



## **The Neighbourhood Planning (Referendums) Regulations 2012**

### **Regulation 4 (3b) Specified Document (iii)**

#### **Ashbourne Neighbourhood Plan: Summary of representations submitted to the independent Examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act**

#### **SUMMARY OF REPRESENTATIONS**

During the Ashbourne Neighbourhood Plan Regulation 16 statutory publicity period (14<sup>th</sup> August to 6<sup>th</sup> November 2020) a total of 18 representations were received from individual and organisations.

All responses are available in full on the Derbyshire Dales District Council website ([www.derbyshiredales.gov.uk/AshbourneNP](http://www.derbyshiredales.gov.uk/AshbourneNP))

A summary of the District Council's representations on the Ashbourne Neighbourhood Plan were approved by the District Council's Community and Environment Committee on 14<sup>th</sup> October 2020. These can be viewed on the District Council's website: [Community and Environment Committee 14th October 2020](#)

A summary of the representations from local residents and organisations received during the statutory public consultation is set out below:

- The plan needs updating, because there has been a significant downward change to the town centre in the 12-18 months since the plan was written. A radical re-think is required in order to "rescue" the town centre.
- The past 20 years has seen a real decline in the town. Road and parking infrastructure has seen no significant changes despite a massive increase in housing. The growth of new estates has been poorly managed. There are now huge estates on the outskirts of Ashbourne which are unsustainable and have limited affordable housing to buy and rent. Despite these estates being a long way from the centre of town pedestrian shortcuts have not been considered along with cycle lanes to link with other estates and the town centre. The town centre now has too many shops which have closed and this is caused by the out-of-town shopping centres. The town does not feel vibrant and the Council needs to support local businesses and community services.
- Strongly object to the continuing development of the airfield, specifically building houses on green fields, extending down to Bradley Wood. Affordable housing needs to be provided for local young people but building should take place on brownfield land. Many of the homes that have been built recently are very expensive and beyond the reach of local people. I don't think that anyone who genuinely cares about Ashbourne would want the green fields down to

Bradley Wood building upon. I think Ashbourne Town Council are doing their very best and reflecting the will of the people of Ashbourne in their plan, and this development is being forced upon the town by Derbyshire Dales District Council as part of meeting house building requirement quotas. It appears that Ashbourne is being disproportionately singled out for mass house building. The town is already adversely affected by heavy traffic and therefore pollution, thus spoiling the ambience of the town, and this is going to make the problem worse still. It is good that people in Ashbourne are consulted, but if their opinions are ignored continually then it is merely a meaningless formality. In the past five years many green fields surrounding Ashbourne have already been built on, and the town extended greatly.

- Support for the proposed bike hub being successful, especially if infrastructure development focuses on providing cyclists safe transfer around the town centre and to the Tissington Trail. This would create jobs and increase tourism. The overall aim of making Ashbourne pedestrian centred is also hugely welcome and needed
- With all these extra houses being built and schools being expanded, where are the plans for child based and family based leisure facilities. So many families go outside of Ashbourne to Derby and Uttoxeter for example, for the cinema and other leisure activities. Resident families and visitor families should have a reason to come to or stay in Ashbourne that isn't just a luxurious shopping or a quick cafe pit stop. Please listen to residents over the parking issue - Marks and Spencer were allowed to come to Ashbourne, now due to parking attendants in the town centre it's a nuisance to risk a ticket for a pint of milk or a piece of cheese and so much easier to pop to the supermarket rather than using our lovely independent delis
- A bypass may be a way off but in the near term, much can be done to force the HGVs to drive more carefully through town and so improve pedestrian safety.
- Objection to Policy HOU1 - Housing Mix. The Ashbourne Housing Needs Assessment (included in the evidence document supporting the Neighbourhood Plan) indicates that, based on Census data for Ashbourne, there will be demand for housing suitable for older people into the future. It is acknowledged that the choice of housing for older people needs to increase in the future in line with expected demographic changes and there will also need to be opportunities for specialist and extra care housing (Table 20, p.260). Notwithstanding this acknowledgement in the Neighbourhood Plan evidence base, there is no specific reference to such housing in Policy HOU1. Given the identified need, it would be appropriate for the policy to make provision for specialist and extra care housing to be brought forward on sites within or adjoining Ashbourne's settlement boundaries, where there is a proven and unmet local need. Therefore, Policy HOU1 should be amended to read: "Housing schemes must provide a mix of housing types and tenures that meet local housing needs, including starter homes, accommodation for older people and homes for downsizing". It is considered that that this change is necessary to ensure that the Neighbourhood Plan meets the Basic Conditions tests, specifically: Basic condition d (achievement of sustainable development): addressing identified local housing needs contribute to the achievement of sustainable development and basic condition e (conformity with the strategic

policies contained in the development plan): meeting the housing needs of all sectors of the community by providing a range and choice of housing is strategic objective of the Council.

- The plan is majorly outdated and certain pieces of information published within the plan are contradictory; with preliminary research dating back to 2014, the overall lifetime of this plan is 19 years. What would be considerably more beneficial to the community and local businesses, would be a plan which has objectives which are then confined to time frames, which could then be re-examined, refined and re-thought when necessary and continuously. The report states several ambitions for what the town will be like in 2033 but fails to pinpoint exactly how this will be executed, subsequently suggesting that improvements/changes will fail to materialize until the year 2033.
- It is argued that the wording on 'a superb range of independent, high-quality shops' is now outdated, with a suggested rewording along the lines of - 'superb independent retail and hospitality, which is varied but not extensive'.
- The Plan holds onto various aspects such as Ashbourne Royal Shrovetide Football and the ever-failing market as a lifeline for the town, failing to illustrate that Ashbourne can expand itself and its inhabitants both culturally and traditionally, forming new traditions and events which will further entice tourists and give residents a feeling of pride in their town.
- The word 'Bypass' is glorified throughout the plan as the saviour of the town, it is heavily suggested that if the Bypass is funded then the majority of problems within Ashbourne will be solved, unfortunately this is far from the case. Continuous traffic management is necessary in order to create a smooth traffic flow within the town and surrounding areas, whilst if the construction of the Bypass is permitted the town itself will have to try even harder to make the stop worthwhile. The construction of the bypass should, of course be built without infiltrating any 'green zones' in order for the objectives of the plan to be met accordingly. Over the last 5 years, high streets across the UK have taken a dive, due to the increasingly popular e-commerce option, in section 5 it is highlighted that the "core retail leisure" must 'be protected and enhanced'. The state of core retail, leisure both recreational and commercial is lackluster, to say the least. With several shops standing empty, with little to no plans for these shops to be filled to create an interesting and worth-while high street which Ashbourne was once renowned for.
- Ashbourne Methodist Church (AMC) want to express support for the Vision and Aims of the Ashbourne Neighbourhood Plan and also to offer support in tackling some of the issues identified in the SWOT analysis. AMC have been working on a Link Development Project for 5 years now. We now have a scheme which is ready to be submitted as a Planning Application, which it is considered fits in with the policies in the Ashbourne NP.
- Ashbourne Cycling Club, welcome the proposals within the Neighbourhood Plan for a Town Centre Cycling Hub, and the aim to provide safe cycling links between the Tissington Trail and the High Peak Trail to the east and the Staffordshire cycle network to the west.

In addition the following organisations submitted representations:

**Severn Trent Water Ltd** – Indicated that a feasibility study to review the sewage system capacity has been instigated to ensure that any adverse impact of new development in the town is mitigated. It recommends that all new development use Sustainable Drainage Systems to manage and balance surface water and adhere to the drainage hierarchy. Comment is made that in relation to Policy DES1 reference to the surface water drainage hierarchy should be made.

**Natural England** – Support the requirement to produce a masterplan for the development of the site at Ashbourne Airfield as a means of securing a cohesive green infrastructure strategy. In relation to Policy DES1 they suggested additional measures are included as some of the 10 characteristics of a well designed place as set out by the MHCLG Design Guide are not covered in sufficient detail. In terms of the proposed employment policies they point out that large scale commercial development has the potential to provide considerable environmental gains through green and blue infrastructure, SuDS provision and delivering Biodiversity net gain.

**Historic England** – No comments

**Environment Agency** – As there are no proposed allocations within the flood zones generated from the Henmore Brook no detailed comments made. Recommend that the Neighbourhood Plan should consider any future development that is to be situated in the flood zones situated within the neighbourhood plan area, to ensure that it accords with the requirements of the National Planning Policy Framework (NPPF), and Policy PD8: Flood Risk Management and Water Quality within the recently adopted Derbyshire Dales Local Plan which steers development away from areas at risk of flooding. In regard to policy EMP1 – Ashbourne Airfield we would note that part of the Derbyshire Dales Adopted Local Plan Policy DS8 for the site highlights the requirements for key environmental considerations at this site and we would highlight that neighbourhood plans policy should work in conjunction with Policy DS8.

**Derbyshire County Council** – Provided Officer comments on the contents of the draft Ashbourne Neighbourhood Plan. In general they indicated support for changes that had been made to the Neighbourhood Plan since the Regulation 14 consultation, and in particular the inclusion of policies relating to renewable energy, dark skies and low emission vehicle infrastructure. Throughout the representations detailed grammatical changes, and factual inaccuracies considered necessary were highlighted.

The response from the County Council highlighted some aspects of the evidence base underpinning the Neighbourhood Plan that required updating including the Governments' latest cycling and walking plan for England – Gear Change. Specific comments were made about the extent of the Neighbourhood Area, and the extent of community and stakeholder engagement, the justification for the town centres policies.

In terms of the policies comments and representations were made seeking the inclusion of references to Low Emission Vehicle Infrastructure in respect of HOU1-Housing Mix, DES1-Design and Policy TRA1-Transport. In relation to the

Ashbourne By-Pass there is support for the inclusion of references to need for such a route, along with an update on the proposals. In respect of Policy COM2 – Local Green Space it was considered that the policy fails to require that compensatory provision or improvement should be provided. Finally the County Council identify two areas of omissions in the plan; firstly the lack of reference to biodiversity, and secondly the lack of policy that seeks to support tourism, despite it being seen as an important component of the local economy.

**Boyer Planning** – Supports the main principles of the Neighbourhood Plan, but considers that there is no recognition of how the objectives of the plan will be delivered. Much of the evidence base, and community engagement was considered to be dated, and that the Plan should be based upon the most up to date information, especially in relation to housing needs.

These representations suggest that the Neighbourhood Plan should include possible routes of the By-Pass, so that local residents are fully aware of the benefits that it will bring to the town. The consultants indicated that in their view the District Council did not have a five year supply of land for housing and as a consequence the District Council will need to allocate more land for housing, which could include facilitating the delivery of the By-Pass, which should be properly assessed as part of the Neighbourhood Plan.

Specific comments were made in relation Policies EMP1, EMP2, ATC1, HOU1 and TRA1. The thrust of comments are that the policies do not reflect current evidence or advice, and that in order to improve the environmental quality of Ashbourne Town Centre that there is an urgent need for the delivery of the By-Pass.

All responses are available in full on the Derbyshire Dales District Council website ([www.derbyshiredales.gov.uk/AshbourneNP](http://www.derbyshiredales.gov.uk/AshbourneNP))