homes) is either appropriate or accurate. The Housing Land Supply position is not published on the website and is certainly not presents as evidence to underpin the Core Strategy Review.

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.

Erewash Borough Council need to publish the evidence that underpins their housing strategy. This should be done at the Regulation 19 stage and not at the point of submission.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

We must have the opportunity to scrutinise and challenge any new evidence that is presented and to draw any issues to the Inspector's attention.

Regulation 19 Representation

Representation Number: 326

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Spatial Portrait

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

There have been significant spatial changes at a regional level inter alia, the launch of the Midlands Engine in 2017, the Greater Nottingham Growth Options Study in 2020, significant job growth created at East Midlands Freeport, the Smart Parc proposals at Spondon and the stopping stations on HS2 and its feeder stations planned to the north (including at Toton). These all constitute significant changes in circumstances and should have triggered an opportunity for a new Local Plan. Erewash Borough Council are silent on all regionally important changes and we must draw the conclusion that they have had no influence on the spatial portrait. The consideration of your place and function in the wider geography should be at the heart of plan making and we can find no evidence of this being the case.

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.

We contend that an holistic review of the suite of Development Plan policies is needed and that the spatial portrait should be reviewed to better reflect Erewash Borough Council's role in the wider region.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

It is important to ensure that all regionally important influences have been taken into consideration in the preparation of a Local Plan and, at this stage, we have no confidence that this is understood or has been carried forward.

Regulation 19 Representation

Representation Number: 327

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Sustainability Appraisal

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The assessment of SGA27 (Hopwell Hall) in the Sustainability Appraisal is out of date and inaccurate in assessing the merits of this site against the subject headings. It is unclear why Erewash Borough Council have assessed 7,504 homes at 'Land around Hopwell Hall'. This is an unrealistic dwelling target for a site of this size and does not take into account all of the supporting infrastructure that would be necessary to support a sustainable urban extension in this location., Green 4 Developments presented a series of technical reports for Hopwell Village (or the 'Land around Hopwell Hall') to the Council's 'Revised Options for Growth' consultation. This included assessments of access and movement, landscape, ecology, hydrology, ground conditions and heritage. It concluded that Hopwell Village could deliver circa 2,080 dwellings by 2037. Moreover, it identified a range of energy, transport, environmental and community amenities that would provide benefits beyond the site itself, and which would significantly justify the release of this site from the Green Belt. The Council have chosen not to revisit the Strategic Growth Area Assessment in light of the presented information, choosing to proceed with a blanket housing density coverage of 35 dph across the whole site, despite that fact that the indicative masterplan and supporting representations submitted at the time made clear that this was not what was proposed by the site promoter. The Council

hint at some of the supporting land uses that would be required such as education and community facilities but no reduction in dwelling numbers is made to accommodate these uses, thus, even setting aside the promoters information, the Council's assessment is flawed. If we reconsider the settlement hierarchy, it is not reasonable, nor can it be considered sound that the principle of a new settlement in the Green Belt is dismissed., Some inconsistencies in the SA process are highlighted below and will be expanded upon in a Hearing Statement:, - Housing typologies are not governed by the location of the development., - Why do employment sites outside of the Green Belt generate more benefit than those within the Green Belt?, - Why would new settlements in the Green Belt have poor accessibility?, - The Council has failed to grasp the concept that new settlement would result in a new community that has its own identity and is served by its own services and facilities, and moreover, as proposed at Hopwell Village, could bring significant sustainability gains to the existing adjacent communities., - Why would new settlements in the Green Belt have poor access to green space?, - Why is development in the Green Belt considered to be 'unhealthier' than development outside of the Green Belt?, - New settlements have the advantage of being able to design out crime and should therefore score more highly than regeneration sites in this regard., - The Council assumes that all new settlements in the Green Belt would be isolated, which is clearly not the case. This has implications for their scoring of social isolation, energy demand and transport factors including traffic generation, pollution and air quality.

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 Sustainability Appraisal demands review and objectivity in order to iron out inconsistencies.

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.

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Please use this space to continue any of your answers

Green 4 Developments would wish to bring in technical expertise to challenge the Council's findings and inconsistencies in their Sustainability Appraisal.

Regulation 19 Representation

Representation Number: 328

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Sustainability Appraisal

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

No

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The Sustainability Appraisal demands review and objectivity in order to iron out inconsistencies.

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Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

Green 4 Developments would wish to bring in technical expertise to challenge the Council's findings and inconsistencies in their Sustainability Appraisal.

Regulation 19 Representation

Representation Number: 329

Name: Pippa Cheetham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Growth Area Assessment

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

The Strategic Growth Area Assessment for SGA19 (Maywood) has completely failed to recognise what the promoters are offering as a rural regeneration solution for this despoiled landscape in the Green Belt. Its current use is as a dis-used golf course, an entirely artificial land use., It is also located in close proximity to the HS2 feeder station at Toton as well as the planned employment opportunities at Stanton, which significantly increase the sustainability credentials of this site. It would not require significant new infrastructure to access these facilities in contrast to the significant road building programme required for the Land South West of Kirk Hallam., Instead, as outlined in the 'Response to Erewash Core Strategy Review: Revised Options for Growth, full consideration should be given to the ecological enhancement offered at Maywood Place and fair consideration given to the enabling residential development that would fund the restoration of the dis-used golf course.

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.

Erewash Borough Council should revisit their Strategic Growth Area Assessment of SGA19 and consider the inclusion of a new allocation at Maywood Place. The draft policy could seek to be considerably more aspirational than the policy requirements drafted for the current allocations. An example is offered below: Land at Maywood Place as shown on the Policies Map is allocated for low density residential development of approximately 360 new homes and 35 hectares of restored ecological open space across 58 hectares of land. Development shall provide the following: - 20% Biodiversity Net Gain, - Enhanced junction on to Rushy Lane, - Financial contributions towards flexible and targeted bus services, - Create opportunities for self and custom build housing, - Priority infrastructure for walking and cycling, - Zero-carbon energy initiatives, - Affordable homes in accordance with policy, subject to viability

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Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

It is necessary as the earlier response to the Council's Revised Options for Growth appears to have been ignored and the offer at Maywood Place needs further consideration.

Regulation 19 Representation

Representation Number: 330

Name: Ashley Dunn

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

the whole Core Strategy

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

Erewash is in the position where it considers green belt housing to be necessary due to many years of failure to grasp the housing issue. The Borough Council has failed to capitalise on the potential of many brownfield sites, and many of these are now sparsely populated and poorly designed commercial housing developments, delivering large profits for the housebuilder at the expense of all others in the Borough (see Wilmot Arms site Borrowwash for example). Erewash hasn't ensured the brownfield sites available to build the housing it needs have delivered the housing types we need. Legally, it hasn't performed assessments on where housing is required in the Borough and has instead selected sites based on ease of development and political expediency. There is also no evidence that cooperation with neighbouring authorities has been positive. For example, the old American Adventure site is only a short distance from one of the selected SGA sites with no assessment of combined impacts on the Borough. Furthermore there is no evidence that a transport assessment has been made to identify whether where homes built are close to the most significant employment areas in the borough and beyond, and

whether sustainable transport is reasonably available to these. For this reason and for the reason that the single piece of major enabling transport infrastructure proposed is a new road, the Core Strategy review fails in adherence to the Climate Change Act 2008. The Council has also not tackled the issue of empty homes, which are a burden on communities, a waste of available housing and a revenue drain for the Authority. We also have empty properties in dying town centres which would be sustainable and attractive places to live for a certain demographic and would breathe life into town centres.

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Nothing can be done now about the previous failings of Erewash Borough Council and the wasting of the best brownfield sites that have become available in the last decades. However this Core Strategy does not put the Borough on the path forwards towards improvement. This would continue us along a worsening path, with past mistakes now affecting future generations through loss of green space, countryside, biodiversity and habitat. The Core Strategy needs a wholesale review, drawing upon correct data to inform the correct approach to development and housing need. This needs to be made through cooperation with all Councillors, local groups, Parish/Town councils, neighbouring authorities, etc., rather than just the work of a single group of councillors and officers. This needs to be a positive document, where potentially tough choices are made for future generations and investment is made in the right areas of the Borough which can accommodate new housing districts on presently ineffective brownfield land. This also needs to be consulted on widely and positively, rather than a very restrictive and confusing set of technical questions which the average resident cannot be expected to engage fully with.

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)?

Yes, I wish to participate in hearing session(s)

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

Because the Council must start to listen to other people's points of view from a wide range of backgrounds and opinions.

Regulation 19 Representation

Representation Number: 331

Name: J Imber

To which part of the Core Strategy Review does this representation relate?

Policies

Policies Map

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Spatial Strategy

Do you consider the Core Strategy Review is Legally Compliant?

Yes

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

Yes

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.

The plan makes no provision for sustainable growth of villages such as Breadsall which are surrounded by Green Belt and which will stagnate unless (limited) growth is allowed for.

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Allocate my client's site on the western edge of Breadsall for a modest housing development to meet the sustainable growth needs of the village (see my email to Policy Team of 13/05/21)

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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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 332

Name: Joshua August

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other Text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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., 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 the 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.,

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, re-evaluate 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.

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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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 333

Name: Sally Ann Doar

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

I feel there has been insufficient communication throughout the consultation process. Indeed, the matter only came to my attention when it was reposted on one of the Ilkeston social Facebook pages very early in the process. How can this be a fair way of gaining input from the people of the borough?, Further, I wish to make the following comments in respect of the Erewash Local Plan Review. Surely we should be looking for creative and innovative solutions to meet housing targets. It is evident that surrounding areas capitalise on existing transport links. The borough as a whole has great transport links. Why does the plan not look to exploit these? Why are Erewash Borough Council pushing forward with plans, specifically SGA7, to add to the burden of traffic through Ilkeston?, Not only that, but also taking away precious green belt land at the same time. I read page 33 of the Conservative Policy manifesto from 2019 and wonder why the wording titled The Green Belt seems to have been overlooked? <https://www.conservatives.com/our-plan/conservative-party-manifesto-2019>, Also, why bother with the COP26 conference, if green belt land is so readily given up for housing?, The plan for the borough should be one to be proud of, one that can set a positive, forward thinking example to other boroughs. It certainly isn't that at this time.

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.

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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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 334

Name: Christopher Chilton

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Strategic Policy 1.4 - North of Spondon

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

Dear Sir or Madam,, I am writing to express my wholehearted opposition to the recent confirmation by Erewash Borough Council (EBC) that land north of Spondon will be declassified as green belt land and included in its Core Strategy Review (SGA:26, Strategic Policy 1.4) for housebuilding. I have outlined numerous points of objection below and trust that you will take these into consideration when reviewing this flawed proposal. I consider that the inclusion of SGA:26 is both unsound and fails to comply with the Duty to Cooperate., 1. Protecting Green Belt Land I would question firstly whether EBC have undertaken a proper Green Belt Review to establish whether there are any sites that are more appropriate for inclusion in the Core Strategy Review than SGA:26, whether Green Belt or Brownfield sites, that are closer to EBC geographical centres such as Ilkeston. The proposed site for SGA:26 lies several miles from major Erewash settlements and directly backs onto Derby City Council land, making it implausible location for housebuilding in the Borough of Erewash. In addition, I note that the Erewash Core Strategy Review: Revised Options for Growth document dated March 2021 includes SGA:26 primarily 'as a replacement for the site north of Lock Lane' (page 7). It is not acceptable to delete the site of SGA:26 from the Green Belt simply because an alternative site for development proved unfeasible - indeed, paragraph 136 of the Government's

National Planning Policy Framework states that 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified'. The proposal for this site is therefore unjustified, inconsistent with national policy and is not an effective use of this particular piece of Greenbelt land, which should instead be protected., 2. A Failure to Cooperate, By including the site of SGA:26 within the Core Strategy Review, I take the view that Erewash Borough Council failed in its duty to cooperate with its neighbours, specifically Derby City Council and the residents of Spondon. SGA:26 was a last-minute addition to the Core Strategy Review, with no prior notice or assessment of the proposal's feasibility given or undertaken in advance and, as mentioned above, it is not acceptable to include SGA:26 simply as a replacement for a failed proposal elsewhere. Residents of Spondon were not even able to voice their objections at EBC meetings due to the EBC constitution and I understand that Derby City Council's planning department was only informed that 'land north of Spondon' was earmarked for development a short time before the Core Strategy review was presented to full council in March 2021. In addition, at the full council meeting in March 2022, over 700 objections from non-EBC residents were simply dismissed., 3. Effect of development upon local services in Spondon, I also have serious concerns regarding the negative effect that the proposed development of 200 homes would have upon local services in the neighbouring area of Spondon, situated just across the border in the City of Derby. The Revised Options for Growth - Erewash Local Plan document published by the Council in March 2021 discusses eight key community facilities (pages 162-163), including bus stops, health facilities, schools and public houses. Of these eight, six are situated in Spondon. The proposed development would only serve to increase the strain upon these already over-subscribed facilities. The Revised Options for Growth document discusses schools in particular and notes on page 162 that the nearest secondary school - West Park School - is already 9% over capacity for enrolment, which would increase to 12% over capacity if future residents of the SGA:26 site were to utilise the school. The Chair of Governors at West Park stated that '...this number of houses will require additional school places at a time when we are oversubscribed and struggling to meet the current local need for places in our school from within, and from outside of our catchment area.' As a former pupil of West Park School, I am aware of the limited options for expansion that the school has and am in full agreement with the Chair of Governors regarding the adverse effect that this proposed development would have upon the school. In addition, the text of Strategic Policy 1.4 discusses how the new development will 'extend the community of Spondon'. May I remind EBC that the community of Spondon is in the City of Derby, not Erewash, so any extension to Spondon should be actioned on Derby City Council land that would directly benefit local residents, not residents from Erewash who would utilise Spondon's services. Furthermore, all council tax collected from residents of the new development would go to EBC, rather than Derby City Council, despite Derby providing all of the services for these residents. 4. Accessibility of the proposed site and potential for congestion, The Council's Local Plan document notes that the proposed site adjoins the A6096 road and states on page 159 that 'only a single point of access/egress is possible'. The A6096 is a country road with a derestricted speed limit and to have slow-moving vehicles turning

into and out of the proposed site via the A6096 would in my view be potentially dangerous to local traffic proceeding along the A6096, especially at night. In addition, the Local Plan document admits on page 159 that such limited access to the proposed site '...could give rise to delays for those wanting to exit the site' and that options to resolve this would be a mini-roundabout or signalised junction, both of which I consider to be unfeasible on this fairly narrow and rural country road. The unsuitability of this site with regard to its only potential access point is also highlighted by the fact that the site would be difficult to access on foot or bicycle, therefore isolating the development from the neighbouring area and requiring residents to use cars to enter/leave the site - surely an unsustainable outlook, given the modern drive towards green living and the move away from polluting methods of transport., Furthermore, consideration must also be given to the adverse effect that the proposed development would have upon local roads in and around Spondon. Local residents exiting Spondon to head towards local supermarkets and Derby can only take one route - along Willowcroft Road - a road already congested especially at rush hour due to its crowded profile and the traffic light junction with the A6005 at the bottom. Adding the cars from an extra 200 homes would only serve to exacerbate this problem. Looking in the other direction from the proposed site - along the A6096 to the junction with Moor Lane and on towards Ockbrook, the plan makes clear on page 160 that Ockbrook '...has a limited, local road network not suited to accommodating additional vehicular movements'. It is therefore clear that the proposed development would have a negative effect upon local residents in terms of congestion in both directions., 5. Negative effects of the proposed site upon wildlife, The declassification of Green Belt land is something that should never be considered lightly and indeed, this proposal would have a severely adverse effect upon the biodiversity of the area. The land allocated for the site has a plethora of species found almost nowhere else in and around the Spondon area, including birds of prey, herds of deer and small mammals. The loss of these species would be unconscionable. Paragraph 175(c) of the National Planning Policy Framework states that 'development resulting in the loss or deterioration of irreplaceable habitats...should be refused' and it is clear in this case that the public benefit of this proposed site would not outweigh the destruction of this extremely valuable local environment. I hope that the Planning Policy Team and the wider Erewash Borough Council will consider my objections to the Core Strategy Review seriously and conclude, as I have, that the proposed development north of Spondon is entirely without merit, unjustified and an ineffective use of precious Greenbelt land. It should therefore not proceed., I look forward to hearing from you shortly. I have also submitted this communication via email.

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.

Strategic Policy 1.4 (SGA:26) should be deleted in its entirety from the Core Strategy Review. Please see my objections in the section above.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

I am a local resident of Spondon and am very happy to participate in hearing sessions to voice my objections in person.

Regulation 19 Representation

Representation Number: 335

Name: Fergus Thomas

To which part of the Core Strategy Review does this representation relate?

Policies

Tell us specifically where the representation relates to (a policy, the policies map or other text).

All of the plan, including all policies

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

1. No evidence the duty to cooperate has been met It is common for Statements of Common Ground with other authorities to be submitted during the examination process, after the regulation 19 consultation, however there is no evidence in the plan's evidence base, approach and spatial strategy that there has been constructive engagement with any of Erewash's neighbouring authorities, Derbyshire County Council (as the highways and education authority) or other relevant statutory consultees., We are aware the Council actively engages with the Greater Nottingham Joint Planning Advisory Group (JPAG), however this engagement appears to be focused on delivery of regeneration sites (such as the former Stanton Ironworks) with some updates provided on plan progress, rather than any plan specific matters. There is no evidence of any engagement with Nottingham or Derby City Councils regarding any potential unmet need that may need to be accommodated beyond those cities' boundaries, as both cities are subject to the standard method 35% cities uplift. Indeed it is noted from the agenda for the JPAG meeting on 8 March 2022 that Nottingham City expects a minimum shortfall of 4,543 homes up to 2038 (Appendix 1, paragraph 2.8), which is only one year beyond the end of the proposed plan period (2037) for the emerging Core Strategy Review., This is contrary to the position advanced at the JPAG meeting on 30 March 2021, when

Erewash indicated that whilst it was preparing its own plan, it was 'committed to joint evidence base preparation and alignment of strategy and policy where relevant' (paragraphs 3.0-3.2 of meeting minutes). Beyond cooperation on meeting unmet housing needs from neighbouring authorities, there also does not appear to be any joint evidence base preparation, which is reflected in the plan's inadequate evidence base (which is discussed further below). As such there is no evidence the duty to cooperate has been satisfied.

2. Inadequate evidence base, Underpinning all Bellway's concerns regarding the plan is the limited and inadequate evidence base supporting the plan. The limited nature of the evidence base does not justify the policies proposed, including allocations that in total will deliver more than 3,000 new homes. For plans allocating development of the scale proposed the evidence base should include the following, as a minimum: - Green Belt Review (no review has been undertaken since 2012, and that review is not referred to in the emerging Core Strategy Review or any part of its evidence base in any case), - Transport evidence, including modelling, - Heritage evidence, -Landscape evidence, - Viability and affordable housing evidence - Infrastructure Delivery Plan, - Baseline assessment of the borough's settlements facilities and infrastructure, - Engagement from other authorities (such as Derbyshire County Council on matters of education) The Strategic Housing Land Availability Assessment (SHLAA) (2019) is also inaccurate. For example, land to the west of Borrowash (site ref: 197) is identified as not available as the landowner is unknown, despite the commentary for the site acknowledging a planning application for new homes on the site has been submitted in recent years. The lack of an adequate evidence base flows through to all aspects of the plan, as we discuss further below.

3. No assessment of reasonable alternatives, The Strategic Environment Regulations require Local Plans to consider reasonable alternatives, as does National Planning Policy Framework (NPPF) (July 2021) paragraph 35b). Section 3.4 (page 22) of the draft Sustainability Appraisal (SA) (January 2022) is clear that the SA process has only tested 25 potential housing allocation sites were appraised. So there is no consideration of alternative spatial strategies for how the borough's housing needs are to be met or alternative growth options, such as going above the standard method housing requirement (NPPF paragraph 61 is clear that the standard method housing need is a minimum). Without this it has not been demonstrated that the plan meets the Strategic Environmental Regulations or the spatial strategy is appropriate or justified, contrary to NPPF paragraph 35b).

4. The borough's market and affordable housing needs are not evidenced NPPF paragraph 61 is clear the standard method housing need calculation is a minimum only and that current and future demographic trends and market signals should be considered to determine if exceptional circumstances justify an alternative approach. In the absence of any housing need evidence (such as a Housing Needs Assessment) there has been no consideration beyond accepting the minimum standard method housing need calculation., The plan includes no borough wide policy for the provision of on-site affordable housing and there is no evidence as to the scale of the borough's affordable housing needs. Although the proposed allocation policies include requirements for affordable housing, there is no explanation or evidence to justify the provision identified or whether it is sufficient to meet the borough's affordable housing needs. As such

there is currently no evidence to demonstrate the plan meets the area's objectively assessed housing needs as a minimum and is not positively prepared, contrary to NPPF paragraphs 31a) and 61. 5. The spatial strategy is not justified As referred to above, there has been no consideration of reasonable alternatives in terms of the plan's identified spatial strategy, as set out in the supporting text to draft strategic policy 1 (housing), in the absence of any evidence it 'flows' from the spatial portrait only (page 4). With no evidence assessing the borough's settlements (including the edges of Derby and Nottingham) and their associated facilities and infrastructure, the borough's Green Belt, landscape, value and highway network, there is no justification for the current proposed strategy. 6. The proposed allocations are not justified or evidenced As the spatial strategy is not positively prepared or justified, it follows that it has not been demonstrated that the emerging Core Strategy Review's proposed allocations are justified and deliverable within the plan period. This is further compounded by the lack of evidence underpinning the plan. For example over 17% of the borough's housing needs are identified for South Stanton (the former Stanton Ironworks, also referred to as the Stanton Regeneration Site) (draft strategic policy 1.2 " South Stanton). This site has been allocated for 2,000 homes since March 2014 when the current Core Strategy was adopted, no planning application for new homes on the site has yet been submitted. As the supporting text to draft strategic policy 1.2 acknowledges (page 6), the site has been 'considered suitable and available for housing' for over ten years and is not expected to deliver in the first five years of the plan given market uncertainty over contamination mitigation costs. Despite the plan now expecting to deliver less housing than the previously adopted plan anticipated and ongoing viability concerns, no additional viability evidence has been prepared. NPPF paragraph 110 is clear that in assessing sites that may be allocated for development it should be ensured that any significant impacts from the development on the transport network (in terms of capacity and congestion) or on highways safety can be mitigated. Mindful of this the lack of transport evidence (including any Infrastructure Delivery Plan) only reinforces that the proposed allocations have not been demonstrated to be deliverable during the plan period and are not underpinned by proportionate evidence., Although there is some commentary on matters such as viability (as well as transport and Green Belt) in the Strategic Growth Area (SGA) Assessments document (March 2021) and the SA, this does not amount to proportionate evidence. Without the proportionate evidence it is not possible to make a judgement as to which sites should be proposed for allocation. Another example is education provision. The north of Spondon allocation proposes that only a financial contribution is necessary for schools in Spondon to accommodate 200 new homes. The SA explains this assumption is based on the Developer Contributions Supplementary Planning Document. This document was adopted in April 2015, over seven years ago. It may be the education needs have changed, there is no up to date evidence in this respect. This issue is compounded by the lack of an Infrastructure Delivery Plan for the emerging Core Strategy Review. The north of Spondon site is also adjacent to Spondon Wood, an ancient woodland. There is no evidence to assess whether new homes will adversely impact the woodland. Indeed it maybe an offset from the woodland is necessary, there is no commentary in the draft policy, SA or SGA assessments. Such an offset may render the entire site

unviable and not deliverable. Furthermore, whilst it is acknowledged that it is most likely the case that exceptional circumstances exist to alter the borough's Green Belt, not least because 70% of its area is Green Belt, there is no Green Belt evidence underpinning the plan, this is despite the SHLAA acknowledging in its assessment for all sites in the Green Belt (including those proposed for allocation) that their release would 'require a full Green Belt Review'. The proposed allocation policies are therefore not positively prepared or justified. 8. Summary For the reasons set out above, the plan in its current form is unlikely to be found sound in the absence of a proportionate evidence base. As currently drafted it is not positively prepared, justified, effective or consistent with national planning policy, nor does it satisfy the duty to cooperate.

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.

We are of the view that the Council should reconsider its approach and undertake the relevant evidence base to support the proposed emerging Core Strategy, its spatial strategy and proposed allocations, and its policies. Consideration should be given as to whether there would be benefits doing this jointly with the Greater Nottingham JPAG authorities, an approach Erewash has previously advocated. We would welcome the opportunity to discuss this further with officers, as well as the benefits that could be delivered by Bellway's site to the west of Borrowash.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

Bellway wish to participate in the examination both in terms providing additional written statements and oral evidence during hearing sessions in order to aid the Inspector.

Regulation 19 Representation

Representation Number: 336

Name: Dale Nottingham

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Other text

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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., 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 the proposal of 1000 houses on the 'Midland storage' site will also add to the number people coming into Ilkeston through Kirk Hallam, have you tried to get into Ilkeston between 4:00pm and 5:30pm, you are already queuing past Kirk Hallam garage., Also regarding Lack of duty to cooperate, Councillor John Frudd was assured by the local Planning Policy office that the 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., This proposal will cause absolute chaos around this area, there are 2 senior schools and 2 junior schools in this area and these simply will Not be able to cope with this volume of people and traffic. People have been greatly suffering with their mental health during the current Covid-19 pandemic and one of the biggest things that can help with this is 'Open green spaces' and the countryside and you want to destroy Kirk Hallam's countryside, when it's gone it's gone. And the next thing you know we will have joined up with Spondon/Derby., There are 'Brown field sites' available at Stanton and Midland storage and there are most likely other brown field sites in other areas of Erewash, I don't care if certain people make slightly less money by using Brown field sites, you have got to do what is in the best interests of the people of Kirk Hallam and Ilkeston (and this proposal isn't one of them).

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, re-evaluate 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)

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Please use this space to continue any of your answers

Regulation 19 Representation

Representation Number: 337

Name: Liane Dodd

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

Specifically SGA 7 (Land North of Cotmanhay) of the Strategic Growth Assessment Preferred Sites

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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.

I set out below details of why I consider the Erewash Borough Council's Strategic Growth Assessment is not legally compliant, is unsound, and fails the duty to co-operate., Legally Compliant:, Consultation with the Community - The Council's consultation process has not been sufficiently transparent to the public across the Borough. The consultation time periods have largely been during Covid-19 restrictions, preventing, or at best hindering the ability for any representatives opposing the SGA 7 to engage face to face with the public concerned to raise awareness., Many individuals, particularly the elderly and the vulnerable are totally unaware of what is going on, many assuming the whole development proposal had 'gone away' and many are incapable of writing out their own representations., The Council has not made their development proposals sufficiently easily available for all, it is only those few that have kept up to date with progress who are aware. It should not be the responsibility of those who are aware to inform the Borough's residents. Surely the Council could have done more to ensure that its residents know what its housing growth plans are? Ilkeston is a poor area however, there seems to be an assumption that everyone has a computer and is computer literate. Even for those who are, the information on Council's website is complex and the representation

form is not necessarily easy to understand or complete. Those who rely on the local library as an information source would have to be a qualified detective to find it as it is hidden away in files, not being accessible. What hope do residents have to raise their own objections? Transparency " Whilst the Council has published a variety of information on its website about the growth options, there appears to be little information easily available or accessible in the public domain, such as libraries, local newspapers, posters, particularly for those individuals who do not have access to a computer. When contacting the Council, representatives advise that the representation form and related documentation have been made available for the public at the Ilkeston Council Office, and Ilkeston and Heanor libraries. I have visited each of these sites. No information was available at Heanor library. I telephoned Ilkeston library and was informed that someone had knowledge of the consultation form and documents. I attended the library and was advised to go the second floor where a form was made available to me. Neither the form nor the Council's supporting documentation were easily accessible, these appeared to be stored in a box behind a reception area. The same was found at the Ilkeston Council Office. (There is no criticism of any Council employees, all of whom have been extremely helpful). The representation form and associated information however, were only made available because I asked for them. There does not appear to be any obvious transparency here, such as use of posters, leaflets sent to residents. The majority of the residents appear to be 'in the dark', many believing the development proposals had 'gone away', particularly after the Council's response March 2021 led many objectors to believe that the Council had listened to their concerns and decided 'NOT to develop land east of Cotmanhay Wood'. This was however, only part of the SGA 7 (described within the SGA as Land North of Cotmanhay Wood), and was only removed from the growth proposals as the landowner for the east of Cotmanhay was not prepared to sell his land. It was unclear to many that the land North of Cotmanhay still formed part of the Council's proposal. Many residents report to be extremely worried, anxious and distressed about the possible approval of the SGA 7., Duty to Cooperate:, Whilst the Council indicate that they have consulted with other council areas, I fail to understand how thorough the consultation has been with Derbyshire County Council and Amber Valley Council. The proposed development of 250 homes on SGA 7 will only serve to further increase the new substantial burden on the local road network (A6007) resulting from Amber Valley Council's approved and current development of the American Adventure site, a third of a mile away. Where is the evidence that the Council has properly consulted and engaged with other surrounding boroughs to discuss development of brownfield land, working together and outside the constraints of borough boundary lines?, Unsound:, It is unclear how the Council's plans meet the area's objectively assessed needs. Strategic Policy 1.6 refers to 'In an area characterised by 3 bed social and privately rented houses new neighbourhood here would provide additional opportunity for there being an opportunity for the aspirational residents to stay in the area'. How does the proposed development at SGA 7, which would result in closure of the gap between the Copse and some houses on the A6007 main road, and Cotmanhay, help the residents of the Copse to improve their lives particularly when Cotmanhay has high crime rates to include violence, anti-social behaviour and drug related

offences? The development of land North of Cotmanhay would cause significant harm to my residential amenities in respect of overlooking, overshadowing and overbearing impacts and noise. This would be contrary to the NPPF, in particular paragraph 127 which requires that planning decisions should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future uses., There is also too much emphasis on addressing housing need at the expense of other aspects of sustainable development, such as the infrastructure and the environment and the health and well-being of current residents. Cotmanhay Wood, Section 15, clause 170 of the NPPF sets out that planning policies and decisions should contribute to the natural and local environment. The Council claim that SGA 7 would result in improved use of Cotmanhay Wood. I fail to see how this will be achieved when the Wood is already well used and appreciated by local residents. I believe SGA 7 will be detrimental to the Wood resulting in the permanent loss of green fields and land around it, and the wildlife which live in and around the surrounding area. Brownfield Sites There is no evidence of the Council's giving substantial weight to the value of using suitable brownfield land and promoting and supporting the development of under-utilised buildings as required by section 118 of the NPPF., Although I am advised that the Council has a brownfield register, which has been fully explored, it is surprising to see that two of the area's largest brownfield sites are absent from such a register, namely use of the Oakwell brickworks and the West Hallam Colliery and brickwork sites. Although it is reported that such sites are not viable due to contamination, such issues have not deterred other boroughs such as Broxtowe and Amber Valley developing equally contaminated sites., The Council owns the Pewit Golf Course, which I am advised has a low membership number of around 26. This is a facility paid for by the Erewash taxpayers and sits adjacent to the Oakwell brickworks and would provide opportunity for a linear development with a major road bisecting the total development opportunity., Sustainability The Council report that only 'a tiny amount of greenbelt' with approximately 1% proposed to be used, and that the Councillors and Planning Officers 'have scoured the borough' for other suitable sites. How sustainable is the use of green fields going forward, what about the next time more housing development is required? This cannot be sustainable in the long term. The country is facing a food shortage, how can the greenbelt and farmland be used for potential housing when such issues are faced, how can this be forward thinking?, Inequitable distribution of housing The Core Strategy is flawed in that it places the burden of most of Erewash's housing around the perimeter of the already densely populated town of Ilkeston. The Strategy is unequal, unbalanced and unfairly disadvantages an already heavily populated area, taking away the limited green belt available. In particular 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 where the infrastructure is far more limited in its availability. If this is the Council's position it implies that overly populated high density sites will always be first choice for development. How can this be fair and not disadvantageous to areas such as Ilkeston?, Infrastructure and local services, The number of cars per household was modelled at a ratio of 1:1. This is a highly unrealistic modelling ratio,

the number of cars per household is closer to at least 2 vehicles per home, SGA 7 potentially resulting in an additional 500 cars on the primary transit route (A6007). This road is the primary traffic route from north to south, and vice versa. This road is already heavily congested to the point of complete standstill at peak times, and will become worse as more people return to work in the office following the relief of Covid-19 restrictions., The current proposal, previously rejected twice because the point of access from Woodside Crescent was considered inadequate, will inject an increased significant additional traffic burden into an already overwhelmed system. The introduction of traffic lights will not adequately address this issue nor reduce the risk of harm for children and adults crossing the main road. The SGA 7 takes no cognisance of the ongoing long term development one third of a mile away at the former American Adventure site within the borough of Amber Valley. It was alarming to be informed at the Erewash Council meeting of 3 March 2022 that detailed traffic flow analysis would only be undertaken as part of the detailed local planning stage " surely this is far too late, and should form part of the core considerations of a development proposal before it is proposed, not at planning stage?, Developer contributions- The Statement of Consultation indicates that the issues of concerns around the infrastructure and local services will be overcome by developer contributions, the responsibilities of the County Council and ongoing liaison with the CQC. Developments at the Shipley View site have not resulted in suitable growth in local services or schooling. How can the residents be confident that appropriate contributions will be made if this proposal is approved?, Living in this area will become untenable; increased traffic noise and volumes, risks to health and safety, oversubscribed medical facilities, local schools oversubscribed, loss of green space, loss of wildlife, all being hugely detrimental to the health and well-being of the residents.

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 modifications I propose for the Core Strategy Review are set out below:, 1.

Brownfield land -undertake a review of the brownfield sites explored by the Council and determine the viability of use. Undertake an investigation of the brownfield sites which appear to have been previously unconsidered, namely Oakwell brick works and West Hallam Colliery sites and identify suitability for use for housing, to avoid the detrimental use of green belt land and other rural land within SGA 7., 2. Underutilised buildings " undertake comprehensive review of underutilised buildings to identify opportunity for development., 3. Inequitable Distribution of housing " undertake review of the proposed distribution of housing across the Borough. If the necessary housing requirements cannot be satisfied by the development of brownfield sites and or underutilised buildings, then the

distribution of housing must be equitable and fair across the whole Borough, not just conveniently adding housing to the deprived area of Cotmanhay. Distribution should be fair to include the parishes, and the areas south of the Borough where it is required., 4. Infrastructure and Local Services - consider the infrastructure in the south of the Borough, this is far better placed to support development. The A52 corridor linking Nottingham and Derby and providing access to the M1 and the proposed freeport around Castle Donnington is by far the largest area of employer development in the area. It is accepted that local services will need to be enhanced wherever development is undertaken but there must be an equitable distribution of development to avoid absolutely overwhelming, to the point of gridlock, one town in the Borough. 5. "Transparent Consultation" The Council must make an effort to ensure that the SGA growth options are far more visible to all the residents concerned. There is a duty to ensure everyone is treated fairly and equally and is not prejudiced in any way preventing them from making their own representations and being heard. This process must be community led and not driven by politics.

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)?

Yes, I wish to participate in hearing session(s)

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Please use this space to continue any of your answers

I believe this would be an opportunity to ensure that my views and that of others can be listened to. Thank you for your consideration.

Regulation 19 Representation

Representation Number: 338

Name: Christina Due

To which part of the Core Strategy Review does this representation relate?

Other text

Tell us specifically where the representation relates to (a policy, the policies map or other text).

SGA7 and SGA25

Do you consider the Core Strategy Review is Legally Compliant?

No

Do you consider the Core Strategy Review is sound?

No

Do you consider the Core Strategy Review Representation complies with the duty to operate?

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 where 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 were closed or restricted and for many people - 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 form were too much of a technical barrier for many to attempt. A lack of transparent communication throughout the entire process has resulted in many people left believing that SGA7 were no longer part of the Core Strategy. It has left people anxious and distressed and angry that so little has been done to inform people in a clear and transparent manner. It has been an ongoing issue and been addressed with the council, who on each occasion has not taken any responsibility in the lack of informing the public by having the information on display at Ilkeston Library or at Ilkeston Town house, both places nothing was on display and only by

request did the staff provide a representation form that has to be found at the back in a set of drawers., No Equitability or fairness - The final proposals and distribution of housing development throughout the region is unbalanced and seems to target an area already overpopulated. Cotmanhay, Kirk Hallam and Spondon are disproportionately targeted to absorb the borough's housing quota. Over the last 30 years it seems that new postcodes in Erewash have almost exclusively been within Cotmanhay and Kirk Hallam., Disproportionate Greenbelt Removal - Loss of over 1% of Erewash's 73% greenbelt total represents almost the entire 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 an ever increasing polluting emissions which their bursting infrastructures are already unable to support., Cotmanhay which is Derbyshire's most under invested area and Kirk Hallam schools are already beyond capacity to deliver and the Erewash Borough Council'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 both town and village have been left to struggle because of the decisions made by their council who are supposed to represent them and have their best interest at heart and not just try to meet some housing targets set by central government. Housing Assessment Needs and 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 levelling up north/south divided 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 the north of Erewash Cotmanhay and Kirk Hallam ., 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 the 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 (Lakeside) site at Pit Lane, is just across the boarder in Amber Valley (which is part of the neighbouring Derby Core development housing area) This site is only 0.3 miles from SGA7 Cotmanhay and will undoubtedly increase traffic significantly in an area where traffic is already heavily congested. Engagement to cooperate could have addressed the issue. Similarly, additional traffic from 1300 houses at SGA25 Kirk Hallam, the Elka Rise development and the New Stanton Park Industrial development less than a mile away will increase congestion and cause gridlock situations around and thru Ilkeston. 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 - though very nice and helpful - had to inform him there weren't any available.

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 Erewash Borough Council's insufficient communication methods, especially during the pandemic. Because of that the Core Strategy Consultation should be declared void, there were no obvious or easily accessible information available to the public about the Core Strategy and the proposal to build houses on greenbelt SGA7 and SGA25. The use of greenbelt is completely unacceptable and a great concern, especially in a time where we are facing a climate crisis, mass extinction, breakdown in ecosystems the list goes on. It is infuriating that it is claimed that all has been done to try and find sites to build on. It is possible to solve the housing problem, but the reason there is a housing problem is because of people and people being unwilling to solve it. Use brownfields, unused property, ensure some don't hoard property make a true effort to make use of what is already there instead of continuing to choose the easy solution and use greenbelt. How long is choosing to use greenbelt going to be an effective solution to a 'housing crisis'? How can future generations have a future that is abundant and thriving, if the living conditions are intolerable because of the choices we made now because we couldn't be bothered to pull up our sleeves and do some hard work to solve the housing problem. Go to the core of the housing issue, change the law so that people can't hoard property for financial gain. Less is better, have less so there is enough for everyone. Also how accurate is the number of new build houses required? Are they actually aimed at the local community or rich people from London and the south bagging a cheap bargain.

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If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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Please use this space to continue any of your answers