

Paul Johnson, QPM,
Rose Cottage,
1 Spinkhill Road,
Killamarsh,
Sheffield, S21 1EH.

24th October, 2018.

Re: Application 18/01003/OL
Application for Outline Planning Permission to build
397 dwellings on land south west of Uppertorpe Road,
Killamarsh.

Dear Mr. Kirkham,

I object to the above application on a number of planning grounds.

Green Belt.

This land is currently part of the Green Belt surrounding Killamarsh, and will remain so until the Local Plan, currently subject to a Public Inquiry, is ratified by the Government Inspector.

The removal of this particular land, and other land in the north of the District, from the Green Belt is based on an alleged 'exceptional need', which is asserted within the Local Plan, following a Green Belt Review.

I, and a number of others, do not believe that this exceptional need has been proved, and will make that case to the Government Inspector at the Local Inquiry.

Until that land has been removed from the Green Belt, which will only occur if the Local Plan is accepted entirely in its current form, then it remains a part of the Green Belt and is, therefore, subject to the stringent planning constraints inherent in that designation – an issue that you will be better aware of than I.

I also read, with great interest, the Planning Statement submitted by Coda Planning, presumably working on behalf of the landowners for this proposed development.

Planning Statement (PS).

There are some strong, and one would have to say arrogant, almost threatening assertions within this document.

Page 13 alleges that, *"...the ability of the LPA to demonstrate soundness of the Local Plan at examination is dependent on the acceptability and deliverability of these proposals"*.

The following paragraph states, *"the development as proposed must be given absolute support by NEDDC"*.

In addition, at page 14 of the Planning Statement, when the applicant has expounded reasons why the 330 dwellings proposed in the Local Plan is insufficient and that the application for a further 67 dwellings is justified, the applicant makes another interesting statement.

"It can therefore again be reiterated that to ensure the continued progress of the Local Plan to adoption the LPA must accept that the above (67 extra houses) is the case, both as part of this application and within the examination process"

Within the ultimate paragraph of page 14 the applicant asserts, *“It is therefore clear that approval of the application is of the utmost importance to the success of the emerging NEDDC Local Plan”*.

Perhaps the author of the report has gained undue confidence from the alleged 7 years of discussions with NEDDC officers. It would appear that these discussions had some effect because this site was not included in the early iterations of the Plan, when there was not felt to be a need to develop Green Belt land. However, this and other areas of Green Belt land were included in later versions.

It is interesting that the PS refers to the North East Derbyshire Local Plan (Publication Draft). The Plan refers to the potential to build 330 homes on this plot of land, but the application is for 397 dwellings. Part of the evidence base for the Local Plan was the report by Nathaniel Litchfield Partners Green Belt review of February, 2017, which suggested that there was only room for 235 units on this site. The figure given by Coda Planning at the consultation event, which I attended, was 394 dwellings. The site has also expanded from 15.3 hectares to ‘approximately 17 hectares’. Are Coda and their clients allowed to make up their own Plan?

It is also interesting to note that Rogers Leask Environmental Ltd (RLE) have produced a number of reports in respect of this application. One describes the site examined as being 15.2 hectares, another 17.02 hectares and yet another less than 15 hectares. The Gradiometer survey relates to 15.5 hectares and the Coal Mining Assessment to 37.4 hectares. Were they all looking at the same site?

The author of the PS paper raises a number of obvious issues in respect of potential challenges concerning the proposed site. Consideration of these issues should enable refusal of the application to be strongly considered. These include:

-) Drainage,
-) Former mining use, including contamination, remediation/mitigation,
-) New boundary (intrusion into countryside),
-) Safe and Suitable visibility for access routes,
-) Archaeological interest,
-) Low value area,
-) Viability.

I will comment upon them in the order in which they appear on the Planning Statement, but I would also like to add comments concerning:

-) Sustainability and,
-) The Framework Travel Plan,
-) Ecological issues.

Drainage.

The application documents refer to drainage being channelled, via a culvert, to Park Brook.

Park Brook floods badly during heavy rain for prolonged periods, closing the road passing over it at its lowest point (Spinkhill Road). This road is one of the main arterial routes into and out of Killamarsh from the south, and would be well used by occupants of the 397 proposed dwellings.

Green Lane, an access and egress route from the proposed site, is also subject to flooding during prolonged heavy rain. It does not require a 100 year storm, or a 40% increase in climate change warming to flood – it is happening now. The 397 dwellings proposed will exacerbate this situation which occurs with the relatively small number of dwellings already present around the proposed site.

All the rainwater emanating from the dwellings will be stored in above ground detention basins and below ground storage tanks before being subsequently diverted to the Park Brook running a few feet below the dip in Spinkhill Road.

Park Brook is not a major watercourse; more a small stream.

Currently, rainwater at the site falls onto open fields, thereby allowing dissipation into the soil. Under the proposed plan this will all be channelled ultimately to a known flooding site.

Regular flooding can, does and will, occur on Spinkhill Road, which has become, by default, a main arterial route (albeit an unclassified road, used as a ‘rat run’ to and from the M1 at J30) for Killamarsh. Spinkhill Road, at this point, is also a bus route.

This proposal will create a heightened flood risk for Spinkhill Road and Green Lane.

The local Waste Water Treatment Plant at Woodhouse Mill has, according to the submitted Local Plan, only limited capacity. However, it is fair to say that this plant has allegedly said that it can accommodate waste water from the proposed site. The timing of confirmation of this information needs to be checked, because there has been almost continuous development in Killamarsh for some time.

There are also significant numbers of dwellings planned for areas within a 3-5 mile radius of Killamarsh. The numbers include those for which approved plans exist, for which outline permission has been approved, which are planned yet without permission and which have been recently built. The number of homes in this group, within the 3-5 mile radius, exceeds 5,000 dwellings, some of which will have an effect on the Woodhouse water treatment plant.

Former Mining Use.

It is a well-known fact that part of this area was used as a spoil dump by the former Westthorpe Colliery, with mine workings taking place underneath the surface of the proposed site from this and other mines in the locality of Killamarsh.

The Geological Survey report, conducted by Wessex Archaeology on behalf of Harworth Estates, notes potential circular mine workings on the site and states, *“large pit-like anomalies have also been noted throughout the survey area (due to) activity on uncertain dates”*.

The report prepared by Rogers Leask Environmental Ltd (RLE) indicates that, according to Coal Authority records, there are 6 mine entries present on the site. One of these will definitely present a constraint to development.

With regard to the other five mine entries there is no record of their having received any treatment, or knowledge of their present condition.

The report states, ***“The risk to proposed development from recorded mineshafts is high, and will provide a constraint to development in these areas”***.

The report also states, ***“A normal fault is indicated in the centre of the Site, trending northeast to southwest, with an indicated downthrow of approximately 10m to the north”***. The report comments that ***“in areas of significant coal mining there is an increased risk of fault reactivation and subsequent and subsequent ground movement, although this is generally considered rare in the UK”***. The report qualifies this by stating that the presence of shallow workings adjacent to the fault may increase the risk of collapse in the event of an earthquake or fault reactivation. Could this be activated by the presence of heavy vehicles and machinery using the site for many years?

The Risk Assessment of the report begins, ***“The overall risk of coal mining legacy impacting the proposed residential development is moderate to high”***.

It is fair to say that the report concludes that ***“The site is likely to be suitable for the proposed development subject to future investigation of the issues raised and adoption of appropriate mitigation measures”***.

Mitigation might be possible, but at what risk to safety, and at what financial cost, which will impinge on viability – an issue to be covered later.

These are not the only problems covered by the coal mining legacy of the locality.

The RLE report states that, ***“...indication of potential unrecorded old workings...in the southwest corner of the site”***. It also shows that, ***“Collapsed unrecorded workings within this seam were encountered...during the excavation of the surface drift (adit) for Westthorpe Colliery in the north of the Site. It is inferred that these workings may underlie other areas of the Site”***.

The report continues, ***“Unrecorded shallow working in this seam has also likely occurred from the five recorded mine shafts in the east of the Site”***.

It concludes that, ***“The risk of unrecorded workings at shallow depth impacting the development is considered high”***.

Evidence to support this view comes from a book published by a local resident. This book, ***Holbrook and Halfway, the Early Years (1996), by James Walton*** details research into the period before the nationalisation of mines in 1947. It describes a total of 442 abandoned mines in the immediate vicinity of Killamarsh and Barlborough, whose location is not known ‘with any certainty’.

RLE show that the ground conditions for the site are such that additional drilling and grouting would be necessary in respect of 175 of the proposed plots on this land, with further investigative work to decide on any remediation required in other questionable portions of the site, including the recorded adit.

The RLE report on Ground Gas Assessment states that one facet of the proposed development will contain 18 dwellings in an area where ***“high concentrations of carbon dioxide are being generated from the spoil”***.

The report also comments that, ***“These untreated mineshafts may still present a possible migration pathway for mine gasses to reach the surface”***.

It is also worth recalling that another part of the mining risk assessment report states, *“The risk of unrecorded workings at shallow depth impacting the proposed development is considered high”*. Surely such unrecorded mine workings not, apparently yet traced, will provide further, as yet undiscovered, migration pathways for mine gasses.

It is accepted that mitigation measures are proposed, but should the Planning Committee be passing an Outline Plan that contains such obvious and identified risks, not only to site workers and new residents, but for existing residents surrounding the site?

Equally, in terms of site contamination, a number of areas within the site have been found to contain material which is considered to be a *“potential risk to end users”*.

Mitigation of this risk can take place, but will involve further remediation work and the disposal of contaminated topsoil, with its replacement by uncontaminated topsoil. This will militate against viability and will involve even more vehicle movements, dust, dirt and noise in the proposed site.

Apart from the obvious noise and disturbance, and the dangers of disturbing the settled land on this site, nearby residents will be at risk of contaminated homes and gardens during the construction phase, when contaminated materials are removed from site. They will also be subject to unpleasant smells as remediation work is undertaken.

New Site Boundary.

The applicant accepts that the extension of the built boundary may be an issue to acceptance. It should be.

The only road from which the site is visible is from Station Road before it becomes Spinkhill Road. At the moment the outer limits of the built environment of Killamarsh are visible at the top of the hill, with green fields showing a clear demarcation line between village and countryside.

There is a 43 metre drop from the northeast of the site to the southwest, giving a perfect view of this current delineation.

If this proposal is passed there will be no such delineation. Due to the topography of the area the built environment will appear to continue down to the roadways of Green Lane and Spinkhill Road – the only roads from which this side of Killamarsh is visible.

This will be a significant, unwanted and obvious intrusion into the countryside.

Safe and Suitable Visibility for Access.

There are three proposed entry/exit routes from the proposed site; two on Upperthorpe Road and one on Green Lane.

One exits the site near to a sharp bend, bounded on both sides by thick hedgerows, proximate to Manor Road. This locality was considered for an alternative exit from a new development site of 28 houses off Fanny Avenue, but was rejected as too dangerous. The roads have not changed and a proportion of residents of 397 dwellings might have more effect than a similar proportion of 28 dwellings. There are no known plans for changes to the road network. This road, at the proposed point, is subject to a 30 mph speed limit, but is within a few yards of where the 50mph limit ends.

The other one on Uppertorpe Road is close to a blind exit from Westthorpe Road, which currently causes difficulties for drivers exiting Westthorpe Road. This is exacerbated by parked vehicles, sometimes on either side of Uppertorpe Road at this point.

The proposed exit on Green Lane is a small, country road, used by heavy goods vehicles entering and leaving the Westthorpe Fields Business Park, which is located very near to the proposed exit road. Green Lane, as one ascends towards Killamarsh, is essentially a one-way system, due to parked vehicles. This road is quite dangerous to navigate in current circumstances as one has to move into the 'wrong' lane on the approach to a blind bend due to parked vehicles.

Additional traffic created by, potentially 800 more vehicles from the proposed site, will create a potential death trap and road block in equal measures. If I am thought to be exaggerating, go to this location and view it.

All traffic used by commuters will enter Sheffield Road, Rotherham Road/Mansfield Road or Spinkhill Road. All of these roads have significant limiting features that inhibit movement currently.

Sheffield Road has a narrow river bridge that cannot accommodate two large vehicles travelling in opposite directions. On-street parking limits available road space anyway, some of it illegal due to both a lack of suitable parking options and a dearth of enforcement activity.

Rotherham Road suffers from congestion, again due to on-street parking and traffic calming measures that merely exacerbate the problem. Rother Valley Country Park is the cause of further disruption due to increases in seasonal use and regional/national events.

This situation will be made worse when the Gulliver's Valley Theme Park is opened. It is currently under construction and plans include the provision of 1,600 car parking spaces. It will also contain three hotels.

Spinkhill Road is an unclassified country road that has, by default, become a rat run for vehicles coming from the M1 motorway, and those avoiding the narrowness and dangers of Green Lane.

The road is undulating, with the biggest 'choke' point being formed by a dip, underneath which runs the Park Brook. Here, the road is dark, narrow and heavily overtopped by trees. Two large vehicles cannot pass. It is a bus route, which is also well used by farm vehicles and horses. It is subject to a 50mph limit.

This development will significantly worsen traffic movements, if approved. Any local resident of Killamarsh will attest to near and actual gridlock conditions on the specified routes at morning and evening peak times.

The Local Plan states that its intention is to provide jobs near to where people live, and to obviate the need for out commuting.

The Plan shows that a very significant percentage (almost 25%) of the working population living in North East Derbyshire commute to Sheffield. It is stated that 61% of the NEDDC working population commute out of the District. The exact numbers for Killamarsh are not known, but local knowledge suggests that a high percentage of workers living in Killamarsh commute, mostly to Sheffield, Rotherham and Chesterfield.

The Planning Statement speaks of employment opportunities at the Westthorpe Fields Business Park

The Employment Strategy within the Local Plan shows Norwood Industrial Estate and Westthorpe Fields Business Park as the two main, and available, options for employment within Killamarsh. The former is historically unattractive to developers, is assessed by the Aspinall Verdi review of employment sites as “suitable for ‘dirty’ operations”, and the extension to the site to provide jobs is “not deliverable for 10-15 years”, giving the site a ‘red’ classification. Sites were judged on:

-) Strategic Communications,
-) Proximity of Labour and Services,
-) Compatibility with Adjacent Uses,
-) Developer Constraints,
-) Occupier Attractiveness.

Westthorpe Fields Business Park has one development plot still available, suitable for one small to medium enterprise. The existing planning permission for the erection of an industrial unit on this land lapsed in 2011, apparently due to lack of developer interest.

The other two Killamarsh sites are shown as having limited, if any, availability.

This lack of employment opportunity means that workers will need to commute, reinforcing the view that roads on the three main routes into and out of Killamarsh will be further swamped with traffic thereby undermining the NEDDC desire to obviate the need to out-commute, as stated specifically in the Local Plan.

The potential for significant, unsustainable additional traffic generation, through general car use, and commuting, is immense. Air Quality will be further diminished through additional CO2 emissions.

Archaeological Issues.

The Planning Statements says that “*there exists the potential for archaeological interest within the site, in particular relating to medieval and post-medieval earthworks*”.

The Detailed Gradiometer Survey Report, prepared by Wessex Archaeology (WA), found evidence of anomalies thought to be archaeological in origin.

These include a medieval Holloway, ring ditches, evidence of a strip field system, evidence of ridge and furrow ploughing and field boundaries corresponding with the 1849 Tithe Map of Killamarsh. In addition, a small recti-linear enclosure, with internal features, was found towards the southwest corner of the site.

Evidence of mining or mineral extraction activity, of uncertain date, was found within the site.

Paragraph 4.1.2 of the WA report comments that, “*the interpretation of the datasets highlights the presence of potential archaeological anomalies, ferrous burnt and fired objects, and magnetic trends*”.

It also notes that, “*small, weakly magnetised features may produce responses that are below the detection threshold of magnetometers. It may therefore be the case that more archaeological features may be present than have been identified through geophysical survey*”.

Having had the potential for the presence of buried archaeological features, possibly medieval in origin highlighted, it would be folly to allow the site to be covered with 397 houses. Killamarsh has had parts of its rail and canal heritage destroyed by past planning decisions, although there may be hope for the resurrection of relevant features through joint council plans and local Heritage Society efforts. The importance of this location may, and perhaps should, become important in the future.

Please prevent future generations from considering the folly of a decision to build on a site that might be of historical relevance.

The NPPF recognises that heritage assets are an *irreplaceable resource*.

WA, at paragraph 5.3.4 of the Historical Environment Desk-Based Assessment, states that, “*Any adverse impact to buried archaeological features would be permanent and irreversible in nature*”. Adjoining paragraphs detail the actions likely to create such an impact.

Low Value Development Area.

The applicant places a high value on this development because of its suitability to fulfil the needs of Sheffield’s workforce.

It states, however, that the development does not fall within a high value area. Is this a fact or a preference? Obviously, this will make a difference to the percentage of affordable homes that have to be provided on site.

This also impinges heavily on ‘viability’

Viability.

This is an issue understandably close to any would-be developer’s heart. It certainly is to this one.

When considering remediation and compensation measures for Killamarsh in accordance with the document prepared by Opun Design East Midlands (ODEM) the loss of Green Belt and open space was to be compensated for by contributions to a western greenway and an eastern play area. Both depend entirely upon developer contributions.

When discussing this issue on page 7 of the Planning Statement says, “*That, on a practical level, the developers of the site will, where viability allows, be required to provide financial contributions which will be ring-fenced by the Local Authority to go towards the provision of local community infrastructure, such as school and GP places*”.

The Local Plan refers to developer contributions being the only way that the western greenway and the eastern play area will be delivered.

In reference to the provision of 20% affordable homes the applicant states, “*The applicant is aware of these requirements and intends to fulfil these obligations where viability allows, bearing in mind the significant remediation works required as a result of the historic use of this site*”.

It should not have come as a surprise to the applicant that this site, located in a high risk development area, might need remediation, particularly as Harworth Estates was spawned by UK Coal. The applicant is already preparing the ground for the inevitable viability whinge.

The highlighted statements show a mindset that intends to gain the financial benefits of high value building land while looking for legal ways to renege on obligations.

I have little faith that the necessary affordable homes that this development should provide, or the compensatory benefits to the people who will bear the pain of this development during, and long after construction, will be forthcoming.

Sustainability.

The applicant makes great play on the fact that this is a sustainable development.

The independent Sustainability Appraisal (SA) of the NEDDC Local Plan placed this particular site in the 'amber' category, commenting that it:

- J Would engender a significant increase in Greenhouse Gas emissions,
- J Would be inefficient land use,
- J Was outside the limits for GP services and hospitals,
- J Was close to Grade II listed buildings,
- J Would alter the urban fringe and intrude into the countryside,
- J Would disturb local wildlife sites,
- J Would potentially damage ancient hedgerows, trees and biodiversity,
- J Was in a mining high risk area.

All the issues highlighted within the SA have been shown to be true by the applicants own expert reports.

In addition, during the Green Belt review which has brought about this unfortunate application, the conclusion of the examination of this area was that it would cause ***“least harm to the strategic functions of the Green Belt”***.

This is not exactly a ringing endorsement of the choice and gives a clear indication that harm **will be** caused to the Green Belt, a fact acknowledged by NEDDC in paragraph 4.69 of the Local Plan.

The necessity for the Green Belt to be altered, and the alleged exceptional need for this, will be strongly challenged at the forthcoming Public Inquiry.

Framework Travel Plan.

The proposed Framework Travel Plan (TP) has been constructed by WYG. Its most incredible supposition occurs at paragraph 2.1.4, which states that, ***“the key to making TP’s work is the actual location of the development and its proximity to local facilities and services essential to everyday life”***.

It continues, ***“the site is located within acceptable walking distance of a number of amenities and facilities. A wide range of leisure, employment and retail facilities can be reached within a 2km walk of the site when using public footpaths/rights of way”***.

Ignoring the fact that this site will cause the diversion or merging of five well-used footpaths, it is worth analysing this assertion.

The village/town centre of Killamarsh would be accepted by local people as comprising Bridge Street, Sheffield Road and the Parkside Shopping Precinct.

In the summary of Facilities and Services within the Local Plan, Killamarsh is in last place of the so-called tier 1 settlements.

In the village centre, as described above, there are 44 services or retail businesses. Of these 18 provide hair and beauty products (40.9%), while 11 are fast food takeaway outlets (25%).

The Planning Statement refers to the site as being, ***“within walking distance of the many services and amenities on offer within Killamarsh”***.

If one looks on a map then a 2km walk to the shops might not seem immense. However, the walk back from the development site to the centre of Killamarsh would test the stamina of an Olympic

athlete. The vast majority of the 2km walk from the centre to the site is uphill; not a gentle slope but, for a significant distance, a 1:10 hill.

Is it considered that anyone having had their hair treated, or having had a beauty treatment, or having purchase a takeaway meal, or having completed a weekly shop, will walk or cycle up a massive hill to get back home? I would suggest that each one would take their car or a taxi. Even a visit to the doctors surgery, or one of the two proximate pharmacies, will challenge someone not very fit, and who is likely to visit these medical establishments when completely fit?

The Chartered Institute of Highways and Transportation published 'Planning for Walking' (April, 2015). This states that, ***“Most people will walk if their destination is less than a mile away.....with a typical catchment area of around 800 metres, or 10 minutes walk”***. However, as previously stated, this must also be viewed against the topography of the area, with a walk from central Killamarsh to the proposed site being almost entirely uphill.

The Planning Statement says that walking to Killamarsh will, ***“increase activity levels through this area of the settlement and will provide new and improved connectivity, particularly for pedestrians. In turn this will contribute towards a greater sense of safety for residents....”***

It is unfortunate that research carried out by ODEM for 'Killamarsh 2035 A Vision for the Village' states, ***“The layout of the 20th century housing areas includes many footpaths and alleyways that vary in condition and use. Many are either poorly maintained or suffer from anti-social behaviour because of the absence of ‘natural’ surveillance”***.

The TP shows that the site is located close to existing bus services. It is true that there are bus routes near to the site, but their value is questionable.

Within the Settlement Hierarchy Study completed for the Local Plan submission, public transport in Killamarsh scored 26 points, by far the smallest figure within the tier 1 settlements. This score equates with far smaller settlements within the District, and indicates a poor service.

All of this means that commuter and other residents wishing to travel to shops or services will use a car. This unfortunate fact goes against paragraph 2.2.2 of the Framework Travel Plan which, it is alleged, ***“will provide a better environment within the site and to its immediate environment as vehicular movements are minimised”***.

There will be no economic benefit to Killamarsh from the chaos caused by a significant inflow of additional residents. Evidence within Local Plan base documents show that 80% of the economic benefit accruing as a result of shopping by Killamarsh residents currently goes to Sheffield.

Parking facilities within Killamarsh are poor not good, as described. One of the three main parking areas is privately owned, another is almost always full as it serves the Aldi supermarket and the other serves the Leisure Centre. This is also very full for most of the day.

Commuters will drive through the village, causing congestion on the three main entry and exit routes, even if they wish to use the Supertram to travel to Sheffield. The nearest Supertram stop is located some 3km from the proposed site, in the neighbouring county. To access this will mean more travel along the congested Sheffield Road.

A very recent article aired on BBC News was headlined, “Young couples trapped in car dependency”. It relates to a situation where planners are allowing edge-of-town housing estates where car travel is the only option. This situation could have been written specifically for this application, and will epitomise the situation in respect of this development, if it is passed.

Jenny Raggett, a researcher for Transport for New Homes, is quoted as saying, “We were appalled to find so many new housing developments built around the car with residents driving for almost every journey. As those cars head for our towns and cities they clog up existing roads. Commuter times get longer and longer. Car-based living of this kind is not good for our health or quality of life”. (BBC News, 24.10.18).

By its very nature development in a Green Belt area is outside the localities development limits. The proposed development could not be further away from the village/town centre.

As the walking, cycling options are barely viable, and transportation by public transport is inadequate, the only option will be to travel by car or taxi.

This can only exacerbate traffic generation.

The TP promises the provision of a travel pack to extol the virtues of sustainable travel options. ***This will not make the hills out of Killamarsh any less steep.***

A Travel Survey is promised when 50% of the proposed dwellings have been occupied. On the trajectory shown in the Local Plan, this should only take five to seven and a half years. One might consider this far too late to do anything about the inevitable congestion that will have occurred.

Ecological Issues.

The Ecological Impact Assessment (EIA) shows that significant damage will be caused to the ecology of the site location, although it does indicate that mitigation measures will ameliorate the adverse effects. The construction work will require the removal of both sections and whole hedgerows, the felling of selected trees and the removal of species rich, semi-improved grassland.

There are 14 hedgerows on site of which 11 have been examined. Five of these are classed as ecologically important. The three unexamined hedgerows may also be ecologically important, but were not examined because the survey was conducted on the site before the owners decided to expand the area upon which they wished to build. This contradicts the proposed development area noted in the Local Plan, upon which 330 dwellings were proposed – not 397.

The EIA shows that some of the hedgerows will be ‘partially or completely removed’, thereby damaging or destroying habitats within those hedgerows. This removal will be of moderate negative significance, according to the report. ***The tree survey report, completed by Access Ecology, shows that the hedgerows are at least 140 years old. This is supported by evidence of the age and diversity of hedge species and signs of past management. The report describes these hedgerows as being of “high value”.***

The removal of them will be environmental vandalism at its worst.

Forty four different species of bird have been identified as using the site. Local residents will provide evidence of far more, if asked. Fifteen of the species identified are protected ones, but remediation measures will involve putting bird boxes on poles to replace the natural tree and hedgerow habitats that the birds have, and do, enjoy. The disruption to these birds is detailed as of “moderate negative significance”.

25 Local Wildlife Sites (LWS) are located within a 2km radius of the site. One LWS is located in the site, according to the Derbyshire Wildlife Trust, with two LWS within 150 metres of the site. The disturbance, damage and pollution will be of “moderate negative significance”.

The fields of the site are described, in the majority, as fairly species rich, semi-improved grassland. They currently contain many species of wild flowers and wild orchids. The loss of this grassland will be of “moderate negative significance”.

The disruption caused to the numerous species of bat using the site will be of “moderate negative significance”. Less disruption will be caused to Great Crested Newts and local reptiles.

It is accepted that remediation measures are intended to ameliorate the damage done to the site, but this will take many years to take effect. ***In effect, the proposals within this plan will cause significant damage, but will replace that which has been lost with something smaller and not as good.*** Local residents who enjoy the options of walking along the five footpaths crossing this site will only see what, for them, will be the demise of the wildlife that was formerly found on these fields, for the next 15 years, until the construction phase is completed and homes are occupied. The fine views of the surrounding countryside they had will be replaced by views of houses. They can get that anywhere in Killamarsh.

Having walked along the footpaths of this site many times in recent days the proposed development will result in a **significantly negative impact** on a **public visual amenity**. Views from the higher parts of the site allow the hills and field of west Derbyshire to be enjoyed, as well as views across to the hamlet of Spinkhill and those to the east. Local residents who enjoy these walks and views will lose them forever.

The results of allowing this development will include **loss of ecological habitat and loss of trees and ecologically important hedgerows.**

In conclusion I suggest that the proposed development **does not represent sustainable development in all three of the elements defined by the NPPF.**

The economic benefit will accrue to the Sheffield City area (as 80% already does), the social element will be damaged by excessive car travel, meaning longer travel times, and the environment will be significantly damaged by the significantly increased CO2 emissions, and loss of habitats and green spaces – the latter being something that Killamarsh is acknowledged (in the Local Plan) to lack.

I ask the Planning Committee to consider these issues closely and to deny the application.

Details of Documents Examined and Referenced .

North East Derbyshire Local Plan (Publication Draft).

Flood Risk Assessment and Drainage Strategy – Rogers Leask Engineering Ltd (RLE) – May, 2018.

Planning Statement – Coda Planning – October, 2018.

Phase 2 Geo-Environmental Report – RLE – 25.1.18.

Technical Note – Coal Mining Investigation – RLE – August, 2018.

Technical Note – Ground Gas Assessment – RLE – 27.9.18.

Technical Note – Targeted Contamination Assessment – RLE – June, 2018.

Aspinall Verdi Report – Employment Sites Review – October, 2017.

Holbrook and Halfway – The Early Years – James Walton, 1996.

Gradiometer Survey Report – Wessex Archaeology (WA) – July, 2018.

Killamarsh 2035 – A Vision for the Village – Opun Design East Midlands (ODEM)

Framework Travel Plan – WYG – October, 2018.

Settlement Hierarchy Study (Local Plan).

Sustainability Appraisal (Local Plan).

BBC Article – “Young Couples Trapped in Car Dependence” – BBC News – 24.10.18.

Ecological Impact Assessment – Access Ecology (AE) – May, 2018.

Tree Survey – AE – April, 2018-10-29

Historic Environment – Desk Based Study – WA – September, 2018.

National Planning Policy Framework, 2012.