

## Appendix 1

The table below sets out a summary of the main issues raised by the persons consulted on the Housing Delivery Test Action Plan November 2019 and how those issues have been addressed. Where the District Council propose to delete any text from the Housing Delivery Test Action Plan this is shown as ~~crossed-out~~. Any new text that the District Council propose to include in the Housing Delivery Test Action Plan is shown in *italics*.

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<b>Number</b>	<b>Section</b>	<b>Respondent</b>	<b>Summary of main issue</b>	<b>Officer Comment</b>
<b>01</b>	<b>General</b>	Coal Authority	I have reviewed the document and can confirm that the Coal Authority has no specific comments to make.	Noted
<b>02</b>		Historic England	We do not comment specifically on Local Authorities housing requirement figures but we do comment on the methodology in selecting suitable sites and areas for development and criteria based policies to ensure appropriate development. We would urge the Council to ensure that they can deliver their housing requirement whilst also adhering to the wide range of National Planning Policy Framework (NPPF) policies, including to conserve and enhance the historic environment and to provide a positive strategy for the historic environment.	<p>Previous consultation with Historic England has been beneficial in the site selection process and SHELAA Methodology. Future work on site selection would include a similar process with input of Historic England.</p> <p>Policies in the Adopted Local Plan seek to ensure development conserves and enhances the historic environment and are used in the determination of planning applications where development may have an impact upon the historic environment.</p> <p><b>Recommendation No Change</b></p>
<b>03</b>		Matlock Town Council	The Town Council has a clear duty to safeguard the future of the lives of its communities, businesses and its facilities. Matlock is a small semi-rural town clearly with a specific topography that is both attractive and yet, at the same time, problematic for obvious	The purpose of the Housing Delivery Action Plan is to put in place a series of measures to ensure that the correct level of housing development

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			<p>reasons. It has little in the way of significant manufacturing employment possibilities and limited retail opportunities. It relies heavily on the tourist industry for its economy.</p> <p>Matlock is rapidly heading towards a situation where significant problems are now affecting the future wellbeing of the town. Its highway infrastructure is becoming closer to being overwhelmed (some sections are already over capacity and many more are forecast to reach capacity in the near future). The increase in frequency of significant flooding events is causing stress to businesses, residents and traffic alike. In fact the drainage infrastructure appears increasingly unable to cope with significant rainfall events.</p> <p>These matters and further increases in sites allocated to housing development will certainly worsen this situation and invariably lessen the appeal of Matlock as a return visitor attraction.</p> <p>This effect can be encapsulated by visualising a simple comparison:- Tourism 'publicity' such as photographs, still show hillside views of Matlock with green fields at the tops of the valley sides. Just what will be left of these fields with unchecked expansion of housing developments? There is also the concept of a green corridor between Matlock and Darley Dale, partly on flood plain land. Is this also in jeopardy? The proposed continuation of turning Matlock into a 'dormitory town' of the nearby major cities in the region is untenable.</p>	<p>continues to brought forward over the Local Plan period to 2033.</p> <p>These representations are ones that do not address the contents of the Action Plan rather seek to query what is the appropriate level and impact of new development for Matlock.</p> <p>This is set out in the adopted Derbyshire Dales Local Plan and which was subject to a thorough and detailed statutory process, including an Examination in Public by an independent Planning Inspector. Any change to the strategy for Matlock would be something taken forward through a review of the Derbyshire Dales Local Plan.</p> <p><b>Recommendation No Change</b></p>
04		Matlock Town Council	Although not directly a response to the HDAP itself – in the context of the statements made in the HDAP to	Noted

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			<p>“HC2 (w) Land off Gritstone Road/Pinewood Road Matlock” and the continued opposition from Matlock Town Council the following is reiterated:</p> <ul style="list-style-type: none"> <li>- The constraints of the topography, confines of the valley, restrictions on infrastructure, lack of employment, heavy reliance on the tourism industry etc. together with other well documented increasing problems give a clear indication that development in the area can only worsen the future viability and wellbeing of the Town.</li> <li>- The ongoing unanswered Material Considerations arising from the Pinewood Road/Gritstone Road housing development site are clearly indicative of the future ‘damage’ to the Town. It should never have been included in the Local Plan as the major aspects were known at that time.</li> <li>- Planning consent should not be granted for this site as the Developer has still not provided evidence based answers to many items, conditions and requests - particularly those of the County Council and other Statutory Consultees.</li> </ul> <p>In particular matters of Material Consideration raised give clear indication of significant problems that have yet to be dealt with and which need resolution as they undoubtedly will affect the successful delivery of this site in a satisfactory manner.</p>	<p>These representations relate to a planning application currently with the Local Planning Authority for determination. As such the issues raised will be addressed through that process.</p> <p><b>Recommendation No Change</b></p>
05		Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England does not consider that this Draft</p>	Noted

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			<p>Housing Delivery Action Plan poses any likely risk or opportunity in relation to our statutory purpose and so does not wish to comment on this consultation.</p> <p>The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individual may wish to make comments that might help the Local Planning Authority to fully take account of any environmental risks and opportunities relating to this document.</p>	
06	Introduction	Matlock Town Council	<p>Matlock Town Council notes the contents of the Housing Delivery Action Plan (HDAP), based on the Government’s objective of delivering a target of 300,000 new homes a year, together with the changes in the NPPF as stated effectively enforcing this objective.</p> <p>In the Introduction and Housing Delivery Plan (Page 4)– using the Housing Delivery Test (HDT) methodology it clearly states that :-</p> <p>“Estimates of housing delivery suggest that over the next five years housing delivery will year on year exceed the HDT” and “This suggests that the District Council currently has the equivalent of 5.75 years’ worth of supply – which includes a 5% buffer to ensure choice and competition in the market, as required in the NPPF”*</p> <p>(Also in Table 3 – Source of Housing Delivery 2019 – 2024) – (Page 6)</p> <p>* In addition it should be noted, subsequent to the adoption of the Local Plan, using the OAN (Objectively Assessed Need) methodology there was clear indication that the required housing numbers were far less than the housing numbers in the</p>	<p>The NPPF and Case Law indicates that where a local planning authority can demonstrate that it has a five year supply of land for housing then the Local Plan can be regarded as being ‘up to date’ and as such the determination of planning applications for residential development can and should be made in accordance with the policies and proposals in the Local Plan. Where no five year supply is capable of being demonstrated the Local Plan is be considered to be out of date. As such it allows developers to argue that policies and proposals in the plan should be set aside in favour of alternative residential development that can contribute towards ensuring that a five year supply is delivered.</p> <p>The Action Plan demonstrates that the District Council has a five year supply as at 1<sup>st</sup> April 2019. This safeguards the policies and proposals in the Local</p>

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			<p>adopted Local Plan – (Table 2 Page 5 [2013 to 2033 and 2019 to 2024] and also Page 6)</p> <p>However contained within this initial section of the HDAP is the following statement:-</p> <p>“As such it safeguards the District Council for the next 12 months against the potential that it will have to grant planning permission for housing development not specifically allocated or not in accordance with the policies set out in the adopted Derbyshire Dales Local Plan.” – (Page 5)</p> <p>This statement appears to contradict the previous findings, taking an entirely different direction – noting in particular the underlined sections – clearly undermining the adopted Local Plan policies. This surely cannot be acceptable.</p> <p>Just what is the point of the policies in the Local Plan if ‘the rule book is to be town up?’</p>	<p>Plan – if however the District Council is not able to demonstrate a five year supply then it has the potential to open up other land for residential development not allocated in the Local Plan.</p> <p>Having a five year supply of housing land is an essential part of ensuring the delivery of the adopted Local Plan as envisaged. The ‘rule book’ would be torn up if the District Council did not have a five year supply of land for housing.</p> <p><b>Recommendation No Change</b></p>
07		Matlock Town Council	<p>Estimated HDT Completions 2019-2023 clearly shows the District Council currently has the equivalent of 5.75 years’ worth of supply, which includes a 5% buffer to ensure choice and competition in the market, as required in the NPPF.</p> <p>Using the OAN methodology resulted in a clear indication the required housing numbers were actually far less than the housing number to be provided in the adopted Local Plan.</p>	<p>The level of housing included within the Local Plan is approx. 17% more than the OAN figure. This was debated at the examination in Public where the Inspector concluded that</p> <p>The 17% figure is consistent with non implementation and lapse rates found elsewhere, albeit not as high as the 20% ‘reserve’ recommended by some such as the Local Plan Expert Group.</p> <p>This greater flexibility in the Plan is necessary and is explained by MM13</p>

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				<p><b>Recommendation</b> <b>No Change</b></p>
08		Doveridge Parish Council	Doveridge Parish Council have read the Draft Housing Delivery Action Plan and are confused by the apparent contradictions contained in the first and later parts of the document. Initially the document seems to state that DDDC has met Government requirements and has a 5% buffer of housing stock. Later in the report on page 7 the Council appears to state that they will be unlikely to achieve development of the two major Brownfield sites within the 5 years' time frame.	<p>In calculating the five year supply of land for housing the District Council has to ensure that sites of capable of being considered 'deliverable' over the next five years, in accordance with the definition set out in the NPPF and NPPG. As such it has to make certain assumptions about what scale of development on specific sites is likely to come forward.</p> <p>For some sites, including the more complex brownfield sites the District Council based upon discussions and other factors have concluded that there is insufficient evidence to demonstrate that these sites will make any meaningful contribution to meeting the five year housing land supply calculation.</p> <p><b>Recommendation</b> <b>No Change</b></p>
09		Wolds Action Group	On the face of it Table 1 indicates that during the period 2019 through to 2023 there will be almost double the HDT delivery targets which, when followed through, suggests that the accumulated delivery will be in the region of 9 years worth of housing delivery in 5 years. This is reiterated on page 6 where it is stated that "This rate is well above 284 dwellings....." supporting the conclusion that risky sites should not be granted permission and it is entirely reasonable	The Housing Delivery Test does not measure development against the requirements of the Local Plan, rather it measures development against the Governments Standard Methodology for Housing Assessment over the past three years. For Derbyshire Dales these figures are less than those set out in the adopted Derbyshire Dales

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			<p>that the Gritstone Road/Pinewood Road (Wolds) site should be at best withdrawn and at worst set aside until the plan is reviewed.</p> <p>It is also noted that from 01.04.18 - 31.03.19 the District Council exceeded its housing targets by achieving 411 completions whereas the average yearly target on which the local plan OAN is based is a required 284, meaning there were 127 completions above average requirement. However, it is notable that these were achieved through permissions granted on “primarily greenfield sites.”</p> <p>It is stated that “over the next five years housing delivery will year on year exceed the HDT.”</p>	<p>Local Plan. This is not an indicator of surplus rather that the District Council is not bringing forward development too slowly. The better measure of surplus is the Five Year Supply, which suggests that the District Council only just has sufficient housing land to meet that requirement – insufficient to be considered that a suitable strategy would be deallocate sites from the adopted Derbyshire Dales Local Plan.</p> <p>The evidence suggests that at 1<sup>st</sup> April 2019 the District Council was able to demonstrate a five year supply of land for housing. However the removal of any of the sites (and assumptions) would make the District Council vulnerable to challenge from developments <u>not</u> allocated in the adopted Derbyshire Dales Local Plan.</p> <p><b>Recommendation</b> <b>No Change</b></p>
10	<b>Housing Delivery Analysis</b>	Resident	<p>Table 1 – not sure if the PDNP figures are included. The footnote says no assumptions have been made.</p> <p>Table 2 <b>F</b> should be 1,702 not 1,700 <b>O – N</b> divided by H is 1.15, not 5.75. Should it be multiplied by 5?</p>	<p>PDNPA Housing delivery is included within the calculation of the HDT for 2019. To make assumptions about delivery within the Park beyond 2019 without any supporting evidence would be supposition.</p> <p>Table 2 provides details of both completed dwellings and future contributions of 20 dwellings per annum within the Park.</p>

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				<p>Table 2 – row F is 1,702</p> <p>The Housing Delivery Test Action Plan was amended to address the comments raised in this representation.</p> <p>The calculation of the five year supply in Table 2 is correct.</p> <p><b>Recommendation No Change</b></p>
11		Resident	<p>The controversial development of 57 houses on flood plain opposite Meadow View, A6, Darley Dale has been omitted from your figures, This should appear in your list of Greenfield Sites, Appendix 1. Presumably this is because this land, although granted outline planning permission in January 2017, it not allocated housing in the Local Plan, but still classed as PD10. Surely outline planning permission cannot be granted on land allocated PD10 Status.</p>	<p>At the 1<sup>st</sup> April 2019 the site at Meadow View only had outline planning permission. In such circumstances the policy in the NPPF is that sites with outline planning permission should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.</p> <p>At 1<sup>st</sup> April 2019 that time the District Council did not have sufficient evidence to justify including this site in the calculation of the five year supply of housing.</p> <p>The District Council resolved to grant approval for a Reserved Matters application on 14th January 2020 and is subject to a S106 agreement. Once this has been signed the permission will be issued.</p>

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12		Doveridge Parish Council	Non delivery on the two major brownfield sites will leave a 68% shortfall which would result in future applications, both brownfield and greenfield sites having a presumption of success.	Ensuring that there is a continuous supply of housing completions on all sites with planning permission and allocated in the adopted Derbyshire Dales Local Plan is the essence of the Action Plan. The lack of completions on the complex brownfield sites across the plan area (and indeed greenfield sites) could jeopardise the policies and proposals in the Local Plan.  <b>Recommendation No Change</b>
13	<b>Key Issue 1 Future Supply of Housing Land</b>	Historic England	We note that the Council is seeing to de-risk brownfield sites to as to ensure that greenfield sites do not come forward for development. Either sites could have an impact on the historic environment, which we hope would be fully considered at the site allocation stage. It is also worth stating that there may be enhancement opportunities for the historic environment, from new development, and we would be grateful to see this considered.	Noted – The impact of the development of the allocated sites for residential development were assessed for their impact upon the historic environment through allocation process. Planning applications for residential development where they have any potential impact and opportunities for enhancement will be assessed against the policies in the adopted Derbyshire Dales Local Plan.  <b>Recommendation No Change</b>
14		Matlock Town Council	As you are aware the Town Council had concerns during the formulation process of the adopted Derbyshire Dales Local Plan and the ramifications of	The Housing Delivery Action Plan has been prepared to support the implementation of the housing policies

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			<p>finding the numbers required to meet the ‘objectively set’ housing need. The ‘pressure’ to meet the required quota was palpable on many occasions in this process and voiced frequently by District Council leaders.</p> <p>Following on from the above, the underlying direction the remainder of the Draft HDAP is taking would, effectively, seen to be driven by the same elements as for the Local Plan process.</p> <p>There are many examples of the above in the HDAP. The following extract is an example of many such statements:-</p> <p>“The consequences of not being able to demonstrate a five year supply of land for housing is that the presumption in favour of development as set out in the NPPF comes into effect. This means that the District Council would be obliged to grant planning permission for residential development on sites that are not allocated for such purposes in the adopted Derbyshire Dales Local Plan, and where there are no other factors which could be seen to override that presumption. Such sites, given experience, are more than likely to be easier-to-develop greenfield sites” – (Pages 7 &amp; 8 - Note also Page 5)</p> <p>i) A key National Policy can be simply stated as “Brownfield before Greenfield”. Brownfield sites are obviously less attractive to Developers (due to inherent difficulties) and are a limited supply. This does not mean that Greenfield sites automatically become ‘the target’ for development. The wording (underlined) of the above, as stated, has a context of</p>	<p>and proposals in the adopted Derbyshire Dales Local Plan. It is not a vehicle for reviewing or allocating alternative sites – this can only be undertaken through a review of the Local Plan, taking account of the evidence available at that time.</p> <p><b>Recommendation</b> <b>No Change</b></p>

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			<p>'Profitability for the Developer' – this should be rephrased.</p> <p>ii) Whilst not clearly stated in the above extract (but clearly stated elsewhere – Page 11) is the 're-examination' of the sites considered in the initial Local Plan process – which were sub sequentially rejected (on various policy grounds). Given the scrutiny these sites were subject to at that time, it is difficult to envisage reasons why they could now be possibly reconsidered as being acceptable.</p> <p>In overall terms the following questions are examples of what needs to be addressed:</p> <p>a) Where are the future Housing Development sites to be located – just how far will settlement boundaries continue to expand into the countryside – or take over existing amenity sites within the settlement boundaries (includes additional infrastructure required?</p> <p>b) Just how are these sites to be acquired – by Compulsory Purchase?</p> <p>c) Why is the concept of a 'new garden village' solution not being reconsidered?</p>	
15		Matlock Town Council	<p>In consideration of 'slippage'- (Page 7) – reducing the allocated housing numbers being delivered – there are many factors. One key aspect is the degree of scrutiny undertaken at the time (Local Plan) of deciding the suitability of any particular area of land is sufficiently rigorous to give any certainty of it actually being delivered. Addressing this matter at the much later stage of an actual Planning Application being submitted is considered too late (Given the present level of information required by the LPA</p>	<p>Whilst the legislation enshrines that the District Council works in a plan led system, the Governments' emphasis on seeking to ensure that the rate of new housebuilding increases to its target of 300,000 dwelling per annum and the policy approach taken in the NPPF makes it clear that where local planning authorities are not doing enough to deliver housing even with</p>

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			<p>specifically when the site obviously has known inherent difficulties). This refers primarily to major large housing development sites – where matters outside the remit of the LPA – are required before any decisions are made.</p> <p>These simple facts can lead to significant problems if not addressed prior to giving consent to a Planning Application – as has already been the case on three Development Sites under construction in Matlock.</p> <p>For Housing Delivery Plans, ‘slippage’ cannot be rectified by ‘stepping outside’ laid down policies, rules, requirements resulting in an adverse effect on the surrounding area. Surely the Government cannot be countenancing such measures in pursuit of the new housing requirement. As an initial ‘start’ - Will the remit of SR5 (Page 11) consider this matter to minimise ‘slippage’?</p>	<p>recently adopted Local Plans it will set them aside in favour of allowing new housing development to meet that need.</p> <p>If sites are not brought forward at the rate envisaged in the adopted Derbyshire Dales Local Plan and the District Council is not able to demonstrate a five year supply of land for housing it runs the real risk of having to grant planning permission (or having applications granted planning permission on appeal) for residential development on sites <u>not</u> allocated within the Derbyshire Dales Local Plan.</p> <p><b>Recommendation</b> <b>No Change</b></p>
16		Matlock Civic Association	<p>MCA note that on page 4 of the Council’s draft it points out that in the year ending 31<sup>st</sup> March the 411 net housing completions were the highest achieved for at least 30 years. The table on page 4 also shows that the Council will comfortably meet the Government’s Housing Delivery Test in the period to the end of 2023</p> <p>Notwithstanding this clear evidence of surplus housing the Council’s draft Site Delivery proposal SD7 states that :</p> <p>“In appropriate circumstances consider the release/removal of conditions including any affordable housing requirements from extant and/or unimplemented planning permissions</p>	<p>The Housing Delivery Test does not measure development against the requirements of the Local Plan, rather it measures development against the Governments Standard Methodology for Housing Assessment over the past three years. For Derbyshire Dales these figures are less than those set out in the adopted Derbyshire Dales Local Plan. This is not an indicator of surplus rather that the District Council is not bringing forward development too slowly. The better measure of surplus is the Five Year Supply, which suggests that the District Council only</p>

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			<p>It is noted that on page 7 of the report that in the longer term, which is after 2023, the release of large brownfield allocations may be hindered. However, the overall evidence produced by DDDC shows that there is no need for the Council to make planning concessions to developers which will reduce the stock of affordable housing, or conflict with Local Plan policy, and SD7 should be deleted from the Draft Action Plan,</p> <p>Rather than encouraging concessions to developers, the Council should make a statement within the Draft Action Plan to ensure that developers are aware that concessions against Local Plan environmental policies and affordable housing policies are not necessary and are extremely unlikely to be granted. This is consistent with our earlier representations on DDDC's proposed SPD on Developer Contributions.</p> <p>MCA's recommendation above is supported by further evidence that housing demand is not exceeding supply in Derbyshire Dales District. Firstly, as we have already informed the Council in representations relating to Gritstone Road that the Asker Lane (Treetops) houses are now largely finished but many remain unsold, and the Thornberries developers are also having difficulties selling with prices reduced by £30,000. The significant housing development at Cawdor Quarry is also coming on stream. Additionally, Estate Agents' turnover in the Matlock area also indicates that there is a good balance between demand and supply over at least the last 2 years. This is also borne out by discussions with local conveyancing solicitors.</p>	<p>just has sufficient housing land to meet that requirement – insufficient to be considered that a suitable strategy would be deallocate sites from the adopted Derbyshire Dales Local Plan.</p> <p>With regard to the comments about developer contributions, the default position is that the District Council will seek to ensure that all policy requirements are met and only in appropriate circumstances will it be acceptable to vary away from policy.</p> <p>The Sales rates of development is not a sign that demand exceeds supply – rather it is a sign of market failure in that the houses are being priced too highly. The evidence of need has come from the OAHN and translated into the housing requirements of the Local Plan.</p> <p><b>Recommendation No Change</b></p>

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17		Matlock Civic Association	<p>The Draft Action Plan should also refer to keeping up-to date accurate records of development in built-up areas. The Council are also in a position to extrapolate trends in housing provision from permissions for development of housing in such locations which would enable the Council to reduce the greenfield requirement accordingly.</p> <p>The continued source of housing from within the built up areas should be calculated and included (and the greenfield requirement reduced accordingly.)</p>	<p>Monitoring of housing provision is an ongoing process throughout the year, as are discussions with landowners and developers.</p> <p>As such the District Council has a thorough understanding of the extent of new residential development taking place across the plan area. However regardless of the level of development taking place across the plan area there is insufficient brownfield sites to be able to reduce the level of greenfield development and at the same time meet the overall OAHN requirement.</p> <p><b>Recommendation No Change</b></p>
18		Resident	<p>The Council must concentrate on the provision of brownfield sites and reduce the use of greenfield sites in the future to as close to zero percentage.</p>	<p>Strategy of the Local Plan seeks to deliver over 60% of housing on brownfield land.</p> <p>The OAHN requirement is however unable to be met solely on brownfield sites. As such the Local Plan has had to include allocation of greenfield sites. Any change in the mix of sites will need to taken forward through a review of the Local Plan.</p> <p><b>Recommendation No Change</b></p>
19		Resident	<p>I completely agree with building development on brownfield sites and am completely opposed to</p>	<p>Comments Noted</p>

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			<p>building on greenfield sites. I think that Wirksworth and particularly Ashbourne are bearing the brunt of development in the Derbyshire Dales (I understand that this relates to available brownfield land) and it is changing the nature of the towns beyond recognition. In Ashbourne this is pushing the traffic congestion problems to breaking point. It regularly takes 20 minutes to drive through Ashbourne. Whilst I have read your statistics on newly built homes it also saddens me to observe how many large detached homes are being built rather than more starter/affordable homes.</p>	
20		Resident	<p>Taking in to account the extra 57 houses planned for the A6, this brings the total number of new dwellings on greenfield sites to 831 for the whole of Derbyshire Dales. Of that 278 or over one third are to be in Darley Dale. Why? Surely this is disproportionate.</p>	<p>At the 1<sup>st</sup> April 2019 the site at Meadow View only had outline planning permission. In such circumstances the policy in the NPPF is that sites with outline planning permission should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years. At 1<sup>st</sup> April 2019 that time the District Council did not have sufficient evidence to justify including this site in the calculation of the five year supply of housing.</p> <p>The strategic approach in the adopted Derbyshire Dales Local Plan, and one endorsed by the Inspector at the Examination in Public is to focus more development to the more sustainable locations such as Matlock and Darley Dale. Whilst there may be local variations across the whole of the Local Plan area there is a greater</p>

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				<p>proportion of new residential development on brownfield sites than greenfield sites.</p> <p><b>Recommendation No Change</b></p>
21		Doveridge Parish Council	<p>On pages 10 and 11 the Council appears to state that when the 2022 review of the Local Plan takes place it will seek to bring forward new greenfield sites to meet its 5 year delivery plan and will undertake a 'Call for Sites' methodology as before.</p>	<p>At this time it is not certain what the future level of housing across the plan area will be required, nor what sites – greenfield or brownfield – will be available to meet that provision. A new Call for Sites is likely to be required and as such the Action Plan indicates that same methodology is used as a means of being able to assess the relative merits of each site.</p> <p><b>Recommendation No Change</b></p>
22		Wold Action Group	<p>The document identifies the allocated Brownfield sites as one of the 'Key Issues' and WAG comments as follows:</p> <p>Brownfield/ Previously used land.</p> <p>WAG agrees with and supports suggested policy/action M5 because it is essential for the Brownfield sites to be developed first and prioritised over any greenfield. Last year's over delivery was created by allocations of greenfield sites, demonstrating that there is a great danger that developers will promote greenfield every time, over brownfield. There is an implicit suggestion in the current NPPF of Brownfield First, reiterated by the</p>	<p>There is no Government policy which sets out a preference for development on Brownfield sites prior to greenfield sites. Government policy does however suggest that local planning authorities should give substantial weight to the use of brownfield sites for homes and other needs. The adopted Derbyshire Dales Local Plan does, however, identify that over 60% of allocated dwellings are on brownfield sites.</p> <p>In bringing forward the Derbyshire Dales Local Plan the impact of new development on the landscape was</p>

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			<p>Prime Minister in his recent visits to Matlock and to the John Smedley Factory.</p> <p>The previous East Midlands Regional Plan acknowledged the value of the landscape in and around the National Park. The Dales relies heavily on tourism for revenue and this is worth circa 2.3 billion per year to the region. This is continuing to grow year on year and the Industry supports 30,000 jobs. ( source: MPDD )</p> <p>It is essential, therefore, that the remaining landscape is protected from unnecessary development. Matlock is the gateway to the Peaks and is regarded as a part of the Peak District by visitors who expect to see lovely views from near and far. Further encroachment into the countryside should not be permitted. Developers should be actively encouraged to develop previously used land; while ever there are large greenfield sites available, these will likely be selected first for development , meaning there is a danger that the Brownfield sites will never come forward, which will be detrimental to the area in the long term.</p>	<p>taken into account and the strategy included in the Local Plan was endorsed by an independent Planning Inspector at Examination in Public.</p> <p>Any future change to the strategic approach will need to be brought forward through a review of the Derbyshire Dales Local Plan. There is however no evidence at this time that an early review is necessary.</p> <p><b>Recommendation</b> <b>No Change</b></p>
23	<b>Key Issue 2 Development Management Processes</b>	Historic England	Where you mention that you offer pre-application advice form new development, Historic England are always keen to engage in the process early on where there may be impacts to the historic environment, heritage assets and their setting. We also offer a pre-application service of which details can be found on our website.	Noted.
24		Environment Agency	Whilst the Environment Agency has no specific comments on the Draft Housing Delivery Plan, we note that under the section Key Issues –	Noted

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			Development Management, the Council mentions their pre-paid service. We would highlight that the Environment Agency offers its own pre application chargeable service for when development is proposed within an area of the Environment Agency's remit. Developer should contact <a href="mailto:planning.trentside@environment-agency.gov.uk">planning.trentside@environment-agency.gov.uk</a> for further information is they would like to get a quote for advice within our remit.	
25		Resident	Brownfield development should not run in parallel with non-brownfield development.	<p>There is no Government policy which sets out a preference for development on Brownfield sites prior to greenfield sites. Government policy does however suggest that local planning authorities should give substantial weight to the use of brownfield sites for homes and other needs. The adopted Derbyshire Dales Local Plan does, however, identify that over 60% of allocated dwellings are on brownfield sites.</p> <p><b>Recommendation No Change</b></p>
26		Resident	The practice of 'paid' advice must be very transparent at all stages to ensure there is no influence on decisions made on housing development acceptance.	<p>Noted – The paid pre application service aims to add value to the planning application process and secure improved outcomes. It does not in any way influence the decision making process.</p> <p><b>Recommendation No Change</b></p>
27		Doveridge Parish Council	Action Plans SR1, SR2, SR4 and SR7 have particular relevance to Doveridge. We have been	The sites in Doveridge have come forward during the earlier part of the

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			<p>allocated 219 dwellings. All but the site at Cavendish Cottage for 46 dwellings have planning permission and two of the larger sites are now nearing completion.</p>	<p>Local Plan period. However at this time it is unknown what the future housing requirements will be beyond 2033. The Actions set out on Page 11 are intended to be used ensure that continues to be a future supply of housing. These comments do not suggest that Doveridge Parish Council have any specific issues with the proposed Actions</p> <p><b>Recommendation No Change</b></p>
28	<b>Action Monitoring Plan</b>	Historic England	<p>Under Actions we would be concerned if conditions were removed which were originally included to benefit the historic environment.</p>	<p>Any proposals to remove or modify conditions would be subject to careful scrutiny and only likely to be approved where the benefits of doing so outweigh any negative impacts. This would include any relating to the Historic Environment.</p> <p><b>Recommendation No Change</b></p>
29		Matlock Civic Association	<p>MCA consider that it is imperative that brownfield sites are developed so as to reduce greenfield allocations and deal with blights on our town. We consider that a very high priority should be given to the proposed monitoring action M5 to:</p> <p>“Continue to have regular engagement with landowners/developers for the more complex brownfield sites to ensure their accelerated delivery”</p> <p>This initiative should be exercised in conjunction with the real threat of implementing Site Delivery Action</p>	<p>There is no Government policy which sets out a preference for development on Brownfield sites prior to greenfield sites. Government policy does however suggest that local planning authorities should give substantial weight to the use of brownfield sites for homes and other needs. The adopted Derbyshire Dales Local Plan does, however, identify that over 60% of allocated dwellings are on brownfield sites.</p>

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			<p>SR4 to use Compulsory Purchase powers to ensure delivery of brownfield allocations.</p> <p>The wording on brownfield sites (policy M5) should be strengthened so that it has clear priority with the real threat of using Compulsory Purchase Powers (SR4).</p>	<p>Compulsory Purchase Orders are generally used as a last resort in the event that negotiations to bring sites forward appear to have stalled or are not likely to be concluded in a satisfactory way.</p> <p>By default what is suggested by Matlock Civic Association would only happen if the circumstances dictated that progress was stalling. At the current time none of the sites allocated in the Adopted Derbyshire Dales Local Plan have reached that stage.</p> <p><b>Recommendation No Change</b></p>
<b>30</b>		Doveridge Parish Council	The Neighbourhood Development Plan for Doveridge is a Statutory document which clearly states that the allocation of 219 has already increased the size of the village by a third.	Noted
<b>31</b>	<b>Action Plan Site Delivery</b>	Matlock Town Council	The last resort proposal for Compulsory Purchase of landowners/developers 'land banking' sites is however considered acceptable – if found deliverable (SR4)	Noted
<b>32</b>		Matlock Town Council	<p>The revised NPPF has even reduced the number of such housing from 40% down to 30% and it is obvious many Developers have used 'profit based' reasons (such as viability assessments*) to even build less than 10% and even none at all in some cases.</p> <p>*Source: Research by the homeless charity Shelter and the Campaign to Protect Rural England (CPRE) – The Guardian 2018</p>	<p>The priority for the Action Plan is to ensure that the level of residential development continues to be brought forward at an appropriate rate.</p> <p>By doing so it will ensure that the policies and proposals in the adopted Derbyshire Dales Local Plan are</p>

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			<p>The CPRE has carried out studies highlighting the problem in rural areas in England where prices are often high but wages low, meaning local residents and workers find themselves priced out of the market. Analysis of eight rural councils over one year shows some 50% 'loss of affordable housing' was lost by Developers using the above justification (looks familiar?)</p> <p>Note: In this context SR7 (Page 11) the wording "including any affordable housing requirements" should clearly be removed.</p> <p>Several District Councils are known to have refused Developers proposals unless significant numbers of 'affordable housing' are to be built. Matlock Town Council urges Derbyshire Dales District Council to also take this stance.</p>	<p>safeguarded and minimise any risk of land not allocated for residential development coming forward.</p> <p>The provision of affordable housing is a cost to developers. However before granting planning permission the District Council will normally work with the developer to ensure that the level of affordable housing provided does not undermine the deliverability of the development. Only in the event of a significant change in circumstances is it likely that the removal of conditions relating to affordable housing will be contemplated. SR7 is only one of a number of potential measures to ensure the continued supply of housing.</p> <p>Any proposals to remove or modify conditions including those related to the provision of affordable housing would be subject to careful scrutiny and only likely to be approved where the benefits of doing so outweigh any negative impacts.</p> <p><b>Recommendation No Change</b></p>
33		Matlock Town Council	For the Matlock area, a separate matter of significant importance is already evident from a consideration of developments already built or under construction, especially those since the commencement of the	This is a matter related to the mix of houses on individual sites rather than the principle of how to ensure that the rate of housing delivery continues at an appropriate level. The adopted

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			<p>Local Plan process (this includes ‘windfall’ exception sites not in the Local Plan).</p> <p>With only the occasional exception these housing developments as advertised (and built) a significant majority of large 4 and 5 bedroomed detached houses. This is a clear failure of the basic intention of the building of 300,000 new houses which was surely to provide significant numbers of what is generally referred to as ‘affordable housing’ – housing for those starting out on the housing ladder and wishing to purchase a smaller sized initial property and those wanting to ‘downsize’ from their existing property to a smaller property as the size of the household decreases in later life.</p>	<p>Derbyshire Dales Local Plan has policies in place to address the mix of new housing to meet the future needs of the District and will influence the decisions on individual planning applications.</p> <p><b>Recommendation</b> <b>No Change</b></p>
34		Matlock Town Council	<p>The use of Compulsory Purchase powers to ‘unlock’ Landowners/Developers ‘Land Banking’ sites is considered acceptable (as a last resort) but only if found deliverable.</p> <p>iv) Future sites should be not considered unless they comply with the Policies in the adopted Local Plan.</p> <p>v) It is considered that concessions to Developers should be actively resisted (clear proof) in the matter of numbers of ‘affordable housing’ to be provided on future sites. The lack of sufficient profits of a Developer should be not be used as a ‘bargaining tool’ in Planning considerations.</p> <p>vi) The key National policy of ‘Brownfield before Greenfield’ should be adhered to.</p> <p>vii) Reconsideration of the ‘Garden Village’ concept for future housing development, rather than further undesirable additions to existing communities should be actively pursued.</p>	<p>Support for the use of CPO powers is noted, and would only be used where sites were considered to be deliverable – as defined in the NPPF.</p> <p>The Housing Delivery Action Plan has been prepared to support the implementation of the housing policies and proposals in the adopted Derbyshire Dales Local Plan. It is not a vehicle for reviewing or allocating alternative sites – this can only be undertaken through a review of the Local Plan, taking account of the evidence available at that time. This includes reviewing the extent to which a ‘Garden Village’ is likely to be a deliverable concept for Derbyshire Dales.</p>

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				<p>Any proposals to remove or modify conditions including those related to the provision of affordable housing would be subject to careful scrutiny and only likely to be approved where the benefits of doing so outweigh any negative impacts.</p> <p>There is no Government policy which sets out a preference for development on Brownfield sites prior to greenfield sites. Government policy does however suggest that local planning authorities should give substantial weight to the use of brownfield sites for homes and other needs. The adopted Derbyshire Dales Local Plan does, however, identify that over 60% of allocated dwellings are on brownfield sites.</p> <p><b>Recommendation No Change</b></p>
35		Derbyshire County Council – Conservation, Heritage and Design Service	<p>Thank you for consulting on the Derbyshire Dales Draft Housing Delivery Action Plan.</p> <p>While I have few comments on the proposed Action Plan in relation to the historic environment, I note with some concern proposed action SR7: “In appropriate circumstances consider the release/removal of conditions including any affordable housing requirements from extant and/or unimplemented planning permissions”.</p>	Any release/removal of conditions would not be something instigated by the District Council, rather it is more than likely to be a developer seeking to improve viability by removing those conditions which are more than likely to be having an adverse impact upon a development’s viability.

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			<p>In the first instance, as currently phrased, it is not clear whether this proposal applies only to conditions relating to affordable housing provision, or whether it applies to planning conditions more broadly, including those relating to affordable housing provision. I suggest that this ambiguity is clarified, for the avoidance of doubt.</p> <p>If planning conditions more broadly are implied, then it is important to establish that with regard to the historic environment, planning conditions are a key part of ensuring that new development complies with NPPF policy on heritage assets. The desirability of conserving and enhancing the historic environment is a vital part of the environmental strand of sustainable development. Where the loss of heritage assets (wholly or partly) is outweighed in the planning balance by the benefits of new development, NPPF para 199 places a clear expectation on planning authorities and applicants that appropriate recording of the relevant assets will take place (for example through excavation and recording of archaeological assets before a housing development begins). Archaeological requirements where secured through planning conditions are in any case required to be 'absolutely necessary', reasonable and proportionate in rendering proposals acceptable that would otherwise be unacceptable against the NPPF and local plan policies. There would seem to be no policy justification for removing such conditions post facto to improve deliverability.</p> <p>The proposed action SR7 – if applied to archaeological and/or other heritage conditions –</p>	<p>Affordable Housing is considered the most likely to be sought to be removed as it has the potential to be one of the most costly elements of a planning permission.</p> <p>It is highly unlikely that the District Council would remove a condition that had an impact upon the historic environment, otherwise the reason for imposition of a condition in the first instance would be negated and therefore more than likely that the planning permission should not have been approved – especially given the advice in the NPPF about the weight to be attached the historical environment in the determination of a planning application.</p> <p>In all cases any proposals to remove or modify conditions including those related to the provision of affordable housing would be subject to careful scrutiny and only likely to be approved where the benefits of doing so outweigh any negative impacts</p> <p><b>Recommendation No Change</b></p>

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			could therefore lead to harm or complete loss of heritage assets without an appropriate record being made, and this would run counter to policies at NPPF chapter 16 and Derbyshire Dales Local Plan Policy PD2. I therefore advise that some appropriate qualification is given alongside discussion of action SR7, to clarify what 'in appropriate circumstances' might mean and to establish that removal of such conditions would not occur where the relevant conditions are necessary to ensure compliance with national and local planning policies on (inter alia) heritage assets.	
<b>36</b>		Matlock Civic Association	The majority of the Councils proposals are helpful and worthwhile. The additional measures, such as the Council acting as a Developer to improve delivery of Affordable Housing (SR3) and using Compulsory Purchase Powers (SR4) where necessary, are also welcomed.	Noted
<b>37</b>		Doveridge Parish Council	As a review of the Local Plan is required by December 2022 it is envisaged that the Council will be influenced by applications for new land for residential development. We would not want any of the subsequent greenfield sites to be found in Doveridge.	Noted – the review of the Local Plan will be subject to extensive public consultation and Doveridge Parish Council will have the opportunity to make suitable representations at the appropriate time.  <b>Recommendation No Change</b>
<b>38</b>		Wolds Action Group	WAG agrees with suggested Policy SR2 because this would encourage smaller sites to come forward which would be more easily deliverable because smaller sites do not have the massive and complicated environmental impacts of large scale proposals.	Noted
<b>39</b>		Wolds Action Group	If the Council finds it unavoidable to release or remove conditions including any affordable housing etc., then this should be considered <b>only</b> if this	The provision of affordable housing is a cost to developers. However before granting planning permission the

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			<p>assists in bringing forward a complex or difficult brownfield site. Any such concessions should be incentives in favour of the development of brownfield only and there should be no such concessions made available to greenfield sites under any circumstances and this policy should be caveated as such and made crystal clear to developers at the outset.</p>	<p>District Council will normally work with the developer to ensure that the level of affordable housing provided does not undermine the deliverability of the development. Only in the event of a significant change in circumstances is it likely that the removal of conditions relating to affordable housing will be contemplated. SR7 is only one of a number of potential measures to ensure the continued supply of housing.</p> <p>Any proposals to remove or modify conditions including those related to the provision of affordable housing would be subject to careful scrutiny and only likely to be approved where the benefits of doing so outweigh any negative impacts.</p> <p><b>Recommendation No Change</b></p>
40		Wolds Action Group	<p>Site Delivery and review of the Local Plan by December 2022:</p> <p>WAG believes that Climate Change should be a driving factor in any LP review and that this review should take place earlier in view of the critical importance attached globally to Climate Change. Given the recent severe and devastating floods Matlock and environs have suffered, there should be no compromise on the future safety of the town. Matlock in particular is unique in its topography, geology and socio economic factors. There should be</p>	<p>A review of the Derbyshire Dales Local Plan has to be completed by December 2022. The extent of that review has yet to be determined. Furthermore these representations do not refer to any aspect of the Action Plan.</p> <p><b>Recommendation No Change</b></p>

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			<p>no further development of the North valley side in Matlock until it can be unequivocally proved that flooding will not be exacerbated or caused elsewhere as a result of that development.</p> <p>At the next Local Plan review, policies should be reviewed to take into account new evidence which has come forward since adoption of the present plan and all policies should take into account the very real risks of climate change.</p>	
41	<b>Action Plan and Performance Management</b>	Matlock Town Council	The 'ridged' adherence to such as a rolling 3 year period (Page 12) is suggested should be ameliorated in a case (usually a large major Development Site) where the final delivery of the total number of houses proposed will be 5 years or more.	<p>The HDT is a measure with a methodology defined by the Government. The District Council has no opportunities to digress away from the methodology.</p> <p><b>Recommendation No Change</b></p>
42		Doveridge Parish Council	Is annual monitoring of residential development sufficient?	<p>Monitoring of residential development is continuous throughout the year. The results of the monitoring are however published annually.</p> <p><b>Recommendation No Change</b></p>
43	<b>Appendix 1 List of Brownfield and Greenfield Sites</b>	Julie Daly Cllr DDTC c/o James Dowling	There is a serious inaccuracy in Appendix 1, the 57 new homes granted outline planning permission on land opposite Meadow View, Bakewell Road, have been omitted. Presumably because it is still allocated as PD10 in the Local Plan. Is it correct that land granted protection under Policy PD10 can be granted outline planning permission? This will then bring the number of new homes to be built on greenfield sites to 831. 278 of which being in Darley Dale. This is over one third	At the 1 <sup>st</sup> April 2019 the site at Meadow View only had outline planning permission. In such circumstances the policy in the NPPF is that sites with outline planning permission should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years. At 1 <sup>st</sup> April 2019 that time the District Council did

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			<p>of all homes allocated for Derbyshire Dales. Why? Surely this is disproportionate?</p>	<p>not have sufficient evidence to justify including this site in the calculation of the five year supply of housing.</p> <p>The strategic approach in the adopted Derbyshire Dales Local Plan, and one endorsed by the Inspector at the Examination in Public is to focus more development to the more sustainable locations such as Matlock and Darley Dale. Whilst there may be local variations across the whole of the Local Plan area there is a greater proportion of new residential development on brownfield sites than greenfield sites.</p> <p><b>Recommendation</b> <b>No Change</b></p>
44		Matlock Town Council	<p>Yet another matter of extreme concern is noted in the HDAP. This appears in Page 16 - Appendix 1 – The list of Greenfield Sites – reference site HC2 (w) Land off Gritstone Road/Pinewood Road Matlock - No of Dwellings 430 – Five Year assumption 165. The columns ‘Planning Permission October 2019’ and ‘Five Year Land Status’ are ‘ticked’. The former has a suffix 4, which states: - “* Or anticipated to obtain planning permission in the foreseeable future”. Note: This is also stated earlier (Page 7) This statement is completely and utterly unacceptable. It surely constitutes a prejudicial view of the Decision yet to be made by the Council’s Officers.</p>	<p>The assumption that 165 dwellings will come forward on the Gritstone Road site has been based upon a number of factors one of which is evidence from the developer about their proposals for bringing the site forward. In coming to this view the District Council was mindful the definition of Deliverable as set out in the NPPF:</p> <p><i>To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic</i></p>

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			<p>If noted by the Developer it will have completely undermined the efforts of the Town Council and other major Statutory Consultees to obtain the many unanswered substantial matters of Material Consideration not yet dealt with – even refused to answer – in latest submission by the Developer and already criticised.</p> <p>Given the foregoing and bearing in mind the volume, strength of opposition and shear weight of factual representations made regarding this particular Development, Matlock Town Council remains completely opposed to Planning Permission being granted by the District Council for the Pinewood Road/Gritstone Road developments site.</p> <p>It is strongly suggested the overall tenet of the HDAP is reconsidered to take account of the matters raised by this Council in the above that affect the future wellbeing of Matlock.</p>	<p><i>prospect that housing will be delivered on the site within 5 years. In particular:</i></p> <p><i>a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).</i></p> <p><i>b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.</i></p> <p>Furthermore in an appeal decision in respect of a development proposal in Hlland Ward made last year an Inspector concluded that the District Council was correct in making an</p>

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				<p>assumption about the extent to which development on this site was likely to come forward over the next five years.</p> <p>Given this and the fact that the site is an allocated site in the Derbyshire Dales Local Plan it is therefore not unreasonable to make assumptions about the level of development anticipated to come forward on this site over the next five years.</p> <p>The inclusion of any assumption about the number of potential dwellings likely to come forward on a site within the calculation of the five year supply of land for housing where that sites currently does not have the benefit of planning permission does not indicate any pre-determination on the part of the District Council in respect any application for planning permission. It is for the Members of the District Council's Planning Committee to determine a planning application based upon the evidence they have before them at the appropriate time.</p> <p><b>Recommendation</b> <b>No Change</b></p>
45		Highways England	Welcome the opportunity to comment on the draft Housing Delivery Test Action Plan and understand that this is intended to be a practical document that seeks to set out how the District Council will minimise the risk of under- delivery of housing and	Noted – these matters will be assessed in detail during the determination of any planning application.

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			<p>maintain an adequate level of housing completions over the Local Plan period. It is our role to maintain the safe and efficient operation of the Strategic Road Network whilst acting as a delivery partner to national economic growth. In relation to the Derbyshire Dales, our principal interest is safeguarding the operation of the A50, which routes through the southernmost part of the District.</p> <p>We note that the list of the adopted Local Plan's allocated sites totalling 2,890 dwellings (2,116 of which will be provided on brownfield sites) is provided in Appendix 1 of the draft Housing Delivery Action Plan. Large sites and those in close proximity to the SRN would need to consider the implications of traffic impacts. Such developments which come forward through the planning process, are likely to need to be supported through the completion of a Transport Assessment, to determine whether it is necessary for mitigation to be provided on the highway network to accommodate the forecast traffic demands.</p>	<p><b>Recommendation</b> <b>No Change</b></p>
46		Matlock Civic Association	<p>It is more than apparent from the Council's own statistics in paragraph 7 that a 5-year housing supply will be comfortably maintained in the District even if the 415 houses proposed at Gritstone Road should are not approved (see our three letters of representation on the current planning application). Among our points have been the need to:</p> <p>a) Properly assess traffic generation onto Chesterfield Road and the Town Centre.</p> <p>b) Consider the ground water and surface water implications of any development. This is even more</p>	<p>The data shows that the District Council is only 269 over the level required to demonstrate a five year supply of land for housing. The assumption has been made in the calculation that only 165 dwellings will come forward on the Gritstone Road site. The unilateral removal of this site from the five year housing supply calculation would make the District Council vulnerable to challenge from developments <u>not</u> allocated in the adopted Derbyshire Dales Local Plan.</p>

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			relevant in view of recent flooding in Matlock, because additional surface water run-off from Gritstone Road is likely to further increase the risk of flooding due to excess flows down Matlock Bank, and rising water levels at the confluence of the River Derwent and Bentley Brook.	<p>All the matters referred to in the representations are for assessment during the determination of the planning application.</p> <p><b>Recommendation No Change</b></p>
47		Matlock Civic Association	The Gritstone Road site should be deleted. The average annual rate of development in the 5-year housing supply will be comfortably maintained without including Gritstone Road. Recent development well in excess of the annual target and developments currently underway make it unnecessary at this stage and its inclusion produces the temptation to not pursue the brownfield options within appropriate vigour. This will allow time for proper investigation of the difficulties of development at Gritstone Road.	<p>The data shows that the District Council is only 269 over the level required to demonstrate a five year supply of land for housing. The assumption has been made in the calculation that only 165 dwellings will come forward on the Gritstone Road site. The unilateral removal of this site from the five year housing supply calculation would make the District Council vulnerable to challenge from developments <u>not</u> allocated in the adopted Derbyshire Dales Local Plan.</p> <p>All the matters referred to in the representations are for assessment during the determination of the planning application.</p> <p><b>Recommendation No Change</b></p>
48	<b>Other Comments</b>	Resident	Looking at the Greenfield sites it seems much of your delivery performance is based on the 430 homes earmarked for the Gritstone Road/Pinewood Road area which is totally unsuitable for that level of development. Surely the Government must take into account the amount of	The inclusion of the site at Gritstone Road was challenged during the preparation of the Derbyshire Dales Local Plan and following review by an independent Planning Inspector it was concluded that the site was

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			land available, we are only a small town and the construction of this many homes in that area will cause huge disruption to local people for many years to come and devalue the area as a market town.	<p>appropriate for inclusion as a housing allocation within the Derbyshire Dales Local Plan. The level of housing being provided is required to meet the objectively assessed need. The removal of this site from the housing trajectory is not justified.</p> <p><b>Recommendation</b> <b>No Change</b></p>
49		Resident	Major need for bungalow site soon	<p>Any such need can be brought forward on existing sites allocated in the Derbyshire Dales Local Plan or on windfall sites which do not yet have the benefit of planning permission. This does not however alter the intentions of the Action Plan.</p> <p><b>Recommendation</b> <b>No Change</b></p>
50		Resident	It seems to be a good document in its intentions, hopefully a useful document in practice.	Noted
51		Resident	I wonder what the point of the local plan is as it will be argued by the developers and lawyers that the plan is slipping and planning permission will always be granted on yet more greenfield sites, which will be lost forever along with wildlife, vegetation, trees etc. along with the affect of surface water etc. the effects all of which have been well documented in national document via the Environment Agency etc.	The purpose of the Derbyshire Dales Local Plan is to provide certainty to both residents and developers about the extent of development policies and proposals in the future. Legislation requires planning applications to be determined in accordance with the Local Plan unless material considerations indicate otherwise. At the present time development proposals are coming forward in accordance with the policies and proposals in the Local Plan and the

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				<p>District Council has not been subject to pressure to release sites not allocated for development in the Local Plan.</p> <p>These comments do not, however, relate to the contents of the Action Plan</p> <p><b>Recommendation No Change</b></p>
52		Resident	When is DDDC going to consider plots for self-build under the 'Right to Build' legislation?	<p>Policy in the adopted Derbyshire Dales Local Plan require that consideration be given to the provision of plots for Self Build. These comments do not, however relate to the contents of the Action Plan.</p> <p><b>Recommendation No Change</b></p>
53		Resident	<p>I would like to understand why, in your draft housing delivery action plan, November 2019, you have already indicated that planning permission has been granted for 430 houses on Pinewood Road/Gritstone Road site in October 2019.</p> <p>To my knowledge planning has not yet been granted to build on this site and this makes your document fundamentally incorrect and therefore misleading.</p> <p>Has the council already made the decision that building will go ahead on that land regardless of the democratic process, the weight of public opinion, without investigating the recent flooding events and evidence that this was caused by water run off from the North valley side of Matlock, and the Prime Ministers assertion that we should not be building on</p>	<p>The Table on Page 16 of the Housing Delivery Test has a footnote which sets out...</p> <p><sup>4</sup> Or anticipated to obtain planning permission in the foreseeable future. In the event that planning permission is not granted for the Gritstone Road site it will have a consequential affect upon calculation of the current five year supply of land for housing.</p> <p>Furthermore for the purposes of calculating the Five Year Supply of Housing for the District Council has only</p>

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			<p>unsuitable greenfield sites? Mr Wilson has previously stated in public that “this site will be built on”, so as a result is this a foregone conclusion?</p> <p>I would like to understand the exact position of the planning permission for this site, and why this document has been published for consultation with certain groups, whilst including incorrect and misleading information? If proven to be incorrect, can you confirm that this will be re-issued and a correct document circulated for further consultation?</p>	<p>assumed that 165 dwellings will be complete in the period 2019-2024 and not the whole 430 allocation.</p> <p>The assumption that 165 dwellings will come forward on the Gritstone Road site has been based upon a number of factors one of which is evidence from the developer about their proposals for bringing the site forward. In coming to this view the District Council was mindful the definition of Deliverable as set out in the NPPF:</p> <p><i>To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:</i></p> <p><i>a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a</i></p>

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				<p><i>demand for the type of units or sites have long term phasing plans).</i></p> <p><i>b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.</i></p> <p>Furthermore in an appeal decision in respect of a development proposal in Hlland Ward made last year an Inspector concluded that the District Council was correct in making an assumption about the extent to which development on this site was likely to come forward over the next five years.</p> <p>Given this and the fact that the site is an allocated site in the Derbyshire Dales Local Plan it is considered therefore not unreasonable to make assumptions about the level of development anticipated to come forward on this site over the next five years</p> <p>The inclusion of any assumption about the number of potential dwellings likely to come forward on a site within the</p>

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				<p>calculation of the five year supply of land for housing where that sites currently does not have the benefit of planning permission does not indicate any pre-determination on the part of the District Council in respect any application for planning permission. It is for the Members of the District Council's Planning Committee to determine a planning application based upon the evidence they have before them at the appropriate time.</p> <p><b>Recommendation No Change</b></p>
54		Wolds Action Group	<p>As per section one, given that the years 2019-2023 are predicted to deliver more than double the HDT, then the large, high risk, greenfield site HC2(u) (The Wolds) should be removed from the Local Plan. This does not mean that targets cannot be comfortably met, quite the contrary since the table in appendix 1 shows that, given the HDT in table 1 will deliver close to 9 years supply in 5 years, the 165 cited as to be delivered from The Wolds can be entirely discounted, permission refused and the allocation set aside for later review.</p> <p>The Wolds has been “on the table” for far too long, and yet, still the answers to serious questions about traffic impacts and flooding (as well as landscape impacts), have not been answered satisfactorily. There is, therefore, a realistic prospect that the site is, as considered previously, un-developable. The recent floods have only served to highlight the substantial risks associated with development of the</p>	<p>Both the HDT and the Five Supply of Land for Housing influence the extent to which developers can seek to put aside the contents of the adopted Derbyshire Dales Local Plan and seek to obtain planning permission for sites not allocated for residential development within the adopted Derbyshire Dales Local Plan.</p> <p>For the reasons outline above it is considered that the assumptions made about the rate of development of 165 dwellings completed by 2024 on the site is reasonable – notwithstanding the issue of drainage and other issues raised in the representations.</p> <p><b>Recommendation No Change</b></p>

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			<p>northern valley and this area of high moorland. The site is a major risk to the town in terms of flooding, highway impacts and loss of a valuable landscape.</p> <p>The socio- economic impacts of repeated flooding from run off and under assessed and un- calculated amounts of groundwater cannot be emphasised strongly enough with regard to the Wolds and the northern slopes in general. A substantial number of town centre businesses have been flooded twice in 13 months and run off was a significant contributor on both occasions. There is a substantial risk that these businesses will not continue to tolerate this and the town centre will likely lose valuable assets (potentially large businesses like M&amp;S ) and suffer economic downturn as a consequence.</p>	