### **ENVIRONMENTAL OBJECTIONS**

Millennium Wood and Heatherton Pond in Littleover, Derby, represent locally cherished green spaces that offer significant ecological, community, and environmental value. Both areas are integral to the Derby green wedge, providing biodiversity, flood mitigation, carbon storage, and recreational opportunities to local residents. Millennium Wood, planted in 2000 and now recognized as a Local Wildlife Site (LWS), together with the adjacent Heatherton Pond, forms a mosaic of habitats, supporting a range of species. The recent planning application proposing significant residential development in the immediate vicinity of these sites has raised serious concerns within the community and the conservation sector about the potential for irreversible environmental harm.

# **Environmental and Green Wedge Objections**

The proposed residential development adjacent to Millennium Wood and Heatherton Pond, both key elements of the Derby green wedge in Littleover, raises compelling grounds for objection due to its profound and multifaceted environmental impacts. These cherished green spaces offer substantial ecological, recreational, and community value, underpinning local biodiversity, flood mitigation, carbon storage, and general well-being. The development threatens to undermine not only these immediate benefits but also the strategic integrity of the Green Wedge system, contrary to local and national planning policy.

#### **Irreversible Habitat Loss and Biodiversity Decline**

Construction in this location would necessitate extensive vegetation clearance, resulting in direct destruction and fragmentation of habitat mosaics that have matured since 2000. Millennium Wood, now a designated Local Wildlife Site (LWS), and Heatherton Pond support a rich variety of woodland, grassland, hedgerow, wetland, and orchard habitats, which together form vital ecological corridors. These habitats sustain numerous species, including protected and priority wildlife such as bats, birds, amphibians (notably Great Crested Newts), and invertebrates, whose continued survival depends on unbroken habitat networks.

Scientific evidence and local management plans confirm that such clearance, especially in urban fringe sites, causes permanent loss of ecological complexity and soil communities that cannot be rapidly or reliably replaced. This process would contravene the National Planning Policy Framework (NPPF) and local policy, both of which prioritise the avoidance of biodiversity harm over post hoc mitigation. The cumulative effect of ongoing and piecemeal developments in the area risks pushing

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local biodiversity beyond recovery thresholds, undermining Derby's contribution to nature recovery targets.

# Threats to Water Quality, Hydrology, and Flood Management

Heatherton Pond, a sustainable urban drainage system (SUDS) feature, and the wider catchment of Millennium Wood play a critical role in local water management, supporting aquatic biodiversity and reducing flood risk. Urban development is well-documented to increase runoff, sedimentation, and pollution, all of which degrade water quality and the ecological health of freshwater habitats. The introduction of hard surfaces and drainage modifications would also alter natural flow regimes, increasing the risk of surface water flooding both locally and downstream.

Such changes are difficult to mitigate or reverse, and the degradation of these features would violate both the NPPF's requirement to avoid increased flood risk and local policy commitments to climate adaptation and resilience. The loss of natural flood storage, infiltration, and hydrological balance would have enduring social, economic, and environmental costs.

# Soil Compaction, Erosion, and Long-Term Land Health

The soils of Millennium Wood are fundamental to its ecological health, supporting woodland regeneration, rich ground flora, and diverse soil fauna. Construction activities—particularly those involving heavy machinery and storage of materials—inevitably result in soil compaction and erosion, with consequences that may persist for decades. Compacted soils lose their ability to absorb water, promote healthy root growth, and maintain resilient ecosystems, leading to higher flood risk, nutrient leaching, and long-term decline in site quality. Best practice guidance is rarely sufficient to prevent such impacts in practice, especially in the context of large-scale, rapid development.

# Fragmentation of Ecological Corridors and Loss of Connectivity

A defining strength of the Littleover Green Wedge is its provision of continuous ecological corridors that connect Millennium Wood, Heatherton Pond, and the wider countryside. These linkages are essential for sustaining wildlife populations, enabling dispersal and adaptation, and maintaining ecosystem services such as pollination and pest control. Development that fragments these green corridors undermines both local and landscape-scale ecological resilience, promoting population declines, genetic isolation, and increased vulnerability to environmental change.

Current policy at national and local levels explicitly prioritises the retention and enhancement of ecological networks. The failure of the current proposal to provide meaningful green infrastructure integration or maintain corridor function stands in

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direct opposition to the requirements of the NPPF, the Derby Local Plan, and national guidance from statutory agencies.

# **Undermining Green Wedge Function and Policy Compliance**

The Littleover Green Wedge is specifically protected by Derby Local Plan Policy CP18, which recognises its importance for urban structure, neighbourhood separation, landscape character, and green infrastructure provision. The Green Wedge Review (2025) reaffirms its ongoing strategic value and recommends its robust protection. The proposed development, by narrowing and fragmenting the wedge, would irreversibly damage its ability to provide ecological, visual, and community functions, leading to coalescence of neighbouring settlements, loss of openness, and urban sprawl.

Such loss would directly contravene both the letter and intent of CP18 and the NPPF, which together demand that development only proceed where harm to green infrastructure is demonstrably unavoidable and fully justified—a criterion not met in this case. Failure to adhere to these policies risks not only local environmental harm but also damaging precedents for future Green Wedge erosion across Derby.

# **Deficient Green Infrastructure and Biodiversity Net Gain**

The application fails to meet mandatory requirements for Biodiversity Net Gain (BNG) as set out in the Environment Act 2021 and Derby City Council's adopted policies. There is no robust calculation or demonstration that a minimum 10% net gain will be achieved or maintained for 30 years, and proposed mitigation measures are neither sufficient nor appropriately targeted to the high ecological value of the site. The scheme's lack of context-sensitive baseline data, failure to prioritise on-site retention, and reliance on fragmented, tokenistic landscaping fall well below local and national standards.

Without a fully integrated, evidence-based approach to green infrastructure and net gain, the development cannot be considered compliant or sustainable, and risks further undermining local nature recovery ambitions.

#### **Increased Flood Risk and Reduced Climate Resilience**

Green Wedges play a key role in Derby's adaptation to climate change by absorbing rainfall, storing floodwater, and mitigating the urban heat island effect. The loss or narrowing of these greenspaces exposes communities to greater flood risk and reduces long-term resilience to extreme weather. The proposed development does not address the cumulative and landscape-scale impacts of losing these natural buffers, instead focusing narrowly on site-specific mitigation that is insufficient to protect wider community interests.

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# Loss of Community Amenity, Well-being, and Precedent for Future Erosion

Access to high-quality, connected greenspace such as Millennium Wood and the Green Wedge is a proven determinant of community health, well-being, and social cohesion. The proposed development would severely compromise these benefits, reducing opportunities for recreation, active travel, and respite, particularly for those with limited alternatives. This outcome is contrary to both public health objectives and sustainable planning principles. Moreover, approval would set a dangerous precedent for further incremental loss of Green Wedges across Derby, undermining the city's long-term green infrastructure strategy and the health and well-being of present and future residents.

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