

Dronfield Green Belt Residents' Group Response to the North East Derbyshire Local Plan Publication Draft (February 2018)

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1. INTRODUCTION

1.1 Information about Dronfield Green Belt Group

Dronfield Green Belt Group is an apolitical residents' campaign group, formed in February 2017, in response to North East Derbyshire District Council (NEDDC) proposals to build 860 houses on five Green Belt sites around Dronfield. The plan has since been revised and put out for final public consultation between February 21st and April 4th 2018, with an extension to the Consultation period for representations to be made on the Green Belt Topic paper, Statement of Compliance with the Duty to Cooperate and a final, awaited Habitats Regulations Assessment document. Following research into the Plan and evidence base last year and liaison with residents, the group has evolved and now opposes all housing developments on Green Belt land in the north of the district.

This objection has been compiled by a research committee through discussions at public meetings and via our social media, website and group email networks. Our Facebook group has 1300+ members and our email group has 700+ contacts (as of 28.3.18.) Further amendments to this statement, relevant to newly released documents, may be submitted during the extended consultation period.

Dronfield Green Belt have liaised with the following groups and individuals who also oppose housing developments on Green Belt land in North East Derbyshire:

Dronfield Civic Society and Safer Dronfield (a subgroup that considers road safety issues in the town)

Dronfield Town Council

Dronfield Junior School Governors

Campaign to Protect Rural England / Friends of the Peak District

Rural Action Derbyshire

MP for North East Derbyshire, Lee Rowley

The group hosted a Green Belt election hustings event with MP Candidates in the 2017 General Election: Lee Rowley, Natascha Engel, David Kesteven, David Lomax and James Bush. All declared opposition to Green Belt development and a belief that housing need could be met without needing to release Green Belt land.

1.2 Statement of Objection to Green Belt Development Proposals

Dronfield Green Belt Residents' Group objects to The NEDDC Local Plan with respect to 1275 houses proposed on six Green Belt sites in Dronfield, Coal Aston, Eckington and Killamarsh. The Local Plan is not sound and not legally compliant with respect to these proposals for two principal reasons:

- i. Exceptional Circumstances for the release of Green Belt land in North East Derbyshire for the purposes of house building do not exist.
- ii. These Green Belt sites are in poorly sustainable locations when compared to reasonable alternatives.

The specific Green Belt sites and 1275 housing allocations we are opposed to are:

DR1	Land off Shakespeare Crescent & Chesterfield Road, SE Dronfield	235
DR2	Land north of Eckington Road, Coal Aston, NE Dronfield	200
DR3	Land at Stubley Lane, Stubley Hollow, North Dronfield	40
EC1	Eckington South	400
KL1	Land at Westthorpe, Killamarsh	330
KL2	Land off Rotherham Road, Killamarsh	70

2. OVERVIEW OF SOUNDNESS AND LEGAL COMPLIANCE ISSUES

There are areas of overlap when considering the four tests of soundness and legal compliance, hence this is intended as a guide and is not necessarily exhaustive. The NEDDC Consultation Guidance Note (2018) and CPRE guidance on making representations at the Publication stage of Local Planning have been used. The Inspectorate's "Procedural Practice in Examination of Local Plans" has also been referred to. However, our group consists of lay-people, not planners and we trust that the Inspector will be better able to link our objection themes to these tests.

2.1 Areas where the plan is not positively prepared:

- i. The need for housing has been over-estimated, based on an economic forecast at the high end of a wide range, added to the evidence base very recently, long after housing targets were inflexibly fixed.
- ii. The Infrastructure study and delivery plan was only completed recently and has not accounted for some unworkable, physical constraints to making necessary infrastructure upgrades in some settlements. Hence, the settlement hierarchy and spatial strategy is not supported by evidence.
- iii. The plan does not seek to meet local needs for green infrastructure in Dronfield, Eckington and Killamarsh. There are no proposals for how the loss of Green Belt land, which presently provides important green space, would be mitigated for. Adequate green infrastructure cannot be created to compensate for the loss of almost 60 hectares of Green Belt land, much of which is used for agricultural and / or recreational purposes.
- iv. Plans for regeneration of Dronfield, Eckington and Killamarsh town centres lack well-defined objectives that can be delivered.

2.2 Areas where the plan is not justified:

- i. The sustainability appraisal has not informed the plan. Brownfield sites that are closer to essential services, amenities and public transport networks have been ignored in favour of Green Belt land readily offered by developers seeking high profits.
- ii. The high housing target is not well-evidenced or sustainable.

- iii. The plan has not been prepared with participation of the community. The consultation has been an exercise in informing the public of decisions already made rather than a two-way process. Lead Councillors have declined to meet with members of Dronfield Green Belt group and have not attended Council-ran consultation sessions. Planners have not answered all questions adequately or consistently.
- iv. Alternative strategies have either not been considered or been ruled out for spurious reasons. There are alternative options to Green Belt development outlined in this statement. In particular, NEDDC have failed to fully recognise the rural nature of the district (including the towns which have a distinctive rural character) and have planned developments that damage the identity of settlements. A higher number of smaller developments would protect settlement character and be more sustainable. (Some larger strategic sites on brownfield plots, combined with appropriate supporting infrastructure and employment opportunities and that do not compromise settlement identity are welcomed however.)
- v. The evidence is not robust in many places and has been interpreted with bias to retrospectively justify the plan, rather than inform it at its outset. This is particularly evident with the Strategic Green Belt Functionality Study, Green Belt review and Green Belt Topic paper.

2.3 Areas where the plan is not effective:

- i. The plan risks under-delivery on affordable housing: quotas have already been lowered from 30-40% to 20-30%. It is almost inevitable that developers will use viability studies to further decrease quotas in areas where expensive homes are readily marketable, such as Dronfield. The inflation of the housing target to boost affordable delivery is an uncertain strategy. Increased density of housing on brownfield sites (close to employment growth areas) would be a more effective use of available land and be more certain to meet the need for affordable housing sustainably.
- ii. Information on how some of the employment growth and infrastructure improvements will be delivered is still scant, particularly in the north of the district. Some physical infrastructure is tightly constrained and cannot be upgraded to adequately serve proposed population increases.
- iii. An initial review of the belatedly publicised Statement of Compliance with the Duty to Cooperate indicates incomplete cross-boundary liaison and inconsistent priorities.
- iv. There has been little or no direct liaison with grass roots service providers, e.g.; individual schools and GP practices have not been approached in Dronfield. Constraints to physical extension of buildings have not been discussed or addressed. Oakhill Medical Centre, close to sites DR1 and DR2 in Dronfield, has recently applied to close its list to new patients.
- v. Several of the Green Belt sites have mining history, yet no mining surveys (even paper-based) appear to have been carried out as yet.
- vi. The plan notes that there may be ecological constraints on some Green Belt sites, yet no ecological assessments have been published as yet.

- vii. Issues of topography and road access are mentioned for some Green Belt sites but no plan to overcome these issues has yet been produced.

2.4 Areas where the plan is not consistent with national policy:

Policies from National Planning Policy Framework (NPPF 2012) with which the plan is not consistent

The proposals to build 1275 houses on Green Belt land in North East Derbyshire are not consistent with many NPPF statements from several sections of the framework, falling under three key themes:

i. Exceptional circumstances to build homes on Green Belt have not been demonstrated, as housing need has been overestimated and reasonable alternative brownfield options exist. NEDDC should have regard for currently emerging updates to the NPPF that add further protection to Green Belt and emphasize the requirement to explore all other options first.

ii. The housing sites are in poorly sustainable locations and are not matched by timely and deliverable economic growth in the north of the district.

iii. Building on Green Belt is inherently damaging to the environment. Removal of trees and hedgerows worsens air quality and removes natural flood defences, as well as destroying flora, fauna and wildlife habitats. Since this is not necessary to meet housing need, the plans are also not consistent with NPPF statements relating to environment protection.

IMPORTANT NOTE: There are a number of policies within the Local Plan that comply with the NPPF and this would, taken within no other context, suggest that the plan is broadly sound and legally compliant. However, **NEDDC have not followed many of its own policies by allocating housing on these specific Green Belt sites. Hence there are a great many areas, including core planning principles, where these specific housing allocations (19% of the district's total) are not consistent with national policy.**

Sections of the NPPF contravened by the NE Derbyshire plans for building on Green Belt are detailed, with some paragraph numbers (not an exhaustive list) highlighted. A selection of some key paragraphs is re-iterated with reference to why these proposals are not compliant with national policy.

2.41 Achieving Sustainable Development

7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- *an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*

Less than 3 hectares of economic growth planned in the north of the District is realistically deliverable within the lifetime of the plan.

Key infrastructure constraints have not been considered, hence essential infrastructure improvements to support new housing cannot be delivered.

- *a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality-built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and*

There is a lack of accessible local health and education services for some Green Belt sites and extension of buildings is not possible in all areas.

- *an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

Developing these specific Green Belt sites contravenes all aspects of this policy.

8. These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

While the Local Plan achieves this objective of delivering new homes, new employment and supportive infrastructure simultaneously via strategic sites in the south of the district, it does not achieve this in Dronfield, Eckington and Killamarsh. 80% of planned employment land in these areas (Callywhite Lane, Norwood Industrial estate) have significant constraints and will not be deliverable until the end of the plan period, if at all (paragraph 6.28 and table 6.2.) Constraints to extending schools and GP surgeries prevents simultaneous housing and infrastructure growth.

Paragraphs 9 & 10

2.42 The Presumption in Favour of Sustainable Development

14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

The settlement hierarchy is based upon a very crude presumption that making the district’s largest settlements bigger will be sustainable. It takes no account of existing infrastructure or capacity for extension and upgrades. These larger settlements are not urbanised areas with a plethora of amenities (unlike Chesterfield and Sheffield.) Adding large developments on the edges of rural character towns, where there is neither space nor monies to build new infrastructure and distances from amenities are

higher, is not sustainable. In Dronfield there are smaller brownfield sites, closer to amenities that offer realistic alternatives.

Dronfield's railway station has also been key in giving the town a Level 1 status in the Settlement hierarchy. However, car use to travel to the station is high and parking facilities are very limited resulting in much overspill parking, significant congestion and road safety issues. The railway station cannot therefore sustainably accommodate more passengers, even if the storage yard is converted for parking, without compounding problems and adding to pollution.

Paragraph 17 sets out **12 core principles** that should underpin plan-making and decision-taking, several of which these housing plans on Green Belt contravene.

2.43 Delivering Sustainable Development

1. Building a strong, competitive economy

Paragraphs 20, 22

2. Ensuring the vitality of town centres

23. Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.

The regeneration plans for Dronfield, Eckington and Killamarsh town centres represent only visions at present, rather than concrete objectives that can ensure essential growth and much needed amenities are delivered. The Dronfield town centre regeneration plan demonstrates that mostly simple, cosmetic uplifts are possible in the short to mid-term. There is a need to address declining amenities for day to day consumer needs (closure of cooperative supermarket at the Civic Centre being the latest casualty.) However, redevelopment of the shopping precinct will be a long-term project and NEDDC have not planned how this can be achieved. This renders the town unsustainable for the proposed amount of housing up to 2034.

4. Promoting sustainable transport

Paragraphs 30, 35,37, 40

6. Delivering a wide choice of high quality homes

Paragraphs 48, 50, 51

7. Requiring a good design

Paragraph 58

8. Promoting healthy communities

73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or

surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

Paragraph 7.6 in the Local Plan highlights that Dronfield is lacking in green space, children's play spaces, outdoor youth facilities and allotment provision. Some Green Belt sites (notably DR1) help to compensate for this as they are used by walkers, nature lovers and as informal green play spaces.

Paragraphs 69-78 inclusive – the value of Green Belt land in keeping air clean and protecting the physical and mental health of communities is very important. NEDDC regard the loss of 0.6% of the District's Green Belt as insignificant and have too readily overlooked the health and well-being of a very significant percentage of NE Derbyshire residents who live in these settlements or visit them. There are no plans to provide new green open space, or outdoor sports / recreation facilities.

9. Protecting Green Belt land

Paragraphs 79-89 – The lack of exceptional circumstances to warrant building on Green Belt are central to this objection statement, hence more detail is given in section 4. Further comment may also be added in future representations in light of the Green Belt Topic paper being made recently available.

Paragraph 89 details the circumstances under which exceptions can be made to allow Green Belt development. For housing developments, the relevant exception may be for "limited infilling" as described below.

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- *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.*

Sites DR1, DR2, EC1 and KL1 are all large plots with large housing allocations ranging from 200 to 400 houses, hence none of these proposals can be described as "limited." The proposed developments would all result in a "greater impact on the openness of the Green Belt" at all six Green Belt sites. Considering the size of developments and the extent to which the existing openness of the Green Belt would be detrimentally reduced at each site, none of the 6 sites meet "limited infilling" criteria for exceptional circumstances.

10. Meeting the challenge of climate change, flooding and coastal change

Paragraph 99

11. Conserving and enhancing the natural environment

Paragraphs 110, 113 and 118

111. Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

Within Dronfield, NEDDC have historically turned down planning applications on a long-term vacant brownfield plot, have allowed low density building, out-with of the Local Plan, of highly expensive homes on suitable, sustainably-located brownfield sites and have rejected an application on a previously developed site (football pitch and car park) within Green Belt. A brownfield plot that could accommodate 160 houses in Hasland, closely situated to new employment growth, has been rejected.

2.44 Plan Making

Local Plans

154. Local Plans should be aspirational but realistic.

The housing target for NE Derbyshire has been increased based upon an ambitious economic forecast at the high end of a wide range. This amount of economic growth is not realistic in a rural district and not based on previous patterns. It has already been outlined that key employment sites in the north of the district are questionable as to whether they will be delivered. Hence the housing target needs to be reduced to reflect a more realistic approach.

155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

NEDDC have not complied with their Statement of Community Involvement in many ways: information has been poor and has used inaccessible language; Councillors have declined to meet with members of our group; people without internet access or computer skills have been obstructed from taking part in consultations; key evidence documents have not been made available in a timely fashion. NEDDC also declined to allocate one representative of Dronfield Green Belt Group 5 minutes speaking time and also declined to allow 30 minutes of a full district council meeting to debate a 4000+ signature petition objecting to housing proposals on Green Belt. Community involvement has been proactively discouraged.

157. Crucially, Local Plans should:

- *be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;*

NEDDC have just published the statement of compliance with the duty to cooperate on 22.3.18, after respondents had noted the absent document and pressed for it to be

published. An initial read of the statement suggests that NEDDC have not been proactive in seeking help from neighbouring authorities at early stages before proposing housing allocations on Green Belt.

This evidence appears to have been contrived retrospectively. A number of representations made on the 2017 draft plan stated concerns about a lack of evidence or plans demonstrating that NEDDC had properly pursued cooperation with neighbouring authorities. The Council response in the Statement of Consultation (Appendix 3, p66) is weak: concerns are largely “noted” and the only specific evidence document referred to is the jointly prepared SHMA update.

Equally evasive information was provided by Councillor Gordon, when asked at a Full District Council on 5.3.18. He merely stated that meetings had occurred during the development of the plan, “more specifically over the last 2 to 3 years” and that Sheffield City and Chesterfield Borough Council had confirmed by letter very recently (Jan 2018 or later) that they were unable to help NEDDC meet its housing needs. Audio feed to this meeting linked here <http://www.audiominutes.com/p/nedbs/>

2.5 Areas where the plan is not legally compliant

The plans to build houses on Green Belt are not compliant with the NPPF as detailed in the previous section. They are also at odds with guidance from the Secretary of State. The new draft NPPF tightening protection for Green Belt, has been preceded by statements over the last year reaffirming the obligation to explore all other reasonable options first and optimise density of housing. In light of these statements and emerging legislation, plus the varying economic forecasts and uncertainty surrounding Brexit, NEDDC could and should have revised plans to decrease the housing target. They should have explored all brownfield suggestions made during the 2017 consultation thoroughly and rejected plans to build on Green Belt.

Community consultation has not been carried out in accordance with the Statement of Community Involvement as already highlighted. Additionally, many objections duly made during the 2017 consultation were mis-reported as “comments” and many were not referenced to all the areas of the draft plan to which they referred. Several objections, referencing multiple parts of the plan, were only recorded under one or two themes. The Statement of Consultation, which was an important tool to inform the re-iteration of the plan is therefore an incomplete, inaccurate and misleading document. Key themes relating to the soundness of the plan that were raised by residents have not been included (further details in section 7.)

The requirements of the Duty to Cooperate have not been met as previously discussed. This will be expanded upon later in this document and potentially in further representations.

3 HOUSING TARGETS ARE TOO HIGH AND ALLOCATIONS OMITTED

3.1 Regeneration Scenario is Aspirational but Not Realistic or Achievable

The NPPG states that “Assessing development needs should be proportionate and does NOT require local councils to consider purely hypothetical future scenarios; only future scenarios that could reasonably be expected to occur.”

Understandably therefore, when calculating the “housing requirement” for the district, NEDDC has looked at the possible future employment scenarios over the period up until 2034.

Lichfields (instructed to undertake the Employment Land Review Update (ELRU)) and G.L.Hearn (instructed to undertake the Strategic Housing Market Assessment) mainly used the “forecasting houses” Oxford Economics and Experian within their analyses. These services are both described as “highly reputable” and are used by many other Local Authorities around the country.

The Regeneration Scenario has been generated due to the forecasts not looking economically attractive enough for the district. As a result, the Council officers decided that it should uplift 5 areas of economic growth from the forecasts of these “highly reputable forecasting houses” to produce another picture of economic growth for the district.

These uplifted areas are:

- Digital and Creative Industries
- Advanced Manufacturing
- Food and Drink
- Construction and Environmental industries
- Social Enterprises

The Council officers elected to use East Midlands growth rate data which was higher than NE Derbyshire. The report comments, “the adjustments to the Experian projections outlined increased the overall job growth by 57% to +2828 (1028 higher than the Experian baseline.)”

In the ELRU (August 2017) of the Regeneration scenario, it’s described as a Job Based estimate of future needs. It goes on to say, “it is recognised that LIMITED CONCLUSIONS can be drawn from results of such an approach, as Experian’s forecasts for NE Derbyshire are complex and consistent with those of other authorities in the Council.”

The Regeneration scenario is also based on the development of employment land within the district. Several sites have been earmarked for this development, but in paragraph 6.28 of the Publication Draft Local Plan it is clear that almost one third of the allocated employment land is of highly questionable feasibility to be delivered within the plan period. The sites with deliverability concerns are Callywhite Lane (Dronfield), Norwood Industrial Estate land (Killamarsh) and Hepthorne Lane (Tupton) – more details in section 4.3 of this statement.

In respect of industrial development and the uptake of business premises, the ELRU (5.41-5.45) goes on to say:

“Future development rates for industrial space may be less than has been achieved historically as the sector rationalises and / or makes better use of space”. Further to support this fact, it comments that “the move is towards a more business services-orientated economy with significantly higher employment densities.”

It predicts that within manufacturing there will be less requirement for new premises: ... “there is a restructuring of the traditional manufacturing economy with the potential of “recycling” older sites.”

“Clearly the recession and prolonged economic downturn (and the continued uncertainty surrounding Brexit) have had a significant effect on the viability of development schemes. Realistically an upsurge in large developments in the authority area is unlikely for the foreseeable future.”

“The future supply of land in the authority is particularly constrained by topographical and environmental constraints, given its proximity to the Peak District National Park.”

We know that currently there are many employment premises empty within the NE Derbyshire district, and in the surrounding Local Authority areas. Commercial agents highlighted that enquiries for premises were driven more by Industrial users than office users and that the prime sites were Sheepbridge, Staveley and Markham Vale (due links to the A61/M1). It is therefore likely that other empty business premises within NE Derbyshire will be a lower priority amongst businesses looking to relocate / establish themselves.

The conclusion of the ELRU states that “for NE Derbyshire going forward it is valid to be looking at a take up rate of 0.95 hectares of employment land per annum.” This equates to less than 20 hectares over the plan period.

Furthermore, in the “Whole Plan Viability Assessment”, it comments that there is a “bleak picture about developing more employment land in the district”. The writers concluded that the district was “not likely to get much in the way of speculative development.”

All of the above supportive information leads to the conclusion that the Regeneration Scenario (proposed by the Council officers and not the highly reputable forecasting houses) is not realistic and unlikely to be achieved. This goes against the NPPG in its recommendations of how to assess development needs.

3.2 What is the Housing Need for NE Derbyshire?

It is the above detailed “Regeneration Scenario” with its associated significant job growth that has been used by the Council and contractors (G.L. Hearn) to justify a proposed 330 dwellings per year housing target for the Local Plan 2014-2034.

G.L. Hearn has produced a Strategic Housing Market Assessment for NE Derbyshire (and collaborating Councils) in recent years and an Update document in October 2017.

As previously mentioned, G.L. Hearn have mainly used the Experian forecasting house for their base data to be working with.

The baseline Objectively Assessed Need in this Update Document was 283 dwellings / year. This was said to “provide a realistic level of housing to support economic growth” (ELRU paragraph 2.58). It also includes “a 10% upward adjustment applied to the demographic need to support enhanced affordable housing delivery” (Housing Topic Paper –paragraph 2.13).

Along with this, the Government has recently published an updated Proposed Standardised Methodology for calculating Objectively Assessed Need. This methodology is likely to apply to plans submitted from Spring 2018 onwards. For NE Derbyshire, this formula provides an OAN of 276 dwellings / year.

If these “evidenced” OANs are applied to the Plan Period, the Housing Target would be a more realistic 5660 dwellings (SHMA OAN update) or 5520 dwellings (new Government Methodology.) Both scenarios would avoid “over supply” of housing and obviate the need to release any NE Derbyshire Green Belt for development.

THE ARGUMENT FOR “EXCEPTIONAL CIRCUMSTANCES” FOR GREEN BELT RELEASE DOES NOT STAND UP TO SCRUTINY.

IMPORTANT NOTE: IT IS ONLY THE UPDATED EXPERIAN PROJECTIONS WHICH GIVE THE REGENERATION SCENARIO AND ASSOCIATED HOUSING NEEDS FIGURE ANY SEMBLANCE OF CREDIBILITY. THESE FIGURES WERE NOT AVAILABLE WHEN THE DRAFT LOCAL PLAN WITH A 6600 HOUSING TARGET WAS PUBLISHED IN FEB 2017. IT SEEMS THAT THE COUNCIL ARE RETROSPECTIVELY SEEKING EVIDENCE TO SUPPORT THEIR UNREALISTIC PREDICTIONS.

3.3 Inflation of Housing Target for affordable housing delivery NOT justified.

It is unquestionable that there are many people / families in NE Derbyshire that cannot afford to buy / rent houses at market rates and therefore require affordable housing. The question really is what is the best way of doing this?

The SHMA update Oct 2017 provided a 283 dwellings / year figure which already included a 10% uplift to help achieve more affordable housing. Publicly available data shows house price inflation in NE Derbyshire to be below that of neighbouring authorities (Land Registry UK House Price Index; 5 years to Nov 17):

NE Derbyshire	13%
Chesterfield	22%
Sheffield	26%
UK	34%

Paragraph 9.15 of the SHMA Update Oct 2017 also states, “Median house prices for the Housing Market Area stand at £135, 500 in 2016, which is 36% below the national and 16% below the regional median prices.”

This would indicate a relatively lower need for new affordable housing in NED, although this must be balanced against employment rates and wages of course. It is expected that with increasing employment opportunities being developed in the district, wages will rise and the relatively low house prices will result in market housing being within the financial reach of many more households.

It should also be noted that inflating housing targets to oversupply the market with houses during the plan period is unlikely to suppress house prices in that time. Significant influences in the complex market relationship of supply and demand cannot be contrived in this way and it does not represent properly coordinated, controlled planning to bring forth the right mix of types and tenures of housing. Developers are not going to want to build more houses than they can profitably sell either.

Moving from the draft Local Plan in Feb 2017 to the publication 2018 version, the Council has lowered the proportion of affordable housing required for new housing proposals. This is to “at least 30%” in the high value areas and “at least 20% in the remaining areas of the district.

Along with this reduction, paragraph 5.72 provides that the Council can negotiate a still lower percentage of affordable housing. This is in circumstances where the developer can demonstrate that the viability of a scheme is not achievable / suitably profitable without doing so. It is very likely that developers will do just this to improve profitably on sites such as large Green Belt plots (see section 5.3.)

In order to achieve a required amount of affordable housing it is the responsibility of the Council officers to be strong in negotiation to keep affordable quotas high, rather than toy with a 10% affordability uplift and other inflations to overall target numbers with unpredictable outcomes in this respect.

It is a significant weakness in the plan that housing allocations lack detail regards the types and tenures of housing on each site. The most realistically achievable way to guarantee delivery of affordable housing is to use Council-owned land and vacant housing stock, both of which are available as will be discussed in section 5.5.

3.4 Houses omitted from housing target calculations

There is much detail in the Land Availability Assessment that has been carried out over the last few years and much of this is summarised within the Housing Topic Paper of Jan 2018. There are many sections of this document which demonstrate where development opportunities have been dismissed by NEDDC for a variety of generally weak reasons. These discounted development opportunities amount to significantly in excess of the proposed allocation of 1275 houses on the Green Belt.

Level 3 and 4 settlements: sites with a yield of 528 dwellings are dismissed. This is because the spatial strategy determined by the council dictates that allocations should only be made in Level 1 or 2 settlements or strategic sites. The spatial strategy adopted by the Council is challenged in section 4 of this statement.

These 528 dwellings dismissed are noted to be, “developable and in line with policy.” It also states that 115 have planning permission already. INTERESTINGLY two of these areas – Wessington and Lower Pilsley - considered inappropriate to be allocated within the Local Plan, have been allocated almost 100 potential dwellings in the Council’s “flexibility list” for their 5-year supply statement. Sustainable enough for one purpose, but not the other.

Within Hasland, a site with a capacity for 160 dwellings has been dismissed because the neighbouring Chesterfield council “has not asked NED to accommodate some of its growth.” Chesterfield’s plans should not be relevant in this respect and this site, within North East Derbyshire, should be allocated within the NED local plan. It is noted that Hasland was not included in the Settlement Hierarchy Study hence NEDDC cannot claim to have dismissed this site on sustainability grounds.

Small Sites: The Council also dismissed “small sites” (less than 10 dwellings) from allocations, because “it is not considered efficient” (paragraph 5.7). The Council does concede that if these “small sites” can be combined with larger adjacent sites, then they can be accepted within the allocation. Those dismissed amounts to a combined yield of 106 dwellings.

Larger Sites (Strategic and Level 1 and 2 Settlements): Several dwellings have also been omitted from larger settlements. Some of these sites have already seen substantial infrastructure investment hence it is vital that these housing allocations are made and delivered.

Coalite Priority Regeneration site: This priority cross-border site (joint with Bolsover District Council) has already been heavily invested in and site clean-up from the old industrial workings has been completed. It is highly sustainable being adjacent to Markham Vale employment area which has seen multi-million-pound road infrastructure investment. There are also plans for a new school. It was previously noted to have the potential for 660 dwellings but has been totally discounted due to uncertainty of the HS2 line. At worst, this is going to impact on one edge of the site, constituting less than one fifth of the total area. Hence, the majority of this site will become deliverable, even if this is after the Plan Period. Thus, although the yield cannot yet be verified, NEDDC should be in a position (liaising with Bolsover) to give a reasonably accurate estimate of housing allocations for this site, in the region of 500 houses accounting for HS2 with perhaps 250 allocated within each of the two authorities. This further demonstrates that the Council’s push for such a high unsupported housing target in the current Plan Period is not justified.

Biwaters Strategic Site: Within the Biwaters strategic site detail, it is stated that the planned number of dwellings is 980 (policy SS4 within the Local Plan states “provide up to 1000 new dwellings.”) Within the 5year supply statement 2017, it specifically details that 155 dwellings at the Biwater site are undevelopable (but reasons for this are not given.) The remaining 825 are shown on the trajectory plan as being built from the current year up until 2031. There are no allocated figures for the last 3 years of the plan on the Biwaters site. Also, the shortfall for the Biwaters site is not mentioned in the Post Plan Completions section (paragraph 5.23 of the Housing Topic Paper.) Are these 155 dwellings deliverable? And if so, why not in the 3 “fallow” years at the end of the plan period?

Clay Cross South: The situation with Clay Cross South is concerning and requires clarification (CX/1501a, CX/1506, CX.1601, CX.2402a). In Table 5.8 it states that all dwellings would not be able to come forward within the plan period. It comments that the site has 3 landowners (the biggest of these being the District Council) and that there is a current lack of joint working between the parties. Along with highways access concerns, “it is therefore not recommended for allocation.” HOWEVER, Table 5.5 shows 280 dwellings expected to be completed within the plan period and 285 in the post plan period. The 280 figure has disappeared from the allocation figures. It should be incumbent upon NEDDC to be the leader in joint working / compromise to get this large site deliverable. The highways access issues are likely to be similar to several other already allocated sites and hence should not provide a total block to deliverability.

Holmewood: a large site west of Chesterfield Road is identified with permission for 550 dwellings. It is noted paragraph 4.4) that the council has been “unable to receive information from the landowner / developer on delivery.” It is the responsibility of the Council to pursue this further. It has arbitrarily decided that 200 of these houses could be delivered in the plan period. No explanation given as to why the full 550 could not be delivered by 2034.

Other Dwellings in Level 2 Settlements:

Table 5.7 shows the “remaining LAA yield with and without planning permission (at Jan 2018.)” This shows a potential yield of 1004 dwellings within Level 2 settlements without planning permission. Once again, the strong driver of the Council’s “spatial strategy” is seen, stating the “remaining provision should focus on the four main towns” (paragraph 5.28.) Of these 1004 dwellings, the 320 that have planning permission pending have been allocated and the other 684 dwellings have been ignored. What will happen if these get planning permission and get developed? It can only be assumed that there will be a further over supply of housing.

Windfall Sites

The Council has looked at the “small windfall site” position and looked at the average completion rate over the 2011-2017 period. This is 76 dwellings / year and the Plan accepts that a similar rate may be expected to come forward over the plan period.

It has been assumed that for the 5 years from 2017/18 to 2021/22, the windfall sites will be those minor sites (less than 10 dwellings) that have got planning permission as at 31/3/2017. These amount to 420 in total (taking into account the 5% lapse rate applied) or 84 dwellings / year. These are already in the allocated Plan numbers.

Further windfalls from 2022/23, for the remaining 12 years of the Plan period, are predicted to provide 75 dwellings / year = 900 dwellings.

In reality, there are likely to be additional small windfalls (over and above the ones that already have planning permission as of 31/3/2017) at least in the 2019/20 to 2021/22 period. A reasonable figure would be approx. 20 / year = 60 dwellings.

From all the details of potential homes omitted from the Plan’s allocations that have been drawn together in this section:

POTENTIAL DWELLINGS FOR ALLOCATION WITHIN THE PLAN PERIOD

Level 3/4 settlements (in line with policy)	528
Hasland	160
Small sites	106
Holmewood (additional on west of Chesterfield Road plot)	350
Biwaters Strategic Site	155
Clay Cross South	280
Level 2 settlements	684
Windfalls	960

TOTAL **3223 dwellings**

Additional allocations of **approx. 500** houses across the NED / Bolsover border at the Coalite Priority regeneration site are also expected to be deliverable towards the end of the plan period or shortly after.

Further potential brownfield sites within Dronfield are discussed in Section 5.

In paragraphs 6.11 and 6.13, it states:

“In the context of the proposals to release Green Belt land, it would be logical and reasonable to consider the anticipated future small windfall sites as the Plan’s flexibility” and;

“It is considered that this approach offers the most appropriate balance, recognising that the housing market will be subject to various fluctuations and some potential slippage over the Plan period, at the same time as avoiding further development in the Green Belt”

Looking at the above figures, it would be logical and reasonable to state that:

- **NEDDC HAVE SIGNIFICANTLY OVER-ESTIMATED HOUSING NEED**
- **MULTIPLE APPROPRIATE AND AVAILABLE SITES / HOMES HAVE NOT BEEN ALLOCATED WITHIN THE PLAN**
- **THERE ARE NO EXCEPTIONAL CIRCUMSTANCES TO WARRANT ANY OF THE 1275 PROPOSED HOMES BEING BUILT UPON GREEN BELT**

4. SPATIAL STRATEGY FOR HOUSING FLAWED / NOT SUSTAINABLE

Plan references: Table 4.2 Settlement Hierarchy, Policy SS2: Spatial Strategy and the Distribution of Development.

Also: Multiple paragraphs and policies within Chapters 2-9 inclusive – some are referenced in the text, Sustainability Appraisal 2018 (SA), Settlement Hierarchy Study Dec 2017, Infrastructure Study and Delivery Plan (ISDP), Green Belt Topic Paper 2018.

The question of where to build new housing needs to link closely with where jobs, essential services and a range of amenities can be accessed using the most sustainable travel means possible (NPPF). Sustainable travel is a challenging objective in our busy, modern society especially in a rural, spread-out district like NE Derbyshire which lacks a city or well-serviced, substantially urbanised, large town.

The reality is that many of the district’s population choose to live in NE Derbyshire because of its rural nature yet are heavily reliant on travelling to Chesterfield and Sheffield for work and to access a broader range of amenities than provided within the district. This accounts for the district’s high rates of out-commuting (61% - paragraph 4.13) and many journeys for other purposes not quantified by the Council.

Rather than fully explore the complex sustainability challenges associated with planning within the district and apply full cross-border cooperation, NEDDC have simply assumed high sustainability for the four largest settlements in the District, based on their relative size. They have subsequently used a crude Settlement Hierarchy (table 4.2) as a spatial strategy. Hence Dronfield (also highlighted as highly sustainable due to its railway station), Clay Cross, Eckington and Killamarsh are deemed Level 1 settlements and have been allocated substantial numbers of new

houses. Large housing allocations are also directed to strategic sites and smaller ones to Level 2 villages (generally the largest villages.)

The Settlement Hierarchy and Spatial Distribution of housing proposed in the Local Plan is flawed on many counts, as detailed below:

- It denotes the four largest settlements as highly sustainable based on size alone. It does not recognise that none of these places are cities or substantial towns well serviced with a good range of amenities and public transport. Nor does it acknowledge that these relatively more “urban” areas all retain strong rural character that needs to be worked with sensitively and not damaged.
- The Settlement Hierarchy Study is too crude and lacks detailed appraisal of the key services and amenities required on a site-by-site basis to underpin a sustainable distribution of development. Size alone and the presence of a railway station cannot guarantee sustainability.
- The Infrastructure Study and Delivery Plan also lacks detailed appraisals and plans for key services in settlements in the north of the district in particular.
- Very limited employment growth can be delivered in the north of the district, hence core principles of sustainable planning from the NPPF dictate that the Settlement Hierarchy and Spatial Strategy for housing is not appropriate.
- The Council’s settlement hierarchy strategy is fundamentally flawed as it directs substantial development to Dronfield which has already seen far greater population growth between 1951 and 2011 (179%) than Derbyshire County as a whole (23%) or Clay Cross (8%)*. This will put further pressure on already straining services and infrastructure.
- NEDDC could and should have adopted a more flexible approach to housing allocations, based on a more detailed appraisal of existing infrastructure and capacity for extension. Multiple alternative allocations across the District have been outlined in the previous section and further proposals within Dronfield specifically are made in Section 5.
- The exclusion of Level 3 and 4 settlements and smaller development sites elsewhere from the Local Plan means that small-scale development is less well-controlled. It is left only to the controls of the planning application framework hence smaller settlements are left at greater risk of inappropriate development. It is important, especially in a largely rural district, to ensure developments of all sizes are planned in a coordinated and cohesive fashion through a well-managed Local Plan and properly conducted public consultation.
- It is not essential, nor appropriate, to stick to a pre-determined Settlement Hierarchy, particularly when employment growth in a number of key, targeted settlements has failed to occur for over 10 years and has ongoing issues of deliverability. A large quantity and quality of representations submitted in 2017, containing material arguments regarding infrastructure and sustainability, should also be taken into account (see section 7 and Appendix C.)
- ***Finally, and crucially, a settlement hierarchy cannot be used to “force” exceptional circumstances to warrant development of Green Belt land. Objectively assessed, true housing need (not demand) can be met utilising other more appropriate and sustainable sites.***

*www.visionofbritain.org.uk

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

4.1 Settlement Hierarchy based on Crude Measures / Not Evidence Based

The Settlement Hierarchy which denotes the largest settlements as the most sustainable is too crude and is not based upon detailed sustainability or infrastructure appraisal. The evidence base presented by numerous iterations of the Sustainability Appraisal, the Whole Plan Viability Study and the Infrastructure Study and Delivery Plan (which was not produced until late 2017) is confusing, with much cross-over between documents. There are four key questions to answer to ensure planned new housing growth is accompanied by new jobs and supporting infrastructure in a sustainable way:

1. What is the existing infrastructure, how well does it serve the present population and does it have spare capacity?
2. What physical scope is there to enhance facilities or build new ones and is it likely that funding can be secured?
3. Where precisely can new development be accommodated to best achieve sustainable travel patterns?
4. How many houses can be accommodated on the available land and what population increase can be supported sustainably?

It seems that NEDDC have worked reactively from a developer-led perspective; responding to sites offered and trying to mould them retrospectively around other considerations. There has been less of a proactive approach to seek out sites in suitable places and consider sustainable capacity and a more reactive, geographical approach to simply allocating as many houses as a piece of offered land can accommodate. In particular, the housing allocations in the north of the district are lacking some detailed appraisal within the confusing crossover of studies such that sustainable planning is not being facilitated in this sub-region.

4.2 Problems with Sustainable Travel Within Dronfield/ High Out-Commuting

Dronfield, as the largest town in the District, already has a degree of Urban housing sprawl at its outer edges, hence car use is high for travel both out of the town and within the town. A Dronfield Household Survey (2016) found that 74.5% of residents travel to Dronfield Town centre by car (paragraph 7.10). The following information about high car use in Dronfield comes from the Dronfield Town Council, Neighbourhood Plan Version 13:

“82. The car provides the principle mode of transport for residents and visitors. According to the 2011 Census,⁷ 85% of households had access to one or more cars, a rate that is far higher than the comparative district (78%) and national (74%) averages. While the town provides some services and facilities, these are limited. Many residents commute; NEDDC’s Settlement Role & Function Study 2013¹⁰ tells us that 70-80% of people commute to work outside the town and the clear majority travel to Sheffield, followed by

Chesterfield. Almost 50% of those employed travel to work by car or van, which is far more than the national average of 37%.”

4.21 Large Housing Developments on Outer Edges of Towns Not Sustainable

This illustrates the fundamental flaw with the Settlement Hierarchy: size alone is not a reliable indicator of sustainability, especially with respect to travel patterns. The most appropriate pattern of new development for Dronfield would be to utilise smaller sites, closer to the town centre and amenities. Section 5 describes other brownfield sites within Dronfield that offer more suitable alternatives to Green Belt sites. The two larger sites proposed (DR1 and DR2) are on outer edges of town, up steep gradients and are not within walking distance of essential town centre and other amenities.

DR1, which sits on the Southern reaches of town below Shakespeare Crescent, is particularly challenging for families and the elderly. The sustainability appraisal highlights DR1 is “not within the target distance of a primary school. The nearest, Dronfield Junior School, is 1.4km north west. It is also outside the target distance of a GP surgery, the nearest being Oakhill Medical Practice 1.6km north.” It is also not within walking distance of a convenience store or supermarket and will be impacted by the recent closure of the Civic Centre Co-operative store.

Given distances to essential services and lack of frequent, practical bus links (particularly to Dronfield railway station) car use from site DR1 would be extremely high. It also borders Chesterfield Road, where the SA acknowledges that greater vehicle emissions will increase pollution levels. This, and road safety concerns on busy roads, added to distances will deter people from walking or cycling. While the Coal Aston (DR2) and Stubbley (DR3) sites are somewhat closer to essential services, their distance from the railway station and town centre, lack of good bus connections and constrained road networks also render them unsustainable. DR2 is also at the top of a steep hill.

4.22 Specific Constraints of Dronfield’s Railway Station / Road Safety Issues

See also a separate detailed and referenced representation (reference number 7112) submitted on behalf of Dronfield Green Belt Group after gathering information from Local School Governors, Dronfield Civic Society, Safer Dronfield (a group affiliated to DCS that holds a wealth of traffic survey data and campaigns for local road safety), Dronfield Town Council and Friends of Dronfield Station.

The railway station is not practically accessible on foot / by bus from existing edges of town, hence car use to access the station is high. Present bus services in Dronfield do not link well to the station or at appropriate times for key commuter trains.

There is limited station parking hence traffic, parking congestion and pollution around surrounding roads near the 1800+ pupil secondary school and School Lane primary schools (approx. 600 pupils) are already at unsafe levels. These are the only “normal area” schools within any feasible walking distance from the 235 proposed housing developments at DR1.

Building 475 houses on the town's outer reaches would put thousands of children at unacceptably higher risk.

Many children are driven to primary schools, largely due to parents commuting to work straight after accompanying children to school. This causes dangerous congestion at peak times: pedestrian safety for school children in Dronfield is already compromised. This problem is particularly acute for circa 600 primary school children (plus accompanying pre-school siblings) travelling to Dronfield Infants and Junior Schools on School Lane. Hundreds of secondary school children also use routes nearby to walk to Dronfield Henry Fanshawe School. High traffic congestion, double parking, parking partially or entirely on pavements on School Lane, Appletree Drive, Fletcher Avenue, Lea Road and other nearby roads compromises pedestrian safety.

The close proximity of the railway station results in overspill parking on School Lane, Lea Road and other nearby roads which greatly compounds these problems.

It states in the ISDP that NEDDC are “working with private sector developers (in discussion with Network Rail) to facilitate improvements to the station car park in the longer term.” This would be welcomed although there has been acute need for this for some years already. The available area to create new spaces (yard behind existing car park) would likely only ameliorate existing problems however, given the high amount of overspill parking already and limited parking for nearby shops in Dronfield bottom. The ISDP also mentions, “improving walking and cycling to the station (5-10 years.) Improve bus links within Dronfield, including to the station (10-15 years.) Again, there are pressing needs for such improvements already. The extent to which walking and cycling routes can be improved will be constrained, to some extent, by steep gradients and narrow roads.

4.23 Consider How Chesterfield Railway Station Can Serve NE Derbyshire

Paragraph 2.4 of the Local Plan: “Whilst Dronfield is the only one of the four towns in the district with a railway station, Chesterfield, with fast and direct rail connections to Nottingham, Derby, Leicester and London to the south, is easily accessible to residents and businesses. In addition, the Midland Mainline from Chesterfield provides access to cities in the north of England such as Sheffield and Leeds.”

From ISDP: “Derbyshire County Council and Chesterfield Borough Council are currently developing proposals to improve access to Chesterfield Station as part of a wide growth strategy linked to the arrival of HS2. It is anticipated this will include significant improvements for bus, walking and cycling links within Chesterfield itself and in the wider area including North East Derbyshire.”

The settlement hierarchy places too much emphasis on Dronfield's railway station, given how constrained it is and the worrying road safety problems associated with it. Chesterfield railway station is readily accessible to many parts of the District, with a better road network, much greater parking capacity and better connecting bus services. In terms of travel networks, other settlements close to Chesterfield are just as, if not more, sustainable than Dronfield. Chesterfield is also set to become an HS2 station in the long term (paragraph 2.20), while Dronfield is not.

The Plan acknowledges the accessibility of Chesterfield Railway station to much of the NE Derbyshire, hence pinning the Settlement Hierarchy and distribution strategy closely around Dronfield, with its much more constrained station is not justified.

Further note regards sustainable travel: The proposal for a new cycle path between Unstone and Dronfield is misguided as it would be extremely unsafe. Even if speed control measures were added to discourage the frequent speeding above 40mph on this stretch, the road is still prohibitively narrow. At a cost of £900,000 this would be an irresponsible mistake to build that would risk lives. A cycle path between Peak Resort and the lane leading from Highgate Lane to Ouzle Bank Cottage would be a safer alternative. However, once into Dronfield there is no obvious choice of a safe, cycle route given the steep and narrow roads accommodating much on-street parking.

4.3 Geographical Mismatch of Housing and Deliverable Economic Growth

There are very limited realistic prospects for delivering new employment on land allocated in the north of the District which is described in detail below. Just 2.85 hectares are considered as reasonable prospects for growth in the north, compared to 28.87 hectares in the South. It is misleading for the Sustainability Appraisal (para 1.4.9) to say that, “each Level 1 settlement would be expected to provide new residents with a broad range of employment opportunities in relatively close proximity to their homes.” The spatial strategy that attempts to spread new housing more evenly across the north and south of the District is grossly mismatched to new employment delivery. This renders the spatial strategy unsustainable and demonstrates that the plan is not sound.

Paragraph 6.28 of the Local Plan states:

“The Plan provides for 46.44ha of employment land on the sites described below.”

“In addition to these (-ref to strategic sites-) is a single regeneration area identified at Callywhite Lane. Taken together the sites listed in Table 6.2 below will provide for new employment land to meet the employment land target in Policy SS2. The Plan makes no other new employment allocations.”

Employment Land Availability in the North of the District

Analysing Table 6.2, there are just 2.85 hectares of employment land, with reasonable prospects of being delivered within the plan period, allocated in the North of the district (at Renishaw Industrial Estate and Westthorpe Business Centre in Killamarsh.) Callywhite Lane and Norwood Industrial Estate both have significant constraints meaning that chances of industrial development at these sites within the plan period are slim.

Constraints to developing Callywhite Lane (6ha)

The Plan acknowledges that Callywhite Lane has been a longstanding allocation since 2005, in a designated flood risk area, with a lack of progress.

The Infrastructure study and delivery plan (ISDP) states:

“Callywhite Lane Industrial Estate is a key Employment Site within the District, however the site functioned as cul-de-sac with industrial traffic accessing the site from Green Lane/ Callywhite Lane and Chesterfield Road junction. Whilst considered to be in the long-term priority list, the Dronfield Regeneration Framework (2016) considers that it is necessary to improve the junction at Green Lane/ Callywhite Lane and Chesterfield Road or provide a new link road between the eastern end of Callywhite Lane to the southern area of Chesterfield Road³⁹.”

There is mention of adding traffic lights at the “T-junction” with Green Lane / Callywhite Lane. However, this junction is not safely manageable in this way as it lies extremely close to the exit of the mini roundabout that connects 3 exits: Chesterfield Road to the south, Chesterfield Road to the north and Callywhite Lane. It would be better to create a separate exit for Green Lane directly off the roundabout for the purposes of car traffic, but this would still not make this area appreciably better for goods vehicle usage and any increase in such traffic would seriously compromise safety. The 1800 pupil Dronfield Henry Fanshawe Secondary School at the bottom of Green Lane must be accounted for and further impact on already compromised road safety for school pupils must be avoided.

Any further industrial development at Callywhite Lane necessitates a linking access road from the southern end of Chesterfield Road to avoid any more larger vehicles coming into this constrained area of road network near the bottom of Green Lane and the secondary school. Such a link road would be very expensive to deliver as it would need a bridge to cross the Railway line and the River Drone. Electrification of the railway line has been cancelled hence there will be no monies forthcoming from this source for such expensive measures. HS2 will not connect with Dronfield either.

There is nothing in the ISDP to suggest that funding for a link road with bridge suitable for HGV use is being explored, hence the emphasis placed on Callywhite Lane as a key regeneration area and suggestion that it will be delivered, “towards the end of the plan period” as stated in paragraph 6.28 is not founded. These issues alone, raised during the 2017 consultation, should have prompted a much more significant shift of the Settlement Hierarchy and Spatial Strategy for housing.

Constraints to developing Land adjacent to Norwood Industrial Estate, Killamarsh (5.4ha)

Paragraph 4.68 states: “This is the amount of employment land remaining from a 2005 Plan mixed-use allocation, partly developed with housing. A satisfactory access cannot easily be achieved for the remainder of the land. The development of the site may also impinge on education and recreation land.”

This is another longstanding allocation that has failed to be developed for employment purposes over the past 13-years. The education and recreation land referred to are presumably Killamarsh Infant and Nursery School and the playing fields behind the school off Primrose Close. Since this was a mixed-use allocation in an area already partially developed with housing, it would be more appropriate for any development here to be for housing (with the caveat that road access and specific local school and other infrastructure capacity should be fully explored.)

NOTE: this “alternative housing site” suggestion has been made without consulting Killamarsh residents, hence lacks detailed knowledge of the site. It would only be acceptable if proposals to develop Green Belt sites in Killamarsh were rejected.

Employment land availability in the South of the District

Paragraph 6.28 also states that employment land at Hepthorne Lane in Tupton has limited prospects for development as it lies mostly in a flood plain and has some access issues. Removing this allocation leaves 28.87 hectares of employment land available in the South of the district; namely ten times more than is available in the north. This is not inappropriate in itself for the south sub-region as it has higher unemployment levels and a recognised need for regeneration.

NEDDC’s objective for sustainable economic growth is to seek to “narrow the gap between the more deprived areas and the more affluent areas” (Plan para 3.9). This is in line with Government policy which specifically seeks to encourage sustainable economic growth by prioritising regeneration in those parts of the country with high levels of deprivation. It is therefore appropriate that employment growth should be targeted at the most deprived areas in the District. The Employment Land Review Update Final Report (para 3.2) confirms that, “higher levels of deprivation are still concentrated in the southern part of the District” and “the more affluent areas are still located in the northern part of the District including Dronfield, Eckington, and Killamarsh, and the rural western part of the District”.

Most (if not all) development in the south is more sustainable and is accompanied by relatively better infrastructure planning (we do not have detailed knowledge of non-strategic sites however). Investment in road infrastructure in the A61 growth corridor is needed and being planned for. No Green Belt loss is to be incurred although green field building and concerns over merging settlements are issues.

The Former Biwaters site at Clay Cross is a strategic brownfield site with 8 hectares of employment growth to be delivered alongside 825 houses and the possibility of a new railway station being discussed. This is an area in the south of the district with an undisputed need for regeneration. This and two further strategic sites for new housing and employment incorporate better plans for infrastructure uplifts and therefore offer much more sustainable growth than the three towns in the north of the District.

The Infrastructure Study and Delivery Plan reports that the Seymour link road to support the Markham Vale employment area, was recently delivered to open up further phases of the site. Funders comprised D2N2 (£2.5 million), Sheffield City Region LEP (£3.7million) and Derbyshire County Council (£1.26 million). There are also plans to build a new school on the Coalite site, yet to be verified while HS2 plans are awaited.

The Avenue at Wingerworth has significant new infrastructure planned, including a new primary school. A proposal to extend Tupton Secondary school (which has had recent building upgrades) has also been made.

In Summary: Spatial Distribution of Housing is Not Consistent with NPPF and Plan Policy

Policy SS1: Sustainable Development states that development proposals will:

“c. Locate development where there is access to a broad range of jobs, services and facilities which are accessible by foot, cycle or public transport with reduced reliance on the private car.”

Paragraph 2.16 states that, “The district has a low jobs density and there is a need to provide employment locally in order to provide the opportunity for people to work close to where they live.”

The 1275 housing allocations on Green Belt in Dronfield, Eckington and Killamarsh are not consistent with this policy as there is very little economic growth guaranteed in this sub-region to be delivered within the plan period. The range of job opportunities is further limited by the decline in Town Centres: significant regeneration (beyond simple cosmetic changes) cannot be expected in the short to mid-term, hence this is another example of housing growth with supporting employment growth being misaligned. This and other sustainability issues point to rejecting the Settlement Hierarchy approach adopted by the Local Plan as it is unsound.

4.4 Inadequacies of Settlement Hierarchy Study / Infrastructure Assessments

Paragraph 9.4 of the Local Plan states: “Local infrastructure includes facilities or services that are essential to meet the day-to-day needs of specific communities – for example schools, health facilities, community facilities and local green spaces. These are often essential for a development to occur.”

Paragraph 9.9 says, “National Policy states that the Local Plan should be supported by evidence of what physical, social and green infrastructure is needed to support the overall quantum and distribution of growth proposed in the plan.”

The settlement hierarchy was agreed without first assessing what essential services could be enhanced / provided in which settlements within the district. The settlement roles and functions study in 2013 talked in much more vague terms about sustainability, did not draw firm conclusions and was not updated to inform the substantially changed housing allocations brought forward in the 2015 and 2017 iterations of the plan.

The Settlement Hierarchy Study has therefore been added to the evidence base retrospectively (Dec 2017) in an attempt to justify the continued use of the Settlement hierarchy and the “need” for more housing in northern settlements despite the constraint of the Green Belt.

A presumption of large size is highly sustainable is made at the outset, hence the four towns of Dronfield, Eckington, Killamarsh and Clay Cross are not compared with other settlements and automatically given a status of 1 in the hierarchy. The services / facilities are nonetheless still listed for each town.

The study uses very crude methodology and simply generates a list of services / facilities for each settlement with a rather inappropriate scoring system (1,3,5 or 7) that gives a Fire Station, Opticians, Taxi Service, dog-grooming service or holiday cottage the same score (1). Separate infant (4-7yrs) and junior schools (7-11yrs) are

each given 5 points, whereas a combined primary (4-11yrs) is also given 5 points. Physical size or pupil capacity are not considered. This is touched upon in the ISDP but is not explored in any detail for any of the northern settlements.

It also contains a substantial amount of inaccurate information - namely listing multiple services / amenities in Dronfield which no longer exist. These include the recently closed Cooperative supermarket at the Civic Centre, The Children's Centre which closed a long time ago, Gladys Buxton Adult Education Centre which is closing imminently, the recently closed Police Station and all Dronfield's closed banks. It also erroneously lists a nurse / carer recruitment service as a GP surgery and gives it a high score of 5.

In terms of the estimated jobs available in each settlement, it is not clear quite why some settlements are stated to have 0-100 or 0-500 jobs. There is also a very significant omission; Calow is said to offer around 200 jobs, yet there are in excess of 3,700 people employed by Chesterfield and North Derbyshire Royal Hospital which is sited in Calow.

The information on bus services is also not particularly helpful as it simply gives information on frequency. There is no breakdown as to where bus routes actually go in relation to the location of key services or key employment areas (at commuter times) that local people access.

Paragraph 3.21 acknowledges: "It should also be noted that the assessment does not look at the quality of services and facilities, their levels of usage or the relative ease of access to them by different modes of transport."

The study does not sufficiently prioritise more essential services and lacks any assessment of accessibility and scope for expansion. It also does not consider the ratio of services available to the size of population accessing them. All in all, it does little more than a telephone directory would do to give a useful picture of the present distribution of key services and other amenities across settlements. It does not demonstrate patterns of sustainability and therefore there is **NO EVIDENCE FOR THE SETTLEMENT HIERARCHY OR SPATIAL STRATEGY ADOPTED BY NEDDC.**

The Infrastructure Study and Delivery Plan was only written in September 2017 (with a transport update in Dec 2017) hence cannot be said to have informed the Settlement Hierarchy or spatial strategy. Many representations on the Feb 2017 draft plan expressed infrastructure concerns and questioned why there was no Infrastructure plan at that stage to support housing allocations. There is still little specific commitment within the ISDP to essential service growth for Dronfield, Eckington and Killamarsh in the north of the district.

Schools Provision

The only plan to increase school provision for the northern settlements is to use modular extensions as and when the need arises. The ISDP offers County Council figures for school places and numbers of pupils but does not account for the physical constraints to extending Dronfield Infants and Dronfield Junior Schools (the only

primary school provision within “normal area” for site DR1) which sit on a very small plot off a small cul-de-sac off the narrow School Lane.

These old, Victorian buildings have been extended to their limits as Dronfield has expanded, leaving limited outdoor play space and no remaining space for extension. Library space is already very limited at both schools and Dronfield Junior School hall is too small to accommodate all pupils at once for whole school assembly. Some existing classrooms are also limited in size and the Junior School is over-subscribed this academic year. Both schools are historically very popular.

Dronfield Henry Fanshawe school also has limitations to extension, having been substantially extended over time and does not have appreciable outdoor space surrounding it. It is a hugely popular school that brings the young population of Dronfield together and also serves a much wider catchment area. It was oversubscribed for last September’s intake and has had more applications than it can accept again for the September 2018 intake.

Primary Healthcare Provision

Sources of information used in the ISDP to generate an understanding of NE Derbyshire’s healthcare provision were all paper-based except for some discussions with Hardwick and North Derbyshire Clinical Commissioning Groups. Some of the documents were also 3 or 4 years out of date which is a long time in the ever-changing world of primary healthcare provision.

We have been informed that Oakhill Medical Centre, which would be the most accessible GP surgery for site DR2 in Coal Aston and is also highlighted as the closest surgery to DR1 (Shakespeare) in the Sustainability Appraisal (2018), is applying to close its list to new patients. This is due to existing strain on the service.

Beyond statements to suggest that extra consulting and parking space may be necessary at Dronfield Medical Centre and Stubley Medical Centre (both sites are actually physically constrained for extension), the ISDP makes no other plan for how Dronfield’s over-stretched GP surgeries will accommodate new patients. Waiting times for routine, non-urgent appointments are anecdotally reported to be up to 4 weeks across Dronfield.

In Conclusion:

The settlement hierarchy should not have been drawn up and stuck to so inflexibly before detailed infrastructure assessments were made. It cannot be used to demonstrate exceptional circumstances for building on Green Belt.

The NPPF necessitates protection of Green Belt, hence all other options to meet housing needs must be explored first, including an uneven spatial distribution of housing across the district and cooperation with neighbouring councils.

It is not inappropriate to have greater housing growth in the South of the district than in the north as the south is where regeneration is most required and where new

employment opportunities are being delivered. The Council must make sure that all appropriate Infrastructure upgrades are now made for this sub region.

Size alone does not necessarily make one settlement more sustainable than another. Spreading smaller housing developments across a greater number of settlements would provide a more sustainable pattern of growth and spread out the burden on straining essential services. Proposals for houses in level 3 and 4 settlements and smaller developments of 5-9 houses, that are consistent with NPPF and Local Plan policies, should be included.

Changes are needed to the spatial strategy as it has been made using crude and inaccurate measures of sustainability. The focus on the settlement hierarchy does not take deliverability of employment into account and specific siting of housing is not within the most sustainable areas of the district or individual settlements.

In particular, Green Belt sites on the outer reaches of towns are at unsustainable distances from public transport services, education and health services and essential shopping amenities.

Sustainable travel needs to be a district-wide priority given the rural nature and high out-commuting levels in NE Derbyshire. Where public transport services are already insufficient in settlements (as is the case in Dronfield), all efforts should be made to enhance and improve them, even if new housing development is limited for the Plan Period in those specific settlements.

5. NO EXCEPTIONAL CIRCUMSTANCES EXIST TO JUSTIFY HOUSING DEVELOPMENT ON NE DERBYSHIRE GREEN BELT

Due to the regrettably late publication of the Green Belt Topic Paper, this section may not be complete and further representations / amendments may be submitted by Dronfield Green Belt Group during the extended consultation period. It is noted that the GBTP references several other evidence documents that link to this key issue of demonstrating exceptional circumstances and we would reiterate (as stated in a previous representation) that the extended consultation should be for the entire plan and evidence base.

5.1 True housing need has been overestimated / Spatial Strategy is flawed

As outlined in previous sections there are strong arguments that the plan period target number of 6600 new homes for the district is too high, not realistic and therefore not sound. These arguments can be summarised as:

- Economic forecasts of employment growth for the district vary considerably. The 330 target reflects the high end of a wide range of growth scenarios.
- This is too high; an aspirational figure that is not realistic for a district largely rural in nature that will struggle to compete at a wider regional level to attract new business.
- Delivery of new industry / businesses on almost one third of the employment land allocated in table 6.2 of the Local Plan is highly questionable. (Callywhite Lane in Dronfield, Norwood in Killamarsh, Hepthorne Lane in Tupton.)

- Recent government calculation methods suggest 276 houses per year are needed. CPRE suggests 270.
- 330 houses per year cannot be built sustainably. NE Derbyshire is largely rural without well-serviced cities / large towns hence out-commuting and car use are very high.
- Even if public transport were improved, no significant reductions in car use are likely due to modern, busy lives and the spread out, rural nature of the district. Steep topography and its impact on travel patterns in settlements like Dronfield must also be accounted for.

The lack of evidence for the Settlement Hierarchy and Spatial Strategy has also been fully demonstrated in the previous section. NE Derbyshire is a challenging district with respect to bringing forth a Local Plan owing to its rural character and lack of sustainable towns or cities. The settlement hierarchy needs to be discarded and the spatial strategy revised in order to achieve development that can:

- i. Be sustained by existing, enhanced or new infrastructure,
- ii. Avoid increasing pollution through unsustainable travel and;
- iii. Avoid unnecessary harm to Green Belt and the five key purposes it performs for communities (NPPF 80):

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

Dronfield already has a degree of sprawl at its outer edges and lies in close proximity to Sheffield to the north and Unstone and Chesterfield to the south. The existing settlement gaps are very narrow hence risk of merging and loss of settlement identity needs to be carefully guarded against. The Peak Resort development in Unstone will extend northwards into the countryside towards Dronfield, hence any development on the south side of Dronfield will encroach upon the little remaining countryside.

The Green Belt Review and North East Derbyshire Green Belt Functionality Study do not provide robust evidence to suggest that any of the Green Belt sites allocated for development do not meet these functions fully. This is discussed in section 5.3.

With an appropriately reduced housing target and the inclusion of other available, sustainable sites around the district, there are no exceptional circumstances necessitating the use of the Green Belt. Smaller scale, suitable brownfield sites in Dronfield are also described in section 5.5 which, together with windfalls, could be used to secure a more sustainable pattern of development for the town.

5.2 Exceptional Circumstances outlined by the NPPF not demonstrated

Paragraphs 1.8-1.12 in the Green Belt Topic Paper (GBTP) set out some, though not all, of the NPPF (2012) paragraphs that relate to development on Green Belt. Of particular note is the inclusion of paragraph 85 and the significant omission of paragraph 89. The GBTP states:

“1.11 Paragraph 85 explains that when defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;”*

It has already been comprehensively argued that the Local Plan Spatial Strategy that dictates a need for high numbers of houses in the northern towns is not sound or evidence-based. It does not fulfil sustainable development requirements, most notably due to a lack of deliverable employment growth in this sub-region.

The need to keep land permanently open relates to whether it fulfils the functions outlined in NPPF 80. The Green Belt sites proposed do indeed fulfil these functions and the case for this is set out in the next section which reviews the Green Belt Functionality Study.

The Council have also highlighted within the GBTP, emerging guidance within the updated NPPF which is likely to come into force in summer 2018.

“1.17 In terms of removing land from the Green Belt, the Housing White Paper proposes providing some assistance in the definition of the term ‘exceptional circumstances’. The proposal is that, before Green Belt is released to provide for development, the Local Planning Authority must demonstrate that they have examined fully all other reasonable alternatives for meeting their identified need, including

- *making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
- *the potential offered by land which is currently underused, including surplus public-sector land where appropriate;*
- *optimising the proposed density of development; and*
- *exploring whether other authorities can help to meet some of the identified development requirement.”*

The Council have not made effective use of suitable brownfield sites, or optimised density, as will be detailed in section 5.5. One important function of Green Belt has been overlooked: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Developing Green Belt while brownfield lies empty not only causes unnecessary harm to the countryside but can leave communities more vulnerable as vacant plots can be magnets for crime and anti-social behaviour.

Many local residents would like to see vacant brownfield plots in Dronfield utilised for housing, particularly where prospects for future employment usage on such land is limited. This is detailed in section 5.5. The Statement of Compliance with the Duty to

Cooperate has not yet been examined in detail but an initial appraisal would suggest that NEDDC have not been proactive in their liaisons with neighbouring authorities. A lack of comprehensive “cross border” thinking is evident throughout the Local Plan.

“Limited Infilling” Exceptions

Paragraph 89 details the circumstances under which exceptions can be made to allow Green Belt development. For housing developments, the relevant exception may be for “limited infilling” as described below.

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- *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.*

Paragraph 5.78 in the Local Plan states: “Policy LC3: Exception Sites for Affordable Housing seeks to provide 100% affordable exception sites.”

This policy, which is rather ambiguous, states that Green Belt land could be used for limited developments of affordable housing where there is a proven need demonstrated by a Local Housing Needs Survey. It also states that it would need to be demonstrated that no other suitable sites within a Settlement’s existing development limits could be found (see section 5.5 regards other suitable sites).

Further statements in the policy and paragraph 5.78 are not entirely clear regarding the allowance of developments that are less than 100% affordable housing within Green Belt. However, paragraph 5.78 further states: “The market units must at all times be subsidiary to the affordable housing element and therefore shall be less than 50% of the total number of dwellings on the development scheme.”

Hence, this policy does not apply to any Green Belt development in NED as there is a stated 20-30% affordable quota target. The outline plans drawn up by developers for Green Belt sites proposed in the Local Plan certainly do not suggest developments of entirely affordable housing either; quite the opposite.

Sites DR1, DR2, EC1 and KL1 are all large plots with large housing allocations ranging from 200 to 400 houses, hence none of these proposals can be described as “limited.” The proposed developments at the six sites would all result in a “greater impact on the openness of the Green Belt.” Considering the size of developments and the extent to which the existing openness of the Green Belt would be detrimentally reduced at each site, none of the 6 sites meet “limited infilling” criteria for exceptional circumstances. A more detailed site-specific consideration of the impact of “infilling” is described below:

DR1 – Dronfield Shakespeare 9.87 hectares 235 houses. Site bordered on only one (uneven) side by existing housing. Impact of proposed developments would be to greatly reduce openness of Green Belt to south and east. While Chesterfield Road

borders the site to the North East, there is further open countryside on the opposite side of the road and footpath networks. Hence openness of Green Belt would also be reduced to the north east.

DR2 – Dronfield Coal Aston 10.35 hectares 200 houses. Site bordered by housing to the south and incompletely to the west. Open to northwest, north and east and links to further parts of the Moss Valley Conservation area; hence impact of housing would be a significant negative effect on openness.

DR3 – Dronfield Studley – smaller site with 40 houses allocated. The only substantially built up area is to the south of this site. A small number of buildings across Stubley Lane to the north are principally stables / farm buildings with open countryside either side and beyond. Very open aspect to the east, hence proposed developments would reduce openness of Green Belt to northwest, north and east.

EC1 – Eckington South 18.2 hectares 400 houses. Site bordered on only one side by existing housing, hence impact of proposed developments would be a very great negative effect on the openness of Green Belt to East, South and West.

KL1 – Westthorpe – 15.6 hectares 330 houses. Openness to the south and south east would be greatly impacted/ reduced by this large-scale housing.

KL2 – Rotherham Road – smaller site with 70 houses allocated but openness to north and east would be impacted negatively. Paragraph 5.34 acknowledges, “compensatory improvements to the environmental quality or accessibility of the remaining greenbelt land will be required.”

5.3 Green Belt Review and Strategic Green Belt Functionality Study flawed

The Green Belt Review commissioned by NEDDC confirmed that the Greenbelt sites proposed for development all perform a valid Green Belt function (Plan para 4.69). The Green Belt is valued highly by local residents as is evidenced by the large number of responses to the consultation on the draft version of the Plan submitted by local people and the 4105 signatories to a petition calling on NEDDC to not remove land from the Greenbelt around Dronfield.

The 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 as stated previously in section 5.1. A serious flaw of the study was the combination of several sites being assessed into one study zone. For example, sites DR2 and DR3 were combined together with other areas in northern Dronfield and assessed as one. To then use this combined scoring to indicate the release of just one site is not reliable methodology.

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.

Much of the scoring for this study is highly subjective and open to bias. The scores for preserving “the setting and special character of historic towns” are a highly subjective matter and appear low for Dronfield sites. The study zone containing DR1 was scored only 1 which does not take into account the farming setting on this land and the high visual amenity it holds when entering Dronfield from the south.

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 incorporates farmland. The Stubley site stands across the road from an old stone-built farmhouse and stabling facility. 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 (site DR1. – Shakespeare, and 2 other sites which have now been removed from allocations) 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

This total score of 12 still placed Dronfield South East in the top 50% of Study Zones (indicating relatively high functionality) and there are good arguments to warrant a higher score.

The analysis of the results within the study talks 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. 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 point to a disregard for the study’s own results negating the purpose of carrying it out in the first place.

The ensuing Green Belt Review methodology reflects a similar approach. Sites were assessed to see how robustly they met Green Belt functions. If insufficient land was identified, further layers of assessment were added until sufficient land was acquired. This cannot be said to be an objective approach.

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 Development in South East Dronfield (site DR1):

	<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 Peak Resort		625 metres

Summary of 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.
- 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.

5.4 Will Green Belt Development Deliver Much Needed Affordable Housing?

The need to provide affordable housing is central to Local Planning and to the Council's arguments for the need to use Green Belt land for housing. However, there is worrying precedent of under-delivery of affordable quotas when larger rural sites (such as Green Belt land) in highly marketable areas (such as Dronfield) are developed. A CPRE and Shelter report on this problem states:

"In one year alone, in just eight rural councils, sites on which a viability assessment was submitted lost 938 affordable homes. That's a 48% cut in affordable homes, compared to what council policies said developers should build. These new housing sites achieved just 18% affordable housing – half the level required by councils' policies."

"Developers of larger schemes are far more likely to use viability assessments to cut affordable housing. The average number of homes on sites where viability was used was 166, compared to an average of 71 on schemes with no viability assessment."

<https://www.cpre.org.uk/resources/housing-and-planning/item/4781-viable-villages-closing-the-planning-loop-hole-that-undercuts-affordable-housing-in-the-countryside>

The preference of the Council to develop large swathes of Green Belt under a "developer-led" plan, rather than work to overcome some difficulties in bringing forth smaller, more suitably-located brownfield sites, is of real concern in this respect.

Affordable housing, over and above all other types, must be built in the most sustainable places and should be authority-led through proactive Local Planning. Large, profitable Green Belt sites on the attractive edges of already sprawling towns are notoriously developer-led, driven by market demand (not need) and are generally not in sustainable locations.

NEDDC have already demonstrated highly regrettable poor land utility in this respect. Planning permission has been granted recently for two such sites in Dronfield for low density, expensive homes. The site of the Hearty Oak Pub, off Northern Common in NW Dronfield and very close to a primary school, has seen 8 large, executive homes with a minimum price tag of £500,000 each built within the last few months. This site is also within walking distance of local shops, a GP surgery and green recreation facilities at Gosforth fields. Northern Common also provides easy car access into Sheffield for commuting that avoids key congested areas of Dronfield.

A further development for expensive homes has been given planning permission on a site adjacent to Dronfield Civic Centre and the library that would have been much better utilised for affordable housing. It is bordered by small, terraced bungalows occupied by elderly people. Dronfield Medical Centre, the adjoining Pharmacy and Sainsbury's Supermarket are also within easy walking distance. Information on the Rykneld website states:

"North East Derbyshire District Council is working in partnership with award-winning developers Rykneld Homes on this prestigious scheme.

The Manor Farm site is to be elegantly restored to create luxury apartments in the historic heart of Dronfield. The apartments will be offered for sale on the open market as part of the Council's on-going commitment to increase housing provision in the town. A number of family sized homes will also be built on land adjoining Manor Farm and offered for sale on the open market.

The scheme, put forward by Rykneld Homes, will see a total of 10 properties - all to be offered for sale on the open market - created in the heart of Dronfield, bringing much needed new homes in an area of high demand - with work scheduled to begin later in 2018."

Dronfield does need more affordable housing to meet the needs of older people, those requiring social housing and first-time buyers. This would be better achieved on smaller brownfield sites within the town which also offer more sustainable locations. These would meet the needs of older people and first-time buyers, whereas more expensive homes at outer reaches of towns on Green Belt would not.

5.5 All other brownfield options for housing not fully explored

Section 3.4 has already outlined several deliverable sites / homes across the district that could be allocated within the Local Plan to achieve sustainable patterns of development. Using even some of these options could negate the need for development on Green Belt.

It is acknowledged that some new housing is needed in the north of the district however and that brownfield sites, including small ones, should be regenerated for the good of communities. Eckington and Killamarsh have some brownfield plots allocated within the Local Plan, hence the following options focus mostly on potential for more sustainable options for development in Dronfield.

5.51 Windfall sites should be included / large buffer zone not justified

Details of likely windfall sites, based on historical patterns, have been given in section 3.4. The Plan (para 4.12) states that “Additional flexibility will be provided by windfalls, which are expected to provide for approximately 75 dwellings per year based upon past trends. This will provide a 13% buffer in relation to the overall housing requirement of 6600 dwellings.”

This is a relatively high buffer zone in comparison to other authorities; a lower buffer zone could and should be used. Small scale windfall building has been occurring in Dronfield, some of which has already been described. As opportunities to develop small, sustainable sites are tending to get “snapped up” by developers looking to build expensive, profitable homes, it would be better to try and anticipate these small windfalls better and manage them through the Local Plan to ensure the best types and tenures of housing are delivered.

5.52 Other brownfield sites in Dronfield should be explored

Several site suggestions were put forward during last year’s consultation, although this is not reflected on the Council’s brownfield register. These are detailed below, along with other suggestions that have been made more recently by residents.

The CPRE have also pointed out that local authorities routinely disregard small brownfield sites, despite the fact that these usually have existing infrastructure, such as good rail and road links, access to local amenities and proximity to existing communities. They are particularly valuable in rural areas, such as in villages and market towns, where much needed development can be provided without encroaching on the surrounding countryside.

Gladys Buxton Centre, Oakhill Road, Coal Aston – County Council ownership

This is a prior school that is closing imminently. It operated as a Children’s Centre until closure last year and has also offered adult education courses. The building would cost in excess of £80,000 to bring up to a standard suitable for ongoing use which is not a worthwhile investment to make for its limited purposes according to County Council sources. There is a playing field and car parking alongside it at present. Oakhill Medical Centre is located next to this building. However, as this surgery has expressed constraints to being able to accept new patients, negotiations with both the CCG and directly with the surgery would be required.

If the development for housing could incorporate extension of consulting and parking space for the surgery (and subject to staffing) this site offers the most sustainable setting for new housing in Dronfield at present. It is within walking distance of 2 Infant Schools and 2 Junior Schools, the secondary school, local shops and the train station (and is in a relatively flatter part of town.) Good design of housing – perhaps 3 storey starter homes / sheltered accommodation for the elderly - that retains some green pathways / a “playing out” green (such as on Burns Drive off Shakespeare) would make this development more acceptable to the public also.

Former Padley and Venables Site, Callywhite Lane

This site, presently used to store large pipes, remained unused for over 10 years. The pipe storage offers very limited employment and could be relocated which would

benefit residents in nearby housing in the Stonelow Road area who experience some noise disturbance when pipes are moved at night. The site is not far from the Gladys Buxton site so is, again, in a good, sustainable location.

Planning permission for housing was last sought on this site in 2013 by Bloor Homes but was refused on the grounds of the land needing to be retained for industrial purposes. There were also issues regards road access as a narrow cul-de-sac (Frithwood Drive) had been proposed which is too small to be appropriate. However, residents largely welcomed new housing and made suggestions for alternative road access. This is part of the response that a resident made on the 2013 planning application:

“There is capacity for additional traffic on Shireoaks Road due to the width of the road – can an access road be considered which goes straight from Shireoaks Road, down the side of Parkgate and onto the new estate? We appreciate that this would require some changes to Dronfield Town Football Club and the cricket ground, but if these are Council owned then this should not be an issue, and particularly if Bloor Homes paid for these alterations. Alternatively, access via Callywhite Lane for residents should also be considered as there are already residential dwellings near to the Akademy which surely sets a precedent.”

NPPF 22 'Planning policies should avoid the long-term protection of sites for employment use where there is no reasonable prospect of a site being used for that purpose.....applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities'. Given the failure of this site to attract business and the constraints to providing suitable road access to the Callywhite area for industrial expansion this site seems highly appropriate for a change of use.

Sheffield FC Site, Sheffield Road / Wreakes Lane

This site is less sustainably located with respect to distance from schools, GP surgeries etc (uphill to services in Stubley) than the previous two suggestions as it is on the northern edge of town. However, it is more sustainably located than DR1 and DR2 and has good road and bus transport access for Sheffield, Chesterfield and Dronfield railway station. The owners wish to relocate back to Sheffield and are fundraising to do so. They have had housing plans drawn up for the site but have been turned down by NEDDC due to the site being within Green Belt.

Since it is a previous development within Green Belt, exceptional circumstances could much more reasonably and robustly apply. Exception criteria in NPPF 89 include, “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 Coach and Horses Pub buildings adjacent to this site would need to be protected if the site were to have houses built upon it and housing should not extend any further than the existing football pitch and stands into the Green Belt (even though the line of housing along Sheffield Roads extends further.)

It would be very much welcomed if this site could be converted for outdoor sports use, but the price of the land would likely make this a non-profitable venture for private

investors so this seems unlikely. Housing, perhaps of 3 storeys to maximise space, would be a more realistic alternative.

It would certainly be unfortunate to allow this plot to become derelict given its prominent place at the northern entry to Dronfield and the likelihood of attracting littering and crime.

The Alma / Holmley Bank (?joint Town and District Council ownership)

This site had housing on it until the 1960's but has now become a naturalised, rougher green space that sees some use by dog walkers in particular. It was gifted to the community of Dronfield under a deed of covenant. It is in a good, sustainable location for housing as it is close to the Railway station, Aldi supermarket and primary and secondary schools. This site is likely to have some public resistance but a sensitive, small development that, again, retained some green pathways would seem appropriate. It would be favoured above the allocated Green Belt development.

Gunstones Bakery, Stubble Hollow

This business is still operating but has seen a significant decline and much reduced staffing in recent years having lost key contracts. There has been speculation that the business may close. The Local Plan states that this site should be retained for employment. Geographically, it is much more suited to housing as it is in a very sustainable location, backing onto a housing estate area in Dronfield Woodhouse and is walking distance from primary schools, a GP surgery, local shops and Gosforth playing fields.

5.53 941 Vacant Homes across District in Need of Regeneration

A Freedom of Information request submitted to the Council has revealed that the number of vacant homes across the district has increased over the last 12 months from 731 to 941. NPPF 51 states:

“Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.

From government white paper, Feb 2017:

“We will continue to support local authorities to encourage efficient use of our existing stock, making best use of homes that are long-term empty.”

Local authorities have powers and incentives to tackle empty homes. Through the new homes bonus, they earn the same financial reward for bringing an empty home back into use as building a new one. They also have flexibility to impose an additional Council Tax premium of up to 50% on properties that have been empty and substantially unfurnished for more than 2 years.

It is also accepted within the SHMA 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. Despite this, NEDDC have made insufficient proactive effort to tackle empty homes as demonstrated below; hence another much less than “fully-explored” option before looking to the Green Belt for development.

Further information provided from the FOI request:

- The Council’s Private Sector Leasing Scheme, Sustainable Tenancy Project and Property-matching service has resulted in just one property being brought back into use.
- The Council has a property matching webpage but there are no properties currently listed on it.
- No formal enforcement action has been taken against owners refusing or unable to bring homes back into use.
- Just 30 owners are being assisted to bring homes back into use across the whole district.

5.54 Increasing density of housing at appropriate sites should be explored

Housing densities could be increased at some sites across the district, particularly smaller ones where affordable housing is often most appropriately and sustainably sited. However, this needs to be balanced on a site by site basis with some retention of communal green space wherever possible.

In addition to this, Policy SP1 states that, “The efficient use of previously developed land within Dronfield will be encouraged, including sites within the Town Centre where development would help to meet housing needs, including above shops.”

5.55 Non-compliance with Duty to Co-operate / regional sites overlooked.

Further representations may be made on this, given the late publication of the Statement of Compliance with the Duty to Cooperate.

There has been little evidence that NEDDC have fully cooperated with neighbouring authorities with respect to finding sites and drawing up the housing allocations to meet housing needs.

An example of this is Unstone which sits on the NED / Chesterfield Borough Council border. There are three disused plots of land in need of regeneration in Unstone that could deliver housing within walking distance of new employment opportunities at Peak Resort. These are the Old Boat Yard (which is understood to have allocations within the CBC plan), an old nursery and the old Lister’s Car Sales plot. Together, the latter two would have a yield of about 128 houses. Given the close geography and use of Dronfield facilities by the Unstone population, this has been a missed opportunity for cross-border working.

6. INDIVIDUAL SITE CONCERNS IN DRONFIELD

6.1 Site DR1: Shakespeare / Chesterfield Road

GREEN BELT FUNCTION IS HIGH:

Classed amber in the Green Belt review, although arguably underscored in the Green Belt Functionality Study.

SA acknowledges, “located on the edge of the urban centre, and would extend development from the town to the south meaning urban sprawl.”

Risk of merging with Unstone is high if this site is developed, as the Plan underestimates the existing settlement gap and does not account for Peak resort, new housing at site of Fleur de Lys pub or existing housing along and set back from the road between main parts of Unstone and existing southern edge of Dronfield.

Peak Resort will merge Unstone with Sheepbridge and Chesterfield, hence there is high risk of Dronfield merging with Chesterfield.

Release of Green Belt sets a dangerous precedent here as the developer, Redmiles, owns more land than that allocated and has pressured for this land to be released for development also.

One previous application was for 449 low-density houses.

OTHER POTENTIAL HARM TO GREEN BELT:

Site contains a footpath linking to Dronfield Rotary Walk

Several mature hedgerows and trees, some with TPOs but residents fear developers likely to fell them and pay the fines.

Site is actively farmed, including cows.

Wildlife spotted at this site: bats, foxes, badgers, mice, squirrels, birds of prey, woodpeckers, jays, chiff chaffs, yellowhammers, fieldfare

THIS SITE IS VERY POORLY SUSTAINABLE:

Sustainability Appraisal notes that the site would increase traffic congestion and hence increase greenhouse gas emission and contribution to climate change.

Site does not have easy public transport access to the railway station to link to key commuter trains at present.

Existing car use for commuting and journeys within town are very high already from southern reaches of Dronfield.

Closest primary school provision would be Dronfield Infant and Junior Schools. Both schools historically popular and on very constrained sites – no physical capacity for extension. Dronfield Junior School presently oversubscribed.

Where existing schools cannot be expanded, the County Council may advise that a new school is required for smaller scale residential developments – but where would it go in Dronfield?!

Walking routes to Dronfield Henry Fanshawe Secondary School not safe from this site – either along busy, polluted B6057 without pedestrian crossings to enable safe crossing to access pavements or link (?via footpath if built) to Shakespeare estate and walk via narrow Hallowes Lane which lacks footpaths entirely on some stretches.

No convenience store or supermarket within realistic walking distance (Civic Centre Co-op was closest, now closed.)

The site is steep and flood risk nearer the bottom of the site needs to be considered. Road access is to be made from Chesterfield Road and there are substantial differences in levels between the road and the site

High visual amenity of the site from Apperknowle / Hundall side of the valley would be compromised

6.2 Site DR2: Eckington Road, Coal Aston

GREEN BELT FUNCTION IS HIGH

A site within narrow strip of Green Belt between North Dronfield and South Sheffield which needs protecting.

Any loss of Green Belt in this stretch sets a precedent: there are other developers keen to build in this strip, notably one on land south of the Bochum parkway in Sheffield.

Proposed housing would reduce openness of Green Belt significantly.

SA states that the proposed development would alter the urban fringe, extend the built form into the countryside and impact on rural and open long-distance views for local residents, users of the local Public Rights of Way network, users of the B6056”.

ECOLOGICAL / HERITAGE IMPACT WOULD BE HIGH

SA states that development at Coal Aston site would have significant impact on the landscape as, “the site is in an area of Primary Significance in an Area of Multiple Environmental Sensitivity.

No compensatory planting / landscaping could mitigate for the harm to the landscape.

Lies within the Moss Valley conservation area, enjoyed by NED residents and those across the border in Sheffield.

Housing site very close to one of three SSSIs.

Other sites are entered on Derbyshire Wildlife register.

Site is adjacent to historic ancient woodland owned by the woodland Trust and a landscape of high quality containing a number of listed buildings.

A recent application to erect a communications mast was rejected due to its impact on the landscape and conservation area. A housing development would have a much greater impact.

Wildlife includes pipistrelle bats, foxes, stoats, bank voles, roe deer, brown hares, lapwings, skylarks, yellowhammers, chiff chaff, bees and butterflies.

Multiple flora and fauna

Ancient hedgerows and trees on the proposed housing site, plus meadows, ponds and marshland in the wider CA.

Bees kept at Troway Hall just 2 miles away – development puts bees under threat / contravenes National Pollinator Strategy.

Working agricultural valley with livestock and arable farmland

SITE NEEDS PARTICULAR CONSIDERATION OF SUSTAINABILITY FOR ELDERLY

Paragraph 2.13 highlights the ageing population which has implications for the types of housing needed and infrastructure requirements, such as access to health services. Table 2 in the recreation research report (Sept 2017) demonstrates that Coal Aston has a far higher proportion of elderly people over 71 years old (26.8%) than any other ward in NE Derbyshire. It also has one of the highest proportions of people between 61-70years old.

Local Plan seeks to change the demographic of Coal Aston – not controllable.

Provision of downsize / sheltered homes for elderly should be considered – so that they can stay close to existing social networks.

The need for family, affordable housing and job opportunities also needs to be balanced with this.

Too far and too uphill from the town centre and health facilities to serve elderly people well.

Further issues not yet assessed at DR2, Coal Aston (para 5.20-5.23)

- Buried high pressure gas pipe
- Overhead high voltage power
- Coal Outcrop with likelihood of shallow coal workings (note the existing farm house is set back from the road to avoid the workings).
- The existing sewage pumping station (presumed to serve Wilson Road area). There will be a pump riser pipe crossing the land somewhere, probably heading towards Ferndale Road?

These issues could significantly affect the density of housing that is possible and be used by the developer to drive down the affordable homes quota on this site.

An ex-mining area hence possible land stability issues. Fracking could also have a negative effect on land stability which could affect suitability of building houses at this site and how marketable they would be.

Cumulative pollution issues through nearby fracking operations (use of chemicals and heavy goods traffic) and loss of mature trees and hedgerows on the Green Belt.

6.3 Site DR3: Stubley

Smaller site but would still encroach upon openness of Green Belt and alter character of area.

Any Green Belt release in this northern strip between Dronfield and Sheffield sets a precedent.

Dense shrubbery and trees / rich in wildlife.

Plan acknowledges possible ecological constraints / still not assessed.

Suitable access not yet determined – Summerwood Lane has a very acute junction with Stubley Hollow – steep with poor visibility.

7. CONSULTATION ISSUES

7.1 Lack of Compliance with Statement of Community Involvement

Community Involvement Strategy SCI Leaflet 1 of 3 outlines the key principles NEDDC pledged to follow regards community engagement and involvement in the planning process. The following key principles have not been complied with:

- ***Keep the process simple by writing in plain English and explain any planning terms that we need to use.***

The Local Plan and supporting evidence documents are mostly written in highly technical, planning language, many acronyms are used and they are inaccessible to a majority of lay people. Dronfield Green Belt have also encountered many residents who needed assistance to understand the representation form and Council's guidance note on how to make representations. The non-technical summary within the Green Belt Topic paper is welcomed, but such summaries have been lacking throughout the Plan and other key documents.

- ***Communicate clearly by explaining the reasons why we want to involve you and receive your comments.***

The NEDDC whole district paper communications announcing public consultation periods on the Local Plan have been poor. The term, "Local Plan," used in headlines is jargon in itself. Terms like, "Plans for thousands of new homes and new jobs" would be more appropriate. There have been no front-page headlines and this year's notification in the Council's "News" magazine was only received after 16 days of the

consultation period had already elapsed. The article was tucked away on page 7 and did not mention anything about housing. An article about the clean-up of the Coalite site on the same page also failed to mention housing.

• *Make it easy for you to get involved by setting out when and where you can provide your comments. We will always try and plan public events so they are accessible to all people and groups and use existing community involvement networks.*

The downloadable consultation form is not in an obvious place on the website. NEDDC have advised people to use their online system or standardised representation forms wherever possible. However, there were no paper forms available at Dronfield library until halfway through the consultation period, after representations were submitted regarding this issue. The forms have already run out once since then, hence none were available for another short period while stocks were replenished.

• *Be inclusive by providing information in an accessible format and giving clear advice on how the planning system works and encourage involvement from those groups that are not usually involved in the planning process.*

The planning system has not been well explained to lay people who have had to do their own research to find this information. In particular, the very different nature of this pre-submission consultation was not explained at earlier stages. People were informed in 2017 that they would get this final chance to “have their say,” without being told how specific the remit is for this particular consultation period.

• *Be transparent and objective through the consideration of reasonable policy options for the Local Plan and presenting all relevant facts about development proposals.*

The Green Belt topic paper and Statement of Compliance with the Duty to Co-operate paper contain highly relevant facts and were not made publicly available until 22.3.18, at a very late stage of the planning process. If, as NEDDC claims, the Green Belt Topic paper collates their evidence for exceptional circumstances from the Green Belt Review and Strategic Green Belt Functionality Study, this paper could and should have been produced prior to the 2017 consultation. It contains a non-technical summary of benefit to lay people, whereas the previous GBR and SGBFS documents are highly inaccessible documents for many.

It is recognised that the Duty to Cooperate is an ongoing process but interim reports could and should have been published to help inform the public at consultation stages. The final Habitats Regulation Assessment is still awaited as of 28.3.18.

The Council’s decision to only extend consultation for specific documents has also made for an obstructed, disjointed and more complex consultation process. Given the high volume of responses (over 2000) and high proportion of objections (57%) in the 2017 consultation, a longer 2018 consultation period (on all aspects of the plan) than the minimum statutory requirement of 6 weeks would have been highly warranted in any case.

- ***Share information with you using the Council’s website, in Derbyshire County Council libraries and in the Council’s Head Office whenever this is appropriate and effective.***

Information has not been made available at the appropriate times and residents have had to “chase” key information sources, such as the missing Green Belt Topic paper. Phone calls and emails to the Planning department either go unanswered or are met with non-specific promises of, “available soon.” This is why Dronfield Green Belt resorted to making an online representation to prompt the Council to act and bring these serious inadequacies of the Consultation to the attention of the Inspectorate.

- ***Make copies of Local Plan documents available to view at key locations throughout the District.***

The range of documents available to view in paper format for those who do not access the internet has been limited. This has been an obstruction to keeping people informed and enabling them to become involved. The Green Belt Topic Paper, with its non-technical summary, is a highly pertinent document that has not been made available at libraries. Many areas (most notably, Coal Aston) have a high proportion of elderly people who either do not access the internet or who use it infrequently and do not have the technical skills to navigate the Council’s website and complex documents online.

- ***Make sure your involvement is effective by ensuring all comments received by the authority are recorded, read carefully and taken into account.***

This did not happen following the 2017 consultation as explained in the following section. Comments were mis-recorded, seemingly not read properly, not referenced at all well and not taken into account.

7.2 Responses submitted during 2017 Consultation not represented accurately in Statement of Consultation 2018

Dronfield Residents have discovered multiple problems with how representations made on the draft plan in 2017 were handled and recorded. These include a lack of consistency in processing representations, errors, omissions and a bias against accurately recording objection responses. This means that the publicised responses in the 2017 draft plan and Statement of Consultation 2018 contain misleading inaccuracies.

This is explained in further detail as residents consider that important, material objections and useful local knowledge to enable more sound planning have been overlooked by the Council in bringing forward the publication draft. It has also acted as a deterrent to people making representations during this final consultation, as people feel that mishandling has been deliberate. Whether or not that is the case, this seriously contravenes the Statement of Community Involvement and renders the plan unsound and legally non-compliant.

OBJECTIONS MISCLASSIFIED as COMMENTS or STATEMENTS of SUPPORT SPECIFIC OBJECTIONS ARE DETAILED IN APPENDIX B

The Planning Department and Cabinet members have been notified of these procedural irregularities via phone calls and an email sent on 7.2.18 supplying specific details of a number of clear objections that have been misclassified as comments or, in one case, a statement of support. It is here where intended bias seems most apparent as some very clear statements have been flagrantly misconstrued. For example, representation number 5316 has been classified as a comment but the opening statement reads, *“I am writing in objection to the recently published (but poorly advertised) February 2017 Draft Local Plan.”* The 3rd sentence goes on to say, *“I would like to raise a few points within my objection - particularly with respect to the Dronfield area.”*

None of these reported errors have been corrected in the February 2017 draft as of 28.3.18. Further information about missing themes in the Statement of Consultation is given in section 7.25.

7.21 Delays in publicising representations / public not informed

Several procedural anomalies only come to light in February this year as NEDDC were delayed by some months in making full responses available for public viewing. It is not clear when exactly responses were published as residents did not receive notification of this, despite many making enquiries with the planning department in April-June 2017 and being told they would be available “soon.” The way in which they were published (interlaced through the online 2017 draft and only accessible by clicking on icons) has never been clearly explained and is not intuitive to lay people.

7.22 Summarising and classification of representations not explained

Most, though not all, respondents received a summary of their representations as confirmation of receipt, often several weeks after the consultation had closed. These summaries were found to be cursory in many cases where residents had submitted detailed representations. Some residents queried the omission from their summaries of material objections they had made regarding infrastructure and then most awaited publication of the responses to check how their full objections had been reported.

NEDDC gave no explanation of summarising procedures, that responses had been classed in one of three ways or how summaries and fuller representations would be taken forward. Some responses may have contained support for some policies in the plan, but objections to specific housing allocations that contravene those policies. Hence, a single classification of “support” or “object” on a detailed representation could be confusing and taken out of context.

There was no indication of how themes of representations were being referenced or collated. Residents naturally assumed that themes listed by the Council in their summaries would be considered and taken forward into a document to inform the next stage of the plan. This was not the case.

7.23 Responses not referenced adequately

A detailed analysis has revealed that many material objections have been published within the 2017 draft plan but have not been referenced to all the paragraphs / policies to which they refer. This includes detailed, referenced statements clearly referring to multiple themes and parts of the Local Plan, such as the Dronfield Greenbelt Residents' Group statement. These objections are not therefore referenced against all appropriate themes in the Statement of Consultation and some key themes of objection are missing altogether.

It appears that only representations made using the online system (which several residents reported as not working during the consultation period) were fully collated and referenced into themes in the Statement of Consultation. While respondents were advised to use the online system (or standardised forms,) at no time did NEDDC warn people that sending free format letters / documents could result in very little content of representations being collated into the key "statement of consultation" document. It seems that NEDDC were grossly under-resourced to handle the volume and detailed quality of representations received and that an element of bias and improper processing of objections occurred.

The majority of objections relating to Dronfield were not made using the online system and many of them contained detailed arguments on many themes. The online system and standardised forms risk representations linking multiple themes becoming disjointed and interpreted out of context. A significant proportion of the population either lack online access or do not have the level of computer literacy to be able to manage this system. Additionally, paper forms for those without internet access were frequently unavailable at Dronfield library.

Looking at the representations published within the 2017 draft, most objections have only been referenced in one place under housing allocations in Chapter 5. Even this single referencing has not been consistent as similar objections have been referenced rather randomly to other parts of the plan, including an Appendix at the end of the document.

Some residents queried the omission of infrastructure themes in their summaries with the Council. It is not clear if these were subsequently added or if / how they have been referenced.

7.24 Lack of procedure for handling responses

A freedom of Information request was submitted to the council asking for, "The criteria used by NEDDC planning officers when interpreting and summarising representations (not made on a representation form) made during the Local Plan public consultation period in 2017, to ensure consistency in interpretation and summarisation."

NEDDC replied 22.3.18:

"When we invited the public to make comments on the Draft Local Plan we asked that they a standard form to ensure they made comments in a clear and consistent way. Comments sent in not using a form were sometimes difficult to read and/or interpret, in these cases officers had to make informed decisions about which parts of the

document their comments related. It was not possible to have criteria to inform this process.”

It is possible to handle free format, qualitative responses manually and in a systematic way:

- i. Perform an initial read-through of representations and list themes.
- ii. Read through again and tally how many people objected or supported under particular themes.
- iii. Include pertinent quotes under themes to add sub-themes and / or context.

This is essentially how Table 3 has been structured which leads to the conclusion that there is a heavy bias against the inclusion of issues that were not raised using the online system. This works against residents (a large majority of whom objected to plans in Dronfield) who will not have been familiar with the use of online planning representation systems. The planning team at NEDDC have been negligent in their duty to collate public responses, represent them fairly and give them due consideration. The lack of standardised procedure / personnel experienced in handling large volumes of qualitative data has been a serious consultation flaw.

Developers, landowners (especially those who can afford legal representation) and planners from neighbouring authorities, in contrast, will have been much better equipped to use the online system to best effect. Hence the Statement of Consultation collated from 2017 representations has a definite bias towards those supporting the plan, whether intentional or not.

7.25 Missing themes of objection in Statement of Consultation 2018

Appendix 3 in the Statement of Consultation contains a list of Issues Raised During Consultation and Council Responses. It also lists representations containing these issues (list of ID numbers), the council’s response and any changes made. The table is rather confusing as representation IDs are often listed against groups of issues, rather than individual ones. In some cases, representations in support and in objection to the plan based on one issue are listed together. This, coupled with the very inadequate and incomplete referencing, means it is certainly not possible to gain any reliable idea of the quantity of support or objection to any given issue.

In terms of the quality of objections and breadth of themes raised, again this cannot be gleaned with any accuracy or validity from the Statement of Consultation due to the problems already described. A list of “missing themes” of objection has therefore been collated, by analysing a sample of detailed objections and pulling out themes that do not appear in the table of issues produced by NEDDC. Several group statements have been used as these will be representative of more people, followed by some individual statements of Dronfield Green Belt members who liaised widely with residents during the 2017 consultation period.

A LIST OF MISSING THEMES OF OBJECTION IS PROVIDED IN APPENDIX C

It is hoped that these issues will now be taken into proper consideration, alongside all representations submitted during this present and final public consultation, irrespective of how they have been submitted.

Before moving to the summary of recommended changes to be made to the Local Plan, we would like to respectfully request that the following is taken into consideration:

1. Recognise that the Statement of Consultation 2018 is an incomplete and biased document that generally overstates support for the plan and understates, both in quantity and quality, objections to Green Belt development overarching many core planning principles.
2. Consider the poor information notifying the public of new housing and growth plans and the many barriers and obstructions experienced by residents in making representations.
3. With this in mind, ensure that the issues that have been raised are scrutinised very carefully during the examination process and Public Hearing.

8. SUMMARY: RECOMMENDED CHANGES TO THE LOCAL PLAN

Reject proposals to build 1275 houses on six Green Belt sites in Dronfield, Coal Aston, Eckington and Killamarsh. All six sites should remain undeveloped and within the Green Belt.

Lower the District Housing target to a more realistic and sustainable figure of between 270 and 276 per annum.

Accept that Rigid Adherence to the Settlement Hierarchy and Spatial Strategy will not deliver new housing growth sustainably and would cause unnecessary harm to Green Belt.

Adopt a more site-by-site assessment of Infrastructure and Sustainability that properly explores the issues raised in this document. Prioritise a detailed appraisal of schools and medical services that involves consultation with grass roots service providers.

Utilise more small sites to achieve a more sustainable pattern of development. Developments in the larger settlements, such as Dronfield, need to be made close to central amenities, not at the most distant outer edges.

Fully explore the plethora of alternatives to meet housing needs that have been outlined in Sections 3 and 5 of this statement.

Ensure the right mix of types and tenures of housing is directed to settlements, with a particular focus on delivery of affordable housing in the most sustainable places.

Ensure that evidence is now used to inform the plan, not as an attempt to retrospectively justify it.

If the Local Plan is referred back to NEDDC for any further changes to be made, it is essential that future consultation is carried out transparently and without bias.

APPENDIX A: Paragraph, Policy and Document References

This statement refers to too many individual paragraphs within the Local Plan to list them all; several are referenced in the text. These lists of Policies / Documents etc may not be exhaustive.

Key Paragraphs

4.64-4.66: North East Derbyshire Green Belt
 5.18-5.19 (DR1 Shakespeare, Dronfield) 5.20-5.23 (DR2 Coal Aston, Dronfield)
 5.24-5.26 (DR3 Stubley, Dronfield) 5.27-5.29 (EC1 Eckington South)
 5.32-5.34 (KL1 Westthorpe, Killamarsh)
 5.35-5.36 (KL2 Rotherham Road, Killamarsh)

Key Policies / Tables / Objectives:

District-wide and North Sub Area Objectives
 Policy SS1: Sustainable Development Table 4.2: Settlement Hierarchy
 Policy SS2: Spatial Strategy and the Distribution of Development
 Table 4.3: Housing Distribution by Level 1 & Level 2 Settlement
 Policy SS9: Development in the Countryside
Policy SS10: North East Derbyshire Green Belt
 Policy SS11: Local Settlement Gaps
Policy LC1: Housing Allocations
 Policy LC2: Affordable Housing Policy LC3: Exception Sites for Affordable Housing
 Policy LC4: Type and Mix of Housing
 able 6.2: Local Plan Employment Land Availability
 Policy WC1: Dronfield Regeneration Area
 Policy WC2: Principal Protected Employment Areas Policy WC3: Employment Areas
 Table 7.1: Dronfield Regeneration Framework Key Themes and Proposals
 Policy SP1: Dronfield Policy SP2: Clay Cross
 Policy SP3: Eckington Policy SP4: Killamarsh
 Policy SDC3: Landscape Character Policy SDC4: Biodiversity and Geodiversity
 Policy SDC6: development within Conservation Areas
 Policy SDC12: High Quality Design and Place-making
 Policy ID1: Infrastructure Delivery and Developer Contributions
 Policy ID2: Provision and Safeguarding of Transport Infrastructure
 Policy ID3: Sustainable Travel Policy ID6: Green Infrastructure
 Policy ID7: Greenways and Public Rights of Way
 Policy ID9: Open Space, Sports and Recreation Facilities

Supporting Documents referred to:

Green Belt Topic Paper (further representations may be submitted)
 NE Derbyshire Strategic Green Belt Functionality Study
 Green Belt Review Statement of Compliance with the Duty to Co-operate
 Housing Topic Paper Strategic Housing Market Assessments
 SHMA Update 2017 Settlement Hierarchy Study
 Sustainability Appraisals Infrastructure Study and Delivery Plan
 Employment Land Review Update
 North Derbyshire and Bassetlaw SHMA OAN Update 2017
 Housing Land Availability Update Housing Needs Market Assessment
 Statement of Consultation

APPENDIX B: OBJECTIONS MISCLASSIFIED AS COMMENTS

Full representation statements were read and judged as being clear objections

Names listed in Chapter 5: Housing Allocations: Dronfield (unless otherwise stated)	Representation Number
Patricia Anderson	4911
Audrey Atkinson	4794
Phillip Brightmore	4864
Mrs HL Burrows	4818
David R Burrows	4817
Carol Clarke	4848
Abby Constantine	4786
Nick Draper	5235
Debbie Dronfield	4958
Kathryn Emblen	4791
Dr Paul Gadsden	5316
R S Gilbert	4792
Anne Greenan	4894
Ros Jackson	4913
Dianna Layton	4946
Paul Markwell and Christine Casey	5688
Millican Hunt	4796
David Murray	4896
David Mortimer (NED Liberal Democrats)	4948
Marcus Read	6277
John Reedman	6367
Joyce Scaife	4937
John Skelton	5237
Anne Taylor	5185
Joanne Taylor	4993
Angela and Neil Terry	5229
Edward Throp	4916
Robert Throssell	5371
C Watson	5266
Adrian Williams	6303
David Wilson	6474
Paul Wilson	6484
Michael Wilson	4884
Victoria Wood	4803
Mr and Mrs G Younge	4784
Andrea Spinks (Policies Maps)	5963
Mrs Valerie Struggles (Ch 7, Policy SP1)	4875
TOTAL NUMBER OF MISCLASSIFICATIONS	37

Andrea Dickson 4787 made a clear objection - misclassified as support.

Note: People have not been contacted individually by Dronfield Green Belt to inform them of these errors. NEDDC informed of these errors by email 7.2.18.

APPENDIX C: THEMES OF OBJECTION RAISED IN 2017 MISSING FROM STATEMENT OF CONSULTATION 2018

The following specific, numbered themes raised in representations made on the 2017 Draft Plan have not been reported in the Statement of Consultation 2018 (Table 3.) Some themes that link to issues that have been reported in Appendix 3 are listed as they are considered to be important sub-themes that add context to explain why plans are not sustainable, sound or legally compliant. Some issues listed in Appendix 3 were ambiguous, hence themes are added to this list to add clarity and transparency.

These themes have been gathered from analysis of the following representations:

Name of Group / Initials of Individual	Representation Number
Dronfield Green Belt Residents' Group (Lynne Gadsden)	6370, 6371
Dronfield Civic Society	5505
Dronfield Town Council (Andrew Tristram)	6126
Campaign to Protect Rural England (Andrew Wood and Tim Silvester)	6222
H.B.	5282
S.M.	4849
D.M.	5048
J.S.	4844
E.T.	4593

It is known, from information shared amongst residents in 2017, that many more representations contained reference to several of these themes. Hence this report should be considered as a set of case examples reflective of the quality, nature and breadth of objection themes that have been missed. A much greater quantity of representations on several of these themes, than demonstrated in the above table, were made in reality.

NON-CONSISTENCY WITH NPPF

1. Plan not consistent with NPPF policies regards sustainability
2. Plan not consistent with NPPF policies regards Green Belt protection
3. Plan not consistent with guidance from department of communities & local government.

HOUSING ALLOCATIONS NOT COMPLIANT WITH LOCAL PLAN VISIONS / POLICIES

Green Belt housing proposals are contrary to the Council's visions and / or policies regards:

4. Quality of life for residents
5. Protecting the environment
6. Shaping sustainable communities
7. Promoting good health for residents
8. Protecting and enhancing open space, sports and recreation facilities (Policy ID3)
9. Natural assets are not supported regards proposals to develop a green belt site within the Moss Valley Conservation area at Coal Aston (Policy ND11)

DUTY TO COOPERATE

10. Duty to cooperate not been exercised / lack of joined up planning with regard to brownfield plots close to NEDDC / CBC border (with respect to vacant plots at Unstone Boat yard, Lister's Car Sales and old nursery.)

11. Availability of brownfield land in neighbouring authorities needs to be fully explored through Duty to Cooperate before exceptional circumstances to build on Green Belt can be demonstrated.

HOUSING TARGET FIGURES TOO HIGH, SOME NEW HOUSES BUILT NOT BEING COUNTED HENCE GREEN BELT NOT NEEDED FOR HOUSING / NO EXCEPTIONAL CIRCUMSTANCES

12. Ongoing housebuilding and planning permissions granted on sites accommodating less than 10 houses not accounted for towards housing target. This could contribute a further 1100 homes towards the target by the end of the plan period.

13. Larger windfall sites could also be used towards target, negating need to use Green Belt.

14. Housing target not based on genuine need in NE Derbyshire.

15. Calculations used have based target at the high end of a wide range of calculated need – this cannot be used to justify exceptional circumstances for developing Green Belt and should be reduced.

16. Housing targets are not in line with realistic economic forecasts which suggest growth will flatten towards the end of the plan period. They should be reduced.

17. A target (OAN) of 270-310 per year is suggested by North Derbyshire and Bassetlaw housing market assessment.

18. 2014 projections suggest a lower growth than that projected in 2011, hence lower end of the range should be used e.g. 270 per year.

19. Some allocations from the Coalite site should be counted towards the target. It will be affected by HS2 to a small extent but will still deliver a significant number of homes in NE Derbyshire.

EXCEPTIONAL CIRCUMSTANCES FOR DEVELOPING GREEN BELT NOT DEMONSTRATED

20. The case for limited infilling, as detailed in NPPF 89 exception criteria, cannot be validly made for the areas of Green Belt land proposed for development. The sites are too big to be classified as "limited infilling" and / or significant encroachment on the countryside would occur.

21. In particular, the proposed Green Belt site in Eckington would result in very significant encroachment on the countryside.

22. Strategic Green Belt Functionality study used subjective criteria and underscored Green Belt sites in Dronfield. Seemed to be conducted with bias.

23. Despite this, all Green Belt sites in Dronfield scored highly, in top 1st or 2nd quartiles. Hence, should not have been released from Green Belt.

NO EXCEPTIONAL CIRCUMSTANCES FOR GREEN BELT RELEASE AS OTHER OPTIONS NOT FULLY EXPLORED

24. Other options not adequately explored, including bringing vacant homes back into use. NEDDC have done nothing to bring the 731 vacant homes across the district back into use.

25. Council have waited for developers to offer land after issuing a call for sites. They have not been proactive in seeking brownfield sites and have dismissed suggestions put to them at drop-in sessions.

26. Information regarding specific analysis of rejected brownfield sites is lacking.

27. Council could offer incentives to businesses located in residential areas to relocate to industrial estates / business parks.

28. Government hold a £3 billion home building fund that can be applied to by small and large developers.

RISKS OF MERGING / SETTING PRECEDENT THROUGH GREEN BELT RELEASE

29. Releasing the proposed sites of Green Belt for development will further decrease existing narrow gaps between Dronfield and Chesterfield / Dronfield and Sheffield.

30. Releasing any Green Belt land in Dronfield sets a dangerous precedent for the future and will lead to merging with Sheffield and / or Chesterfield in future.

31. Settlement gaps between Shakespeare site in Dronfield and Unstone have not taken new Peak Resort development into account, hence gap will be narrower than stated. Peak resort will be an urban area with hotel, bars, nightclubs, lodges and other buildings, plus a 2800 space car park.

32. New housing at Fleur de Lys pub in Unstone not accounted for when measuring settlement gaps.

MORE HOUSES ALLOCATED THAN NEEDED IN DRONFIELD

33. This number is more about market demand than true need.

34. Dronfield allocations catering to demand from Sheffield, not need in NE Derbyshire

OVERALL SUSTAINABILITY / SETTLEMENT HIERARCHY FLAWED WITH RESPECT TO DRONFIELD

35. Dronfield's classification of highly sustainable, placing it at the top of the settlement hierarchy is not accurate. Less crude means of grading sustainability / drawing up the settlement hierarchy should have been used. Large size and presence of railway station does not necessarily mean sustainable.

36. Dronfield's population has expanded far more than anywhere else in the County: 179% over 60year period to 2011, compared to 23% across Derbyshire County and 8% in Clay Cross. Hence it has already reached limits of sustainability and cannot accommodate much more new housing.

37. A more appropriate strategy would be to spread new housing over a greater number of towns and villages.

BUILDING ON GREEN BELT WILL NOT DELIVER AFFORDABLE HOUSING

38. Developer drew up plans for Shakespeare site 2 years ago, for 449 houses at low density on big plots. Hence more profitable and expensive homes likely, not affordable ones.

39. Quota of affordable homes likely unattainable due to demand for more expensive homes.

INCREASED OUT-COMMUTING / NON-SUSTAINABLE TRAVEL

40. Taking land out of the Green Belt in Dronfield, Eckington and Killamarsh will only serve to increase out-commuting to Sheffield (contrary to NPPF and Plan policies.)

SPECIFIC CONSTRAINTS / PROBLEMS REGARDS DRONFIELD RAILWAY STATION

- 41. Car use presently very high to access station from outer reaches of town where housing proposed due to distance / steep gradients. This would increase.
- 42. Network Rail declined to release yard behind existing car park for provision of more parking spaces.
- 43. Imminent loss of parking spaces at Manor Farm development will exacerbate this.

RAILWAY STATION PROBLEMS CAUSE ROAD SAFETY PROBLEMS FOR SCHOOL CHILDREN

44. Car parking very limited at train station, hence significant amounts of overspill parking on roads besides nearby schools cause worrying road safety problems for school children. More houses, especially at outer edges of town where car use to other parts of town and to station is high, would make this worse.

INFRASTRUCTURE PLANNING LACKING

- 45. No infrastructure planning done for north of the district. Infrastructure delivery is too questionable to warrant Green Belt release for housing.
- 46. Infrastructure planning has been better in the south of the district, poor in the north. (NB: p238 in Statement of Consultation lists Infrastructure Delivery Plan as an issue. It just mentions two respondents. A very high number of Dronfield residents objected to proposals based on the lack of timely Infrastructure planning before housing proposals were drawn up.)

PLANS NOT SUSTAINABLE DUE TO POOR SERVICE / INFRASTRUCTURE PROVISION

- 47. Vision for town centre regeneration in Dronfield lacks resources or capacity to be implemented.
- 48. HS2 uncertain and not likely to bring benefit to Dronfield regards sustainability
- 49. Electrification of line looks unlikely due to need to move listed bridges
- 50. Closure of high street banks in Dronfield with respect to elderly residents who do not use internet and local businesses needing to bank cash takings renders high numbers of new houses poorly sustainable.
- 51. Dronfield roads constrained – narrow, steep, much on street parking, tightly packed housing. Roads cannot be widened without knocking down housing.
- 52. Closure of police station, banks and children’s centre.
- 53. Space to extend schools lacking – Henry Fanshawe, Dronfield Junior School, Dronfield Infants School.

QUESTIONABLE IF INDUSTRIAL EXTENSION TO CALLYWHITE LANE CAN BE DELIVERED

- 54. Present access to Callywhite Lane poor: a tight mini roundabout at the bottom of Callywhite / Green Lane that does not accommodate HGVs / long vehicles well. It cannot accommodate more HGV movements.
- 55. This junction already causes road safety issues for pedestrians, notably 1800 children attending Henry Fanshawe school.
- 56. A new link road would be needed from Chesterfield Road, south of the town, but would be prohibitively expensive as a bridge would be needed to cross the railway line and disused tip.
- 57. Plots on Callywhite lane have remained empty for a long time (over 10 years in some cases) hence the ability of the area to attract new business is questionable.
- 58. Building high numbers of houses in Dronfield without being able to deliver new jobs will increase out-commuting which is contrary to the NPPF.

NEGATIVE EFFECT ON PHYSICAL / MENTAL HEALTH

59. Studies show access to green open space, such as Green Belt land, is important to maintaining good physical and mental health.

60. Children need green space for less structured, more self-led play to develop social and problem-solving skills (as well as green space for more organised sport and recreation.)

HERITAGE LOSS

61. Dronfield's surrounding green space is part of its heritage and should not be built upon.

62. Countryside access decreased by loss of footpaths, including access to Dronfield rotary 2000 walk – part of countryside heritage of Dronfield.

PROTECTING THE ENVIRONMENT AND WILDLIFE HABITATS

63. Site at Coal Aston is within the Moss Valley Conservation Area so should not be built upon. It is rich in wildlife habitat and contains ancient woodland, meadows and hedgerows. There are three sites of special scientific interest and other sites entered on the Derbyshire wildlife sites register.

POSSIBLE THREAT FROM FRACKING COMPOUNDS SOME CONCERNS REGARDS NEW HOUSING AT COAL ASTON SITE

64. There would be a cumulative effect of extra traffic if housing and fracking go ahead. Set-up phase alone for fracking would include 100 vehicles per day, many heavy freight. Pollution and road safety issues a concern.

DELIVERABILITY CONCERNS AT SPECIFIC GREEN BELT SITES

65. No safe site access will be possible at Stubley, Dronfield due to limited visibility at Summerwood Lane, Stubley Hollow junction and significant differences in land levels.

66. A wide variety of wildlife spotted at different sites – ecological constraints should have been assessed.

POOR CONSULTATION

67. Questions not answered adequately / consistently by planners at consultation events