Ref:

(For office use only)

**REPRESENTATION FORM**

**NORTH EAST DERBYSHIRE LOCAL PLAN**

**PUBLICATION DRAFT**

**General Information**

This stage of the consultation is focussed on whether the Publication Draft version of the Local Plan is legally compliant and sound, rather than the wider ranging questions that we have asked in previous consultations on the Local Plan.

* The deadline for representations is 5pm on Wednesday 4 April 2018. Late representations will not be accepted.
* Be clear about which policy, paragraph or Map of the Local Plan you are responding to.
* Be clear whether you are supporting or objecting to the Local plan. If you think the Local plan is not **legal** or **sound**, be clear why. Please refer to the Guidance Note for more details.
* Try to support you representation(s) with evidence.
* Be clear about any changes you want to see.
* Briefly and precisely cover all information and evidence to support or justify your representation(s). Once the consultation closes there is unlikely to be a further opportunity to provide further information or evidence.
* The Council has also published supporting documents to accompany the Publication Draft Local Plan. They are the Sustainability Appraisal, Policies Map and Consultation Statement and are available to view on the Council’s website, and at deposit venues (the Council Offices on Mill Lane and libraries throughout the District). A range of evidence base studies that underpin the policies within the Plan are also available to view on the Council’s website.

If you wish to make comments on this Plan you may fill in this form. Additional copies of the form are available on line at [www.ne-derbyshire.gov.uk/localplan](http://www.ne-derbyshire.gov.uk/localplan) and can be submitted by e-mail to local.plan@ne-derbyshire.gov.uk. Or by post to:

**Planning Policy Team,**

**North East Derbyshire District Council,**

**2013 Mill Lane, Wingerworth,**

**Chesterfield, Derbyshire,**

**S42 6NG**

**All comments must be received by 5pm**

**on Wednesday 4 April 2018**

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| **Submitting your representation online**Submitting your representation online is a quicker way of getting involved.* You will receive an instant confirmation email to give you a receipt so that you know your representation has been successfully delivered and that your comments will be considered.
* Go to <https://bolsover.jdi-consult.net/localplan/> for more information.

*(If you don’t yet have an account, you can set one up easily from this web address)* |

**Filling in the form**

* **PLEASE READ THE GUIDANCE NOTE BEFORE COMPLETING THIS FORM**
* **Your comments are classed as formal representations on the Local Plan.**
* **This form has two parts:**

**Part A: Personal and contact details**

**Part B: Your Representations**

* **Please fill in a separate sheet for each representation you wish to make**

Only the content of your representation and your name will be available for public inspection, and will be published online and in public reports and documents.

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| **PART A – PERSONAL AND CONTACT DETAILS** |

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| --- | --- | --- |
| **Personal Details**  |  | **Agents Details (if applicable)** |
|  |  |  |
| Rep ID (if known from previous |  |  |
| consultations) |  |  |
| Title | Mr. |  |
|  |  |  |
| First Name  | Paul |  |
|  |  |  |
| Last Name | Johnson |  |
|  |  |  |
| Job Title  |  |  |
| (where relevant) |  |  |
| Organisation  |  |  |
| (where relevant) |  |  |
| Address Line 1 | Rose Cottage |  |
|  |  |  |
| Line 2 | 1 Spinkhill Road, |  |
|  |  |  |
| Line 3 | Killamarsh, |  |
|  |  |  |
| Line 4 | Sheffield. |  |
|  |  |  |
| Post Code | S21 1EH |  |
|  |  |  |
| Telephone Number | 0114-248-2929 |  |
|  |  |  |
| E-mail Address | pjassociatespaul@aol.com |  |

If you do not complete this section, your comments cannot be registered or considered as part of the process.

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| **PART B – YOUR REPRESENTATION** |

Please use a separate form for each representation/ point you wish to raise and firmly attach these to part A which contains your contact details.

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| **Question 1** (See page 3 of the Guidance Note) |

To which part of the Local Plan does your representation relate?

(Please quote paragraph or policy reference)

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| Chapter 8 – Sustainable Development and Communities. |

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| **Question 2** (See page 3 of the Guidance Note) |

Do you wish to state your support or objection to this part of the Local Plan?

|  |  |
| --- | --- |
| SUPPORT | ☐ |
| OBJECT | X☐ |

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| **Question 3** (See page 3 of the Guidance Note) |

Please enter your representation here. This should explain why you either support this part of the Local Plan or why you think the Local Plan is or is not legally compliant or sound (see guidance note for an explanation of legally compliant and sound). Please be as precise as possible (in no more than 100 words).

If your representation requires more than 100 words, please attach any additional sheets securely to this form and use the box below to summarise your representation.

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| Both large sites proposed for Killamarsh (Westthorpe and Rotherham Road) are located in the Green Belt. Westthorpe has five footpaths (not 4) crossing it which might prove difficult to divert. After the closure of the Westthorpe Colliery the land was remediated into a wildflower meadow, which has attracted many species of flora and fauna. Desktop studies do not scratch the surface of the species present on the sites, but local people know and value the diversity. Box 6.1 of the Sustainability Appraisal, 2018, describes the potential effects perfectly.Significantly diminished air quality will be a consequence of this proposed development.**Supporting Comments.**Paragraph 8.8 relates to trees, woodland and hedgerows are acknowledged as important for both recreational use and amenity value, whilst helping to reduce noise and atmospheric pollution.The environmental value of flora within open spaces, due to its absorption of CO2, is well known (Sustainability Appraisal, Feb 2018, paragraph 6.54.2). The ability of the landscape to absorb excess water slowly, helping to avoid flooding, is also well known (Paragraph 6.55.2 SA, 2018 report) The landscape character of Wooded Farmland, upon which the two Killamarsh Green Belt proposed sites are located, would contribute to SA Objective 9. That value will be compromised and may exacerbate flooding along Green Lane - a location prone to flooding during heavy and prolonged rainfall – if development were to take place at Westthorpe.SA Objective 3 states that Public Rights of Way will be protected from development unless a suitable alternative route can be sought. There are five footpaths crossing the proposed Westthorpe site. Re-routing will be difficult on a site containing 330 new dwellings. This will diminish the amenity value for local residents, discouraging the important physical activity of walking (SA Objective 8). In terms of ecology Box 6.1 of the SA Appraisal, 2018, describes the cumulative impacts on biodiversity, flora and fauna. The effects of development at Westthorpe and, to a lesser extent, Rotherham Road, Killamarsh are perfectly described.***‘The cumulative effects of development proposed in the Local Plan is anticipated to result in further loss and fragmentation of habitats and an increase in barriers to the movement of species. This is anticipated to particularly be the case for wildflower-rich grassland…hedgerow…field margins…and the flora and fauna species they support.’******‘The overall impact will potentially be one which disrupts the District’s ecological network and diminishes the important ecological services they provide.’******‘The cumulative impact of all sitesin combination would be likely to constitute a significant loss of important arable field margin and hedgerow habitats.’***Both Killamarsh Green Belt sites, particularly the Westthorpe one will be impacted by such development. The SA Report, 2018 refers to the cumulative impact of all sites proposed in the Draft Publication Local Plan, but it could easily be referring to the cumulative effect of excess development within Killamarsh during the latter half of the 20th Century which continues to the present day.Paragraph 6.35.3 of the SA, 2018, refers to the deficiency in green space and children’s play space in Killamarsh. It talks about the protection of green space within the settlement limits but the comment could equally relate to the large, open, publically used Green Belt space at Westthorpe, crossed by five public footpaths, upon which large-scale development is proposed.Paragraph 3.8.24 refers to a local wildlife site at the former Westthorpe Colliery. The development at Westthorpe, 100 metres to the north east, has the ‘potential to impact’ this designated local wildlife site.The sustainability of these sites, at the very periphery of Killamarsh has many other sustainability implications that have been covered in associated submissions.The site at Rotherham Road will be impacted by possible air pollution from the Norwood Industrial Estate. Current residents will be similarly impacted by the additional traffic movements from the proposed site and from traffic movement to and from the plan-approved site for the Gulliver’s Valley theme park which, when operating fully, will provide 244 rooms in 3 hotels and 1,600 visitor car parking spaces. The entrance to this site will be approximately 1 mile away from the Rotherham Road proposed site.The east side of Killamarsh has the poorest air quality due to its proximity to the M1 motorway. Whilst not currently an air management area the air quality has been judged to be amongst the poorest in the District. Since the last review of air quality a Biomass energy plant has been opened in the Sheffield City area, but adjacent to the NE Derbyshire boundary to the west of Killamarsh. This plant burns waste, pre-used wood.Burning wood emits a similar range and level of pollutants as burning coal. Pollutants include nitrogen dioxide (NOx), carbon monoxide (CO) and small particulates (PM10 and PM2.5). Burning chemically treated waste wood involves those pollutants but also can include heavy metals, dioxins and furans. Other emissions will depend on the chemicals used to treat the wood.World Health Organisation research indicates that:-* Air pollution is strongly linked to heart disease and strokes;
* Long-term exposure to NO2 is linked to reduced lung function and increased bronchitis in children with asthma;
* Short-term exposure to NO2 is linked to the inflammation of airways;
* NO2 is an important source of fine particulates (PM2.5);
* NO2 is a source of ground-level ozone, which is linked to breathing problems, asthma attacks, reduced lung function and heart/lung disease;
* Long-term exposure to small particulates (PM10 and PM2.5) is linked to respiratory and heart disease, and to lung cancer. There are no safe levels of exposure to PM2.5.
* Dioxins and furans are highly toxic and persist long-term in the environment. They can cause reproductive and developmental problems, damage the immune system, cause cancer and interfere with hormones. Air emissions of dioxins can be inhaled but they can also pollute the food chain.

It is interesting to note that the Sheffield City Council has built two of these plants, one located as close to its border with Rotherham as is possible, with the other being as close to North East Derbyshire, and Killamarsh, as is possible. I wonder why?NO and NO2 are emitted from Biomass plants but by far the largest source of such pollutants, and particulates, is from petrol and diesel vehicle movement.Sheffield Road (B 6058) is by far the busiest road in Killamarsh. Delays on this road at peak times can be extensive, very often from 20 minutes to an hour, creating a perfect storm of pollutants for those living close to the road. This is currently unacceptable, but will be more so if the planned development is allowed to be built. |

If you have stated your support for this part of the Local Plan, please move to Question 5. If you have stated your objection for this part of the Local Plan, please move to Question 4.

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| **Question 4** (See page 3 of the Guidance Note) |

If you are objecting to this part of the Local Plan, please let us know what changes you think are needed to make the Local Plan legally compliant and / or sound (see guidance note for an explanation of legally compliant and sound).

You will need to say why this change will make the Local Plan 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 (in no more than 100 words)

If your representation requires more than 100 words, please attach any additional sheets securely to this form and use the box below to summarise your representation.

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| Remove the two main sites from the local plan as being totally unsustainable development. |

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| **Question 5** (See page 4 of the Guidance Note) |

Do you consider that the Local Plan is legally compliant?

|  |  |
| --- | --- |
| YES | ☐ |
| NO | X☐ |

If you have stated no, please make sure this links back to your response in Questions 3 and 4 (the meaning of ‘legally compliat’ is explained in the guidance note).

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| **Question 6** (See page 5 of the Guidance Note) |

Do you consider Local Plan is sound?

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| --- | --- |
| YES | ☐ |
| NO | X☐ |

If you have stated no, please make sure this links back to your response in Questions 3 and 4 and let us know which of the ‘tests of soundness’ it has failed (Questions 6A – 6D below).

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| **Question 6A** (See page 5 of the Guidance Note) |

Do you consider that the Local Plan is unsound because it is not ‘positively prepared’?

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 6B** (See page 6 of the Guidance Note) |

Do you consider that the Local Plan is unsound because it is not ‘justified’?

|  |  |
| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 6C** (See page 6 of the Guidance Note) |

Do you consider that the Local plan is unsound because it is not ‘effective’?

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 6D** (See page 6 of the Guidance Note) |

Do you consider that the Local Plan is unsound because it is not ‘consistent with national policy’?

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| --- | --- |
| YES | ☐ |
| NO | ☐ |

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| **Question 7** (See page 6 of the Guidance Note) |

Do you consider that the Local Plan complies with the Duty to Co-operate?

|  |  |
| --- | --- |
| YES | ☐ |
| NO | X☐ |

If you have stated no, please make sure this links back to your response in Questions 2 and 3 (remember to look at the requirements in the guidance note).

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| **Question 8** (See page 7 of the Guidance Note) |

If you are objecting to this part of the Local Plan, please let us know if you raised this matter at an earlier stage of the plan making process such as the Consultation Draft Local Plan in February/March 2017.

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

If yes, please move to Question 9. If no, please move to Question 10.

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| **Question 9** (See page 7 of the Guidance Note) |

If you raised this matter at an earlier stage of the plan making process, which stage was it?

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| --- | --- |
| Consultation Draft Local Plan (February-March 2017) | X☐ |
| Initial Draft Local Plan (Part 1) (February-March 2015) | X☐ |
| Local Strategy Consultation (August-September 2012) | X☐ |
| Core Strategy Issues and Options Consultation (April-June 2009) | ☐ |

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| **Question 10** (See page 7 of the Guidance Note) |

If your representation is seeking a change, do you consider it necessary for you to participate at the Hearing Sessions should the Inspector wish to discuss your representation / issue at the Hearing?

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| --- | --- |
| YES | X☐ |
| NO | ☐ |

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| **Question 11** (See page 7 of the Guidance Note) |

If you wish to participate at the Hearing Sessions, please outline why you consider this to be necessary?

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| To emsure that the views of local people are heard. |

Please note that the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing sessions.

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| **Question 12** (See page 8 of the Guidance Note) |

Would you like to be notified of one or more of the following (please tick the relevant boxes)

|  |  |
| --- | --- |
| When the Local Plan is submitted for independent examination? | X☐ |
| When the Inspector’s report is published? | X☐ |
| When the Local Plan is adopted? | X☐ |

Please return the completed form by 5pm Wednesday 4 April 2018 to:

By email:

local.plan@ne-derbyshire.gov.uk

By post:

Planning Policy Team

North East Derbyshire District Council

2013 Mill Lane

Wingerworth

Chesterfield

Derbyshire

S42 6NG

If you have any questions, please contact us on 01246 217171/ 7694/ 7169/ 7180

Next Steps

Following the close of consultation we will prepare a summary of the main issues raised by representations. The representations, summary of issues, Local Plan and other supporting documents and evidence base studies will then be submitted to the Independent Inspector for examination in May 2018.

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|  All personal information provided to North East Derbyshire District Council will be held and treated in confidence in accordance with the Data Protection Act 1998. It will only be used for the purpose for which it was given, which is to ensure your representation is recorded, and to contact you regarding your representation. However, the content of your representation including your name and address will be available for public inspection, and will be published online and in public reports and documents. |