

NEDDC LOCAL PUBLICATION PLAN – PUBLIC INQUIRY.

My specific objections to proposals within the North East Derbyshire Local Plan relate to the negative effects on Killamarsh and the Green Belt to the north of the District. These objections impinge upon the soundness of the Plan.

Paragraph 4.6 of the Local Plan refers to the proposed housing target forming a ‘central building block’ of the Council’s spatial strategy.

It is my assertion that the NED District Council’s strategy has built a structure with foundations of sand. The flimsy walls of the structure will collapse when subjected to the force of objective scrutiny. These ‘walls’ are:

-) Excessive housing requirement and inappropriate location,
-) Employment proposals,
-) Settlement Hierarchy rationale, use and evidence base, and
-) Need to utilise Green Belt for development.

Main Matter 1 – Duty to Cooperate and Other Legal Requirements.

The Duty to Cooperate – Draft Statement of Compliance, was not available when the Publication draft plan was released as part of the consultation process. In fact, it was not released until five weeks after the Plan’s release. This gives no confidence that this issue informed the Plan, more likely that it was drafted to provide retrospective ‘evidence’ of the virtue of the Plan’s detail.

One significant issue is the revelation that Bolsover District Council (with whom NEDDC shares services and costs) had offered land outside of the Green Belt to meet identified housing need. The council’s belief that this land is ‘not related to North East Derbyshire’ is confusing when related to the alleged housing need, which is aimed at providing accommodation for those working in Sheffield. Bolsover has better access to the M1 which would allow easier travel for anyone travelling to Sheffield, Chesterfield, Rotherham and the prime employment sites in the south of the District (NEDDC Green Belt Topic Paper, 2018).

This may also negate the perceived need to build upon Green Belt land.

Despite being part of the Bassetlaw and NE Derbyshire HMA there is no evidence of discussions with Bassetlaw about the availability of land within their area.

Failure to release the Green Belt Topic Paper until long after the Plan itself had been released would appear to show that the Plan was not positively prepared, based on evidence apparently compiled to support decisions already made without that evidence. This contravenes paragraph 182 of the 2012 NPPF.

Main matter 2 – Local Vision and Objectives. (Will the plan contribute to the achievement of sustainable development).

The main concepts of the Plan are not realistic or achievable because of the lack of opportunity for increased employment, which will lead to significant and inevitable

out-commuting. This will increase road congestion in the absence of sustainable travel options, and which will cause further deterioration in already poor air quality.

The NED Plan contains no assumptions on job migration, despite this being required by Planning Practice Guidance.

The NED local Plan states that Killamarsh is “well served by public transport”. All the evidence from local people, with actual knowledge of the locality, and from the Council’s own background evidence, is to the contrary.

The Plan seems to accept that there is a ‘high demand for growth due to its (Killamarsh’s) close proximity to Sheffield’. This was already a factor in previous iterations of the Local Plan which proposed a housing target that did not need to utilise **any** Green Belt land. However, it was alleged by the District Council, during local consultation discussions, that the then targets were not deliverable because ‘the developers did not want to build there’. Who actually makes the Plan? Is it the Council or developers?

It is a fact that, during the 1970’s, there was a local referendum to decide whether Killamarsh residents (and other villages), wished to become part of the Sheffield conurbation or whether they wished to remain as part of Derbyshire. The decision was to remain in Derbyshire.

To adopt the Local Plan in its present form will, by stealth and default, make Killamarsh a suburb of Sheffield.

Killamarsh has been overdeveloped throughout the 20th Century without a commensurate growth, in fact barely any growth, in infrastructure. This is also true of the other towns in the north of the District.

Paragraph 2.16 of the Plan espouses the ‘*need to provide employment locally in order to provide the opportunity for people to work close to where they live.*’

The two employment sites specified for Killamarsh are located at the Westthorpe Business Centre and the Norwood Industrial Estate. Westthorpe has capacity for one more unit only on a site of .35 of a hectare.

The Norwood site has proved unpopular with developers, according to the District’s environmental scan. This is, no doubt, because of its proximity to the former sites of Yorkshire Tar Distillers, Lee Environmental and, currently Veolia, in view of the significant contamination known to have emanated from those sites.

This is reinforced by the assessment of the site, during a study entitled, ‘NE Derbyshire Employment Sites’, by Aspinall Verdi, which concluded that Norwood (and Callywhite Lane at Dronfield) each scored 13 – the lowest of the sites studied. In contrast, Markham Vale and Biwaters/Clay Cross scored 25 and 23 respectively. Eckington is in a much worse situation. Much of its employment land has been taken over for housing development, leaving a small rump of employment land with little opportunity for expansion.

All of this means that the significant housing growth planned for Killamarsh will not lead to increased jobs for local people. Any one of the ‘new’ residents would have to look for work, or travel to their established job, outside the village, with the majority commuting to outside areas such as Sheffield, Rotherham, Chesterfield, Markham Vale etc. This is the **ultimate of unsustainability**.

The proposed Sustainable Transport option is doomed to failure, without significant infrastructure enhancement, because of issues with the topography of the area and the location of proposed sites at the periphery of the current settlement limits (outside them, currently). The fact that the main site is situated as far as possible from the village centre, with a significant hill to ascend and descend, militate against the use of a bicycle, or walking, unless the residents are very fit. The bus service is diminishing through lack of current use.

In the Settlement Hierarchy Study, 2017, the bus services to and from Killamarsh received a score of 26 (on the actual scores, transposed to 29, for some reason, on the Settlement Chart). This score is by far the lowest of all the tier 1 settlements. The score of 26 equates to the services available to residents in the villages Holmewood(25), Shirland (26), Morton (23), Pilsley(24), Lower Pilsley(24) and Heath(24). In contrast, a score of 48 is allocated to Clay Cross, with scores of 46, 46 and 36 respectively being allocated to North Wingfield, Wingerworth and Tupton. All have significantly smaller populations than Killamarsh.

Despite this evidence, the Plan, at paragraph 7.37 refers to Killamarsh being, “well served by public transport”. The evidence belies this claim.

The use of public transport is not an option if the service is irregular. If the public transport option is not appropriate to the needs of the general public then the heavy use of cars and vans will continue, making additional development unsustainable.

Background evidence papers support the view that the majority of new residents will commute to work elsewhere. This includes the independent Sustainability Appraisal.

With additional and inevitable out-commuting not only will the roads (and all road users) be subjected to increasing and prolonged gridlock but the already poor air quality will decline further.

Main Matter 3 – Objectively assessed need for employment and employment land requirement.

Certainly in the case of Killamarsh high employment growth targets would not be achievable. Both identified ‘key’ sites within Killamarsh are not popular with developers and are not, in the case of the Westthorpe Business Park, capable of any significant expansion, with land only available for one small to medium unit to be built (0.35 hectares).

In respect of the larger area of land promoted as a General Employment Area under Policy WC3 (Land to the south of Norwood Industrial Estate) the situation is even worse.

Paragraph 6.28 of the Plan states, "...satisfactory access cannot easily be achieved for the remainder of the land (the 5.4 acres of protected employment land). The development of the site may also impinge on education and recreational land".

In addition, the Aspinall Verdi Employment Sites Review, 2017, describes the Norwood Industrial Estate (Rotherham Road site) as 'mainly (for) dirty uses'. This site has proved unpopular with would-be tenants. This unsuitability argument is particularly cogent as this site is directly opposite the second largest proposed development of 70 dwellings on Green Belt land off Rotherham Road, Killamarsh. The NED Employment and the Economy topic paper, August 2018, comments that this site is 'quite far away' from the Killamarsh town centre, which would 'encourage car use'. This would apply to the proposed 70 dwellings as well.

The buildings on the employment site at Sheffield Road, Killamarsh, are, according to Aspinall Verdi, 'fully occupied'. This review also comments that 'many of the buildings on this site appear dated and in a state of disrepair'.

However, the NED Employment and the Economy topic paper, August 2018, fails to mention anything about the state of the site, merely commenting that 'site appeals more to the local market than the national market'.

Of the 'Allocated Employment Sites' the Norwood Industrial site extension at Killamarsh, and the Callywhite Lane extension at Dronfield score 13 points on the Aspinall Verdi report – the lowest of all the Allocated Sites, and almost half the score of the Markham Employment Growth Zone (25). In table 9.5 of the Aspinall Verdi report these same two sites are placed in the red zone for deliverability, meaning that they are 'long term', with potential deliverability of 10-15 years.

Paragraph 4.18 of the Plan refers to the need to '*safeguard and improve successful and attractive employment sites*', and to '*allocate new sites to improve the portfolio of available employment land within the District*'. In my opinion, none of the sites in Killamarsh even approach, never mind achieve, the aspirational criteria espoused in this section.

The case is similar in Dronfield. The Infrastructure and Delivery Plan, 2017, states that improvements to the Callywhite Lane junction, and the new link road, are essential to bring the extension into use. Unfortunately, the delivery mechanisms and costs are unknown. Deliverability is placed in the red zone by Aspinall Verdi (10-15 years).

The Plan refers to Dronfield and Killamarsh as being the main focus for employment in the north. Given the facts above this seems a ludicrous assertion, particularly when the Plan shows that 500 net jobs have been lost in the 15 years prior to 2015. With no viable employment sites to build into, or options identified, how is this going to happen?

In terms of Main Matter 3.6 the consequence will be that Dronfield, Eckington and Killamarsh will inevitably become dormitory towns for Sheffield, with the City reaping 80% of the economic benefit of such a situation to the further detriment of the three towns (according to background evidence papers).

This is also implicit in the Employment and Economic Topic Paper (August 2018) where paragraph 2.1.8 states, “...*some local authorities, which have lower levels of jobs expected to be created within their own boundaries, are likely to see a significant number of their residents taking up employment opportunities elsewhere in the city region – for example, North East Derbyshire, where residents are expected to take up 3,250 of the 70,000 additional jobs, but will only see 1,900 additional jobs (2014-2024) created within the district boundary*”

The paragraph further concludes, *Many of North East Derbyshire’s residents work outside the district boundaries,...The priority for NE Derbyshire, therefore, is to improve connectivity for local people, ensuring that residents are able to access employment wherever in SCR (Sheffield City Region) it is located.*

These assertions make a mockery of the Local Plan’s intentions to provide ‘local jobs, near to where people live’, and to ‘minimise the need for commuting’.

Whilst there is a duty to co-operate with the Sheffield City Region there is no stated or implicit requirement to commit economic suicide. The only winners will be NEDDC who will have accrued all the New Homes Bonuses and will continue to receive all the additional council tax payments at the expense, both literal and figurative, of local residents.

The Employment by Settlement table within the Plan (Appendix G) is not credible. As an example, this refers to the High Moor settlement, effectively part of Killamarsh, being capable of employing up to 100 people. There is one public house in High Moor and a builder’s yard that has ceased business some time ago. The buildings formerly occupied by a builder have received planning permission to erect 34 dwellings. There is no other business there, other than a storage area used to dump building materials and rubbish. This land is owned by a local builder.

Main Matter 4 – Objectively assessed need for housing and housing land requirement (Policy SS2)

The housing land requirement appears to have been led by builders, targeting the Sheffield housing market, who covet the attractive prospect of building on open countryside. This has obvious attraction for prospective purchasers.

Research by the National Trust has shown that some 330,000 building plots (current figures not known), each with planning permission, have not been developed, mostly by the ‘big’ builders, who are allegedly waiting for more attractive Greenfield and Green Belt sites to become available.

In August 2012, the last occasion when NED carried out a public consultation on their strategic plans, they proffered four options for future development in the District. The poll showed that option 4, to place the majority of development ‘along the A61/A6175 corridor, and elsewhere to meet the needs of the population’ was by far the most popular option (10% larger than the next highest). Despite this evidence, and the comments based on the NPPF, NED continued with their strategy of placing 50% of development in the larger towns and strategic sites.

The actual scores were:

-) *Option 1 – Build only on four main towns (34.1% pro – 44.7% anti)*
-) *Option 2 – 4 main towns and 6 larger villages (21.6% pro – 50.27% anti)*
-) *Option 3 – 4 main towns, 6 larger villages, and other areas (27.12% pro – 37.29 anti)*
-) *Option 4 – Focus on A61 and A 6175 corridor and elsewhere to meet needs of population (46.41% pro – 38.12% anti)*

Option 4 was the only one to have a positive balance for acceptance.

One other reason espoused for the need to build more homes was the alleged lack of affordability of housing in the north of the district (see later).

The requirement for affordable homes within the District has varied wildly throughout the protracted term of the Plan's metamorphosis.

-) 2012 consultation version – requirement 494 affordable homes p.a.
-) 2015 consultation version – requirement 381 affordable homes p.a.
-) 2018 publication version – requirement 172 affordable homes p.a., enhanced by 'demographic requirement' to 248, with 10% added, presumably for 'good luck', giving a total of 273 affordable homes p.a.

Whilst accepting that situations change over time it does appear that there is a declining trend, which makes the enhancement of the affordable homes 'need' figure aspirational, without good evidence. At best it is an educated guess; at worst, just a guess.

Research carried out on behalf of NEDDC shows between 2006 and 2011 there was a growing proportion of larger houses built, with a significant decline in 1 or 2 bedroom properties. Equally disturbing are the figures which show that, between 2002 and 2011, only 9.5% of the properties built were in the affordable category – this in an era when the requirements was 40%. As I understand from previous housing market survey evidence documents that the need is for one, two and, to a lesser extent, three bedroom dwellings. Unfortunately, smaller homes do not generate the profit margins to make them attractive to developers.

Whilst I agree that the District Council should have the provision of affordable housing as a priority it should be to provide a 'reasonable' number of affordable units in 'appropriate' places, for 'local' need. This should exclude Green Belt areas.

This view is supported by a comment, reported in a national newspaper, by a spokesperson for the Department of Communities and Local Government. ***When commenting about the 2012 NPPF she said, "This will put power back in the hands of local people, ensuring they are in charge of deciding the areas they wish to see developed and those to be protected, including green spaces of value to the community".***

Killamarsh Residents Against Greenbelt Erosion (RAGE) has a petition with more than 1,000 signatures of local residents strongly opposed to the development of Green Belt sites surrounding Killamarsh. This gives a guide to the opinions of a significant group of local residents.

Paragraph 2.15 of the Plan relates to the alleged link between affordability and home owning, apparently necessitating the building of more homes in the north.

It is worth pointing out that home values have fallen **in real terms** by 22% in the Killamarsh West ward and by 12% in Killamarsh East, according to the BBC Business News report on the 17th October, 2017.

In the 2017 SHMA-OAN update data shows that house price inflation in NE Derbyshire is below the neighbouring authorities of Bassetlaw, Bolsover and Chesterfield, and that house prices in the Housing Market Assessment areas are 36% below the national average and 16% below East Midland averages.

Paragraph 2.16 espouses the *‘need to provide employment locally in order to provide the opportunity for people to work close to where they live.’*

The whole concept of the ‘Regeneration Scenario’ chosen by NED to support their choice of housing target can be linked to paragraph 2.16.

The two employment sites, with the potential for expansion, specified for Killamarsh are located at the Westthorpe Business Centre and the Norwood Industrial Estate. Westthorpe has capacity for one more unit only on a site of .35 of a hectare.

The Norwood site has proved unpopular with developers, according to the District’s environmental scan. This is, no doubt, because of its proximity to the former sites of Yorkshire Tar Distillers, Lee Environmental and, currently Veolia, in view of the significant contamination known to have emanated from those sites. The site is classed as appropriate for ‘dirty’ uses.

This is reinforced by the assessment of the site, during a study entitled, ‘NE Derbyshire Employment Sites’, by Aspinall Verdi, which concluded that Norwood (and Callywhite Lane at Dronfield) each scored 13 – the lowest of the sites studied. In contrast, Markham Vale and Biwaters/Clay Cross scored 25 and 23 respectively.

The scoring parameters encompassed strategic communications, proximity to the labour market, local services, adjoining uses, development constraints and attractiveness to occupiers.

How does this lack of options for employment equate with the regeneration aspiration and the building of homes for local employment use.

The Plan does not assess the effects on how housing availability will be affected by the high number of over 65’s (approximately 24% in the District). Normal mortality rates will ensure that many houses will become vacant during the Plan period.

Main Matter 5 – Spatial strategy, settlement hierarchy and the distribution of employment and housing land (Policies SS2, SS7, SS8, SS(and SP1-SP4)

Some arguments in respect of this have been produced in MM3.

Paragraph 4.2 of the Plan relates to sustainable growth and sustainable development, *“as a means of protecting and enhancing the environment, growing the District’s economy and supporting the health and wellbeing of the District’s communities”*. Presumably this should have been critical when selecting sites for housing development.

The Plan states that sustainable growth will lead to residents enjoying a ‘better quality of life’, but that it means ‘encouraging suitable development.’ The two are, to a large extent, incompatible, unless there is sufficient capacity within settlements to sustain increased development. If not it will diminish the quality of life not only during the development process, with all the inherent inconvenience and upset that this entails, but also by ‘building in’ unbearable pressure on services and facilities for the longer term.

Paragraph 4.31 appears to recognise that villages such as Killamarsh will be used as ‘dormitories’ for other areas where employment and the economic benefits that engenders for that area, not Killamarsh (thus negating the aspiration in paragraph 2.6). Due to traffic movements, and the pollution accompanying them, through commuting, this is *unsustainable development*.

The negligible proposed infrastructure developments for Killamarsh within the Local Plan are laughable in the context of the massive 20th Century development already undertaken, coupled with the planned addition of in excess of 500 homes, leading realistically to 2,000 extra people and 1,000 extra vehicles within the village. This is an extra 20% added to the current population of Killamarsh.

No road improvements are planned by either Derbyshire County Council or the District Council, with the only potential alleviation being ‘new site specific’. Even then any light at the end of a very dark tunnel depends on the unreliable source of developer contributions via S. 106 agreements. Factor in the ‘viability get-out-of-jail-free card’ and the prospects of any positive benefits for current residents are extremely uncertain.

Paragraphs 4.6 – 4.12 of the Plan detail the rationale for the figure of 330 new dwellings p.a. This figure contradicts the Baseline OAN target of 283 dwellings, based on the aspiration for significantly increased employment growth. The CPRE suggest that this growth number should be 270.

The document links housing requirement to employment growth, pitching the latter right at the top of an estimated scale. I am aware that such targets should be

challenging, but I am also aware that such targets should be realistic and achievable. These are not.

The rationale is incompatible with the requirements within paragraph 17 of the Housing and Economic Needs Assessment, PPG, which requires that estimates be *'clearly explained and justified on the basis of established sources of robust evidence'*. This aspirational target does not meet that criterion. The Local Plan admits as much where, in **paragraph 3.33**, it states that *'a level of policy intervention and support would likely be required'* to achieve the challenging target. There is no explanation of why such intervention would be necessary, or what form it would take.

It is also appropriate to point out that important background evidence documents were not available during the public consultation on the draft Publication Plan. The evidence was produced some time after the Plan was published, leading to the conclusion that it did not inform the plan-making process, but was merely constructed to support pre-conceived requirements.

GL Hearn's comments within the Economic Growth Analysis, 2018, confirm that when considering a regeneration/growth scenario, the District Council should *'test the potential to support the higher growth or regeneration scenario figure in bringing together the evidence during the Plan-making process.'* Such evidence has not been presented; neither has the *policy intervention* been identified or explained in the Plan.

Settlement Hierarchy. (Paragraphs 4.29 to 4.35 and Table 4.2 of the Plan)

The Settlement Hierarchy approach designates the areas with current facilities as being appropriate for future development. Over decades of continual development the Council has taken for granted the belief that the facilities present are *currently* adequate, and that they will endure.

There is no evidence provided to show that settlement size equates to settlement sustainability. This is a core building block of the Plan.

Taking Killamarsh as an example, there is a bus service, the Parish Council Leisure Facility, a Post Office, a Doctors Surgery, Dental surgery and numerous shops. This may seem adequate on a shallow (desk top) overview.

The reality is somewhat different.

The private provider of the bus services is currently withdrawing some services. According to local sources, other services are planned for withdrawal, whilst others are significantly curtailed.

The Parish Council Leisure facility is a massive drain on local finances and the Parish Council has previously had to borrow money from the NEDDC to survive until the end of the financial year. It runs at a massive overspend which, for the new Council Tax year, has to be made up by a huge rise in the Parish precept. This causes much local disquiet. Unlike the other large sporting facilities in the District, all of which are funded by the District Council, the Killamarsh facility is funded by the Parish Council via its council tax payers.

The Post Office survived the last ‘cull’ of similar offices and its continuing existence must be debateable. The Doctors surgery, despite a recent extension, is full to capacity and the Dental Surgery is not able to accept new NHS patients for the foreseeable future.

The town centre shops consist predominantly of a mixture of fast food outlets (hardly conducive to a healthy lifestyle or the fitness aspiration of the Vision), and a number of hair, nail and beauty salons. The evidence base shows that 90% of evening leisure activity in Killamarsh involves takeaways. Apart from being an indictment of lifestyle in Killamarsh it does not help any objective aimed at healthy living.

There is no bank (except a limited facility at the Post Office and Co-op), no butcher, minimal bakery options and no fresh fish or seafood outlet. The greengrocer was forced out of business by a very limited, publicly funded option provided by the Parish Council which has itself been supplanted by the Aldi supermarket.

The Aldi Supermarket, has replaced the former Kwiksave Supermarket. Although an excellent facility for local people it also attracts people from other local townships, exacerbating the problem of greenhouse gas emissions.

People who have the option also travel to Supermarkets in South Yorkshire for their retail needs. The situation is unlikely to alter significantly in the future. This will increase the need for vehicle journeys, not reduce them, as per District Objective 10.

There are no planned road improvements in the Infrastructure Plan and a bad traffic situation for Killamarsh will become significantly worse if more houses are built here, now, as planned, or if future development is concentrated in the areas with supposed good facilities.

The analysis of the available facilities in Killamarsh has taken an approach akin to opening a copy of Yellow Pages and writing down everything with even a peripheral connection to Killamarsh. This ‘Yellow Pages’ approach identifies 144 businesses with links to Killamarsh, giving it a total score of 272 (the lowest of all four main towns).

There are 44 of these businesses located in what locals would acknowledge as the village/town centre of Killamarsh, i.e., Sheffield Road-Bridge Street-Parkside Shopping Centre. Of these 44 retail outlets 18 relate to hair and beauty products (40.9%), 11 are food ‘takeaway’ outlets (25%). Whilst businesses of this type are wanted and necessary they should not form the bulk of the retail offer for a vibrant community.

A total of 10 of the facilities (out of the 144) shown are no longer operating (6.9%). A further 10 (6.9%) work from home on a peripatetic basis. A number of the recorded businesses are either duplicated (through having two or more services operating from the same premises), or non-existent. An example of duplication is that of the doctors’ surgery, shown under the names of each doctor in one entry

and by the surgery name on another – both entries scoring the maximum five points.

This brief analysis belies the assertion that the four main towns have appropriate infrastructure and services to absorb yet more development.

Equally, and perhaps more importantly, The Sustainability Appraisal, 2018, paragraph 10.1.2, states that, “*there is considered to be limited capacity at various waste water treatment works including Grassmoor, Calow, Wingerworth, Clay Cross, Tupton, North Wingfield, Renishaw, Eckington and Killamarsh”. It continues, “*There is no additional capacity at the waste water treatment works which serve Dronfield, Holmewood and Temple Normanton”.**

This is a recipe for the demise of the village/town, not a renaissance.

The Transport Evidence Base, 2017 shows that employment and Residential trip generation is estimated at 586 additional trips (a.m. – 1 hour only) and in the evening (1 hour only) 585 additional trips. The ‘rush’ periods extend to more than two hours each in both morning and evening.

The report places Killamarsh in 15th place in the Transport Sustainability table (out of 35), with only Clay Cross of the Level 1 settlements being worse off at 18. However, Clay Cross will benefit from the provision of significant grant money to ameliorate problems on their main trunk route, the A61.

The same report includes a map showing where potential work may ease traffic flows in Killamarsh. It refers to a number of pedestrian crossings being present, road width reduced by parking bays (the few that there are), a mini roundabout at Norwood and a bad bend on Uppertorpe Road. The map also refers to the river bridge on the B6058 (Sheffield Road). It shows ‘the potential to remove footway to increase road width.’ This shows the folly of looking at maps after a quick drive through of an area. The removal of the footpath at this point would leave the bridge parapet vulnerable to a vehicle strike, thus damaging the bridge and closing the road. It could also allow a vehicle to fall into the river.

There have been two fairly recent fatal accidents near this bridge and the removal of the footpath on the ‘offending’ corner would possibly add to these tragic incidents. In any event, the removal of the footpath, which is very narrow at this point, would give about 18” of additional room. Unfortunately vehicles still need that 18” to miss the bridge parapet (Transport Evidence Base, 2017, figure 3.5).

The Transport Evidence Base also refers to Travel to Work Patterns (Figures 3.17 and 3.18). These show that North East Derbyshire is a significant net exporter of commuters, with 19% of the total workforce commuting to Sheffield. The accuracy of the evidence currently is debatable as it was compiled using the 2011 Census. Significant building has continued in Killamarsh during the period 2011 to 2018. It still continues. The percentage of commuters will not have decreased.

There are only three access/egress routes in Killamarsh, the main one being the B 6058/A 618 Rotherham Road/Mansfield Road. The A618 Rotherham Road leads

towards J31 of the M1 motorway. The other route is the unclassified Spinkhill Road leading to J30 of the M1 motorway. This latter route is used as a 'rat run' from Killamarsh to the M1 southbound and, due to satellite navigation directions, sees heavy goods vehicle traffic along a totally unsuitable road. The road is relatively narrow along all of its length when considering the size of heavy goods vehicles using it. At one point the road narrows yet more, in a dip surrounded by trees, where it is not possible to see opposing traffic until the last minute. There is not enough room for a car and a bus or goods vehicle, on opposing paths, to pass safely.

At the junction of Spinkhill Road and Uppertorpe Road a 'stop' sign creates difficulties for drivers of heavy goods vehicle. They are entering a road with a speed limit of 50mph, with a very restricted view to their offside, caused by hedgerows.

Any requirement for heavy vehicles to come to a stop results in difficulties in restarting, due to the slope at the junction. This is exacerbated by adverse weather conditions.

Main Matter 6 – Whether or not the approach to the Green Belt is soundly based and consistent with national policy (Policy SS10).

The Green Belt still performs the role that its initiation intended, performing the five specific tasks of a Green Belt.

The Green Belt performs a protective function, but the terminology employed by NED District Council, such as 'constraining' or 'restricting' development implies that their mindset views the Green Belt as obstructive and negative.

The North East Derbyshire District Council have taken strategic decisions to adopt a top-end figure in terms of development growth, from a list of 10 lesser options, based on its aspiration for its Regeneration scenario.

This involves creating jobs for local people in local areas to obviate out-commuting and, using its settlement hierarchy as its cornerstone, wants more than 50% of that development to be located in the three northern towns Dronfield, Eckington and Killamarsh, and the strategic sites. It assumes that the infrastructure of all three towns is excellent and capable of sustaining growth ad-infinitum, and that there is the opportunity for employment growth based on their strategic site designation.

Much of the previous development within the District has been directed to these three towns in an acknowledged 'duty' to serve the needs of the city of Sheffield.

Due to previous overdevelopment there is little undeveloped land within the settlement limits of the three towns. This, according to the Council, triggers the need to utilise Green Belt land for additional development, despite the fact that all the areas selected for development still fulfil their Green Belt purpose, based on an external review which took no account of the value of these areas locally.

Paragraph 7.32 of the Plan states that development on the chosen Green Belt sites would cause "*least harm to the strategic functions of the Green Belt*". That is not a

ringing endorsement for the selection with a clear indication that harm **will** be caused to the Green Belt, a fact accepted by the Council in Paragraph 4.69.

Paragraph 4.70 advises that the NEDDC will, “seek to enhance the beneficial use of the remaining Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, and to improve damaged and derelict land”

One of the sites selected to be removed from the Killamarsh Green Belt has 5 footpaths traversing it (access), contains a wildflower meadow and diverse flora and fauna (visual amenity and biodiversity), and many groups who use the paths for organised walks and dog exercising (recreation). This area of land, at Westthorpe, Killamarsh, has been described as ‘scrubland’ both by the council and developers. In fact, the upper part of the land was farmed for vegetables and animal feed until the farmer was required to move by the landowner. Who knows whether this land will be needed for food production in the future? That will not be an option if 393 houses (developer’s intention) have been built upon it.

Perhaps the would-be developers know that their ‘scrubland’ description is inappropriate. They have placed a sign near to one of the public footpaths, requiring walkers to keep to the footpath across the field. The sign depicts “**Harworth (Agricultural Land) Ltd.**” as the landowner.

Previous iterations of the Local Plan proposed development that did not require the re-designation of Green Belt land. Developers were unhappy at this, probably because they believe that they can sell homes in the north of NE Derbyshire to people from Sheffield.

Whilst there is a duty to co-operate this does not mean that NEDDC has to lay down and allow the developers and the City of Sheffield to walk all over them.

Paragraph 4.67 acknowledges that Green Belt boundaries should only be altered in ‘exceptional circumstances’ (paragraph 83, NPPF).

Paragraphs 4.66 and 4.68 again, as justification for their strategy, refer to land values being driven up by high demand, thus militating against ‘affordability’. However, a BBC Business report in 2018 shows a significant ‘real terms’ **drop of 22% in Killamarsh West**, where a major site of 330 dwellings (393, if a director from Harworth Estates is to be believed) is proposed, and **12% in Killamarsh East**, where a further 70 are proposed.

Case Law (*Gallagher v Solihull BC, 2014*) states that the preparation of a Local Plan is not sufficient in itself to justify alterations to a Green Belt boundary. It is necessary to show:-

-) Effective use of suitable brownfield and estate generation;
-) The potential offered by under-used land (including surplus public sector land);
-) That the optimisation of density of development has taken place;

-) An exploration as to whether other authorities can help to meet some of the need of the identified development requirement.

It is apparent that the strategic sites to the south of the District have not had their planned density optimised. As new strategic sites they can be planned to include future-proofed infrastructure, with appropriate services and facilities. There are areas of deprivation in this locality and significant funding is being expended to upgrade the A61. Employment opportunities are optimised in this segment of the district by the expansion of popular and accessible employment sites. All of the above 'benefits' are not available in the north of the District.

Once again, this asks a question about whether housing need has been objectively and rationally decided. There are a number of issues that suggest that this need has been overestimated and that other provision that should have been included in the appropriate calculation have not been so included.

In paragraph 4.7 of the Housing Topic paper (2018), used within the evidence base, NEDDC demonstrates that planning permissions for dwellings on major sites in level 1 and 2 settlements are included as part of the housing supply up to 17.1.18. However, major sites in settlements 3 and 4 were only included up to 31.3.17, meaning that sites that gained planning permission between 31.3.17 and 17.1.18 have been excluded from the housing supply.

A 5% lapse rate, *based on past trends*, has been applied to the figures. **Since 2014 records show that the lapse rate figure has been well below 5% (Paragraph 8 of the Five Year Housing Land Supply Statement, 2017).**

In fact, Table 2.13 of the Housing Topic Paper (2018) shows that since 2012/13 the average lapse rate has been 2.13%. More up-to-date information may show a further diminution in the lapse rate. The LGA guidance suggests that lapse rates should be based on *'historic data that sets out the number of permissions compared with completions on similar sized sites'*, not on a *'standard approach'*, which the *5% calculation appears to be.*

Equally, the figures shown for Strategic Sites exclude large numbers of potential dwellings for various reasons:

-) 660 dwellings at the Coalite site – because of the HS2 route (as yet unconfirmed) affecting a small part of the estate;
-) Chesterfield Road, Holmewood – 325 dwellings not deliverable, although an additional 225 are assessed as deliverable on the site;
-) The Avenue – 700 granted planning permission, but not another 400 potential ones without current planning permission, despite the site being under construction making the additional 400 potentially deliverable.

The figures also fail to include windfall sites granted planning permission since 31.3.17.

Yet another factor is the number of empty homes in North East Derbyshire. As at March, 2017, there were **731** such homes. In February, 2018, there were **941**. The Council are currently assisting in bringing **30** of these back into occupation.

Taking account of this excluded potential **would completely obviate the need to build on any Green Belt land. It also contradicts the ‘extreme circumstances’ argument used to undertake a Green Belt review in the first instance.**

A Local Plan submitted by County Durham was rejected by the Government Inspector because it was unjustifiable for the planning authority to propose Green Belt development because the decision to do so was made before evidence of exceptional circumstances was provided. The same judgement should be applied to the NEDDC Plan because the ‘exceptional circumstances’ have not been evidenced, other than a verbal explanation that ‘developers do not want to build on the non Green Belt land’.

Killamarsh – Specific Sites (Paragraphs 5.32 – 5.40) (Policy SS2).

Paragraphs 5.32 – 5.34 inclusive deal with a major site at Westthorpe, Killamarsh. The site is currently within the Green Belt and is expected to deliver 330 dwellings (or more), the majority within the first 10 years of the Plan.

This site is within the High Risk area because of historical mining work. There is anecdotal evidence of house subsidence surrounding the site and sinkholes on the planned site.

There is also real evidence from the initial drilling operations on the land, conducted on behalf of Harworth Estates, where a number of test holes (believed to be 5) broke through into old mine workings. The potential developer has kindly indicated that this specific area will not be used for housing but will be utilised as a ‘wildlife area’. That should be safe then!

The Sustainability Appraisal for this site raised a number of issues:-

-) Significant increase in Greenhouse Gas emissions;
-) Inefficient land use;
-) Outside limits for GP and hospitals;
-) Close to site of three Grade II listed buildings;
-) It would alter the urban fringe and intrude into the countryside;
-) Disturbance to local wildlife sites, potentially damage ancient hedgerows, trees and biodiversity;
-) In a mining high risk area.

This site is owned by Harworth Estates Limited, Part of the Harworth Group of companies. The land passed to RJB Mining Ltd., which became UK Coal Limited which spawned Harworth Estates Limited under its corporate umbrella.

Other residents suffered the dust, dirt and inevitable disruption that the scale and nature of working coal mines entail. After the collieries closed subsequent reclamation projects returned the land to its former rural appearance. These sites are now used as recreational areas by walkers, dog walkers and those who enjoy the proliferation of species of flora and fauna that abound in the fields.

It is interesting to note some comments made by RJB Mining (UK) Ltd. When they sought permission to open cast for coal on the Westthorpe and High Moor areas of Killamarsh, and promised to restore the sites:

“....some of the lower quality land will be converted into woodland and wildlife habitats to enhance the species diversity and recreational amenity of the area.”

“Steps will be taken to protect and preserve part of this site, and upon restoration create a larger habitat than presently exists to enhance wildlife interest in the area.”

“The.... scheme is an opportunity to substantially enhance wildlife habitats and species diversity. Advance planting, including the creation of a wetland habitat will extend beyond the site boundary...”

As you will be aware, RJB Mining was the predecessor of UK Coal, which spawned the Harworth Group, and which now wants to build 330 houses (393 if they are to be believed) on this same land. ***To allow them to do so would be tantamount to an act of environmental criminality.***

There are five footpaths (not four) crossing this proposed development site, passing through the created wildflower meadow. These are used by local residents to walk dogs or just to walk for health and recreation.

The road network around the site is totally unsuitable for the addition of large numbers of additional people and vehicles.

The other main site at Killamarsh is located off Rotherham Road (A618). This is currently Green Belt land.

This has similar drawbacks to the proposed Westthorpe site. The sustainability appraisal finds similar issues to Westthorpe, excluding proximity to Grade II listed buildings but including the potential for air and light pollution from the proximate Norwood Industrial Estate. In addition, a family living in a house beside the proposed development had to leave their home for 18 months so that subsidence damage could be repaired.

Neither of the two Killamarsh Green Belt sites have been judged as totally suitable for development – they have both received an overall judgement of ‘amber’ in the sustainability appraisal. Their only advantage is that developers wish to build there.

The unique position of Killamarsh within the North East Derbyshire District needs to be considered as well.

Situated on the far north eastern corner of the District it abuts Sheffield City, Rotherham Borough, Bolsover District and Chesterfield Borough councils.

Due to this unique position Killamarsh is vulnerable to development in the four areas and, to a lesser extent, to that within the Bassetlaw District and Eckington. Here is an example of relevant development within those areas, all of which lie within a 3-5 mile radius of Killamarsh:-

- J Clowne (Bolsover District) – 1,800 homes and an industrial estate;
- J Sheffield City – 745 dwellings in directly adjoining areas;
- J Bolsover (Bolsover District) – 500+ dwellings;
- J Cresswell (Bolsover District) – 277 dwellings;
- J Whitwell (Bolsover District) - 200 dwellings;
- J Barlborough (Bolsover District) – 150 dwellings;
- J Eckington (NEDDC) – 400 dwellings.
- J Worksop, Bassetlaw – 1,000 plus new dwellings recently constructed and hundreds more planned.

All of the named development will impact the roads around Killamarsh, with the most likely to be impacted being the unclassified Spinkhill Road/Station Road/The Avenue/Syday Lane. This will be the main road used by residents of the proposed Westthorpe estate if travelling anywhere south of the District.

The additional pressure on Junction 30 of the M1 motorway will be immense.

The Transport Evidence Base, 2017 shows that employment and residential trip generation is estimated at 586 additional trips (a.m. – 1 hour only) and in the evening (1 hour only) 585 additional trips. The ‘rush’ periods extend to more than two hours each in both morning and evening. That is just for the Killamarsh-generated traffic. When one factors in the other planned development the additionally generated traffic movements for this locality will be unprecedented. The percentage of out-commuting from Killamarsh is likely to be significantly higher than the percentages given.

The report places Killamarsh in 15th place in the Transport Sustainability table (out of 35), with only Clay Cross of the Level 1 settlements being worse off at 18. However, Clay Cross will benefit from the provision of significant money to ameliorate problems on their main trunk route, the A61. There is nothing planned for Killamarsh.

The Transport Evidence Base also refers to Travel to Work Patterns (Figures 3.17 and 3.18). These show that North East Derbyshire is a significant net exporter of commuters. The current accuracy of the evidence is debatable as it was compiled using the 2011 Census. Significant building has continued in Killamarsh during the period 2011 to 2018. It still continues.

Traffic leaving both Green Belt sites would need to enter the A 618 road.

The A 618 Rotherham Road is the only route to travel to the M1 northbound at J31 and southbound to junction 30. The Rother Valley Country Park is located in the Rotherham Borough area, literally yards from the boundary with Killamarsh/Rotherham – South Yorkshire. Traffic is very heavy on this road at peak times, and weekends in the Summer. This situation will be exacerbated as the development of the Gulliver’s Valley theme park (on the currently vacant ‘other half’ of the Rother Valley Country Park) progresses after it successfully obtained planning permission in March, 2017. This development includes three hotels and parking spaces for 1,600 vehicles, when completed. The entrance is on Rotherham Road (A

618). A large proportion of vehicles wishing to access this Park will travel through Killamarsh.

That is the reality – not a ‘best guess’ based on a desk-top study or a drive-by visit.

Main Matter 7 – Whether or not the plan makes appropriate provision for new infrastructure to support the level of new development proposed (Policies ID1 – ID9)

Many previous comments throughout my responses deal with infrastructure issues. I will not repeat them.

However, there is one relevant comment within a document that is now 32 years old.

The North East Derbyshire Green Belt Local Plan, published in April, 1986, refers to the ‘larger settlements of Dronfield, Eckington and Killamarsh’. Paragraph 4.35 states, *These three towns have all experienced considerable residential development over the last 25 years....”*.

Paragraph 4.36 states that, “The Green Belt has been drawn quite tightly around these settlements to limit their future expansion, to prevent their coalescence with neighbouring settlements and to protect the countryside from further encroachment”.

It is fair to say that, although the essential permanence of the Green Belt has been emphasised, the 1986 report (paragraph 6.7) accepts that the Green Belt boundaries will remain ‘substantially unchanged for 20 years or more’.

It is telling that the document shows the populations of Eckington and Killamarsh as 7,000 and 8,000 respectively. Certainly, in the case of Killamarsh, the population is now approaching 11,000. There has been virtually no infrastructure enhancement during the period since 1986.

Despite the lack of infrastructure investment the NED Local Plan considers the Killamarsh facilities to be adequate.

In support of this assertion the Infrastructure and Delivery Plan Report, 2017, states that *‘much of the infrastructure needed to support the growth in the Local Plan is capable of successful delivery through the current S 106 regime’ (Paragraph 9.13 of the Draft Publication Local Plan, 2018).*

Once again, the residents of Killamarsh, and other areas in the north of the District, will be waiting for ameliorating infrastructure development until many new dwellings have been built. This may be more than 15 years, and is by no means certain to happen. Site-specific issues will be dealt with in the planning stage, so the newly-arrived residents will be fine. The current residents will just have to cope with the massive disruption that building the two large proposed sites in Killamarsh will bring. This is totally unfair, unjust and unsustainable.

The proposal to develop a children's park in the east of Killamarsh is welcome, but long overdue. Similarly the newly proposed western Greenway will be a welcome addition to enhance the meagre recreational opportunities available within Killamarsh. The Infrastructure Plan indicates (in table 81) that these enhancements will depend upon S106 agreements and developer contributions.

However, the draft Plan contains a note of caution that a cynical person (where developers are concerned, I am one such cynic) might be concerned about.

Paragraph 9.15 states, *“Given the viability assessment found relatively tight margins of development viability across significant parts of the district it is considered that the flexibility afforded through the S 106 regime is of particular benefit to the successful delivery of development in the district.”* The viability get-out clause rears its head yet again.

Paragraph 9.20 appears to give a measure of comfort in stating, *In cases where essential/critical site specific infrastructure and mitigation cannot be secured because of viability concerns and the infrastructure is an essential prerequisite to enable the development to proceed, schemes will not be supported.*

However, paragraph 9.18 says where the viability of a development is in question a *‘site specific financial evaluation’* will be undertaken to the Council's satisfaction at the earliest stage in the application process. Paragraph 9.19 goes further in saying *‘where a scheme is agreed to be unviable or marginal the Council will review.....the timing or phasing of payments to assist the financial viability of the scheme’.*

I suggest that the highly paid lawyers employed by rich developers will have a wonderful time arguing about the definition of the underlined phrases. Essentially, local people will have the mess, disruption and chaos, over at least a ten-fifteen year period, without any substantial guarantee of the small mitigation areas promised in terms of green infrastructure. Even then the mitigation will not make up for the Green Belt land lost.

Within the NEDDC infrastructure Plan and that of the Derbyshire County Council there is no acknowledged need to enhance the road system around Killamarsh, despite the acknowledged out-commuting by current and future residents of Killamarsh. Local people are fully aware of the problems on the B 6105 Sheffield Road and the A618 Rotherham Road, but apparently those carrying out The Transport Study are not.

A recent extension to the Killamarsh doctor's surgery is, a short time later, proving inadequate due to the continual building in Killamarsh and the ability of patients to register with a doctor outside their own practice area. This will not improve.

There is a plan to utilise Children's Centres to enhance Early Years educational provision, which is excellent, but the funding mechanism and timescale are both shown as *‘unknown’* in the Infrastructure Study and Delivery Plan, 2018 (ISDP), Table 76.

The Killamarsh Leisure Centre is shown as an important facility for Killamarsh which should be maintained *‘to ensure ongoing availability to the general public.’* The delivery mechanism and funding are shown as unknown again. The Killamarsh Leisure Centre is different to similar Centres in Eckington, Dronfield and Clay Cross. The latter three are District Council-owned, while the former is owned and managed by the Parish Council. In the absence of external funding the only source of ongoing support is the council tax payers of Killamarsh (Table 79 ISDP).

The Killamarsh Leisure Centre is a loss-making entity, causing money for running costs to be borrowed from the District Council and as evidenced by the ever-increasing Parish precept for Killamarsh, making the Council tax payable by Killamarsh residents the most expensive in North East Derbyshire. There is no sign of any change to this situation as the pattern shows an inexorable rise. Is this fair? Killamarsh Council tax payers would say no.

Killamarsh surely deserves the family play area to the east and the new western greenway, to supplement the Chesterfield canal restoration, because of historic overdevelopment without infrastructure enhancement. Its residents should not have to suffer more unwelcome development to fund it. This should be funded by the District Council through the non-ring fenced New Homes Bonus and affordable Homes bonus in acknowledgement of the previous planning damage done to Killamarsh (Table 81 ISDP).

At least the initial stages of the Chesterfield canal restoration are funded and properly planned. This restoration will be a bonus and will give a boost to almost non-existent tourism in Killamarsh (Table 81 ISDP).

The Derbyshire County Council Infrastructure Plan, 2013, contains nothing in terms of infrastructure enhancement for Killamarsh except the restoration of the Chesterfield canal through Killamarsh. The DCC is a partner, with other Councils and agencies, in this scheme, so this commitment is not exactly a revelation or a game-changer.

The plan to refresh and revive Killamarsh, contained in the document entitled *‘Killamarsh 2035 – A vision for the village’* is the only piece of background documentation that has been subject to true consultation within the whole of the local Plan-making process.

The authors of the report, Opun Design East Midlands (ODEM), carried out a number of consultation meetings with local residents, which were properly advertised and well attended.

Their suggestions for making Killamarsh more attractive to visitors include improvements to the village centre realm, improving parking spaces and pedestrian/disabled access routes and utilising existing green space and heritage assets.

Unfortunately, their plans depend entirely upon developer contributions – a weak reed upon which to build a strategy.

The ODEM report places great value on the proximity of the Rother Valley Country Park and the plans to restore the canal – virtually destroyed due to a previous catastrophic planning decision which allowed the canal to be filled in and developed for housing.

The report proposes that a western Greenway be developed and the plans by the local historical society to rebuild the former Central Station be renewed.

My view is that the western Greenway, which itself links to the Pennine Way walking route, should link with the Rother Valley Country Park, which will access the new Gulliver's Valley leisure park, thereby providing a through route for wide-ranging leisure pursuits and ecological benefit.

Rother Valley provides a multitude of water sport opportunities, while Gulliver's Valley will provide theme park entertainment coupled with ecological activities. Both will support natural habitats for flora and fauna.

The western Greenway in Killamarsh should include the Westthorpe Green Belt site, with its wildflower meadow, ancient hedges, medieval dewpond and large varieties of bird, animal and plant life, together with its access for local people, and its extension to the Pennine Way.

Such a linked scheme would allow leisure-based businesses to flourish, would encourage significant visitor numbers to Killamarsh as well as the parks, and would significantly contribute to healthy living, and income for local businesses, not Sheffield-based ones.

This scheme should not be left to the vagaries of developer contributions. It should be funded by the District Council from New Homes Bonus money, increased council taxes from the homes to be built, together with external sources of funding.

The ODEM report contains an introduction from the then NEDCC leader which says, ***"We are keen to see the continued development of the town centre where the District Council has invested heavily over recent years"***.

I, as a local resident for 13 years, and my wife, who was born in Killamarsh, cannot see any evidence whatsoever to support these remarks. Killamarsh has been left to rot by the Council with the exception of the housing 'dumped' on it over many years.

My suggestion gives NEDDC the opportunity to put the leader's words into practice.

Main Matter 8 – Whether or not the site selection processes for the employment and housing allocations are soundly based.

The site selection process for housing is not soundly based for topographical and geological reasons.

The Spatial Portrait shows that the North of the District has a mining history and comments that little evidence of it exists today.

This is true of the overt aspects of mine working, but not so of its legacy. Sites will require Coal Mining Assessment Reports concerning the known mines worked during the 20th Century, but little is known, other than through historical records, about mines pre-dating this period.

Historical accounts detail hundreds of small, sometimes family owned and operated, mines, stretching through Killamarsh as far as Barlborough, that have been abandoned without the benefits of the Health and Safety concerns prevalent today. It is known that there are dangerous areas in the prime site of Killamarsh (Westthorpe Fields) because a previous farmer on the site had the misfortune to have his tractor fall into a sinkhole on the plot. Recent drilling has discovered a dangerous area near to a potential entrance to the site.

To support the dangerous ground theory a number of established houses on Green Lane have suffered significant subsidence, as their own submissions will verify.

As evidence of this research in 1947 into the Nationalisation of Mines shows that there were more than 442 abandoned mine workings in the immediate vicinity of Killamarsh and Barlborough. Their location is not known with any certainty.

One specific one relates to a mine known as Worrall's Colliery which was sunk in 'green fields off the main Rotherham Road in Killamarsh' (the site of one main development). Owned by JJ Worrall, the mine was sunk by his grandfather. It closed in the early 1900's but was reopened in 1913, operating until 1943. The shaft drove 60 feet underground (source Holbrook and Halfway, the early years, by James Walton, 1996).

This network of subterranean tunnels holds hidden dangers, including subsidence and gas escapes, not only for workmen on the site but to new home occupiers and existing residents.

Apart from this a large number of other mine shafts and tunnels cross the whole area underneath Killamarsh and its environs. Only the workings undertaken by British Coal are accurately recorded.

Whilst appreciating that any planning application in high risk areas will need an assessment report, it is reasonable to point out that a number of test holes drilled on behalf of the landowner have broken into old mine workings, as previously referred to.

The other site planned for Killamarsh is similarly within a high risk area and would encounter similar issues if test drilling takes place.

Main Matter 12 – Whether the Plan will safeguard and enhance the landscape character, natural and historic environment in the Plan area.

Paragraph 8.8 of the Plan relates to trees, woodland and hedgerows which 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).

According to a discussion with the Director of Coda Planning, which described their plans for the Westthorpe site, all five footpaths along this site will be amalgamated into one which follows a concrete footpath. This does not accord with SA Objective 3, although I appreciate that any such change will be a matter for Planning Committee consent.

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 sites in 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. The air quality to the east of Killamarsh has been judged to be amongst the poorest in the District, although not yet sufficient to become an Air Quality Management Area. An inevitable decline in the already questionable air quality for Killamarsh is highlighted in paragraph 7.21 (box 7.1) and 11.2.2 (box 11.1) of the Lupus Consulting Sustainability Appraisal, Feb 2018.

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 (NO_x), carbon monoxide (CO) and small particulates (PM₁₀ and PM_{2.5}). 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 (PM_{2.5});
-) 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 PM_{2.5}) is linked to respiratory and heart disease, and to lung cancer. There are no safe levels of exposure to PM_{2.5}.
-) 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.

The plans to develop the Westthorpe site will have an obvious and dramatic effect upon the openness of the Green Belt and the purposes of its designation. The proposed development will be clearly visible when one approaches the area from Spinkhill Road, the only road along which this segment of Killamarsh is visible, and it will constitute a significant intrusion into the countryside, and a narrowing of the gap between Killamarsh and Spinkhill.

Plans to build on Green Belt land should be deleted from the Local Plan.