

# **DRONFIELD GREEN BELT RESIDENTS' GROUP STATEMENT ON THE NEDDC DRAFT LOCAL PLAN TO BUILD 860 HOUSES ON GREEN BELT LAND AROUND DRONFIELD**

## **CONTENTS**

<b>Introduction to the Group</b>	<b>2</b>
<b>Our Key Summary Statement</b>	<b>3</b>
<b>Section 1: The Vital Role of Dronfield's Greenbelt</b>	<b>6</b>
1.1 Policy Regarding Green Infrastructure	6
1.2 Key Functions of the Five Green Belt Sites Proposed for Development	8
1.3 Protecting the Environment and Wildlife	11
1.4 Preserving Health and Well-being	14
1.5 Protecting the Heritage and Character of Dronfield	16
<b>Section 2: Challenging the Local Plan &amp; Evidence Base Provided by NEDDC</b>	<b>20</b>
2.1 How Much New Housing is actually Needed across the District?	22
2.2 Exploring Other Brownfield Options for Housing Development	24
2.3 Are there any Exceptional Circumstances for Removal of Dronfield's Green Belt?	28
2.4 What is Driving Such Extensive Development on Dronfield's Green Belt?	34
2.5 Does Removal of any Green Belt Land set a Precedent?	35
<b>Section 3: The Sustainability of Dronfield for Housing &amp; Industrial Development</b>	<b>36</b>
3.1 Dronfield's Size, Structure and Population	36
3.2 Dronfield's Railway Station	38
3.3 Traffic Congestion and Road Infrastructure	39
3.4 Public Services: Schools, Doctors, Policing, Banking, Family Services & Retail Shops	41
3.5 Sustainability for Employment and Industrial Development	45
APPENDIX A: Freedom Of Information Request regarding Vacant Homes	46

# **DRONFIELD GREEN BELT RESIDENTS' GROUP**

## **Introduction to the Group**

We are a non-political residents' group made up of people who care about protecting Dronfield and Coal Aston's Green Belt from encroachment. We have been formed following the announcement of the District Council's draft Local Plan, which proposes 860 new houses on greenbelt land around Dronfield, as well as a 15 acre extension of the Callywhite Lane Industrial Estate.

Our primary purpose has been to raise awareness of what has been proposed, encourage the strongest and most vocal response to the consultations from local residents and to do everything within our power to fight the plans.

As of Thurs 6th<sup>th</sup> April 2017 we have 1192 members on our Facebook group; a forum where daily discussion, sharing of local knowledge and appraisal of the plans has been taking place. Many members have been active during the consultation period for the Local Plan, having posted comments or new topic threads for information and discussion. Our website has received 8963 hits since being launched two months ago and has been regularly updated with new information.

Our hardworking team of volunteers have also raised awareness of the Local Plan through a public meeting, delivering leaflets to over 9000 households in Dronfield, through communications to our 1000+ email contact list and awareness sessions around town. We have encouraged as many of our members as possible to attend the NEDDC consultation sessions also. Many have discussed the plans with district council representatives and planners; they have fed back details of the discussions to the group.

We have used these discussions and feedback to draw up our group statement, which has been made available on-line for members to comment on.

## **On behalf of Dronfield Green Belt Residents' Group**

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Committee members: Oliver Hewitt Bsc (Hons), James Briggs BA (Hons), Rachael Oades BA (Hons), Ian Warburton, Tony Jackson, Enid Lumb

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# OUR KEY SUMMARY STATEMENT

## 1. PROTECTING GREEN BELT LAND AND ITS FUNCTIONS

The following group statement on the Local Plan registers our strong and firm objection to the removal of green belt status from any of the five sites proposed for housing. There are no exceptional circumstances to justify removal of Green Belt status. **We adamantly wish to keep all Green Belt land around Dronfield as Green Belt, fulfilling the same vital functions as it does at present** (NPPF 80):

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one other.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging recycling of derelict and other urban land.

**In addition to these functions, the Green Belt land around the present settlement limits of Dronfield, where housing is proposed, serves further special and important functions:**

- Provision of outdoor, green recreation space for sports.
- Access to further open green space, countryside and footpaths.
- This quality green space is of key importance as Dronfield is significantly lacking in green space, outdoor sports and children's play space within its present settlement limits. (Based on 2011 population figures, Local Plan 7.6 p126).
- Some of the land is arable farmland.
- The land has high value "landscape character" and "visual amenity"  
These are terms used in the Strategic Green Belt Functionality Study (2.20, p20) which states that such factors should be "robustly taken into consideration."
- All five parcels of Green Belt land have ecological importance in terms of conserving flora, fauna and wildlife habitats. The proposed site at Coal Aston is part of the Moss Valley Conservation Area.

## 2. EXPLORING OTHER OPTIONS FOR HOUSING

**Green Belt land should only be built upon in "exceptional circumstances"** (NPPF 89, p20-21). **NEDDC have not provided valid evidence that any exceptional circumstances exist.**

All options for building on brownfield sites have not been adequately explored or presented to the public in the present Local Plan. The district council have ruled out smaller brownfield sites for assessment. The housing requirement calculations (Strategic Housing Market Assessment) have omitted to factor in building on smaller brownfield sites, which could yield around 1000 houses over the remaining plan period. Additionally, the high end of a wide range of predicted need has been used. The amount of housing needed has therefore been substantially overestimated. **There can be absolutely no exceptional circumstances to build on Green Belt, given these significant errors and grey areas within the calculations.**

**No attempts have been made, or are underway, to bring 133 vacant homes back into use**

**in Dronfield, and a total of 731 vacant homes across NE Derbyshire.** (Freedom of Information Request submitted to NEDDC, March 2017 – see Appendix A).

**Before planning to build on Green Belt NEDDC could and should have explored options and availability of brownfield sites with neighbouring councils.** Given the close proximity of Chesterfield Borough and Sheffield City regions this is negligent.

Chesterfield Borough Council is at an earlier stage of planning. Nevertheless, suitable sites to bring forth plans for 4,600 homes on brownfield sites with 1000 reserve homes on greenfield are presently being assessed. It appears that there will be a more than adequate supply of homes for the predicted future increase in the borough's population (<10,000), without resorting to building on Green Belt. (CBC Draft Local Plan Jan 2017).

Sheffield is one of 73 councils piloting the government's brownfield register scheme. This aims to make sure brownfield plots are found and listed so that they are readily identifiable for developers to speed up building. Sheffield is one of 15 councils with the most brownfield land in need of regeneration in England. **With so much brownfield land in a neighbouring council district, there is no justification to build on Dronfield's Green Belt land.**

<https://www.gov.uk/government/news/first-areas-to-push-for-faster-brownfield-land-development>

### **3. INFRASTRUCTURE AND THE SUSTAINABILITY OF DRONFIELD**

**Dronfield is not a sustainable town that could accommodate a 10% increase in population over the plan period without incurring many infrastructure problems.**

The district council has designated Dronfield as the most sustainable settlement in the whole district (Local Plan, Settlement Hierarchy, Table 4, p35). This is based on its being the largest settlement in the north of the district and it having a railway station. Size is a thoroughly crude and inaccurate measure of sustainability and is no substitute for doing infrastructure assessments in a timely way, alongside housing planning. Dronfield already has a large amount of housing relative to an only modest amount of facilities and over-stretched public services. There is already a degree of urban sprawl at the outer edges.

Dronfield saw a 179% increase in its population between 1951 and 2011. This is compared to a much lesser increase of 23% across Derbyshire as a whole (including Derby). Infrastructure capacity and improvements are already lagging behind the huge population increases in Dronfield. The council's assessment of Dronfield's sustainability holds no validity whatsoever; it is irresponsible to existing and potential new residents to allocate such high numbers of houses.

**Dronfield railway station will not be able to provide sustainable travel without having a negative impact on the environment, pollution, road congestion and road safety.**

Parking at Dronfield station is already limited with no space for expansion. "Overspill" parking on nearby roads exacerbates congestion and road safety problems, notably around schools. The already sprawling nature of Dronfield's housing, up steep gradients and narrow roads from the train station, contributes to many train commuters travelling to the station by car. All 5 proposed housing sites, being at the outer reaches of town, do not provide sustainable sites for accessing the train station.

**The road infrastructure of Dronfield would be overwhelmed by 1720 more cars (based on an average of two cars per household).**

Congestion and pollution would increase and pedestrian safety will worsen.

Many of the roads in Dronfield were built for a village, not a large town. They are narrow / winding / steep and already congested with traffic and on-street parking. Widening or upgrading such roads will simply not be possible.

The Local Plan does not state how new sites would be accessed and which roads would be used. We consider none of the potential roads offer safe, sustainable capacity for the increased traffic.

Several streets leading from the outer limits of town (notably in the south of Dronfield where 655 houses are proposed) have very narrow pavements and no pavement on some stretches. Road safety will worsen and pedestrians (particularly children walking to and from schools at key busy times) will be at greater risk.

**The future provision of primary and secondary school places has not been considered in the Local Plan. The proposed new housing in Dronfield would not reach usual thresholds for building of new schools; 1000+ for primary, 6000+ for secondary (Local Plan 9.65, p223-4)**

Schools in Dronfield hold high reputations and are historically and currently extremely popular. Capacity is already an issue for some schools, with some class sizes over 30. The head teachers of Dronfield Henry Fanshawe, Dronfield Infants and Dronfield Junior Schools have all confirmed that they have not yet been approached by Derbyshire County Council or any other local authority regards future provision of school places.

**Limitations to expanding schooling provision for the south side of Dronfield render the plans for 655 new houses on the south side of town completely unsustainable.**

Dronfield Infants and Dronfield Junior School stand adjacent to each other on very small plots with no room for extension of school buildings and very limited accessible outdoor play space already. These are the only schools within feasible walking distance of the 655 new houses proposed across the south of Dronfield.

**Other public services and amenities are over-stretched or lacking. NEDDC have not yet provided a plan and the feasibility of delivering necessary improvements is questionable.**

GP services in Dronfield are already overstretched with long waiting times for routine appointments. GP provision is usually factored on one full-time equivalent GP to serve 1,800 patients. A new surgery would not be forthcoming on these numbers, GP recruitment is very difficult these days and ability to extend existing practices has not been explored.

The police station is only open for limited hours, hence reporting local crime is already difficult.

Dronfield will soon have no banks with the announced closure of the two remaining banks. Thus Dronfield will not be a sustainable town for those without internet banking facilities (this may apply to many of the town's large elderly population) or for local businesses needing to regularly deposit cash takings.

Callywhite Lane has been failing to attract businesses for over 10 years so the deliverability of the industrial extension is questionable. Without new road access from Chesterfield Road (likely to be prohibited by logistics and cost) even greater HGV traffic at the difficult junction at the bottom of Callywhite and Green Lane would result. **We object to the Callywhite Industrial extension.**

## **SECTION 1: THE VITAL ROLE OF DRONFIELD'S GREEN BELT**

Our key summary statement has outlined all the vital functions of Green Belt status and further special functions that apply to Dronfield. This section gives more specific detail regarding the five parcels of Green Belt land where housing development is proposed. All of these sites are important to preserve from an ecological perspective. They are not bland fields with little substance and they do not just simply afford nearby residents a “view” to look at, as suggested by one of the representatives at a Council drop-in session. There are trees with preservation orders, mature trees and long-established hedgerows protecting the local environment and providing habitats for wildlife.

The four largest sites also offer quality green recreation space, arable farmland and connection to a wealth of footpaths and wider countryside. Walkers, runners, horse-riders, golfers, outdoors and wildlife-lovers all use it. It is nature’s great playground for the town’s children. As stated in our summary and acknowledged in the Local Plan, Dronfield is “significantly lacking” in green space, outdoor sports and more formal children’s play space within the existing town boundaries. **The Green Belt is a key part of Dronfield’s Green Infrastructure. Housing development over the years has left little enough of it left and absolutely no more should be taken for development.**

## **1.1 Policy Regarding Green Infrastructure**

Before describing the nature and functions of the five Dronfield sites, it is pertinent to refer to policy and statements provided within the Local Plan, which has much to say on Green Infrastructure. Any building on any grade of Green Belt land is irreversibly damaging; the land is not a renewable resource. In the case of Dronfield, highly valuable Green Infrastructure would be irreversibly destroyed if the plans went ahead and there would be no way to replace this.

*9.7 Green Infrastructure is the network of agricultural land, green spaces and corridors that exist, **around**, within and between settlements. As well as public open space, it includes wildlife sites, river and canal corridors, moorland, and woodland. Collectively these areas contribute to the ecological network of the District. (Local Plan)*

The Green Belt under threat “around” Dronfield provides high quality and highly functional green infrastructure and it is much used (especially given the relative lack of green infrastructure within the town boundaries for the population size.)

**The plans seek to destroy Green Infrastructure, rather than provide, protect or enhance it. This directly contradicts NEDDC’s own policy (ID1) and the National Planning Policy framework (which underpins this policy.)**

***Policy ID1: Green Infrastructure (Local Plan p202-203)***

***Development proposals should conserve and where appropriate***

***improve and extend the Green Infrastructure Network running through and beyond North East Derbyshire.***

In the case of Dronfield, NEDDC plan to take perfectly good infrastructure and destroy it.

***Development proposals that would result in the loss or isolation of existing green infrastructure will not be permitted unless:***

***a) The affected site or feature does not have a significant recreational, ecological, landscape or townscape value; or***

All the proposed sites in Dronfield have significant value in at least one of those features.

***b) The affected site can be demonstrated to be surplus to local requirements, or***

***c) A compensatory amount of green infrastructure of an equivalent or better quality can be provided in the local area.***

None of Dronfield's Green Belt land could be classified as "surplus to local requirements," nor has any of equivalent or better quality been even mentioned, never mind promised, within the Local Plan. This is because it is glaringly obvious that the amount of high quality green infrastructure the Local Plan proposes to build on in the local area is irreplaceable and impossible to replicate elsewhere.

***"Development will be expected to maintain or improve the permeability of the built environment and access to the countryside for walkers, cyclists and horse riders. Proposals that would result in the loss of, or deterioration in the quality of existing Public Rights of Way (PROWs) will not be permitted unless equivalent alternative provision is made. Where diversions are required, new routes should be direct, convenient and attractive, and should not have an unacceptable adverse impact on environmental or heritage assets."***

It is demonstrated in the following subsections that the developments would have a significant adverse impact on the integrity and access to footpaths, including access to the Dronfield 2000 Rotary Walk.

***To ensure the quality of new or improved Green Infrastructure, new development proposals shall, where appropriate:***

***d) Incorporate Green Infrastructure as an integral part of designs at an early stage in the planning process***

NEDDC have communicated nothing within the local plan or in this consultation process to suggest they have considered green infrastructure for Dronfield, other than to suggest destroying vast swathes of it.

***e) Enhance connectivity between green spaces and improve public access to green infrastructure particularly within walking***

***distance of housing , employment, health, education and community facilities***

The footpaths on and adjacent to the proposed sites presently fulfil this purpose, but they are under threat if the plans go ahead.

***f) Contribute to the character and creation of high quality and locally distinctive places***

All five sites contribute, as they add attractive and distinctive landscape character and visual amenity adjacent to housing that already represents a degree of urban sprawl at the outer settlement limits of Dronfield.

***g) Be appropriate to its context having regard to the landscape, townscape and ecological character of the locality, and where appropriate, the setting of heritage assets***

The “context” is a woolly and subjective construct. Nevertheless, Dronfield is a town which successfully manages to retain a rural feel. The five Green Belt sites very much support this “overall rural or semi-rural context” – without it, the “ecological character” would be destroyed.

***h) Protect ancient and other woodland and trees and hedges, and increase tree cover wherever possible and appropriate***

All five sites contain mature trees and rich hedgerows. For example, Hallows Golf Course has many mature trees; tree planting on the course itself began 106 years ago in 1911 (information from HGC website.) It is likely that more ancient trees have been incorporated as the course expanded.

***i) Incorporate native species and habitats appropriate to the surrounding landscape character and contribute to local ecological networks***

Green Belt land usually fulfils this objective more comprehensibly than any other type of green space. It typically contains bats, badgers, newts and a rich variety of breeding birds, plus uncommon or rare wildflowers to name but a few species.

## **1.2 Key functions of the Five Green Belt Sites Proposed for Development**

### **1.21 Site g. Land Below Shakespeare Crescent and Burns Drive**

A footpath on this land connects Shakespeare Crescent and Chesterfield Road, providing access to further open countryside and the Dronfield 2000 Rotary Walk. “Dronfield 2000 Rotary Walk is a millenium project by the Rotary Club of Dronfield. The route of the 14.5 miles circular Walk is clearly waymarked in both directions. Walkers may feel challenged to complete the full walk which is relatively strenuous, having ascents totalling 1,500 feet (500

*Metres). Alternatively, shorter sections, perhaps linking up with the 26 footpaths which are shown on an illustrated map, can be selected.”*

[http://www.dronfieldrotary.org.uk/dronfield\\_2000\\_rotary\\_walk.htm](http://www.dronfieldrotary.org.uk/dronfield_2000_rotary_walk.htm)

The rotary walk is a valued asset in Dronfield, as a well-designed and maintained footpath encircling all of Dronfield and connecting parts of the town by walking in green open space. It is much used as short sections can be dipped into and made into circular walks using the linking footpaths described. The Rotary Club have invested much time and effort into the project and it is part of the town’s millennium heritage. As the footpath on this site is a contributory footpath to the Rotary walk, removal of this path significantly compromises green connectivity and wider access to open countryside.

This land is also actively farmed; part of it has been recently ploughed for planting of crops, part of it is presently grass for silage and there are presently cows grazing on the field behind Southfield Mount. The farmland is leased from the landowner, a large developer.

### **1.22 Site h. Hallowes Golf Club Land adjacent to Hallowes Lane**

Golfing started at Hallowes 125 years ago and present-day members have described the course as a high quality outdoor leisure facility. Parts of the long-established course have recently undergone improvement works and the present financial status of the club is reported to be healthy.

The golf club has recently started hosting a scheme whereby two leading golf professionals run golf course “taster” sessions for 8 children each Sunday afternoon. The idea is to give children, as young as 4, experience of playing on a real course. Interest in golf has been declining nationally and this pioneering scheme hopes to boost interest and family involvement.

Hallowes Golf Course is clearly an asset to the region for adult golfers, plus it is engaging children in outdoor exercise and worthwhile pursuits (at a time when childhood obesity is an escalating problem).

<http://www.yorkshirepost.co.uk/sport/golf/yorkshire-golf-sheffield-duo-working-with-juniors-to-show-golf-is-fun-1-8465080>

A footpath across Hallowes golf course (part of which would be built upon if the development goes ahead) links to a wider network of paths, including the Dronfield Rotary Walk as described in the previous section. The footpath is very widely used by people of all ages, including parents with young children and prams, joggers, cyclists and many dog walkers. It serves an important social purpose and there is good community spirit between golfers and footpath users. It also provides an important walkable connection for residents from Hilltop area and Shakespeare Crescent area.

The south section of Hilltop Road, adjacent to Hallowes Golf course, is presently quiet in

terms of traffic and therefore much used in a sustainable and pedestrian-safe way to access the footpath across the golf course, a bridleway network towards the south west and a wider network of footpaths to the south, west and east; including sections of the Dronfield Rotary Walk. Walkers, runners, cyclists, horse-riders, wildlife-spotters and nature-lovers all currently use this end of Hilltop Road to access outdoor recreation pursuits.

Footpaths to the south of this site may already be impacted upon by the Peak Resort development in Unstone, although precise details of these plans do not appear to be in the public domain. NEDDC will surely be party to more detail, yet they have failed to reference this significant development and its likely impact on Dronfield in their lengthy documents.

This further statement from section 9 of the Local Plan also highlights a relevant point in respect of Hallowes Golf Club:

*“Economic development – green infrastructure improves the setting and image of towns and villages, making them more attractive places to live, work and invest.”*

Hallowes Golf Course fulfils a dual purpose of providing highly attractive green infrastructure and it is an employer for grounds staff, bar staff etc. NEDDC have stated a firm intention to provide work places where people live to promote sustainable commuting; thus, why is it looking to remove such an attractive employment opportunity in Dronfield?

### **1.23 Site i. Land behind Hilltop Road, Longacre Road and Southwood Avenue**

Part of this site is Hallowes Golf Club land, hence the golfing recreation purposes described in 1.22 also apply to this site. The northern tip of this site was sold by a large developer to a private owner some years ago, but with a buy-back clause. The developers are looking to repurchase the land under this clause and thus, to build houses on it. Part of the land is presently leased out to a local resident who keeps horses in the field. This lease would not be continued by the large developer, hence the horse-owner and the many children who enjoy visiting the horses will lose out.

The access track which serves this field, currently bears very little traffic as it serves just a small row of cottages. It is a much used pedestrian route to access a scout and guiding hut (Guideacre) that has been used by these associations for over 30 years. These active groups cater for children between the ages of 5 and 18 years. If this access track is widened to provide road access for new housing (Henry Boot surveyors have been seen inspecting this track within the last 3 weeks) it will completely change its usage from bearing less than 10 cars to bearing almost 400 cars. This will render pedestrian access to Guideacre significantly less safe. It will impact on the many children engaged in a wide range of healthy outdoor pursuits through the scouting and guiding movements.

### **1.24 Site j. Land between Eckington Road and Birches Lane at Coal Aston**

This land partly consists of open space and level grass playing fields with football pitches,

tennis courts and a bowling green. The Local Plan (5.22) states that these sporting facilities are expected to be retained or provided at an alternative location in line with policy ID3. No suggestions for an alternative location are given.

There are footpaths directly bordering two sides of this site that link to the Dronfield Rotary Walk. Any new road access for this site could adversely affect the accessibility to the wider footpaths network.

There is also arable farmland at this site which presently has pasture for silage and young cows in the shed being fed on the silage.

### **1.25 Site k. Land between Stubble Hollow and Stubble Drive**

This smaller site does not host any sporting or outdoor recreation facilities and is not presently accessible for public use. However, it is likely to be particularly rich in wildlife habitats given the dense undergrowth. The local plan (5.23) has noted that there may be ecological constraints at this site.

## **1.3 Protecting the Environment and Wildlife**

### **1.31 Increased Vehicle Emissions and Pollution**

The proposed housing developments in Dronfield and the proposed Industrial extension at Callywhite Lane would have a negative impact on the environment and wildlife. The number of cars in Dronfield would be increased by 1720 (based on an average of 2 cars per household) and there would be extra HGV traffic. The significant increase in vehicle emissions would worsen pollution and decrease air quality.

### **1.32 Trees and Hedgerows**

There are mature trees and hedgerows within all of the development sites, both along the perimeters (some of which would need to be removed to provide site access) and in the middle of the sites (where removal would presumably be required to build such high density housing as has been proposed). The Local Plan gives no specific indication of the quantity of trees and hedgerows that would need to be removed, yet it acknowledges of the important contribution plants and trees make to climate change mitigation:

*9.8 Climate change mitigation – plants and trees absorb carbon dioxide. Trees act as windbreaks and provide shade and flood management mechanisms to reduce the impact of climate change on the local environment.*

Planting new trees elsewhere could not possibly mitigate for the environmental damage caused by removing mature trees, particularly not in terms of windbreak (important in high locations such as Hilltop especially), shade and wildlife habitat functions.

The Local Plan also contains the following policy regards trees and hedgerows:

*Policy SDC2: Trees, Woodland and Hedgerows*

*Proposals for development should provide for the protection and integration of existing trees, woodland and hedgerows for their wildlife, landscape, and/or amenity value.*

*Development that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of protected trees, hedgerows, orchards, veteran trees or woodland (including those not protected but considered worthy of protection), will not be permitted.*

*Where trees, woodland or hedgerows will be lost to development and this is considered to be acceptable, suitable replacement planting on site where it is practicable to do so, or off-site if not, will be required.*

It is disappointing and irresponsible that there is not specific reference to how the trees and hedgerows on the proposed development sites would be protected, beyond mentioning some trees on the land behind Shakespeare Crescent (site i.) with Tree Preservation Orders.

The land at Stubble Hollow (site k.) is particularly dense with more unstructured shrubbery and trees. It is assumed that most of this site would need to be cleared which would result in increased pollution, loss of the “windbreak” effect on this raised site and loss of natural flood defences.

There are Tree Preservation Orders on some of the trees that border site g. (land behind Shakespeare Crescent) that would need to be retained within the layout of houses (Local Plan 5.19). Flood risk assessment is crucial before planning large scale development, especially on sites with significant valleys or steep banking, such as this land behind Shakespeare Crescent. This slopes down to a similar water plane to the Fleur de Lys pub, which has experienced significant flooding in recent years. Removal of trees and hedgerows (which form natural flood defences) increases flooding risk.

Hallowes Golf Course (sites h. and i.) contains many mature trees and hedgerows, notably a large swathe of trees in the middle of site h. (site adjacent to Hallowes Lane) and dense, rich hedgerows and trees around the perimeter. The Local Plan does not make it clear if these trees and hedgerows would be retained, but the high housing allocation suggests that some (if not all) would need to be removed. This would be in direct contravention of policy SDC2 and extremely damaging to the environment and wildlife. As previously stated, tree planting began on the course in 1911 and it is likely other trees pre-date this and were incorporated as the course was extended.

There are further substantial rows of trees and hedgerows across the northern section of the land at site i. These are close to Guideacre, the scouting and guiding hut. Flooding risk would be increased by the removal of trees and hedgerows.

At the Coal Aston Site (j.) there are clusters of trees by the drive at the side of Eckington Road and two cherry trees in the field which were planted 50 years ago when the new farm house was built in the 1960s. There are five mature oaks and two others in the hedge line down the middle of the field, plus two adjacent to the farm. This land contains a valley, hence flooding risk should be considered.

### **1.33 Wildlife Habitats**

**The Eckington Site (j.) lies in the Moss Valley Conservation area.**

The proposed housing developments on this site could have a significant impact on the wildlife habitats within the wider conservation area. The Moss Valley website contains details of many species spotted within the last week within the area. These include lapwings, skylarks, yellowhammers, chiff chaff, bees, butterflies and wildflowers (including celandines and speedwell).

<http://www.mossvalleywildlife.org.uk/w/doku.php>

Bees are currently known to be under threat, which is of great concern due to their role in pollination. Bees are kept at Troway Hall, just 2 miles away from the proposed development site at Coal Aston within the Moss Valley Conservation Area. The government launched the National Pollinator Strategy for bees in 2014. The removal of Green Belt land from this conservation area for housing contravenes this policy.

<https://www.gov.uk/government/publications/national-pollinator-strategy-2014-to-2024-implementation-plan>

#### **Further Information from the Moss Valley Wildlife Group Website:**

This is a working agricultural valley with both livestock and arable farming. It is rich in wildlife habitat, some of which has been designated as nature reserves. The Moss Valley Woodlands nature reserve is managed by Sheffield and Rotherham Wildlife Trust. There are three Sites of Special Scientific Interest and other sites are entered on the Derbyshire Wildlife Sites Register.

The valley has ancient woodlands, meadows, hedgerows, ponds and marshland, together with many tributary streams flowing into the Moss. Access on foot is easy as there is a network of public footpaths criss-crossing the area. The flora and fauna include the common and not so common, but you will see bluebells, lesser celandines, wood avens, betony, various fungi, and many species of trees. Mammals include fox, pipistrelle bat, stoat, bank vole, roe deer and brown hare. There are many bird species and a wide variety of insects.

The wildlife group runs a varied programme of activities including wildlife walks, plant and mammal surveys, fungus walks, hands-on conservation work, recording of species and educational events.

#### **Wildlife Spotted at Other Sites**

Hallowes Golf Course (sites h. and i.) has not been designated a wildlife zone. Nevertheless, lesser-spotted woodpeckers, buzzards, shrews and bats have all been seen within the last 18 months on the course by local residents. Deer have also been spotted at site i. All of these species are on the at risk wildlife list – all of which should prevent the removal of Green Belt

land, in order to protect the species. The Local Plan (5.20) merely acknowledges that there may be ecological constraints at this site.

Residents of Shakespeare Crescent, Burns Drive, Southfield Drive and Southfield Mount have reported seeing bats, foxes, badgers, mice, squirrels, birds of prey, woodpeckers, jays, chiff chaffs, yellowhammers and fieldfare at site j.

### **1.34 Other Environmental Constraints to Development**

Sites h, i and j (Hallowes Golf Course and Coal Aston) are all considered high risk by the Coal Authority, containing potential hazards arising from former coal-mining activity. The threat of fracking close to the Coal Aston site is also of concern to local residents. There is a large high-powered gas main running across the width of the Coal Aston site and a newly refurbished sewerage pumping station in the valley within this site that would need to be taken into consideration. The topography at the sites may present challenges to building, notably gradients at g. (Shakespeare) and k. (Stubley).

## **1.4 Preserving Health and Wellbeing**

The NEDDC corporate plan 2015-2019 *“further aims to support healthier, cleaner and greener communities.”* (Local Plan 1.22). The District Council’s vision is that *“North East Derbyshire will be a place that is clean and attractive, a place where people are proud to live and work, where they will prosper and are safe, happy and healthy.”*

Building 860 houses on Green Belt land around Dronfield would not realise the Council’s vision: *“By 2033 everyone in North East Derbyshire will enjoy a high quality of life, with residents, businesses and visitors all benefiting from what the district has to offer.”*

Quality of life would be considerably reduced for many Dronfield residents through pollution and the loss of swathes of high quality, accessible, green infrastructure (the detailed nature of which has already been described). Opportunities to connect with nature and green spaces would be dramatically reduced.

There is a large body of evidence demonstrating the value of being outdoors and amongst nature for preserving our mental and physical health. The Institute for European Environmental Policy recently gave a briefing to Friends of the Earth Europe on the key importance of access to nature in protecting mental and physical health:

*“Countries across Europe face many health and social challenges such as obesity, mental health issues, social exclusion, air and noise pollution. These challenges disproportionately affect socio-economically disadvantaged and vulnerable groups and add pressure on already stretched health budgets.*

A growing body of evidence is emerging on the links between health inequalities and access

to nature in urban, suburban and rural settings. Health inequalities affect all stages of life: pre-birth, childhood, adult life and old age. The evidence shows that access to nature is vital for good mental and physical health at all ages.”

<http://www.ieep.eu/publications/2017/03/access-to-nature-reduces-health-inequalities-an-ieep-briefing>

National Geographic and Truththeory.com have recently published articles reviewing the scientific evidence for this. Here are some of the findings:

- One study compared walking in a natural environment vs walking in an urban environment. Walking in a natural environment decreased “rumination” by a significant margin, whereas walking in an urban environment did not have any such beneficial effect. Rumination is obsessive, negative thoughts that can lead to anxiety and depression.
- Walking or hiking in natural environments can decrease mental fatigue, soothe the mind and boost creative thinking.
- Crucially, it can improve Attention Deficit Hyperactivity Disorder (ADHD) in children.
- We know that regular exercise is important for maintaining both physical and psychological health. There is evidence that people stick better at outdoor exercise compared to indoor pursuits, due to the boost in happiness and contentment that being outdoors brings.
- While formalised outdoor sports are very valuable to all, children also need the opportunity to play outdoors in a less-structured, more self-led way. This is critical for learning social skills and problem-solving.

<https://truththeory.com/2016/04/22/doctors-explain-how-hiking-actually-changes-our-brains/>

<http://news.nationalgeographic.com/2017/02/nature-fix-brain-happy-florence-williams/>

Thus, the removal of these multi-purpose areas of Green Belt land around Dronfield would be deleterious to the health of all residents, but particularly for our younger generation whose future is at stake with these damaging housing plans. Mental health problems have been increasing dramatically across all ages, with the most worrying increase being in children (some as young as 8 or 9 years old). Prevention is always better than cure, hence why Dronfield residents wish to rigorously defend all our Green Belt land, use it to stay healthy and not add further burden to our National Health Service.

There are further physical health concerns arising from increased pollution. The increased pollution levels resulting from extra cars and destruction of trees and hedgerows would be of most concern for children and those with asthma, chronic obstructive pulmonary disease (COPD), other lung and airways diseases (including bronchiectasis and cancers) and heart

disease.

Additionally, Department of Health Guidelines, “An Update on the Government’s Approach to Tackling Obesity”, state that “Local authorities will be instrumental in implementing plans that encourage people to do more exercise.” These free-to-access, quality areas of Green Belt offer so many exercise opportunities for all and should all be maintained and fiercely defended from development.

## **1.5 Protecting the Heritage and Character of Dronfield**

The Local Plan designates Dronfield as an urban town, casting it with a dark grey hue on the Landscape Character Map of Derbyshire (Fig 8.1). Both section 8 in the Local Plan and comments in the Strategic Greenbelt Functionality Study indicate that NEDDC does not perceive Dronfield to have much character or heritage. This is a misconception; Dronfield has plenty of character and heritage if anyone troubles to take a good look around, see the historic buildings within the town, visit Dronfield Hall Barn and Hallows Golf Club perhaps, take a stroll out in the Green Belt - rather than view Dronfield as a dark grey sprawl on a map. One could also refer to the Domesday book to find references to both Dronfield and Unstone.

The proposals to take land out of Dronfield’s Green Belt contravene national guidance in this respect:

*“National planning guidance advises that local planning authorities should set out a positive strategy for the conservation and enjoyment of the historic environment.”* (Local Plan 8.23)

Dronfield may have become a large town but residents feel it has retained a “rural feel.” A large part of this rural perception is down to the Green Belt around the town which affords direct access to wider countryside. Many residents take walks into the countryside straight from their front doors. The four large sites of Green Belt land around Dronfield, serve as a “green social hub” for sports, walking and informal recreation. People greet one another when walking in green space, in a way they would not so readily do when walking in urban areas. This helps give a sense of neighbourliness and community spirit.

### **1.51 The Heritage and Character of Dronfield South East (sites g,h,i)**

The land below Shakespeare Crescent and Burns Drive improves the setting and image of the town when entering or leaving at the southern side, with its pleasantly sloping fields, bordered by stone-walling, arable farmland and mature trees and hedgerows. The plans would result in an almost constant ribbon of development from Sheepbridge through to Unstone and through to Dronfield. This would clearly alter the character of the landscape.

The Strategic Greenbelt Functionality Study (SGFS) appraised all three proposed development sites (g, h, i) across the south of Dronfield as one “study zone” (Dronfield

South East). On a scale of 1 – 5 for “preserving the setting and special character of historic towns” it gave Dronfield South East just 1 point; the lowest grading for character that could be attributed. The scoring of 1 is described as, *“Land adjacent to settlement areas without any clear historic character, form or scale recognised as being of conservation value.”*

While the Local Plan acknowledged that there is a degree of subjectivity with this aspect of Green Belt function, it cannot be stated that these areas have next to no character. With a pleasantly landscaped, well-maintained and steeped in history golf course, pastureland for horses and cattle to graze on, a variety of characterful homes, country lanes, footpaths and mature trees and hedgerows, one could more objectively argue for a score of 4 or 5:

4 *“Land adjacent to areas where some historic character, form and scale remains, has some historic relationship with its countryside setting.”*

5 being: *“Land adjacent to areas where strong historic character, form and scale remains, has a significant relationship with its countryside setting and would be highly sensitive to extension.”* (Table 2, p18 SGFS)

The study (SGFS) also stated, “The whole study zone frames mid-late 20<sup>th</sup> century expanded settlement.” This is factually incorrect. There are characterful houses around the Hilltop area that predate 1950 (some of which are stone built) and, actually, some very attractive homes and gardens that lend plentiful character and post-date 1950 in any case.

Hallowes Golf Course is steeped in heritage and character, with over 125 year’s history of golfing at the site. The club was formed in 1892, and the course was extended to 18 holes in 1896. Tree planting commenced in 1911 and the beautiful, grade II listed clubhouse dates back 96 years. Hallowes Farm and Farmhouse were purchased in 1921 and were used to form part of the present day clubhouse. Land at the 1<sup>st</sup> and 2<sup>nd</sup> holes was used for production of food during the second world war and was subsequently returned to the club in 1954.

Hallowes Lane, which continues into Highgate Lane and out into the countryside has old, distinctive and varied housing along its entire length, from Dronfield bottom to its southern end, with views across to woodland and Chesterfield beyond. When travelling up from Dronfield bottom, the beautiful, stone-built clubhouse is a striking feature with distinctive windows, standing in an elevated position with the pleasant practice green and stone walls as frontage. The beautifully landscaped, undulating and well-maintained golf course stands across the road; the greens framed and punctuated by mature trees and hedgerows, notably some striking evergreens. The aesthetic of the Grade II listed clubhouse, the golf course and homes in this area lend a country village feel to this stretch.

Similarly, Hilltop Road has houses of very varied character and age (again, some stone-built with stone walling) along its entire length, then the golf course vista opens up to one’s left. Shortly after the housing finishes a gateway on the right affords a view to the east across to

Monk wood, Grasscroft wood and the eastern fringe of the Peak District. Continue further to a bridleway, a farm, footpath networks and views to Chesterfield.

Residents feel connected with the countryside in these areas and feel the close connection with the Peak District. NEDDC's district-wide objective, D3, claims to *"support the District's tourism economy by developing assets, .... , and by strengthening the District's role as the gateway to the Peak District National Park."* The proposals for Dronfield would achieve the exact, polar opposite. While Dronfield has been designated as being in the north of the District, it's relatively westerly position and proximity to the Peak District seems to have been overlooked.

Both Hallows Lane and Hilltop Road would become access routes for the proposed developments on the south side of Dronfield (totalling 655 homes in all). These characterful, semi-rural roads would be changed beyond all recognition. The nature of these and surrounding roads would drastically change from quiet, safe roads where children play football and ride scooters and bikes. If access to site g was created via Burns Drive (a planner at one of the drop-in sessions was non-committal regards this) it would totally change Burns Drive from a cul-de-sac with a small communal grassy area where children play out to a busy, much more hazardous through road with this pleasant play area removed. The family-friendly character of the road would be lost.

### **1.52 The Character and Heritage of Dronfield North (sites j,k)**

The Coal Aston site (j.) provides a pleasant aspect when entering or leaving this part of Dronfield at the eastern side along Eckington Road. The farm buildings, farmland, fields, trees and mature hedgerows lend a "village feel." Both Coal Aston residents and many residents in the wider Dronfield area, view Coal Aston as having a village character with its own identity.

Coal Aston Village Hall and Birches Lane, which is presently a country lane with characterful houses and recreation space on either side, add to this rural setting. The village identity is perhaps less strong further towards the centre of Dronfield, but is maintained at this north eastern tip of Coal Aston despite some extent of sprawl at this end of Dronfield. The building of 180 houses on this site would remove the last remaining sense of village identity and character for Coal Aston residents.

The site at Stubley Hollow (site k.) stands across the road from Stubley Hollow Farm and Riding Stables, with open countryside in further Green Belt beyond. The farm buildings are old, stone-built, character buildings, standing in beautiful farm grounds with traditional stone walling fencing the plot from the road. This lends much character, before entering the more built up parts of Dronfield Woodhouse.

The Strategic Green Belt Functionality Study appraised all of the Green Belt Land along the

extensive northern boundary of Dronfield as one Study Zone: Dronfield North. On the scale of 1 – 5 for “preserving the setting and special character of historic towns” it gave Dronfield North a relatively low functionality score of 2: *“Land adjacent to settlement areas with some remnant historic character, form or scale recognised as being of conservation value but which has become partially separated from its landscape by later development.”*

This scoring is despite the numerous farms and farmland testifying to a heritage of farming across this northern stretch and the Moss Valley Conservation Area at the north-eastern end which encompasses the Coal Aston site (j.) The community around the Coal Aston site has not yet been separated from its Moss Valley landscape, but they would be if the development plans go ahead.

The study results section (p44) states, “The extensive Moss Valley Conservation Area abuts the north east edge of Dronfield but it is not influential on Dronfield’s settlement importance or character per se.” I’m sure many Coal Aston and Dronfield residents would entirely disagree with this statement and would have a very different opinion to NEDDC as to what constitutes Dronfield’s “Settlement Importance.” Residents strongly feel that countryside and conservation areas that abut the town are of huge “settlement importance.” Conversely, NEDDC seem to only regard the importance of Dronfield in terms of its size; a large, urban settlement to make even larger with yet more housing. The District Council seems to attach no importance at all to countryside access for Dronfield’s residents.

Furthermore, the above statement contradicts a statement on p21 in the methods section of the study: “..legislation and other policy mechanisms serve to protect the special historic character of small and scattered settlements within sensitive landscapes such as the Moss Valley Conservation Area.” Perhaps NEDDC are trying to argue that because Coal Aston is no longer small and scattered, the “special historic character” and “sensitive landscape” of the conservation area are not worthy of protection. This is an invalid argument and points to these subjective and grey areas in the study being interpreted in an entirely biased fashion to achieve the result that NEDDC wanted from the start.

Like the community in South Dronfield, Coal Aston warrants a Green belt functionality Score of 5 regarding special character of historic towns as it also has “significant historic relationship with its countryside setting.” By nature of being next to the conservation area (where building is proposed) which offers habitats for a wide variety of wildlife, flora and fauna, plus access to a wide network of footpaths and the Dronfield Rotary 2000 walk, this area “would be highly sensitive to extension.”

## **Section 2: Challenging the Local Plan and Evidence Base Provided by NEDDC**

### **Introduction**

The Local Plan and NEDDC's interpretation of the evidence base documents demonstrate that the District Council has failed, in several respects, to follow national policy (or sometimes its own policy) in drawing up the Local Plan. The validity of some research is questionable as assessment criteria used are, in some cases, unclear and indistinct; for example, the Green Belt review contains too many different criteria that effectively measure the same thing. It is also clear that research has been interpreted with a heavy bias towards reaching an end conclusion of justifying release of land from the District's Green Belt. That end objective seemed to be the driver for conducting the Green Belt review and functionality study in the first place.

- NEDDC have undervalued and disregarded the scope and strength of functions of the Green Belt land around Dronfield.
- The Strategic Green Belt Functionality Study found that proposed development sites in North Dronfield are in the upper quartile (top 25%) of Green Belt sections that would suffer most when measured against green belt purposes.
- The Study also found that proposed development sites in South Dronfield are in the top 50% of Green Belt sections that would suffer most.
- In addition to these high scores, the Strategic Greenbelt Functionality Study (which admits to containing subjectivity) has under-estimated the functions that the Dronfield Green Belt fulfils, particularly in South East Dronfield. More appropriate scoring would put South East Dronfield high in the upper quartile.
- Notably, the stated existing gap between Dronfield and Unstone is incorrect; it is less than stated. Building has already begun on the Peak Resort development in Unstone. This will narrow the settlement gap between Unstone and Dronfield, bringing more areas of the two settlement's limits to within less than 800m of each other.
- Furthermore, repetitive and ambiguous statements in the results analysis fail to justify why the results of the study appear to have been totally disregarded in any case. North Dronfield scored 17 from a maximum of 20 (17 was the highest score of all "study zones") yet two areas of Green Belt in North Dronfield are still being proposed to be released for large scale housing development.
- There is suggestion that there may be variability between parcels of land within a given Study Zone, but no explanation as to how the Coal Aston (j.) and Stubble (k.) sites may be worthy of lesser scores than the rest of the Northern zone as a whole.

**NEDDC have NOT demonstrated that exceptional circumstances exist to justify the removal of land from the Green Belt around Dronfield.**

The housing requirement calculations (drawn from the Strategic Housing Market Assessment) have omitted to factor in building on smaller brownfield sites, which could yield around 1000 houses over the remaining plan period. Additionally, the high end of a wide range of predicted need has been used. The amount of housing needed has therefore been substantially overestimated.

The District Council has made insufficient effort to explore all brownfield development options, either across the district or within Dronfield itself. In particular, there are smaller sites which lie closer to amenities (as opposed to much less accessible places at the outer reaches of town) that would be more appropriate for affordable and social housing.

NEDDC have not explored the option of re-designating industrial land at Callywhite Lane for housing development. Callywhite Lane has remained undeveloped for many years and has been failing to attract new businesses.

The District Council has taken no action to bring 733 vacant homes back into occupancy across the district. This includes 133 vacant homes within Dronfield.

NEDDC have not co-operated with Chesterfield Borough or Sheffield City Councils. It appears that Chesterfield Borough will have a more than adequate supply of homes for its predicted future increase in population, without having to resort to building on Green Belt. Sheffield is one of 15 councils with the most brownfield land in need of regeneration in England.

**The Settlement Hierarchy drawn up by NEDDC is flawed and based upon crude and inaccurate measures of sustainability.**

NEDDC have drawn up a Settlement Hierarchy in the Local Plan in order to decide which settlements are most “sustainable” and could therefore support the highest increases in population. Dronfield has been placed first in the Settlement Hierarchy, deeming it as the most sustainable settlement in the district. This is based upon two factors; its large size and its railway station.

Size is a thoroughly crude and inaccurate measure of sustainability, especially as Dronfield already has a large amount of housing relative to an only modest amount of amenities and over-stretched public services. NEDDC have not yet drawn up an Infrastructure Plan; without this, sustainability cannot be reliably gauged at all.

The council has identified that Dronfield is the only settlement in North East Derbyshire with a railway station. However, public transport links from the outer reaches of town are lacking which drives up the use of cars to get to and from the station. Parking is limited at the station and set to be further reduced, causing overspill parking on nearby roads. This adds to road congestion and road safety concerns for school children on nearby School Lane and Lea Road. Hence the train station does not provide a sustainable means of transport for commuters and other users.

Section 3 will address the detailed infrastructure problems 860 new houses would bring to Dronfield; an area which NEDDC has not yet addressed.

## **2.1 How Much New Housing is Actually Needed across the District?**

The Local Plan sets out a figure for new housing requirement over the 22 year period from 2011 - 2033 of 6600 dwellings.

The North Derbyshire and Bassetlaw District Strategic Housing Market Assessment (SHMA, November 2013) forms the basis for this calculation. The challenging nature of undertaking projections is acknowledged and it does state that the results should be considered with such uncertainty in mind.

The analysis in the SHMA (a 200+ page document) takes baseline Communities and Local Government figures, and then considers numerous projections based on population demographics, births, deaths, employment, and migration to predict population expansion and thus, future housing need.

The document splits the larger region it relates to down into slightly smaller parts - North East Derbyshire being one - but not into individual villages and towns.

TO CONSIDER THE CALCULATIONS ....

The SHMA suggests that based on the data analysis, the lowest possible requirements would be 242 dwellings per annum for NE Derbyshire, which would equate to 5324 (over the 22 year period).

However in its conclusion, the SHMA offers that from 270 to 310 dwellings per year would be a more sensible target, with the higher end being aimed for if looking towards significantly increasing economic growth (which would result in more housing being needed to accommodate the labour force).

The Local Plan has opted to look towards the top of the scale, at 300 dwellings per year. Taking into account, the 1016 dwellings already built from 2011-2016 (of which 329 are deemed to have been built on "smaller sites ") this would leave:

6600 - 1016 = 5584 dwellings to build in the remaining period to 2033

**THE PROPOSED 5740 DWELLINGS IS ALREADY 156 ABOVE THIS ALREADY HIGH TARGET.**

**Now looking at the 5740 planned dwellings, this does NOT include any residential properties in the Coalite regeneration proposal.**

This site initially had a housing allocation of 660 but, in light of the recently suggested redirection of HS2, things are a lot less certain (as the new HS2 route would cross the Coalite site.) A planner at a District Council drop-in session indicated that it is still feasible for at least some proportion of the planned homes for this site to be built. A precise figure cannot be given as yet, but perhaps 200-300 could be hoped for.

**Also of great significance is that the proposed 5740 dwellings only takes into account developing on larger sites.**

As mentioned above 329 properties were built on smaller sites from 2011-2016.

**If this rate of building on smaller sites continued throughout the period of the plan, ANOTHER 1100+ houses would be realised.**

So for example, assuming 6600 were needed over the 22 yr period, deducting those already built (1016), ongoing smaller site developments (1100), and some residential development at Coalite (maybe 200 ) **THAT LEAVES 4284 PROPERTIES TO BUILD, based on the higher end figure of estimated requirement.**

**THIS TRANSLATES TO NEEDING APPROXIMATELY 1500 HOMES LESS THAN IS PROPOSED IN THE LOCAL PLAN, even based on higher targets for building rates.**

If we took the lower end figure of what the SHMA document proposed (270 dwellings per year) this would give a total of 5940 required over the 22 year period. Using the same adjustments as above, **THAT LEAVES 3624 PROPERTIES TO BUILD, based on the lower end figure of estimated requirement.**

**THIS TRANSLATES TO NEEDING APPROXIMATELY 2000 PROPERTIES LESS THAN IS PROPOSED IN THE LOCAL PLAN, based on the lower targets for building rates.**

## **IN CONCLUSION, 25-35% LESS HOUSING IS ACTUALLY NEEDED THAN HAS BEEN STATED BY NEDDC**

This also does not take into account any "windfall sites" that may arise over the remaining plan period to 2033. These are sites which have not been specifically identified as available in the Local Plan process, but that unexpectedly become available. Such sites are normally previously developed sites. District Council figures show that windfall sites between 2011 and 2016 accounted for 5% of the proposed needs.

It is very likely that some windfall sites will become available and, although not predictable, could be considered as a potential "buffer" when looking at housing requirements.

### **Some Other Considerations From The SHMA Document**

It is stated that levels of "overcrowding" in properties are low in our region, and overcrowding is one factor in determining housing need (ie. more overcrowding, more need for new housing.)

The economy of North East Derbyshire is not a strong driver of housing demand in the region. It also states that there is a **STRONG POTENTIAL** for the labour force requirements for economic growth to be provided by reducing "out-commuting" of our population, rather than needing increased housing to bring in the labour force.

**It is accepted within the SMHA that the need for affordable housing is unlikely to be met in reality by large site development** and it encourages councils to look at **VACANT** dwellings (there are presently 731 vacant homes identified in NE Derbyshire, see section 2.22 and Appendix A). Maximising the private rental sector is also encouraged as this would encourage investment and development. All this guidance from the Strategic Housing Market Assessment is advocating small site development!

It is also recommended that councils collaborate "as appropriate" with neighbouring authorities, including the Sheffield City region, when considering overall housing needs. The "duty to cooperate" is emphasized. The level of co-operation with neighbouring councils is highly significant to consider and is discussed in 2.23.

Additionally, housing is more ideally provided near to areas of economic growth to promote sustainable travel that is less damaging to the environment. Given that much of the economic growth is planned for the south of our region (around Markham Vale, Barlborough Links, the regeneration at Castlewood and the Riverside in Chesterfield) needlessly over-populating Dronfield would further increase numbers commuting out of the town with a negative impact on the environment and road safety.

## **2.2 Exploring Other Brownfield Options for Housing Development**

The Department of Communities & Local Government have guidelines which state, “... *local councils should be looking to brownfield first and foremost, and be in line with government policy of protecting Green Belt.*” ..and.. “*We should use this also to provide a steer to our local council that they should be looking to Brownfield first and foremost and be in line with the government policy of Protecting Green Belt.*”

The previous iteration of the NEDDC Local Plan (334 pages long), which went out to consultation in Feb 2015, contained very different housing proposals for Dronfield. All the proposed sites were within the present town boundaries and all were brownfield (with the exception of one site on greenfield). A total of 285 houses were proposed for the period of 2011-2033. As 104 had already been built, there was a remaining need for 181 further houses.

The reasons why none of these brownfield sites have been brought forward into this present iteration of the Local Plan have not been clearly stated by NEDDC. A planner at a council drop-in session failed to answer questions regarding these previous sites, what was happening with them and what reasons there were for ruling them out. There is nothing in the present plan and supporting documents, nor is there anything in the NEDDC Position Statement, that was issued in November 2016, before this present consultation period.

### **2.21 Brownfield Sites**

As stated, Dronfield Green Belt Group firmly opposes the removal of Green Belt Status from any of the five parcels of land around Dronfield where house building has been proposed. However, we recognize the need for new housing, taking into account our comments in section 2.1 regarding how substantially less housing is actually needed than stated in the Local Plan. We are keen to contribute positively towards exploring opportunities for brownfield development.

Brownfield sites of all sizes should be considered as stated in the recent Housing White Paper “...*supports releasing more small and medium sized sites*” (p.18) to help provide housing where it is required. NEDDC ruled out even considering sites that could accommodate 10 dwellings or less when drawing up the Local Plan, hence it cannot be said that every option has been explored and release of Green Belt is warranted.

We recognize that brownfield land can be more expensive and more difficult to develop than Green Belt, but this absolutely does not provide an “exceptional circumstance” to warrant using Green Belt land! All sources of funding should be explored for this kind of regenerative development. The Homes and Communities Agency holds a £3 billion Home Building Fund. It is government finance to increase the number of new homes being built in England. Applications are being accepted from private sector businesses to build new homes or prepare sites for development. The web link states:

*“You can apply if you’re a private sector business that builds new homes or prepares sites for housing developments.*

*This includes small builders, community builders, custom builders and regeneration specialists, as well as larger builders and developers.”*

<https://www.gov.uk/government/publications/home-building-fund-developer-case-studies>

### **Time for a Rethink on Callywhite Lane?**

The old Padley and Venables site on Callywhite Lane in Dronfield has not been used for at least 10 years and an application for 51 residential dwellings in 2013 was turned down. This would entail a change of use of land presently protected for employment.

The NPPF states that, *“planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.”* It also notes public feedback that *“considerations should be made over whether a site should be protected where it is clear that employment uses cannot / will not come forward.”*

It seems entirely reasonable, after more than 10 years of Callywhite Lane failing to attract new industry, to consider a rethink about the future of this estate. We do not feel that Callywhite Lane is sustainable for Industrial Development and wish to object to the 15 acre extension proposed in the Local Plan. More detailed reasoning for this is in section 3.5.

One smaller business that **has** moved to Callywhite Lane within the last 5 years is a nursery offering childcare for children from 3 months to 5 years of age. This nursery also offers some forest schooling and employs local people. With Cliffe Park long-established off the lower end of Callywhite Lane, and now a Forest Schools nursery this small, latter shift in the nature and usage of the area could be expanded.

While there are many issues to consider in terms of building housing on former industrial land (providing road access and adequate demarcation between housing and industrial areas) these are options residents wish to see explored. It is noted that Coal Mining and Contaminated Land assessments would need to be carried out.

One of the key functions of Green Belt is to encourage exactly this kind of regeneration! It is also worth noting the close proximity of Dronfield Henry Fanshawe School at the bottom of Green Lane and in close proximity to the Industrial Estate. With its 1800 pupils, provision of nearby family housing (rather than even more HGV traffic adding to pollution and further endangering pedestrian safety) would be highly beneficial.

The local plan also states, *“There are a number of sites across the District that have planning permission where there are deliverability concerns and / or a history of unimplemented permissions.”* Further consideration should be given to overcoming these obstacles and utilising these sites wherever possible.

### **2.22 Vacant Homes**

It is stated in the “Growth Strategy – Unlocking our Growth Potential” document that:

*“if [empty homes were] brought back into use it would contribute towards meeting housing*

*needs and improve neighbourhoods”.*

From a Freedom of Information request submitted to NEDDC in March 2017 (see Appendix A) we have discovered that there are **731 properties recorded as being Empty Homes across the whole of the NEDDC area, including 133 in Dronfield, Dronfield Woodhouse and Coal Aston**. For the years of 2015 and 2016, NEDDC have assisted no owners in recycling those properties back into use as homes, the result being where those homes are now in full use; nor are NEDDC currently assisting owners to do the same; nor have NEDDC taken formal enforcement measures against owners to bring about the same.

Every effort should be made to bring these homes back into use, before housing developments on Green Belt land are proposed. Again, other options being more costly does not provide exceptional circumstances for building on Green Belt.

### **2.23 Duty of Co-operation with Neighbouring councils**

Before planning to build on Green Belt, NEDDC could and should have explored options and availability of brownfield sites with neighbouring councils. Given the close proximity of Chesterfield Borough and Sheffield City regions this is negligent. The increased risk of settlements merging through release of Green Belt land around Dronfield is extremely pertinent to all three regions. The councils should work co-operatively to ensure all other options are explored before any Green Belt is compromised.

Commuting from Dronfield into both Sheffield and Chesterfield is high. The proposed industrial extension at Callywhite Lane is not sustainable or deliverable (see section 3.5) and would only generate limited employment opportunities in any case. Hence collaborative planning to maximise housing near employment opportunities in Sheffield and Chesterfield should be a priority.

#### **Chesterfield Borough Council**

Chesterfield Borough borders NE Derbyshire very closely, being almost surrounded to the north, west and south by NED. Council boundaries are artificial to how people live their lives. Chesterfield Borough Council is at an earlier stage of planning, which is unfortunate given that the NPPF encourages neighbouring councils to adopt similar time frames for Local Plans. Some of Chesterfield’s potential sites presently under consideration may yet be lost through suitability assessments. Nevertheless, plans to bring forth 4,600 homes on brownfield sites with 1000 reserve homes on greenfield are presently being looked into.

Based on an average of 2.5 people per household, it appears that there will be a more than adequate supply of homes for the predicted future increase in the Chesterfield Borough’s population (<10,000) without resorting to building on Green Belt. (CBC Draft Local Plan Jan 2017).

#### **Sheffield City Council**

A recent government press release has highlighted that Sheffield and Bassetlaw are two of

73 councils piloting the government's brownfield register scheme. This aims to make sure brownfield plots are found and listed so that housebuilders can identify suitable sites quickly, speeding up the construction of new homes. Sheffield has been selected for this scheme as it is one of 15 councils with the most brownfield land in need of regeneration in England.

<https://www.gov.uk/government/news/first-areas-to-push-for-faster-brownfield-land-development>

The press release states:

*“(The Brownfield Registers) will also allow communities to draw attention to local sites for listing, including in some cases derelict buildings and eyesores that are primed for redevelopment and that could attract investment to the area.*

*The government has pledged 1 million more homes and to get planning permission in place on 90% of suitable brownfield sites for housing.”*

With so much brownfield land in a close neighbouring council district, there is no justification to build on Dronfield's Green Belt land, especially given the high commuting levels into Sheffield from Dronfield.

### **2.3 Are there any Exceptional Circumstances to Warrant Removal of Dronfield's Green Belt?**

There are many references to the importance placed on Green Belts throughout the Local Plan:

4.59 *“The essential characteristics of Green Belts are their openness and their permanence....”*

4.62 *“National guidance is clear that Green Belt boundaries should only be altered in exceptional circumstances.”*

Policy SS9 *“The NPPF tells us that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. LPAs (local planning authorities) should respect the permanence of the Green Belt.”*

NEDDC and the evidence base it has referenced have failed to demonstrate any exceptional circumstances for removing land from the Green Belt around Dronfield.

#### **Appraising the District Council's Evidence Base Regarding the Green Belt**

The Strategic Greenbelt Functionality Study assessed collective areas of Green Belt land, or “Study Zones” against how highly they functioned for each of the five key functions of Green Belt:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one other.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging recycling of derelict and other urban land.

Each study zone was given a score of 1-5 for each key function, where 1 is the lowest functionality score and 5 is the highest. High scores suggest the Green Belt is highly functioning and “sensitive” to removal of status, therefore high-scoring zones should generally be preserved.

For the fifth purpose, “To assist in urban regeneration...” all Study Zones scored 5, hence this function was removed to simplify data analysis, leaving a maximum score of 20.

The scores for preserving “the setting and special character of historic towns have been discussed in detail in section 1.5.(p17-20) South East Dronfield Study Zone (incorporates sites g,h,i) was scored at just 1, whereas the pooling of local knowledge amongst our residents’ group and information on the Hallows Golf Club website would indicate the highest score of 5. This measure is, of course, somewhat subjective as is acknowledged in the study, but we hope the descriptions in section 1.5 illustrate that a score of 1 is wildly inappropriate.

Similarly the North Dronfield Study Zone was given a score of just 2, indicating that the land has “become partially separated from its landscape setting by later development.” The Coal Aston site is still part of the Moss Valley Conservation Area and presently has young cows and pastureland for silage. The Stubley site stands across the road from an old stone-built farmhouse and stabling facility. As the Study Zone encompassed Green Belt across the entire north side of Dronfield it could be that other areas were deemed to score less highly (so why not score each parcel of land separately in that case?), although there are further farm buildings and farmland right across the northern side. Again, the low score seems inappropriate.

This Dronfield North Study Zone scored 5 for each of the 3 remaining functions hence it achieved an overall score of 17; the highest score of any of the zones which included areas of Green Belt across the entire district. Hence it is baffling as to why NEDDC still deemed the Coal Aston and Stubley sites suitable for release.

The Dronfield South East Study Zone (sites g. – Shakespeare, h. – Hallows Golf Club and i. – Hilltop Road) was scored as following:

- To check the unrestricted sprawl of large built-up areas. 5
- To prevent neighbouring towns merging into one other. 4
- To assist in safeguarding the countryside from encroachment. 2

- To preserve the setting and special character of historic towns. 1

The scores will be discussed in the next sub-sections, where the issues of preventing merge between Dronfield and Unstone will be addressed and the “infilling” of Green Belt land on town boundaries will be challenged. Suffice to say for now, that while this total score of 12 still placed Dronfield South East in the top 50% of Study Zones (indicating relatively high functionality) there are good arguments to warrant an overall score of 20!

The analysis of the results within the study talks in circular and repetitive fashion about limitations of subjectivity, how one particular function may be more significant in one location than another and about how certain functions should perhaps bear more weight than others. A large number of Study Zones scored a maximum 5 on at least one of the four functions in the scoring system. Rather than conclude that Green Belt serves a very good purpose in most instances, it was decided that *“Potentially, localised releases could still be considered, even within high scoring study zones.”*

It also states that Zones that fell in the lower 50% of scores (indicating less functionality) should not necessarily be released from the Green Belt as they may have other sensitivities not considered. It concludes with:

*“Findings of this study should be used only as a broad filter or sieving tool, rather than to set firm guidelines for where further consideration for identifying small-scale release sites could take place.”*

The flaws and limitations of this study (which should have assessed each site individually using on-site inspections, plus carried out research into heritage) and the concluding statement gave NEDDC the carte-blanche it had been seeking to propose plans for housing developments on Green Belt. It does point to the study not being commissioned without bias from the start.

### **Dronfield South East Greenbelt Functionality (sites g. Shakespeare, h. Hallowes Golf Club and i. Land behind Hilltop Road)**

#### **2.31 Preventing Merge between Dronfield and Unstone**

The function of preventing neighbouring towns merging into one another was scored at 4, with this accompanying statement:

*“These settlements lie between 700 and 800 metres at their narrowest points of separation. Development in the study area would be likely to erode the sense of separation between the villages and town, although carefully directed and limited development should limit such impacts.”*

Using Ordnance Survey Explorer Map 269, the narrowest points of separation stated above seem to have been measured from the SE tip of Shakespeare crescent to the NW tip of Unstone Green. This ignores the closer proximity of Unstone (area of Fleur de Lys pub and

surrounding housing lies) where the settlement separation is already just 550m and the houses around Unstone Hall, where the settlement separation is only 400m.

Additionally, neither this study, the Local Plan or other supporting documents have taken into account the Peak Resort development in Unstone, where building has now begun. This will serve to further narrow the gap. The resort will contain woodland and countryside, but also several lodges, a hotel and other buildings for accommodation, plus an “event dome” and University Campus. Peak Resort will merge Unstone Green with Sheepbridge and Chesterfield. The distance between Unstone Green and Unstone along the main road is 275m and then onto Unstone Hall Housing is just 125m. Any developments along the main road through Unstone (Chesterfield Borough’s Local Plan) would reduce these gaps further.

**If the housing developments proposed for South East Dronfield went ahead, separation between the settlements would range from just 250m and 1.4km. This certainly warrants the highest functionality score of 5 and is of extremely worrying significance as Dronfield would be at high risk of merging, not just with Unstone, but with Chesterfield also.**

Separations Between Dronfield (SE tip of Shakespeare Crescent) and Unstone Before and After Proposed Housing Developments in South East Dronfield (sites g,h,i):

	<u>Before</u>	<u>After</u>
To Housing at Unstone Hall	400 metres	250 metres
To Unstone (Fleur de Lys Pub area)	550 metres	325 metres
To Unstone Green	750 metres	750 metres

To put things in overall context, these will be the separations between existing parts of SE Dronfield and Peak Resort when completed:

Existing Southern tip of Shakespeare Crescent	625 metres
Southern side of HGC development (h.)	825 metres
Southern end of housing on Hilltop Road	1 km
*SW tip of development bordering A61 (i.)	1.4km

(\*This would be the largest separation after proposed developments behind Hilltop / Longacre Road developments.)

**Based on these very fragile separations, none of the three sites proposed for housing development in the South of Dronfield (g,h,i) should be released from the Green belt as merging with Unstone, Sheepbridge Estate and**

## **Chesterfield would become inevitable.**

### **2.32 Does “Infilling” Constitute an Exceptional Circumstance for Removing Green Belt?**

The functionality score given for South East Dronfield for “Assisting in Safeguarding the countryside from encroachment” was just 2. The statement with this score includes the following:

“The urban boundary across the Study Zone is irregular, serving to present some parts of Greenbelt with semi-enclosure of an urban (semi-urban) frame. The strong physical and perceptual influence of the bypass to the west also serves to frame parts of the study area.”

Both this study and the Local Plan refer to “infilling”, whereby a parcel of Green Belt is bordered on 2 or 3 sides by existing housing development, it is considered reasonable to infill the space with housing and thereby, straighten out the settlement boundary. “Limited infilling can constitute an exceptional circumstance for releasing Green Belt, but there is nothing “limited” about the plans for Dronfield and the context of the very fragile separation between settlements and the high quality sports and recreation provision afforded by the Green Belt land, must over-ride this exception clause.

Infilling is a rather mathematical approach to straightening out boundary lines on a map and, as such, an invalid measurement tool to judge the extent to which a development would encroach on or change the character of the countryside. The terminology is meaningless as any building on any Green Belt land encroaches on the countryside.

The Green Belt Functionality study uses this approach to grade the level of encroachment on the countryside. If a parcel of land is bordered on just one side by housing, it is considered to be connected to wider countryside and development would encroach on the countryside to a greater extent. If a parcel of land is bordered on 3 sides by housing development (in a horse-shoe shape) it is considered to be less open to the countryside and development is deemed to encroach less.

Ironically, when a parcel of non-Green Belt land is bordered by housing on all 4 sides it is called a green recreation space or urban green space and would be much more protected from being developed!

For the south Dronfield sites

Site h. Hallowes Golf Club - horseshoe shaped

Site i. behind Hilltop road - is said to be “framed” on one side by the bypass and the other by housing, forming a ‘V’ shape

Site g. framed on one side by Chesterfield Road and the other by housing forming a ‘V’ type shape.

Hence, the low score of 2 using a very arbitrary and crude measure which seeks to roughly quantify openness, but not qualify it at all. A better means of assessment would be a more qualitative appraisal taking into account topography, the nature of the countryside and the biodiversity. NEDDC seem to have disregarded the quality and special purposes Dronfield's Green Belt serves. The government's white paper states:

*"The case for development is also propped up by overly simplified claims that much of the green belt is poor-quality, unproductive land, with no clear requirements for good management"*

In the case of Dronfield's proposed sites, they are high quality productive green spaces, some farmed others used for recreation in addition to fulfilling the exact role greenbelt was first conceived for i.e. stopping urban sprawl and the merging of settlements.

Paragraph 89 of the National Planning Policy framework states that, "A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt, and the purpose of including land within it, than the existing development."

The only exception criteria that could apply to Dronfield's Green Belt land is that of "limited infilling."

The housing proposals at all 4 larger sites cannot be called "limited" infill, given the high numbers of houses. The promontories of existing housing that jut out to the south of Dronfield and at the NE tip near Coal Aston already demonstrate a significant degree of urban sprawl, at considerable distance from the town centre. Keeping Urban sprawl under check is also a key function of Green Belt. Infilling these shapes with housing will increase

the extent of urban sprawl significantly.

These outer-reaches of town are also less accessible places to live, due to their distance from the town centre and amenities and their steep gradients. It renders them less sustainable for elderly people and parents with young children in particular. Bus services are limited and car usage is very high, for short journeys in and out of town. Adding yet more housing to these areas will not be achieving the District Council's vision of "Sustainable places."

The **openness** of parcels of Green Belt land is only crudely defined by the extent to which the land is already bordered by housing. The **access** it affords to wider countryside and networks of footpaths beyond the parcel of land is also a determiner of openness. We have already demonstrated in section one that sites g, h, and k provide excellent access to the wider countryside and the Dronfield 2000 Rotary Walk. The A61 bypass has been stated to "frame" site i, and used as justification for infilling. There is open countryside, woodland and footpaths beyond the bypass to the west, that is accessible via the road bridge onto Barlow Lees Lane at the northern tip of site i. This lane provides access to footpaths into Grasscroft and Monkwood. Similar access to this countryside west of the bypass can be gained using footpaths and bridleways off the south end of Hilltop Road (adjacent to golf course at site h.), skirting the golf course at site i, and crossing over the bypass on a footbridge. Hence it is invalid to state that the bypass limits or "frames" the openness of site i.

It is also essential to reconsider those very narrow and fragile settlement gaps described in section 2.31. "Infilling" would remove more of the little remaining countryside and **would** risk merging with Unstone and Chesterfield.

## **National Planning Policy Framework Statements Regards Green Belt**

*81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the 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; or to improve damaged and derelict land.*

*88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.*

## **SUMMARY OF SPECIFIC CONCERNS REGARDS MERGING OF SETTLEMENTS**

- The greenbelt strip on the north of Dronfield is already very narrow. Removing greenbelt status anywhere on this side of town puts Dronfield at high risk of merging with Sheffield in the future. Becoming part of a city will totally alter the character of Dronfield.
- The Peak Resort development underway\* will narrow the gap between Unstone and the

south of Dronfield. Since Unstone has little separation from Chesterfield, removing any greenbelt status on the south side of Dronfield leaves high risk of all three settlements merging in the future. Dronfield will cease to be a rural town. \*Dronfield Eye, Issue 138, April 2017

- If these sections of greenbelt land are given up for houses, it sets a precedent for more greenbelt land to be taken in future, merging Dronfield with Sheffield and / or Chesterfield.
- The character of Dronfield will change from a rural town surrounded by quality green space, used by many, to an over-congested, urban sprawl.

**There are no exceptional circumstances and Greenbelt Status should be retained.**

#### **2.4 What is Driving Such Extensive Development on Dronfield's Green Belt?**

The government requires all District Councils to draw up a Local Plan in order to address chronic housing shortages. In particular, a need has been identified for more affordable homes (including purchasable starter homes, privately rented homes and social housing).

NEDDC released a position statement for the public in November 2016, following its consultation period on an earlier iteration of the plan in Feb 2015. It was scant on specific detail regarding feedback from that consultation but it did include this statement:

“The Green Belt tightly constrains development in the North and West of the District, areas with particularly high **demand.**”

It is clearly “demand” more than true “need” that is driving these housing developments. In particular, there is high demand from people wanting to move from Sheffield. This is often with a view to live in Dronfield, but continuing to work in Sheffield. Hence, catering very highly for this demand would hugely increase commuting, adding damage to the environment. It is not meeting NEDDC's objective of people living where they work.

There is a demand for cheaper housing in a “highly desirable location” such as Dronfield. It must be considered what makes Dronfield desirable:

- Green Belt and good access to wider countryside and footpaths, notably the Dronfield Round Walk
- Green “connectivity” between areas of housing within Dronfield and with neighbouring villages.
- Character and sense of community.
- Clean air provided by the Green Belt and more limited green spaces within the town.

The irony is that catering to the demand for housing would result in Dronfield becoming much less desirable as its best and most distinctive features would be destroyed and its infrastructure would be over-loaded.

The plans seem, to a large extent, to be developer-led since large developers have owned much of the land for several years, waiting for it to be released from Green Belt to enable

profitable building.

Two years ago, large owner-developers provided a plan for 449 houses on the site below Shakespeare Crescent and also across Chesterfield Road, extending as far as Half Acre Lane. Their plans did not include starter or affordable homes, but did include low density, large houses in big plots, bearing some similarities to the Gosforth Valley estate. <https://bolsover.jdi-consult.net/localplan/viewrepfull.php>

If large developers are allowed to develop the land below Shakespeare Crescent (plot g.), they will push for more expensive and profitable houses, that they know will sell in Dronfield, and seek to drive the necessary quota of affordable homes down. Such negotiations commonly occur between large developers and planning authorities.

### **2.5 Does Removal of any Green Belt Land set a Precedent?**

The short answer is, Yes it does!

This is especially likely to be the case if NEDDC continues to allow plans to be “large developer-led” rather than more proactively seeking to work with a full range of builders (local if possible) and smaller scale developers and encourage them to apply for national brownfield fund monies.

In particular, land below Shakespeare Crescent is at high risk, where the settlement gap between Dronfield and Unstone is very narrow. If development was permitted here, the developer would inevitably seek to develop their remaining adjacent land in future. The Council’s approach is encouraging and rewarding developers who speculatively purchase Green Belt land, hoping that councils will concede to pressure to develop these sites.

## **Section 3: The Sustainability of Dronfield for Housing & Industrial Development**

The Local Plan talks frequently about “Sustainable Places”, stating:

*“4.3 The purpose of the planning system is to contribute to sustainable development. The goal of sustainable development is to enable all people to satisfy their basic needs and to enjoy a better quality of life, without compromising the ability of future generations to meet their own social, economic and environmental needs. (p25)*

*4.4 The Local Plan’s vision and objectives are centred on sustainable growth, which means encouraging 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. (p25-26)”*

Section one has described in detail how the proposed housing developments are contrary to supporting health and well-being and destructive to Dronfield’s Green Belt; the most valuable component of green infrastructure in the town. This section concerns other areas

of infrastructure which NEDDC have, irresponsibly, barely explored before releasing these housing plans for consultation. The Local Plan (9.5) states that *“The council’s Infrastructure Delivery Plan will be carried out after consultation on the draft Local Plan in Feb / Mar 2017. It will be published in the next iteration of the plan.”*

To speak very bluntly, residents are most united in these concerns and feel, “This plan just won’t work!” and that it is a, “Cart before the horse plan.” Future provision of school places is a critical concern and many feel this should have been a first consideration when drawing up the plans, not the last.

### **3.1 Dronfield’s Size, Structure and Population**

#### **Is it valid to use NEDDC’s settlement hierarchy as the basis for housing allocation?**

The district council has designated Dronfield as the most sustainable settlement in the whole district (Local Plan, Settlement Hierarchy, Table 4, p35). This is based on its being the largest settlement in the north of the district and it having a railway station.

Size is a thoroughly crude and inaccurate measure of sustainability and is no substitute for doing infrastructure assessments in a timely way, alongside housing planning. Dronfield already has a large amount of housing relative to an only modest amount of facilities and over-stretched public services. There is already a degree of urban sprawl at the outer edges. The council’s assessment of Dronfield’s sustainability holds no validity whatsoever; it is irresponsible to existing and potential new residents to allocate such high numbers of houses.

#### **Dronfield is not a sustainable town that could accommodate a 10% increase in population over the plan period without incurring many infrastructure problems.**

Many residents have stated the view that Dronfield’s housing and population have expanded such a lot already that the town cannot cope with any further large increases in population.

Many feel the population expansion has outstripped the development of services and infrastructure. As one resident put it, “Dronfield is already too many houses, with not enough of anything else!” Hence, residents have a multitude of concerns about infrastructure provision and are dismayed that there is no infrastructure plan at this stage.

NEDDC may try to dismiss these statements as subjective, but population figures demonstrate that, if anything, residents are understating the population increases the town has seen over the last 60 years, as shown in the tables below.

	<b>Population Figures by Year</b>			
	<b>1951</b>	<b>1961</b>	<b>1971</b>	<b>2011</b>
<b>Dronfield</b>	7,627	11,303	17,838	21,261
<b>Clay Cross</b>	8,553	9,163	9,719	9,222

<b>Derbyshire (incl. Derby)</b>	826,437	871,620	885,130	1,018,438

	Population % Change to 2011		
	From 1951	From 1961	From 1971
<b>Dronfield</b>	<b>179%</b>	<b>88%</b>	<b>19%</b>
<b>Clay Cross</b>	<b>8%</b>	<b>1%</b>	<b>-5%</b>
<b>Derbsyhire (incl. Derby)</b>	<b>23%</b>	<b>16%</b>	<b>15%</b>

Over a 60 year period between 1951 and 2011, the population of Dronfield has expanded by an enormous 179%, compared to a 23% increase across Derbyshire as a whole and 8% in Clay Cross. For each of the time frames shown, Dronfield’s population has expanded by a greater percentage than its county as a whole. Dronfield has already done so much to accommodate newcomers compared to the rest of the county that **it is entirely reasonable, and actually responsible, for residents to object to 860 houses being added to the town.**

Residents are trying to ensure responsible planning occurs that protects existing residents, but also can provide appropriately for any new residents. ... and people need more than a roof over their heads; they need green infrastructure, clean air, safe roads, school places, medical services and other amenities.

NEDDC have heavily inferred that the Green Belt review was carried out to release land and enable a “fairer distribution” of housing allocation across the north and south of the District. Dronfield has accommodated more than its fair share of population expansion already and its public services and infrastructure are already under strain.

**WE ASK NEDDC TO DRAMATICALLY REDUCE THE NUMBER OF HOUSES PROPOSED FOR DRONFIELD AND TO STRICTLY LIMIT ANY NEW BUILDING TO BROWNFIELD SITES ONLY**

Population data was obtained from these sources:

[http://www.visionofbritain.org.uk/unit/10109292/cube/TOT\\_POP](http://www.visionofbritain.org.uk/unit/10109292/cube/TOT_POP)

<https://observatory.derbyshire.gov.uk/IAS/Custom/Pages/profiles/census/summary.aspx>

**3.2 Dronfield’s Railway Station**

Dronfield is the only settlement in NE Derbyshire with a train station, hence NEDDC have placed the town at the top of its settlement hierarchy as previously explained. However, the

station cannot deliver “sustainable” (ie environmentally friendly) travel for the town due to the already sprawling, hilly and over-populated nature of Dronfield. These factors drive heavy car usage and those more than a few minutes away from the station are using cars to get there.

Parking at the station is already limited with no room for expansion. Available parking space is soon to be further reduced and charges for parking introduced. This will discourage commuters away from train travel, resulting in more car usage.

The Local Plan has also highlighted Electrification and HS2, but these may never happen and their effects for Dronfield will be marginal in resolving issues associated with bringing the proposed extension to Callywhite Lane to fruition.

Railway track in the North of England is due to be electrified soon. Rail companies are presently investigating the possibility of moving Dronfield’s station out of town, due to listed bridges in the centre prohibiting electrification. This currently has no workable solution and as such cannot be used as the basis for the justification of supporting additional housing from the Green Belt.

Given present constraints and the uncertainty of the future of Dronfield’s railway station, it is irresponsible to plan such large quantities of housing and blindly assume that sustainable travel will occur.

### **3.3 Traffic Congestion and Road Infrastructure**

The potential impact of the housing developments on the roads in and around Dronfield, is of key concern to all Dronfield residents, whether or not they live near one of the proposed development sites. Dronfield’s streets were built for a village, not a large and sprawling town. Many streets, especially in the older central part are extremely narrow and regularly become jammed (especially around school pick up and drop off times.)

Residents have been expressing concerns about the safety of our roads for several years, with concerns about the potential for accidents being most serious (again, especially around schools). Based on an average of 2 cars per household, 860 new homes would generate 1720 more cars in Dronfield. This is totally unsustainable for the whole town, where roads could not physically be widened without knocking down existing housing (which obviously defeats the point of the exercise!)

There are no mitigating improvements that could be made to the town’s roads to enable them to cope with such increased traffic. Placing traffic calming measures on one street would simply divert traffic to an adjacent street and raise safety problems there. Also, many of the safety problems relate to the high amount of on-street parking which hampers visibility for drivers and, more notably, pedestrians trying to cross roads.

Traffic would also increase on all routes in and out of Dronfield putting strain on rush hour

periods in particular. The Stubley Lane / Stubley Hollow area is already very busy with over 1000 cars passing in a single hour at morning rush hour (information from Safer Dronfield).

The increase in pollution from car emissions could have a seriously detrimental effect on health, especially that of children and those with respiratory and heart disease.

### **Hallowes Lane (plus relates to Highgate Lane)**

- Hallowes Lane is a direct route for vehicles and pedestrians from sites g. (Shakespeare Crescent) h. (Hallowes Golf Course) and i. (Hill Top) down to Dronfield Infant School, Dronfield Junior School, and Dronfield Henry Fanshawe School.
- It is a bus route that is narrow, busy and steep.
- It is a main route from one part of Dronfield to another.
- The pavement is narrow and absent on part of Highgate Lane
- The road is reduced in part to one lane, owing to the presence of parked vehicles.
- On bin day, residents in the terraced houses have nowhere else to put their bins other than on the narrow pavement.
- Pedestrians are close to the vehicles on the road, and pedestrians often have no choice but to walk in the road.
- Pedestrians are in large numbers at the start and close of the school day.
- There is no pavement on the lower part of Hallowes Lane (near the White Swan).
- The junctions with Hollins Spring Avenue, Cemetery Road, Quoit Green, Scarsdale Road and Chesterfield Road are busy.
- The junction with Lea Road is busy, has poor visibility, and has no safe refuge for pedestrians.

### **Hilltop Road**

Hilltop Road is currently specified as a multi user route, indicating an assumption that this is possible to use as an access route to the developed Green belt land. This is incorrect as this is a single lane farm track and cannot sustain anything larger than cars, and small horseboxes. There is no pavement on parts of this road, so it could not be deemed as a suitable access road. It is narrow and frequently clogged with park cars that could cause access problems for emergency vehicles.

- The road is narrow.
- Part of it is a single-carriageway farm track with no pavement.

- Residents in terraced houses who have no off-street parking, plus those households with two or more cars, park their vehicles on the road. This reduces the road in part to a single lane.
- The road is popular with horse riders – the road is a direct route to a farm.
- The road is popular with walkers – it is a link from one part of the Dronfield Round Walk to the other, and also a link to the Chesterfield Round Walk.
- There is no direct access to the site at i. The site is hemmed in by houses, a pub, and pub car park.
- There is no direct access to the site at h. If access is granted via Hill Top Road, this would result in vehicles for a total of 420 additional houses using the road.
- Hill Top Road is an established, semi-rural road, and such an increase in vehicles on the road would change its character.

### **Green Lane**

The impact of increased traffic is of key concern on Green Lane as Dronfield Henry Fanshawe School (with its 1800 children) is sited near the bottom, close to the busy and awkward junction with Callywhite Lane. Road safety for children is paramount and Green Lane would be hit with both extra cars accessing the Coal Aston site and extra HGVs accessing Callywhite Lane. A planner has described Green Lane as a, “good, main road” when studying a map, but on-site safety assessments at peak school times should be done and this would give a much different impression!

Other Key access roads leading to the sites where new housing is proposed - Longacre Road, Southwood Avenue,, Hallows Rise, Shakespeare Crescent, Burns Drive (if this cul-de-sac was to be opened up for access to site g.) Gosforth Lane, Snapehill Lane, Holmley Lane, Stublely Lane and Stublely Hollow. All have issues with one or more of; narrow, steep, on-street parking, busy, presently quiet and safe cul-de-sac and character and usage would change.

## **3.4 Public Service Infrastructure: Schools, Doctors, Policing, Banking, Family Services and Retail Shops**

### **3.41 Schools**

While applications for school places can vary year on year, there has been a general trend of Dronfield Schools being in high demand. The Derbyshire County Council website gives some data on school places; it's imprecise data to interpret but you can see that every infant, junior and primary school in Dronfield is already in very high demand for the number of available places. It is known that Dronfield Junior School presently has some class sizes over

30.

### Primary Schools

The capacity of Dronfield Infants and Junior Schools is of vital importance as they constitute the only existing primary school provision within reasonable walking distance of the sites in South Dronfield where a total of 655 houses have been proposed.

The District Council's local plan states:

9.65 p223-4 "As a guide, development proposals of around 1,000 dwellings will normally require provision of a new single form entry primary school and around 6,000 dwellings will normally require provision of a new secondary school. Developments of a smaller scale may also trigger a need for new schools if the existing normal area schools are expected to have no surplus capacity and are unable to expand."

As the proposed number of houses for Dronfield is 860, there would be no new secondary school.

The local plan goes on to say:

9.66 p224 "The Derbyshire Infrastructure Plan identifies that strategic growth at the former Avenue (a strategic site allocation in Policy SS4) would require a new single form entry primary school and an extension to the existing Tupton Hall Secondary School. **However, it concludes that residential development elsewhere in North East Derbyshire could potentially be accommodated through capacity and expansion (subject to funding) of existing schools.**"

A planner has informed one of our residents at a consultation session that a new primary school "cannot be guaranteed." Given this statement and the statement from the local plan above, a new primary school for Dronfield looks highly unlikely.

There is no room for physical expansion at Dronfield Infants or Dronfield Junior Schools on School Lane. These old school buildings stand on a very small plot with limited, accessible outdoor play-space already. These would be the only schools within reasonable walking distance of the 655 houses proposed for the south of Dronfield. Even then, many people from the existing southerly outreaches use cars to deliver children to and from school.

To "infill" these outer reaches with yet more housing is unsustainable regards schooling provision and road infrastructure. It is also irresponsible for existing and new residents from a safety perspective. The steep gradients, narrow roads, narrow pavements and (in some places) lack of pavements already pose safety risks for children and families walking to school. School Lane already experiences significant traffic congestion, parking and road safety issues, with additional overspill parking on its surrounding roads from users of the train station.

The headteachers of Dronfield Infant School, Dronfield Junior School and Dronfield Henry Fanshawe School have all confirmed that they have NOT yet been approached by Derbyshire County Council or any other local authority regards capacity and future provision of school places.

It should also be born in mind that all schools in Dronfield will be hit by significant budget cuts if the government's new funding formula goes ahead. Resources and staffing levels will be under great strain and it will be of prime importance to ensure everything is done to maximise infrastructure monies for schools from developers and all other available sources.

### **Dronfield Henry Fanshawe School**

Dronfield is an extremely desirable place for families to live in, hence we can reasonably assume that significant increases in the numbers of school-aged children will occur if the plans go ahead. One resident has estimated (using Office of National Statistics data) that there could be an extra 265 11-18 year olds living in Dronfield.

This could clearly cause capacity issues at DHFS, where physical space to extend is lacking. At the very least, the ability of this popular and successful school to take pupils outside of Dronfield would be significantly reduced. It is hoped that all Dronfield children could be accommodated, but this remains uncertain.

Part of what gives Dronfield a strong sense of community is that the vast majority of 11-18 year olds in the town attend DHFS and this brings them and their families together. If a proportion of these children had to attend other secondary schools, this would fragment the younger community of Dronfield with a knock-on effect on the whole community.

DHFS will take a very significant budget cut if the government's new national funding formula goes ahead hence it would be imperative to maximise infrastructure monies from developers and other sources to support the town's secondary school.

### **3.42 Doctors**

Current GP services within Dronfield are operated from 4 surgeries spread around the town. The biggest of these is the Dronfield Medical Practice located at the Civic Centre. As is common throughout the country, primary care services are under significant pressure, and this is no different within our region.

Waiting times for appointments are already longer than would be liked, and with the increasing complexity of medical care (amongst many other factors), there is little prospect of access to doctors improving. Hence, with the proposed housing development of 860, this equates to a predicted 2150 increase in the local Dronfield / Coal Aston population. (The planning team work on an average house occupancy of 2.5 people.)

Current guidance from the British Medical Association is that an average patient "list size" for a full time GP is approximately 1800. This would therefore mean that Dronfield would

ideally need a further 1.2 full time GPs to manage the increase in patients. Two main problems arise here:

One is whether the GP surgeries have the physical capacity to accommodate more doctors, and the patients. This may well be feasible, but as buildings are unlikely to have extension potential, it may mean relocation of ancillary services (eg, physiotherapy, midwifery) at an inconvenience to patients.

The other is related to recruitment of GPs. The country is struggling to keep hold of junior doctors in general - many leaving to work abroad. Many of the older GPs are choosing to retire earlier than planned, due to increased pressures upon them. An added consequence of the rising demands on primary care services, is that of those junior doctors going into training posts in England, many are discouraged from choosing a career pathway in General Practice. In summary, the GP pool is limited, and recruitment is very difficult.

**HENCE INCREASING DRONFIELD'S POPULATION BY MORE THAN 10% COULD PUT EXTREME PRESSURE ON THE TOWN'S GP SURGERIES, COMPROMISING THE DELIVERY OF PRIMARY CARE SERVICES.**

### **3.43 Policing Services**

Dronfield has a small police station on Lea Road, one of the already over-congested streets owing to its proximity to the train station and School Lane schools. Hence parking constraints affect access to policing services. The station is also only open for limited hours, making it difficult to report crime. With budget constraints on the policing service, as with most public services, residents are concerned about such a significant increase in population and the ability of the police service to meet the needs of the larger population.

### **3.44 Banking**

Dronfield will soon have no banks with the announced closure of the two remaining banks. Thus it will not be a sustainable town for those without, or not wishing to use, internet banking facilities. Dronfield has a higher than average percentage of elderly population, amongst whom the absence of high street banking facilities may be a particular issue.

The absence of banking facilities also poses problems for existing businesses and any new businesses the town hopes to attract, as there will be no local facility for depositing cash takings.

### **3.45 Family Services**

The Children's Centre in Dronfield has recently closed, which was a valued resource for many families. The government has emphasized the need for more affordable housing, to enable young people and families to get on the housing ladder. A target of 30% affordable housing has been set for Dronfield, plus Dronfield is a desirable and sought-after place for young families to move to. It is most unfortunate that the Children's Centre is no longer

there to service this target population, and another challenge to the District Council's designation of "most sustainable settlement in the district" for Dronfield.

### **3.46 Retail Shops**

The south side of Dronfield has no newsagents, convenience or grocery shop, the nearest facility being down at the Civic Centre. This presents access difficulties already for elderly people and parents with young children, especially as getting back from the Civic Centre to Hilltop and southerly areas is steeply uphill.

With the outer limits of town being at some remove from other facilities, car usage feels like a necessity to most. Hence, any new convenience store would struggle to be viable. People require cars for other purposes and would also use them to purchase groceries from the more competitively-priced supermarkets. Hence, a vicious cycle that perpetuates itself, whereby a more local, smaller outlet would continue to be under-used, yet needed by some without cars / with mobility issues. Again, 655 houses on this side of Dronfield is not sustainable and would promote yet more car usage.

### **3.5 Sustainability for Employment and Industrial Development**

NEDDC's proposed utilisation of Callywhite Lane is class B8 - storage and distribution. This is the worst possible potential use, given the access difficulties, as it would result in many more HGVs. A new link road, connecting from Chesterfield Road, between Dronfield and Unstone, has been mentioned. However, getting over the disused tip and the railway line would mean this is an enormously expensive prospect (especially for the little it could deliver) and is highly unlikely to come to fruition.

With or without a new link road, there would be far more HGV movements both in Dronfield bottom and also past Unstone Junior School and through Unstone Green residential area. Storage and distribution is also synonymous with minimum wage zero-hour contracts, which is not the type of employment those who are seeking to move to Dronfield would be drawn to.

For years there have been empty units, vacant plots and derelict land on Callywhite Lane and we feel it makes more sense to try and re-designate some land for housing development as suggested in section 2.2. The effects of building 860 homes on the Green Belt at the outer edges of town, with industrial extension at Callywhite for low-grade, insecure employment, will be to increase commuting out of the area which is already 61%. This is contrary to the NPPF which aims to provide jobs where people live.

Given the close proximity of the Sheepbridge Industrial Estate to Dronfield, NEDDC should co-operate with Chesterfield Borough to consider if Sheepbridge has capacity for industrial extension to create local jobs. It is a more successful and less run-down site and already has far more suitable road infrastructure than Callywhite Lane, given its position immediately off the A61 bypass. The junction here is also due to be improved and upgraded for the Peak

Resort development. We have not had chance to explore Sheepbridge potential in any detail, but an overview impression is that the existing industrial developments are not densely packed and there may be room for new businesses without encroaching on Green Belt.

**In summary, we object to the proposed Industrial extension of Callywhite Lane and would like to see opportunities to provide housing and other types of business and employment opportunities (non-industrial / non-polluting / not requiring frequent HGV movement) explored fully.**

#### **APPENDIX A: FREEDOM OF INFORMATION REQUEST SUBMITTED by Heather Brown TO NEDDC REGARDING VACANT PROPERTIES IN DRONFIELD AND NE DERBYSHIRE**

The following questions were submitted to NEDDC in March 2017 under a Freedom of Information request. They concern the numbers of vacant properties in Dronfield as a whole and North East Derbyshire as a whole, plus any attempts since 2015 and presently ongoing to restore these properties for occupancy.

1. How many properties does NEDDC have recorded as being Empty Homes as of today's date (6 March, 2017), in Dronfield, Dronfield Woodhouse and Coal Aston (taken as a whole)?

**133 at 13/03/17**

2. For the years 2015 and 2016, how many owners of Empty Homes in Dronfield, Dronfield Woodhouse and Coal Aston (taken as a whole) have NEDDC assisted in recycling those properties back into use as homes, the result being where those homes are now in full use?

**Zero**

3. As of today's date (6 March, 2017), how many owners of Empty Homes in Dronfield, Dronfield Woodhouse and Coal Aston (taken as a whole) are NEDDC currently assisting to bring those homes back into full use?

**Zero**

4. For the years 2015 and 2016, how many owners of Empty Properties in Dronfield, Dronfield Woodhouse and Coal Aston (taken as a whole) have refused or have been unable to bring properties in Dronfield, Dronfield Woodhouse and Coal Aston back into use as homes?

**No information held.**

5. How many times has NEDDC taken formal enforcement measures against those owners at

(4) to bring those properties back into full use as homes?

**Zero**

6. How many of those formal enforcement measures at (5) were successful, resulting in an Empty Home being brought back into full use?

**Not applicable. See response to question 5 above.**

7. How many properties does NEDDC have recorded as being Empty Homes as of today's date (6 March, 2017), across the whole of the NEDDC area?

**731 as at 13/03/17**

8. For the years 2015 and 2016, how many owners of Empty Homes across the whole of the NEDDC area have NEDDC assisted in recycling those properties back into use as homes, the result being where those homes are now in full use?

**Zero**

9. As of today's date (6 March, 2017), how many owners of Empty Homes across the whole of the NEDDC area are NEDDC currently assisting to bring those homes back into full use?

**Zero**

10. For the years 2015 and 2016, how many owners of Empty Properties across the whole of the NEDDC area have refused or have been unable to bring properties in Dronfield, Dronfield Woodhouse and Coal Aston back into use as homes?

**No information held.**

11. How many times has NEDDC taken formal enforcement measures against those owners at(10) to bring those properties back into full use as homes?

**Zero**

12. How many of those formal enforcement measures at (11) were successful, resulting in an Empty Home being brought back into full use?

**Not applicable. See response to question 11 above.**