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To: [planningpolicy@erewash.gov.uk](mailto:planningpolicy@erewash.gov.uk)  
cc: All Erewash and Spondon Councillors

**RE: SGA:26 Formal Objection**

Dear Erewash governing bodies,

Having lodged my initial objection to SGA:26 being included in the revised housing allocation and be re-designated as "not green belt" March 24 2021, I was disappointed that the re-designation was still in consideration. I have taken the time to consider the facts from all angles and am now lodging my formal objection in this regard, categorised in order of my personal reasons.

**Wildlife**

Wildlife is prevalent in the area proposed. There are deer I occasionally spot whilst passing by and I sit frequently watching the birds of prey soar through the sky above the tree line. Although the wood would still exist - to what impact to the diverse wildlife it houses. Introducing housing so close to Spondon Wood would introduce risk of infecting the trees with diseases and increase fire risk. Noise and air pollution would also be damaging to the rural species Spondon Wood houses.

The large birds rarely come over the houses now, thus would naturally be pushed further back or even re-home, they have increased from 2 a few years back to 5 this year. Upsetting habitats and migration paths may not be reversible, a significant impact on the amount of wildlife was seen when houses were built on the old water treatment site (Dove Meadow) c150m from my home in 2014. At the time, I had no exception to this as the land was completely disused and somewhat inviting to local youth. I did not foresee the impact that would be seen by removing the eco system that had developed. The foxes and hedgehogs have gone with the volume of birds only just recovering (my personal yearly RSPB garden birdwatch reduced to a handful of birds in 2014 from over 30 in 2011 through to 22 this year, song thrush and robin have not reappeared).

I am trying to recover from long-term severe depression and one of the biggest factors that helps me is outdoors and watching wildlife as it is very relaxing. Apart from my own rabbit

the only wildlife I see when I am unable to get out and about are the birds, and in the evening the fleeting sight of a bat flicking past. As a collective, we must not underestimate the importance of protecting the biodiversity in our environment.

The proposed area is not just green space, none of the parks locally house this level of wildlife. The area is not accessible as it is private farmland, this helps protect the wildlife with limited human interference – it should be kept that way (as much as I would love it to become a nature reserve I could frequent and do my wildlife photography). Millions are being spent trying to reintroduce lost species to areas, do the right thing and protect them in the first place.

### **Importance of Green Belt**

According to Defra, Spondon Wood (Object ID: 46639) is designated as Ancient and Semi-natural woodland. The Woodland Trust echoes the importance of maintaining these unique areas given they rich, complex territories housing more threatened species than any other. “Centuries of undisturbed soils and accumulated decaying wood have created the perfect place for communities of fungi and invertebrates. Other specialist species of insects, birds and mammals rely on ancient woodlands. Ancient woods also retain important archaeological features”.

Given that ancient woodland makes up just 2.5% of the UK area it must be protected, if it is damaged it will be gone forever. Based on the NHBC 2021 standards for building, it would not be possible to build on the fields in question without damaging these woodlands: “Roots often extend to distances more than the height of the tree, the majority are within 600mm of the surface and project radially. All parts of the system are easily susceptible to damage which may not regenerate, and which can affect the stability of the tree.” The Spondon Wood trees sit above the 2 story houses so are well over 7m high, yet the proposed re-designation goes right up to the edge of the woods.

I would like to draw your attention to the National Planning Policy, section 13, paragraph 133. This states: “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.” Changing the allocation of this land directly contravenes this policy.

There is increasingly more evidence that open spaces are so important for mental health. The pandemic has brought this home for many people who are getting out and enjoying the open air. Removing Green belt, even where it is not accessible for direct use decreases air quality and changes the feel and calm in the given area. If planning strategies are not considering this now, it is likely as more evidence is gained in this regard that a significant level of back-peddalling and introduction of more green spaces will be required in strategic plans. There is opportunity for Erewash Borough Council to be forward-thinking in this regard and if the areas need some purpose (which, incidentally, is what the planning policy says must happen with green belt land) then an area for green space activities for those suffering mental health issues would be applauded far beyond the county boundaries. There is lots of media and recent publications, the book “Natural Health Service” by political journalist Isabel Hardman really

brings a real experience to life. I would also recommend this study:  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5663018/>

### **Services over-subscription**

Local services are already over-subscribed and set to get worse with recent and in-progress developments within Spondon to re-purpose dis-used brownfield sites. Any further expansion to housing is going to require improvements to vital services to accommodate the additional population.

Most prominent and affects existing residents is access to a GP. Even when you phone on opening the wait time is often 30 – 45 minutes for the call to be answered, by which point you cannot get an appointment and end up at the walk-in centre when urgent or trying again for several days. Whilst this has been exacerbated during the pandemic, it was the case in 2019 too.

Schools are a problem within Spondon. Springfield and St Werburghs Primary schools receive twice the number of applications to places available and Borrow wood and Asterdale receiving just over the available places. Secondary school being over-subscribed. The area listed for re-allocation is not currently in any catchment area for primary schools so will be problematic for any families moving in to find school places.

For secondary school, the new development would be in the catchment area for either St John Haughton or Kirk Hallam Community Academy. This would not be accessible via foot so reliant upon buses (Ilkeston flyer) or a car journey. I am sure families would want their child to go to West Park given its proximity and outstanding reputation. However, the school continues to be over-subscribed every year with countless out of area families left disappointed. In 2019, the school increased the admission limit however still receives over 190% applications and of the 290 places, 98% are filled by children within the existing catchment area.

### **Traffic congestion and emissions**

Part of the justification for SGA:26 is the site appears to have good access from the A6096. This must have been the view from a map because I'm afraid the reality is different. The existing Pheasant Field exit onto the A6096 can be difficult at times due to the speeds at which cars approach. This is just yards from the NSL speed limit section and few cars are down to 30 by the time they reach the junction and are already approaching NSL before the junction heading out of Spondon. The alternative exit off Huntley Avenue, whilst safer is very busy and generally takes 3-5 minutes for a gap unless someone flashes you out.

There is only this one road out of the village towards Derby and given the size of the village plus those passing through from Ilkeston direction it is heavily congested. You have to allow time to get out of the village to go anywhere – and not just during peak times. I have often queued for 10 to 20 minutes from the shops down Willowcroft Road to get out of the

village. The problem with this is attempts to take alternate routes that are adding to congestion in those locations too. For example, when the traffic is backed up through the shops, you can turn down Stoney Lane, onto the A52 toward Nottingham and exit at Ockbrook to turn back down the A52 toward Derby. I had been doing this myself due to the congestion, however, this has become more common to the point traffic is backing up beyond the slip road onto the A52 – extremely dangerous! The only other alternative is to go through Ockbrook adding to the volume of traffic through this small village.

I note a set of pneumatic hoses were placed along the A6096 just outside of Spondon recently. It was not there for a full week to gain a full view of the traffic but also, this does not consider the traffic from within Spondon that causes the aforementioned congestion.

### **Questionable legalities and inconsistency with decisions**

Section 13 of the National Planning policy details how exceptional circumstances must exist before re-designation of green belt is undertaken. This includes making as much use as possible of brownfield and under-utilised land. The Core Strategy Review does not include any detail of such sites being considered except for Stanton Iron Works. I work in Eastwood and shop in Ilkeston and Borrowash so drive past under-utilised land – what total housing numbers does this provide rather than looking for one large development that encroaches into green belt?

A recent publication of the case of Gold Valley Farm, Risley explains how Erewash Borough Council had refused planning for one single home next to stables. The home was to replace a temporary housing solution (static caravan). The reason for planning rejection was due to the proposed dwelling being on green belt land. This forms an inconsistency with the proposed planning.

The reason for rejecting numerous options in this strategic review was due to reduced separation, for example, West of Borrowash and Breadsall Hilltop. If SGA:26 was built on, it would not be part of Spondon as it is beyond the village boundary and would remove any green belt separation between the councils. This presents a considerable inconsistency in the decision-making process.

On this point, I cannot comprehend how it is workable to have a settlement who will pay council tax to one council who will provide some services but not most of the infrastructure. Additionally, owing to the proximity would want to be part of a community and care about decisions being made in an area they are not really part of and certainly would not get any say in the elections for this area.

### **Ill-considered central government decisions that should be challenged**

I completely appreciate that central government have set new home targets on local councils to comply or face significant fines. However, this has had no consideration to the overall demand for housing in the local area or the impact in meeting these targets (i.e. the erosion of green belt). If it is not possible to meet the numbers using brownfield or enforcing adequate use of disused sites, this should be presented back to central government to recalculate the housing numbers imposed. As I mentioned in the importance

of green belt section, the national planning policy states how much importance the government places on greenbelt, thus this strategic plan would go against national policy.

To conclude, I do hope that Erewash Borough Council can see that this strategic plan affects much more than a handful of residents getting a home built “in their back-garden”. This impacts Derbyshire and the future availability of the irreplaceable “England’s green and pleasant land”.

Sincerely,  
Sharon Lunney

### **References:**

Wildlife and environmental

<https://www.gov.uk/topic/environmental-management/wildlife-habitat-conservation>

<https://nhbc-standards.co.uk/4-foundations/4-2-building-near-trees/4-2-3-building-near-trees/>

[https://naturalengland-defra.opendata.arcgis.com/datasets/a14064ca50e242c4a92d020764a6d9df\\_0?geometry=-1.624%2C52.895%2C-1.102%2C52.968](https://naturalengland-defra.opendata.arcgis.com/datasets/a14064ca50e242c4a92d020764a6d9df_0?geometry=-1.624%2C52.895%2C-1.102%2C52.968)

<https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/habitats/ancient-woodland/#:~:text=Other%20specialist%20species%20of%20insects,features%20like%20earthworms%20from%20damage>

[https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land#:~:text=The%20fundamental%20aim%20of%20Green,their%20openness%20and%20their%20permanence.&text=\(e\)%20to%20assist%20in%20urban,derelict%20and%20other%20urban%20land](https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land#:~:text=The%20fundamental%20aim%20of%20Green,their%20openness%20and%20their%20permanence.&text=(e)%20to%20assist%20in%20urban,derelict%20and%20other%20urban%20land)

Borders for villages and schools

[https://maps.derbyshire.gov.uk/connect/analyst/mobile/#/main?mapcfg=Ordnance\\_Survey\\_Maps](https://maps.derbyshire.gov.uk/connect/analyst/mobile/#/main?mapcfg=Ordnance_Survey_Maps)

[https://maps.derby.gov.uk/webmap/Map.aspx?x=435269&y=336219&resolution=5.00000000000001&epsg=27700&mapname=publicmaps&baseLayer=Colour&datalayers=Secondary%20School%20Catchment%2CselectFeaturesControl\\_container](https://maps.derby.gov.uk/webmap/Map.aspx?x=435269&y=336219&resolution=5.00000000000001&epsg=27700&mapname=publicmaps&baseLayer=Colour&datalayers=Secondary%20School%20Catchment%2CselectFeaturesControl_container)

School admissions data

<https://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/schools/admissions/primary-school-handbook-2021-22.pdf>

[https://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/education/secondary\\_admissions\\_handbook\\_2021-22.pdf](https://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/education/secondary_admissions_handbook_2021-22.pdf)

Inconsistency

<https://www.derbytelegraph.co.uk/news/local-news/plan-replace-caravan-home-green-5356786>

[https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land#:~:text=The%20fundamental%20aim%20of%20Green,their%20openness%20and%20their%20permanence.&text=\(e\)%20to%20assist%20in%20urban,derelict%20and%20other%20urban%20land](https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land#:~:text=The%20fundamental%20aim%20of%20Green,their%20openness%20and%20their%20permanence.&text=(e)%20to%20assist%20in%20urban,derelict%20and%20other%20urban%20land)

## **Erewash Core Strategy Review – Revised Options for Growth Proposals** **Opposition to the inclusion of land North of Spondon – Green Belt - SGA**

If you wish to **object** to this land being included in Erewash Borough Councils growth proposals you will need to object **before the 10th May 2021**.

Objections by email to [planningpolicy@erewash.gov.uk](mailto:planningpolicy@erewash.gov.uk)

or by post to: **Planning Policy, Long Eaton Town Hall, Derby Road, Long Eaton NG10 1HU.**

**REMEMBER TO PUT YOUR FULL NAME, ADDRESS INCLUDING POSTCODE ON ALL CORRESPONDENCE**

**Below are some but not all of the reasons that can be helpful when objecting.**

- Failure of Erewash Borough Council in it's legal 'duty to cooperate' with Derby City Council and Spondon Residents.
- Why has SGA 26 site above others has been chosen. There are plenty of other sites closer to Erewash residents.
- How does SGA 26 site above others meet the needs of Erewash Residents, when it is more likely to be Derby Residents whose needs will be met.
- The detrimental impact that development of this site will have on Spondon, but also Derby. So whilst the council tax, and new homes bonus will be paid to Erewash it will be Derby that has to provide, school places, GP's, Dentists, road maintenance etc.
- Impact on the volume of traffic in Spondon, particularly on Willocroft Road and Nottingham Road. Increase in Air pollution.
- The Minister of State for Housing has stated that green belt should only be used in exceptional circumstances. To claim that there were objections to other sites is not good enough.
- To back this up, how do Erewash know that they don't have any other available green belt that suits their residents needs better? Have they completed a Green Belt Review? Such a review would enable them to strategically look at sites that will keep settlements separate but will suit the needs of their residents not Derby's.
- Access to the proposed site is from the A6096 to the east. Because of the size of this site, any proposed development would be incredibly unsafe onto an unrestricted spread country road with national speed limit, with no other possibility for access or egress, for pedestrians, cyclists and vehicles.
- Biodiversity. This encompasses wildlife, ecology, nature conservation, habitats and species so not just wildlife. So the hedgerows around the site, the trees in the woods etc
- What impact a development could have on endangered species such as bats, dormouse etc.
- Ancient woodland such as Spondon Woods, whilst not specifically listed as Priority Habitat, they are sited in the national planning policy as important.
- Bird listed in Schedule 1 of the Wildlife and Country Act are Ciri bunting, Harriers, Heron, Kingfisher, Barn Owl, Peregrine, Darford Warbler and Woodlark.

Please ensure your objections are personalized its important not all letters received are the same. Examples of potential issues you may wish to consider are bullet pointed above.

Also whilst a petition is good to show the feeling of objections, it only counts as one objection. So please feel free to sign them but we must also write individually to ensure maximum impact of an objections .