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14 June 2016
To: All Councillors

As a Member of the Local Plan Advisory Committee, please treat this as your summons to attend the meeting on Wednesday 22 June 2016 at 6.00 pm in the Council Chamber, COUNTY HALL, Matlock. (PLEASE NOTE VENUE)

Yours sincerely

Sandra Lamb
Head of Democratic Services

AGENDA

1. APOLOGIES

Please advise the Committee Team on 01629 761133 or e-mail committee@derbyshiredales.gov.uk of any apologies for absence.

2. PUBLIC PARTICIPATION

To enable members of the public to ask questions, express views or present petitions, IF NOTICE HAS BEEN GIVEN, (by telephone, in writing or by electronic mail) BY NO LATER THAN 12 NOON OF THE WORKING DAY PRECEDING THE MEETING. NB: REPRESENTATIONS MUST RELATE SPECIFICALLY TO ITEMS BEING CONSIDERED BY THE COMMITTEE AT THIS MEETING.

The District Council's Constitution limits Public Participation to a maximum of one hour, with individual "slots" limited to 3 minutes. The length of individual slots will, however, be reduced if the number of registered speakers means the 1 hour limit will be exceeded. We will liaise with speakers, after the deadline for registration, if a reduction of their allocated time is necessary.

3. APPROVAL OF THE MINUTES OF THE PREVIOUS MEETING

29 February 2016.

4. INTERESTS

Members are required to declare the existence and nature of any interests they may have in subsequent agenda items in accordance with the District Council’s Code of Conduct. Those interests are matters that relate to money or that which can be valued in money, affecting the Member her/his partner, extended family and close friends.

Interests that become apparent at a later stage in the proceedings may be declared at that time.
5. DERBYSHIRE DALES LOCAL PLAN – DRAFT PLAN CONSULTATION

To consider a report that summarises the responses received during the six-week period of Public Consultation (7th April 2016 to 19th May 2016) on the Derbyshire Dales Draft Local Plan.

6. DERBYSHIRE DALES LOCAL PLAN – DUTY TO CO-OPERATE UPDATE

To consider a report that summarises the current position with regards to the District Council’s obligations in relation to the Duty to Co-operate.

**Members of the Committee:** Councillors Martin Burfoot, Albert Catt, Ann Elliott, Tony Morley, Tony Millward, BEM, Garry Purdy, Mike Ratcliffe, Lewis Rose, OBE, Andrew Shirley, Andrew Statham, Peter Slack, Jacquie Stevens

**Substitutes:** Councillors Jason Atkin, Richard Bright, Deborah Botham, Sue Burfoot, Phil Chell, Richard FitzHerbert, Chris Furness, Alyson Hill, Susan Hobson, Neil Horton, Angus Jenkins, Joyce Pawley
DERBYSHIRE DALES LOCAL PLAN – DRAFT PLAN CONSULTATION

PURPOSE OF REPORT

The purpose of this report is to summarise the responses received during the six-week period of public consultation (7th April to 19th May 2016) on the Derbyshire Dales Draft Local Plan.

RECOMMENDATION

That the Committee note the responses received to the Derbyshire Dales Draft Local Plan and that the responses received be taken into consideration as part of the ongoing plan preparation process.

WARDS AFFECTED

All Wards outside the Peak District National Park

STRATEGIC LINK

The Derbyshire Dales Local Plan will be a pivotal tool in the delivery of the Council’s Corporate Plan and the Derbyshire Dales and High Peak Sustainable Communities Strategy

1 BACKGROUND

1.1 At a Special Meeting of Council held on 16th March 2016, Members endorsed proposals for a six-week period of public consultation on the Derbyshire Dales Draft Local Plan (Minute 351/15).

1.2 A copy of the Derbyshire Dales Draft Local Plan was made available on the District Council’s website¹ as well as at Matlock, Ashbourne and Wirksworth libraries. It was also made available at Matlock Town Hall, Arc Leisure Matlock, Wirksworth Leisure Centre and Ashbourne Leisure Centre. All the relevant documents including the evidence base underpinning the Derbyshire Dales Draft Local Plan were also available on the District Councils website

1.3 A series of public exhibitions were held in Wirksworth, Ashbourne and Matlock at which, on selected days, Officers from the District Council were in attendance to answer questions from members of the public.

1.4 In addition, public meetings were held in Wirksworth (11th April 2016), Ashbourne (19th April 2016) and Matlock (25th April 2016). In total approx. 300 people attended the public meetings.

1.5 A seminar for Parish Councillors and Parish Clerks was held on 13th April 2016. A total of 23 people attended the Parish Seminar.

1.6 In addition to the public exhibitions and meeting a number of press releases were issued, and all relevant documents and evidence was made available on the District Councils website2.

1.7 Respondents to the consultation were encouraged to adopt a ‘digital by default’ approach whereby comments were to be submitted online through the District Council’s website.

2 DERBYSHIRE DALES DRAFT LOCAL PLAN - ANALYSIS OF RESPONSES

2.1 A total of approx. 2,600 comments were received approx 800 individuals and organisations (including statutory agencies, landowners, developers and their agents) in respect of all aspects of the Derbyshire Dales Draft Local Plan both through the online survey and in writing by letter or e-mail.

2.2 Appendix 1 sets out the combined of the level of support and objection to individual policies in the Derbyshire Dales Draft Local Plan.

2.3 The following is a summary of the key issues raised during the public consultation on the Derbyshire Dales Draft Local Plan Chapter by Chapter. A detailed summary of the representations received is set out in Appendix 2.

Chapter 1 – Introduction

2.4 Some representations have indicated that the District Council’s approach to the requirements in relation to the Duty to Co-operate, especially in relation to the extent of housing provision within the Draft Local Plan is inadequate and unlikely to meet the legal test.

2.5 A number of objections have been raised in relation to the contents and application of the different pieces of the evidence base, including the assumptions used in the Objectively Assessed Need for Housing, the Infrastructure and CIL/Viability Study and the methodology used in Landscape Sensitivity Assessment.

2.6 Whilst not directly related to the contents of the Draft Local Plan some representations criticised the public consultation exercise indicating concerns with the quality of the exhibition material, and the complexity of the online survey. Further concerns were raised by residents suggesting that their comments were not properly being taken into account.

2.7 Although the statutory bodies appear to be generally satisfied with the Sustainability Appraisal it would appear that there are some aspects of its contents that require further elucidation.

Chapter 2 – Portrait of the Derbyshire Dales

2.8 A number of representations note that the ability of the Local Planning Authority to meet the Objectively Assessed Need for housing is constrained by the virtue of the fact that a significant proportion of the District lies within the Peak District National Park. It is suggested that the overall housing target should be reduced and further work undertaken to encourage greater levels of house building within the National Park.

2.9 Other comments suggest that revisions should be included to ensure references to the Historic Environment Record and Water Framework Directive are encapsulated within the Portrait of the Derbyshire Dales.

2.10 Support for the Key Issues is provided in the representations however there appears to be the opinion that elements of the Draft Local Plan do not address the Key Issues identified, for instance housing allocations do not address the issue of improving accessibility or provide housing to meet the needs of the elderly. Comments have been received stating that the Key Issues are too aspirational and will not be achieved. It is also suggested that a new Key Issue ‘Enhancing Rural Communities’ should be incorporated.

Chapter 3 – Spatial Vision, Aims and Objectives

2.11 Representations support the Spatial Vision, Aims and Objectives. However a number of comments request that a stronger reference to the built and natural environment and landscape of the District should be made within the Vision, whilst others consider that the Vision is not articulated through the policies in the Plan and will not be delivered.

2.12 Overall support for the Strategic Objectives is provided in the representations. In respect of the Strategic Objective 6 it has been suggested that this should refer to meeting the Objectively Assessed Need for Housing within the Housing Market Area, not just within the District and that the overall housing requirement should delivered without a shortfall. Some representations have indicated that they consider there to be inconsistency between the proposed housing allocations on greenfield sites and Strategic Objective 11 which promotes the efficient use of brownfield land.

Chapter 4 – The Spatial Strategy

2.13 Taking together all the representations made in respect of this chapter more objections were made to the policies than supporting them. The detailed representations indicate concerns about the approach taken to the Settlement Hierarchy and the overall strategy for the plan.

2.14 Whilst there are objections to the overall level of housing development that has been identified as being required across the whole of Derbyshire Dales, and the target included within the Local Plan, some representations set out that the Objectively Assessed Need for Housing is too low and that the assumptions upon which it is based were not appropriate in respect of the economic and affordable housing elements. The overall outcome being that the plan does not meet the Governments objectives of significantly boosting new house building.

2.15 It was suggested that more sites should be brought forward within the Local Plan to meet this need. There was concern expressed about the impact that the level of
development within the Peak District National Park has on the overall housing requirement within the plan area.

2.16 Particular concerns were raised about the criteria and evidence used for the identification of the settlements in the different tiers, and the justification for the scale of development within individual settlements. The availability of services such as medical facilities, public transport and employment opportunities are indicated as reasons why some settlements should not be considered to be sustainable locations for new development. Some comments were made that was a disproportionate allocation of housing to three settlements in Tier 3. A number of representations considered that development should be allocated in Fourth and Fifth Tier Settlements to maintain their sustainability, and thereby spreading development more evenly across the plan area.

2.17 Other comments suggest that there should be more flexibility in regards to the identification of the Settlement Development Limits to allow for more housing development to come forward and contribute to meeting the identified shortfall in housing provision within the plan against the Objectively Assessed Need for Housing.

2.18 A number of representations suggest that one potential solution to meeting the housing requirements should be the identification of a New Village in the south of the plan area, rather than allocating land for housing within or adjacent to existing settlements.

2.19 A number of alternative sites were identified through the consultation process as having potential to meet the District Council’s housing needs. Similarly, additional evidence about the suitability of some sites previously considered inappropriate for development was submitted during the consultation period. Both the new sites and the new evidence in respect of existing sites are currently being reviewed, and will be reported to a future meeting of this Committee.

2.20 In terms of employment development the representations suggest that generally the plan should seek to encourage more economic growth and that the overall level of provision within the local Plan of 15 hectares is inadequate.

2.21 In relation to the area development strategies, concern is raised about the policy which seeks to protect the A6 corridor between Matlock and Darley Dale. Some representations consider that it should include more areas in order to ensure that it properly prevents the coalescence of the two settlements. Others consider that the policy limits the potential to bring forward both housing and employment development in this what is considered to be a sustainable location.

2.22 There is support for the Ashbourne area development strategy, although concerns are raised about the impact that the scale of development proposed on the Airfield site will have upon the local infrastructure including traffic congestion, education, medical and leisure facilities. Some representations indicate that the Local Plan should be more positive about the provision of a bypass for Ashbourne, especially given the large amount of housing development proposed in the town.

2.23 In the rural areas there is concern about the scale of development in Brailsford, Doveridge and Tansley, and the extent to which they should be considered sustainable locations for new development. A number of comments reiterate the point that additional development should be allowed in the lower order settlements in order to spread the amount more evenly across the plan area.
Finally in relation to infrastructure provision there are a number of facilities that the representations suggest should be delivered through development including enhanced public transport, medical facilities, education, broadband and a bypass for Ashbourne. Although comments made by developers indicate that seeking financial contributions must not have an impact upon the viability of development.

Chapter 5 – Protecting Derbyshire Dales Character

Overall more representations were received in favour than objected to the policies that seek to ensure the character and appearance of the Derbyshire Dales is protected over the plan period.

From the comments received there is clearly a desire from local residents to ensure that the quality of new development is of the highest standards, and development is appropriately designed for its specific location, rather than being standard developer house types. A number of representations have highlighted changes to Government guidance in relation to issues such as the Code for Sustainable Homes and the Lifetime Homes standard that will need to be addressed in taking the plan forward.

There is general support for the overall aim and intentions of the heritage policy, although Historic England have raised a few detailed points about the consistency of the policy to the guidance within the NPPF. These are subject to ongoing discussions and will be reported to a future meeting of this Committee.

Although there is general support for the Policy PD3 that seeks to protect and enhance the ecological assets of the plan area, there are some concerns that the development proposals identified in the Local Plan will have an adverse impact upon biodiversity and other ecological interests. A number of representations set out that the policy should be strengthened to provide more protection for biodiversity assets. However the response from Natural England indicates that they are satisfied that subject to some minor modifications to the policy wording the approach in the Local Plan can be seen to be in accordance with the NPPF. Whilst there are concerns about the provisions in relation to green infrastructure again Natural England have set out that the plan takes a positive approach to the protection and enhancement of green infrastructure.

Ensuring development does not have an adverse impact upon the landscape character of the plan area is supported by agencies including Historic England, the National Trust and Derbyshire County Council. The validity of the District Council’s landscape character assessment in specific locations across the plan area has however been challenged by some developers on the basis that it is not transparent enough to justify some allocations, has not been applied consistently nor should it be used in decision making.

Natural England and the National Trust welcome the trees and hedgerow policy but both have indicated some potential improvements in the wording of the policy that would allow more protection to ancient woodlands.

There is concern that the climate change policy does not provide adequate support for the move to a low carbon future and that more should be done to adapt to climate change. Although, subject to improvement in the wording of the policy there is support for the policy from Natural England and the National Trust. In relation to flood risk a number of comments are made that suggest that sites allocated within the Local Plan are at risk from flooding, but again, subject to modifications to both the preceding text
and the policy itself Natural England, the Environment Agency and the National Trust support the approach taken within the Local Plan.

2.32 The representations received on the pollution and unstable land policy indicate support (subject to some modifications) from Natural England, the Coal Authority and the Environment Agency. However other representations indicate concerns that a number of allocated sites would be adversely affected by pollution, including noise, to such an extent that are likely to result in unacceptable conditions for future residents.

2.33 Although there is overwhelming support for the policy that seeks to protect the areas used for the Royal Shrovetide Football in Ashbourne representations have been received from landowners which suggest that the policy isn’t needed because of the strict controls that exist over development in the countryside.

2.34 Representations received in regards to the protection of the Matlock/Darley Dale A6 Corridor indicate support for the policy approach adopted but that it should be extended to cover more parts of the corridor. There were however some comments that suggest that there is no evidence to support the policy and that this type of policy has in other locations been found not to be in compliance with the guidance in the NPPF.

Chapter 6 – Healthy and Sustainable Communities

2.35 The majority of the policies contained with this Chapter are supported in the representations that were received during the public consultation period. However there were significant objections received in relation to the housing provisions included within the Draft Local Plan.

2.36 The representations objecting to the housing provision in many instances repeat comments made in relation to the policies in Chapter 4 – The Spatial Strategy, that the overall scale of housing development is inappropriate, that there should be more flexibility about the location of development across the plan area, that brownfield sites should be brought forward in advance of greenfield sites. A number of representations suggest that the Local Plan’s aim should be to fully meet the Objectively Assessed Need for housing and set out the circumstances when a review of the plan’s policy would be triggered.

2.37 The majority of the representations relate to individual sites allocated for housing in Policy HC2, especially those in Brailsford, Doveridge, Tansley, the site at Snitterton Fields and the site at Gritstone Road/Pinewood Road Matlock. Some concerns are raised in relation to the impact of the proposed development on congestion in Ashbourne as a result of the proposed allocation on the Airfield site.

2.38 The key concerns raised in respect of the site specific allocations are:

- that the scale of development is too large;
- the “urbanising” effect of development on villages;
- the lack of suitable employment opportunities;
- adverse impact upon heritage assets;
- adverse impact upon landscape character;
- development will have a detrimental impact upon local wildlife and ecology;
• the loss of greenfield sites prior to redevelopment of brownfield sites;
• the impact of new development on road safety/the existing highways network;
• the inability of the existing infrastructure, services and facilities to be able to accommodate the level of development proposed, and;
• the potential for flood risk to proposed and existing properties.

2.39 Representations were received that suggested that a number of sites previously considered inappropriate for allocation by the District Council should be allocated within the Local Plan. Again the suggestion of a new village in the southern part of the plan area was identified as a potential solution to meeting the housing requirements of the plan area.

2.40 The allocation of site at Middlepeak Quarry, Wirksworth resulted in a number of representations concerned about the impact on the highways network, the services and facilities in Wirksworth, heritage assets and the presence of local biodiversity and environmental designations on the site. Further concerns were raised about the fact that the site was not included within the adopted Wirksworth Neighbourhood Plan.

2.41 In relation to the Middlepeak Quarry site the landowners have indicated in their representations that the allocation in the Derbyshire Dales Draft Local Plan for 220 dwellings is not viable, given the significant costs that would be required to reclaim the site in comparison to the value of the mineral reserves within the quarry. Consequently, they have proposed a revised allocation for inclusion within the Local Plan that would increase the number of dwellings to 645. This proposal has been supported by a number of pieces of technical evidence which are currently subject to further assessment.

2.42 Representations have sought to either the extent of the allocated area or increase the overall capacity on the sites at Snitterton Fields, South Darley; Slinter Mining, Cromford and Matlock Transport, Northwood. The agents for the Gritstone Road site have indicated that in order to deliver the requirements of the Highways Authority for a link road through the site and in order to bring forward the number of units viably the extent of the proposed allocation needs to be extended.

2.43 Whilst there was support for the policy supporting provision of land for self-build housing some representations pointed out that at present time there is no proven need for such provision, and that in other Local Plans Inspectors have suggested policies that encourage the provision rather than require land to be made available for self-build housing.

2.44 The representations made in relation to the affordable housing policy are divided. Some comments suggest that the policy should seek to provide more affordable housing, whilst others, acknowledging that it is a significant matter for the District Council that the policy should indicate a requirement which is “up to” 30% rather “at least” because such a level of provision will have an adverse impact upon the deliverability of development across the plan area. There is however support for the continued development of exception sites to meet local need for affordable housing.

2.45 The allocation of the site at Watery Lane, Ashbourne for a Gypsy and Traveller site raised a number of objections indicating that this site was subject to further review and that its allocation would prejudice the potential for the implementation in the long term of a bypass for Ashbourne. An alternative site at Homesford was identified as having the potential to meet the future needs of the Gypsy and Traveller community.
Concerns were also raised about the technicalities of the policy and the extent to which the policy meets the Government policy in the Planning Policy for Traveller sites.

2.46 Policy HC10 which seeks to ensure that the future mix of new housing meets the future needs of residents of Derbyshire Dales were considered by a number of representations to be unrealistic and likely to have an adverse impact upon the viability of development, and that it does not comply with the advice in the National Planning Practice Guidance and is contrary to the Deregulation Act 2015 which seeks not to limit the size of new dwellings. A number of representations seek greater provision of bungalows as a means of ensuring that the needs of elderly persons are met in the future.

2.47 The evidence for the open space standards included in Policy HC13 is considered to be out of date by Sport England, and should be subject to review to ensure that the Local Plan includes standards that are based upon up to date evidence. Members are advised that whilst this has not been undertaken to date it is currently in the process of being procured, and will be completed such that any new standards can be considered at the Examination in Public into the Local Plan. A number of suggested improvements to overall provision are included in the representations, including the suggestion that the land at The Meadows, Wirksworth be designated as a public open space after the de-notification of the site by Derbyshire County Council. There were concerns raised about the overall level of recreation facilities and that more is required to be undertaken to ensure the health and well-being of residents.

2.48 There is general support for safeguarding existing and the provision of new community facilities and services. A number of representations did however indicate concern about the relationship between the lack of facilities or the location of facilities relative to proposed housing allocations in the Local Plan suggesting that such deficiencies are significant constraints to development. Furthermore, a number of comments were made specifically seeking the provision of additional medical facilities to meet future needs of the population.

2.49 Concerns were raised that public transport was already inadequate, that this wasn’t going to improve in light of the County Council’s decision to review subsidised services in rural areas. Furthermore, concerns were identified about the overall balance between the need for future housing provision and the adverse impact that this was likely to have on the traffic and transport network, unless improvements were made to public transport provision. A number of comments were made about specific sites including Gritstone Road, Matlock and those in Brailsford. It has been suggested that the car parking standards need to be reviewed in light of a change in Government policy set out in a Written Ministerial Statement in March 2015.

Chapter 7 – Strengthening the Economy

2.50 Again, overall the number of representations in support of the polices relating to the local economy are greater than those objecting.

2.51 The representations appear to be split on whether the level of employment land provision included within the Local Plan is too little or too much relative to the forecast changes within the local economy over the plan period. Some comments appear to suggest that the balance between housing and employment land allocations is disproportionate, and that more employment land is required to ensure greater
sustainability. Other comments suggest that there should be a more even distribution of employment land across the three market towns.

2.52 Some comments suggest that within the specific employment land allocations that a wider range of development should be encouraged and not solely limited to Use Classes B1(a-c), B2 & B8. Objections on environmental grounds (ecological/heritage impact and landscape character) are given to the allocations at Middleton Road, Wirksworth and Porter Lane/Cromford Road, Wirksworth.

2.53 There is general support for the retention of the existing key employment sites identified under Policies EC2/EC2A as a means of ensuring that there is a continuing supply of employment land in the future. Similarly, there is general support (subject to the impact being adequately addressed in relation to heritage assets) for the policy which seeks to bring forward the regeneration of sites previously in employment use as a means of continuing the growth of the local economy.

2.54 A few comments were made indicating concern about the future of the three market town centres in the plan area. Furthermore, some representations were made which suggest that the threshold for which a retail assessment and sequential test of 200 sq. metres is not justified in relation to the available evidence. More flexibility is suggested to be needed in relation to the operation of the Primary Shopping Frontages policy in order that it does not give rise to boarded up or further charity shops.

2.55 Although there is support for the continued growth of the tourism aspects of the local economy there is concern that the overall scale of development being proposed within the Local Plan will fundamentally impact upon the attractiveness of the area to tourists in the future.

2.56 There would appear to be divided opinion about the merits of holiday chalets etc throughout the local plan area, with some comments seeing the benefits of them to the local economy, whilst others objected to any further growth in these types of development because of the impact that they have on the character of the local landscape.

Chapter 8 – Strategic Site Allocations

2.57 The policies in this Chapter seek to identify the detailed requirements in relation the key strategic housing sites (i.e. development of over 100 units) allocated in the Draft Local Plan.

2.58 As part of representations on these policies it has been suggested that the site at Cawdor Quarry be included with an allocation made for 800 dwellings and a minimum of 30,000 sq. metres of retail and leisure floorspace, as well as a minimum of 3,000 sq. metres of office floorspace.

2.59 An objection has been made by the Environment Agency about the capacity at the Ashbourne Sewage Treatment Works to accommodate development serving it. Furthermore, it is suggested that the extent of existing capacity at all existing Sewage Treatment Works should be identified to ensure that they are able to accommodate the proposed level of development set out in the Draft Local Plan.

2.60 There are objections to the allocation of the site to the rear of the RBS in Darley Dale, which suggest that this site should be protected as a green space within Darley Dale, or else just redeveloped for a replacement medical facility, and not residential development. If development is to come forward on the site, it is suggested that it
should contain some form of new retail and service provision to meet the future needs of Darley Dale.

2.61 The most number of objections were received in relation to the site at Gritstone Road/Pinewood Road, Matlock. The objections to this site suggesting that the site cannot be accessed adequately, will have an adverse impact upon the surrounding highways network, is not is a sustainable location, and will result in the loss of significant ecological habitats, and exacerbate existing flooding problems in the area. Concerns are raised about the ability of the local schools to accommodate additional pupils, the potential for noise and light pollution and disruption to existing residents as a result of construction traffic. The Environment Agency has suggested that the issue of flood risk should be highlighted as part site investigation works and in accordance with the advice in the SFRA.

2.62 There is support for the redevelopment of Halldale Quarry, as a brownfield site, but some comments were made that the number of dwellings on the site should be increased, whilst another suggested that it was more suited to employment development rather than residential development.

2.63 Some concerns were raised about the impact of the scale of the Middleton Road development, when combined with the proposed allocation of the site at Middlepeak Quarry. A number of comments were received which expressed concern about the impact that development of this site could have upon ecological and heritage assets associated with both sites, and the extent to which these will be considered in the future assessment of the site through the planning application process.

2.64 It has been suggested that the allocation for Ashbourne Airfield (Phase 2) should be increased in scale as a brownfield site, however other comments express concerns about the sale of the proposed allocation being disproportionate to the size of the town, and the potential impact that the proposed development is likely to have on traffic congestion within the town.

3 NEXT STEPS

3.1 Section 2 above summarises the comments received during the public consultation on the Derbyshire Dales Draft Local Plan. As Members will note it does not set out any Officer recommendations in relation to these comments as work on these are currently still on-going.

3.2 Any proposed changes to the policies set out in the Derbyshire Dales Draft Local Plan will need to be tested through the Sustainability Appraisal and where appropriate, the Habitats Regulations Assessment process to assess the social, economic and environmental impact of such revised policies. They will also need to be subject to an Equalities Impact Assessment to ensure that none of the protected groups are adversely impacted by the policies in the Local Plan. Officer recommendations, taking into account of the results of the Sustainability Appraisal and Equalities Impact Assessment will be reported to the meeting of this Committee.

3.3 Additionally work is on-going on a number of new sites identified as having the potential for allocation for residential development in the Local Plan, as well as the new evidence submitted in respect of sites previously not considered to be suitable for allocation in the Local Plan. Furthermore, the evidence submitted by the landowners of Middlepeak Quarry to justify their proposed increase to the allocation from 220 to
645 dwellings is also subject to review. The outcomes of these workstreams will also be reported to a future meeting of this Committee.

3.4 There are a number of elements of the evidence base that are currently being finalised, including the Traffic and Transportation Assessment, the update of the Strategic Flood Risk Assessment, and the Infrastructure Delivery Plan. The outcomes of these, are likely to influence the Officer recommendations in respect of the policies and proposals to be included within the Local Plan. As such the conclusions and recommendations will be reported to the meeting of this Committee on 11th July 2016.

3.5 Once the review of policies, the updated evidence base and the site assessment work has been completed a revised Derbyshire Dales Local Plan will be prepared. This will form the basis of the Local Plan to be submitted to the Secretary of State and will be presented to the meeting of this Committee on 13th July 2016.

4 RISK ASSESSMENT

4.1 Legal

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Not having an up to date Local Plan in place which provides adequate land for housing places the District Council at risk to residential development being brought forward on appeal rather than on a plan-led basis.

4.2 Financial

The cost of preparing the Derbyshire Dales Local Plan, including any consultation is contained within the District Council’s budget. The financial risk is, therefore, assessed as low.

4.3 Corporate Risk

The Derbyshire Dales Local Plan will be a pivotal tool in the delivery of the Council’s Corporate plan and the Derbyshire Dales and High Peak Sustainable Communities Strategy. In order to fulfil this role it is necessary to ensure that robust evidence-based and “sound” documents are prepared. Failure to do so will undermine the ability of the District Council to achieve its key aims and objectives. In light of the Inspector’s Report the Corporate Risk associated with the preparation of the Local Plan has been reviewed and identified as Medium Risk.

5 OTHER CONSIDERATIONS

In preparing this report, the relevance of the following factors has also been considered: prevention of crime and disorder, equalities, environmental, climate change, health, human rights, personnel and property.

6 CONTACT INFORMATION

Mike Hase, Policy Manager
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E-mail: mike.hase@derbyshiredales.gov.uk
## BACKGROUND PAPERS

<table>
<thead>
<tr>
<th>Description</th>
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<tbody>
<tr>
<td>Individual Responses to Key Issues Consultation</td>
<td>November/December 2015</td>
<td>G/5/P1</td>
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<td>Reports to Local Plan Advisory Committee Report to Council</td>
<td>July &amp; September 2015</td>
<td>G/5/P1</td>
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<td>October 2015 &amp; March 2016</td>
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<td>National Planning Policy Framework</td>
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## ATTACHMENTS

- Appendix 1 - Derbyshire Dales Draft Local Plan Policy Support & Objections
- Appendix 2 - Derbyshire Dales Draft Local Plan Detailed Summary of Representations
APPENDIX 1
Derbyshire Dales Draft Local Plan Policy Support & Objections
# Chapter 8 - Strategic Site Allocations

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<tr>
<th>Site Description</th>
<th>Support</th>
<th>Object</th>
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<tr>
<td>DS1 Land at Ashbourne Airfield (Phase 1), Ashbourne</td>
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<td>DS2 Land to the Rear of Former RBS premises, Darley Dale</td>
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<td>DS3 Land at Stancilite Quarry, Darley Dale</td>
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<td>DS4 Land off Gritstone Road/Pine Wood Road, Matlock</td>
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<td>DS5 Land at Haldon Quarry/Matlock Spa Road, Matlock</td>
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<td>DS6 Land off Middleton Road/Cromford Road, Wirksworth</td>
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<td>DS7 Land at Middle Peak Quarry, Wirksworth</td>
<td>30</td>
<td>15</td>
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<tr>
<td>DS8 Land at Ashbourne Airfield (Phase 2), Ashbourne</td>
<td>30</td>
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APPENDIX 2
Derbyshire Dales Draft Local Plan Detailed Summary of Representations
CHAPTER 1 - INTRODUCTION

KEY ISSUE

PARAGRAPH 1.7

In respect of the Duty to Cooperate Natural England agrees that the strategic matters relevant to our organisation should include the matters that the District Council has identified i.e.; The need to ensure that Local Plan policies afford adequate protection to European Designated Sites (SPA and SAC); The need to carry out a HRA on the effects likely to be generated by the Local Plan on European Sites and way in which effects can be avoided. In addition there are other potential strategic matters which the District Council may want to consider including the following; Impacts from increased air pollution; Recreational impacts on designated sites close to the local authority boundary, Landscape character in relation to opportunities for enhancement, Larger scale green infrastructure and opportunities to increase habitats; create bigger, better joined habitats to support climate change adaptation for wildlife, Conservation of best and most versatile land, in relation to choice of sites for housing/employment. Natural England will fulfil its duty through consulting on statutory consultations.

Chesterfield Borough Council agree that based on evidence to date the Derbyshire Dales’ need to meet its OAN is the only strategic cross boundary issue to be identified. This is the most appropriate time to address this issue given the stage that the Authority it at with the Draft Local Plan preparation. Chesterfield BC like many other authorities within the region are struggling to meet their own housing requirement primarily due to private sector delivery rates remaining low post recession. In order to assist in their response request that DDDC provide detail of the proportion of the unmet need which it is wished that CBC take into account. Unlikely to resolve the issue prior to the end of consultation but are happy to engage in an ongoing dialogue on this issue.

Object to the Plan- why have the District Council not worked in conjunction with and cooperated with surrounding Councils to produce joint plans to meet the overall housing need. There is a need to think strategically and build a new settlement that does not adversely affect existing residents. The District Council should have been more proactive approaching landowners after a strategic review of all available options and cooperated with them to meet housing needs.

The key message from this (which emerged strongly from the previous Local Plan) is that the District Council cannot rely on other surrounding authorities to ‘mop up’ its housing needs and requirements – nor should they expect them to do so. The upshot of this is that the Council’s own Objectively Assessed Housing Needs (OAHN) must be met in full, with a suitable allowance for flexibility, in order to cater for both the locally generated and the wider needs of the Derbyshire Dales, otherwise legitimate housing needs will go un-met and there will be adverse implications on the employment market. This could lead to the distorted age structure of the District being exacerbated as young people are priced out of the market in turn leading to further distortion of the age structure of the Derbyshire Dales. The plan refers to the tendency of rout migration of younger people and the inward migration of older families.

Derbyshire Dales has undertaken an assessment of housing needs for its own administrative area rather than a wider HMA but the
District is not without connections to its surroundings. Derbyshire Dales adjoins seven other Local Planning Authorities (LPA) namely. At the previous Local Plan Examination the Inspector found that “the HMA extends across Derbyshire into East Staffordshire and Sheffield. The Council needs to work closely with other authorities … re-open discussions with adjoining authorities under the provisions of the Duty to Co-operate” (paras 7 and 34 of Inspector’s Note on Examination of Derbyshire Dales Local Plan dated July 2014). When the new Local Plan is submitted for examination a Statement of Co-operation and / or accompanying signed Memorandums of Understanding with neighbouring authorities will have to demonstrate that the Council has satisfied the legal requirements of the Duty and appropriately dealt with any arising unmet housing needs. If the Council is not meeting its full OAHN then the meeting of any unmet needs (425 dwellings) elsewhere should be resolved with neighbouring authorities.

If the Derbyshire Dales Local Plan is to be compliant with the NPPF development should not be subject to such a scale of obligations and policy burdens that viability is threatened (paras 173 & 174). At the moment the Council’s latest SHLA & CIL Viability Study prepared by Cushman & Wakefield dated September 2015 concludes that in “mid to low value areas where the majority of the District’s future development is anticipated to come from is unable to withstand this level of requirements at the current time … to ensure the cumulative impact of all planning gain does not place delivery at risk”. Whilst it is accepted that developers can negotiate lower affordable housing provision on the grounds of viability such negotiations inevitably incur additional costs in terms of both time and money which impairs housing delivery. It is unrealistic to negotiate every site on a one by one basis. The purpose of whole plan viability assessment is to ensure that the bar of policy expectations is not set unrealistically high.

Any submission Plan would need to be accompanied by a signed Memorandum of Understanding with Derbyshire Dales’ neighbouring authorities if the Council are to demonstrate that they cannot meet the OAN in full and that their neighbours have agreed how they will address the unmet need.

Historic England agrees that the need to ensure that the Local Plan contains appropriate policy provision for the historic environment is a strategic matter. Suggest that the strategic landscape features and other designations are likely to continue to be strategic issues (National Park and Derwent Valley Mills World Heritage Site) and would wish to reserve the right to continue working with the District Council on these matters.

English Heritage consider that tourism is a strategic issue in respect of the National Park and Derwent Valley Mills World Heritage Site and reserve the right to continue working with the Authority on these matters.

Elements of evidence base – particularly the Landscape Study require further clarification to demonstrate that the evidence base in respect of the historic environment is sound. The Study in para 1.3.2 refers to the evidence for the Landscape Study – this does not refer to the Historic Environment Record which would provide valuable information about designated and non-designated heritage assets. Para 139 of the NPPF requires that ‘non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets’. It is noted that the HER is referred to later in the document in the settlement analysis sections but it is not clear if
the HER evidence has been used throughout the LSS production. It is unclear whether information form the Local list has been taken into account.

<table>
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<th>Paragraph</th>
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<tr>
<td>4.2.14</td>
<td>Sets out that the 'low, medium and high sensitivity categories' are not a prescriptive matrix for determining sensitivity, and that 'an area of land with low susceptibility to change may still be of high sensitivity due to being of high value'. Paragraph 4.2.15 then sets out that the assessment has been undertaken at a strategic level and detailed surveys at the site or field level would determine variations. The Assessment in the Field section and the assessment sheet in Appendix A show what heritage assets have been, potentially, considered (although the completed forms do not appear to be available on the website) and this includes setting of the heritage asset. This level of detail is considered to be more than just a strategic level as set out in Para 4.2.15. Furthermore, it is not clear how the LSS information has been applied to the housing and employment site allocations in the Draft Plan, and the LSS sets out is has been undertaken in respect of housing allocations only.</td>
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Object to the Landscape Sensitivity Study which has kept within the Council’s administrative boundary and has not explore the potential impact on adjoining areas i.e. housing proposals adjacent to Snitterton at allocation HC2(aa) and HC2(bb) on the National Park. It is a concern that elements of the Duty to Cooperate may not have been taken fully into account.

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In respect of the evidence base and the Landscape Sensitivity Study and Section 6 Results of Assessement - There is an inconsistency within the settlement descriptions in respect of heritage assets, e.g. Listed Buildings are referred to in relation to some of the settlements but not others yet they form part of the make up of that settlement. For example, Stancliffe Hall is a Grade II Listed Building and the associated park is a Registered Park and Garden but their designations are not mentioned as part of the description.

The Landscape Sensitivity Study forms part of the evidence base for the Local Plan, and has been used to direct development away from many of the rural settlements, many of which due to the virtue they are in the countryside have been regarded as high sensitivity. However the fact that they are high sensitivity should not be a reason to prevent organic growth of villages, it is that such expansion should be well planned and location. It is within the most attractive settlements and countryside where there is the most acute and greatest need for affordable housing.

CPRE and others have identified large numbers of vacant beds and properties nationwide. Recommend that the evidence base would justify (positive) policies in the plan to provide incentives to make use of spare capacity in existing properties. (Not the punitive route of the bedroom tax.)

Although Derbyshire County Council does not have statutory responsibilities for the production of Local Plans or Core Strategies that make provision for new housing development, under the requirements of the Duty to Cooperate, DCC works jointly with councils in Derbyshire to assist them prepare their Local Plans and Core Strategies, particularly relating to housing provision. The County Councils officers have assessed the land and property in DCC’s ownership with a view to identifying any that might be suitable to accommodate new housing development. DCC’s officers will continue to work jointly with city, district and borough
The AHEDN included a review of the District’s HMA and functional economic market area (FEMA). This issue had been the subject of extensive discussions during the EIP into the withdrawn DDLPS. The AHEDN indicates that the northern part of the District should be defined as falling within a Sheffield-focused HMA/FEMA with some inter-relationships between the north of the District and High Peak, particularly Buxton. The southern part of the District is considered to fall within a wider Derby-focused HMA/FEMA. The central part of the District is considered to fall within an ‘area of overlap’ between the northern and southern HMAs/FEMAs with influences from Sheffield, Chesterfield and Derby.

In this context, it is considered to be a justified approach that DDDC has contacted all those local authorities in adjoining areas in the Northern HMA and Derby HMA to investigate whether any of the District’s housing shortfall could be accommodated in their areas, given the evidenced HMA and FEMA linkages between Derbyshire Dales District and these nearby areas.

| DDDC should have been in negotiation with all neighbouring authorities not just the PDNP. |

A number of the evidence base documents are out of date. Particularly the transport study. The Plan should be supported by up to date evidence studies.

| The Council's first priority which is to Protect and Enhance the Character and Distinctiveness of the Landscape, Towns and Villages of the area is underpinned by a Landscape Sensitivity Study. This study was also used to assess the extent to which the Local Plan Area can accommodate future growth and the Council’s full objectively assessed need. The aim of the Landscape Sensitivity Study is to form part of the evidence base for the local plan, provide context for the allocation of sites for housing development and in providing a sound basis upon which decision making can be informed with regard to ongoing and future site assessment and the determination of potential planning applications. Object to the outcomes of the Study which in effect re-affirms policy constraints rather than a landscape sensitivity study that looks at an area afresh with development determined by an assessment of landscape quality, the impact of existing built development and where development could be better integrated in landscape terms. The assessment of land was undertaken at a strategic level only and the study acknowledges that variations in landscape impacts could be better determined by further more detailed surveys. |

| The published report provides no guidance on the number of assessments that were taken or where from. A Landscape & Visual Impact Assessment looks at the nature of the receptor and the nature of the effect of development. Judgements are then made upon the susceptibility of the receptor to change arising from the proposal and the value attached to the receptor. Judgements on magnitude are made on the size and scale of the effect, the extent of the area affected and the duration of the effect and its mitigation or reversibility. An LVIA requires a baseline landscape assessment and then an assessment of the impact of that change. It includes an assessment of visual effects including zones of theoretical visibility and the sensitivity of visual receptors. The Wardell Armstrong Report provides none of this detail and no sensitivity analysis. It makes a series of statements and |

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assumptions for example under 6.2.12 the Study states:-

“Old Matlock is a small village connected to the southern edge of Matlock extending southwards on Starkholmes Road. Land to the east of the village rises steeply up from the settlement with high visual prominence and long distance views across the Derwent Valley. Although linier development connects Old Matlock and Starkholmes, it is important the coalescence is not exacerbated further”. Old Matlock is not a village and no assessment is being made about the linier development which connects Old Matlock and Starkholmes. This linier development runs up the hill to the south and does not look over the Derwent Valley but into the Lower Lumsdale Valley for most of its length the linier development is not visible from the Derwent Valley. It is these simplistic and bland statements which bring into question the value and validity of the work. In its plan forum the study juxtaposes Low Sensitivity sites next to high sensitivity sites. In most cases this cannot be justified in landscape terms. Landscape Impact and the sensitivity of landscape require a more subtle approach which is clearly absent from this Study. In its assessment of Darley Dale the Wardell Armstrong study makes no distinction regarding the valley floor and the upper slopes and no distinction regarding the sensitivity of sites in the valley floor adjacent to build development and those on the upper slopes which are visible over a wide area. It is a bland and simplistic assessment which cannot form the basis of good decision making.

The Council’s response to the Wardell Armstrong Study has been variable. A number of key development sites HC2(K), HC2(I), HC2(N), HC2(O), HC2(U), HC2(X), HC2(aa) are all in areas of high sensitivity and this reflects a more nuanced judgement based on local knowledge and experience.

<table>
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<tr>
<th>PARAGRAPH 1.11</th>
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<tr>
<td>It is requested that the ‘Strategic Statement Planning and Health across Derbyshire and Derby’ is mentioned.</td>
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<th>PARAGRAPH 1.26</th>
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<tr>
<td>Consultation with Parish Councils &amp; local people needs to be ongoing &amp; accessible</td>
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<tr>
<td>Exhibition material should have been better. There was nobody present from the Council to answer questions. There was no plan of the District indicating the proposed allocations. There was no book in which to write comments. The exhibition material at its strategic level did not inform local residents of what was proposed in the area and the potential impact on their lives and environment. Local people need a better opportunity to have their say considering that the plan is for the next twenty years.</td>
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<tr>
<td>The District Councils consultation has been flawed, the Council only received 400 responses from the 35,000 documents it sent out, residents in Doveridge did not receive a copy. This does not equate to engaging with the community.</td>
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<tr>
<td>In respect of the public meetings no interest was given by some members of the panel to the extremely valid points being raised by members of the public. Felt it was rude and people weren’t given any empathy or concern.</td>
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<tr>
<td>Object to and protest against the use of the survey software. To utilise this for a long and detailed survey when no save facility is offered is unacceptable. It is not realistic to expect users to complete the survey at one sitting and there is no warning that it must be completed in one attempt or all work is lost. This is hardly encouragement to community participation.</td>
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<tr>
<td>The online survey was not user friendly and very difficult to use. Improvements to the consultation method are required to ensure</td>
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all feel able to respond.

The community has not been consulted properly, the online questionnaire is very limited in scope and the consultation has effectively excluded residents who have no internet access.

Fears that people may have lost interest and confidence in our Planning Department and in the Local Democratic Systems. Spent a large amount of time and effort in workshops, on questionnaires and in consultation meetings to help to prepare the first Local Plan. We all made our views clearly known and supported the Parish Council in resisting large scale development in Tansley. The consultation exercise appeared to me to be meaningless – why bother wasting all that time, effort and money if people’s views are going to be ignored? Expresses concern that the public consultations are just a cosmetic exercise – a box ticking event.

. Despite the opening statement to the survey monkey, communities, residents or businesses have not been listened to at all. It is undemocratic to listen, but not take account of the view of local communities.

Support the Council in its efforts to take the opinions of their constituents into account in the production of the District Plan 2015-2016.

**SUSTAINABILITY APPRAISAL**

Natural England welcomes the Sustainability Appraisal report and are generally satisfied that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive (2001/42/EC) and associated guidance.

The principles of the SA are supported, however it is noted that a many number of the allocations are predicted to have adverse impacts on the key issues identified in the Sustainability Appraisal.

The Environment Agency has been working with Derbyshire Dales District Council and JBA Consulting on the preparation of the update to the existing SFRA. The 2016 update will have regard to more recent flooding information than the 2008 version it will replace. The SA report correctly states that the current SFRA is out of date. The new SFRA is welcomed and will assist the SA process by addressing the data gap that has been identified within the SA.

All references to 'Heritage England' within the document should be revised to read 'Historic England' for clarity. Part 2 Scoping Report - list of documents Table 11 for the Townscape Quality, Historic and Cultural Heritage section - it is noted that some of the documents we previously suggested should be referenced in the list have not been included. We consider that the UNESCO World Heritage Convention 1972 is particularly relevant since part of the Derwent Valley Mills WHS lies within the plan area. We maintain our previous comments in relation to the list of documents since they are key documents relevant to the Derbyshire Dales.

The following revisions should be made to Part 2 Annex B of the SA Report:-

13.7 - The reference to 'English Heritage' should be replaced with 'Historic England'.
13.8 - The reference to non-designated heritage assets and the numbers of listed buildings are noted and welcomed.

The references to non-designated heritage assets within the current document are welcomed e.g. Part 2 Annex B and Part 3 Table 6.1. This provides the clarity which was previously recommended by Historic England and addresses previous concerns.

The following change should be made to Page 27 of Part 3 of the SA - The fourth bullet point refers to SA Objective 15 (which is heritage assets) but goes on to refer to landscape and natural resources which is SA Objective 13 - confirmation of which SA Objective is being referred to is necessary.

Assessment matrices - Table 4.3 sets out that in respect of draft plan policy HC2 Housing Land Allocations potential significant negative effects are identified in relation to SA15 (heritage assets), amongst others. Historic England has addressed site assessment information in a table format in our response to the draft local plan.

English Heritage state in respect of the SA any uncertain or negative effects in relation to the historic environment are of concern and indicate that further work is required to inform the process resulting in either confirmation that a site is not suitable for allocation, or that effects can be mitigated to a level that would mean any effects would be neutral or positive.

Council should carry out an assessment of all 'strategic scale' proposals through this important evidence base development plan document. Particularly in the case of Wirksworth as in the previous iteration of the Local Plan provision for housing there was significantly lower. Refers the council to the Congent Land Case. New proposal of a Sustainable Urban Expansion through Hc2ee and Hc2ff would need to be analysed within the SA.
CHAPTER 2 – PORTRAIT OF THE DERBYSHIRE DALES

KEY ISSUE

OVERARCHING COMMENTS
Support - this chapter sets out a clear portrait of the natural environment within the Derbyshire Dales. Particularly welcome the sections on Landscape and Natural Heritage and Environmental Quality and Health.

PARAGRAPH 2.1
The effects of the National Park should be reconsidered. The Plan area is having to compensate for this and is expected to accommodate far more houses. Other National Parks have received recognition of this issue and had lower housing targets agreed. The Authority should refer to the case recently approved at South Downs National Park.

The Peak District National Park should consider releasing properties/land for local housing needs. The North Yorkshire Moors National Park has recently done this.

The existence of the National Park adjacent to our area means that the rest of the Derbyshire Dales area must accept proportionately more houses. This seems to be unfair and should be challenged.

Requests that DDDC lobby the Government with regard to the fact that because development is restricted in the Peak District (rightly so), there is consequently a serious over concentration of proposed development in the remainder of Derbyshire, and particularly Derbyshire Dales.

It is noted that the task of the planning authority in meeting the governments housing target of 6,440 dwellings is made challenging by the virtue of the fact that 50% of the district lies within the Peak District National Park. A modest level of extra house building should be allowed in the Park to help support families and allow subsequent generations the opportunity to live in the Park.

The area covered by the Derbyshire Dales Plan is unusual in two respects:
Firstly, the Local Plan area only relates to part of the District which lies outside the Peak Park. The remainder is covered by the Peak District National Park Planning Authority, and Secondly, it comprises an elongated geographical area which covers a wide variety of smaller towns and villages, which is effectively composed of at least four wider strategic housing market areas – looking eastwards to Derby, north-westwards towards Manchester, north-eastwards towards Sheffield westwards towards Stoke on Trent and southwards towards Burton and Birmingham. Nevertheless, the District has been interpreted by consultants, GL Hearn, as a single housing market area for Local Plan purposes. Doveridge very clearly looks towards Uttoxeter, Derby and Stoke on Trent all of which are outside the District. Brailsford falls clearly within the effective housing market area for Derby and lies within 20 minutes’ drive. The former Derbyshire Structure Plan incorporated the south-eastern part of Derbyshire Dales within the Derby Sub-Area at that time.

PARAGRAPH 2.2
With 24% of the population of DD living within “small villages and hamlets” it is important that the sustainability of these rural settlements is enhanced, rather than become fossilised, where only the wealthy and retired can afford to live. These settlements need to house single people (both young and old) and growing families as well.
PARAGRAPH 2.15
Suggest that the Plan should quantify listed buildings at Grade I and Grade II* (highest levels of designation). Certainly should quantify number of Scheduled Monuments within the plan area, as these are equivalent in status to Grade I Listed.

PARAGRAPH 2.17
Question relevance of mentioning ‘county treasures’ as this process has not been active since the 1990s – this should be replaced with reference to the Historic Environment Record which includes assets of historic, architectural, artistic and archaeological interest (as per Historic England conservation principles)

PARAGRAPH 2.18
Welcomes all reference to the Derwent Valley Mills World Heritage Site.

PARAGRAPH 2.21
Welcome that this section of the Plan details the Water Framework Directive (WFD). Advise however that a more comprehensive review of WFD would be of benefit to the Plan and request the following additional wording be added;

The Water Framework Directive aims to achieve ‘Good’ Status for all surface and ground waters. It is managed through River Basin Districts, each River Basin District has its’ own River Basin Management Plans (RBMPs). RBMPs set out how organisations, stakeholders & communities will work together to protect and improve the water environment. Local authorities provide a key role in the management of the water environment. The Water Framework Directive and the River Basin Management Plans must be taken into account to ensure sustainable development.

TABLE 1
Welcome Table 1 which sets out the ecological status of the water bodies within the District. Advise that the table is outdated, due to the recent release of the second cycle of River Basin Management Plans. New classifications for water bodies have been released in 2015. An updated Table 1 must be provided for submission. Refer to the most recent status of the relevant waterbodies via;

http://environment.data.gov.uk/catchment-planning/

PARAGRAPH 2.25
The figure for commuting is higher in Doveridge due to the lack of local opportunities.

PARAGRAPH 2.31
Housing that is more affordable to local residents is needed and smaller households are required than those being proposed in the recent spate of development. The Plan should do more to address this issue.

PARAGRAPH 2.32
The Plan acknowledges the lack of services, facilities and public transport in the southern villages of the plan area. There is a significant
reliance on private cars due to the lack of alternative means of public transport, which of course leads to higher carbon emissions in this area. There is a national cycle route and a footpath over the fields to Uttoxeter (a different county) but there is really no option in the Local Plan for improved facilities for sport and recreation to maintain the health and wellbeing of Doveridge residents. Just because there is a lack of services should not be a reason to prevent villages from growing and providing the housing and employment that they need to survive. These issues are similar to other rural areas, not just those within Derbyshire Dales.

**PARAGRAPH 2.37**

The Plan should add reference to health. Request that a description of the health of residents in the District including, for example life expectancy, Index of Multiple Deprivation, fuel poverty, health issues particularly related to an ageing population, weight and lifestyle factors that have cross-cutting implications that are being addressed to paragraph 2.37. It is welcomed that the value of the Green Infrastructure (GI) network is recognised for the good health and wellbeing of communities in 2.23 and 2.35. In the same way, the link could be given greater emphasis in 2.37 between health and wellbeing and enhancing job opportunities and protecting the District’s good air and water quality, high quality landscape and rich cultural, heritage and recreational assets to benefit the health, wellbeing and quality of life of residents, workers and visitors.

**KEY ISSUE 3**

Support that carbon reduction will be addressed as a key issue.

Climate change impacts should have a wider focus than carbon emissions in isolation. The climate will continue to change, irrespective of any reductions to greenhouse gas. Increased flooding is expected as a result of climate change and will affect people, properties, infrastructure and the environment. Biodiversity is already declining due to habitat loss through new development and diffuse pollution and climate change places even more pressure on wildlife. Additionally, climate change impacts on the demand for water as well as its availability and quality. Derbyshire Dales District Council is a co-deliver for the Water Framework Directive and an enhanced water environment should feature as a key indicator for the benefit of people and wildlife.

The issue of flood risk should be identified as a key issue, either under Key Issue 3 or as a stand-alone issue.

**KEY ISSUE 4**

The type, size and tenure of housing being proposed do not address the needs of the ageing population. Mixes of housing types are required with bungalows to allow for downsizing and starter homes for locals. This key issue must be appropriately addressed in the Plan.

**KEY ISSUE 5**

In rural areas the motor car will be the predominant mode of transport. This factor needs to considered in all development proposals, even where walking, cycling and public transport are options. The Department for Transport (DoT) National Policy Statement for National Networks states on page 14 that “.....it is not realistic for public transport, walking or cycling to represent a viable alternative to the private car for all journeys particularly in rural areas.....”

A number of allocations are in locations where managing travel demand and improving accessibility cannot be addressed. The lack of
public transport services does not allow for improving accessibility – Doveridge is not a suitable place for new development.

**KEY ISSUE 6**

Too aspirational and gives no indication of how it could be achieved. Key Issue 6 (Protecting and Enhancing Community Infrastructure) is too aspirational and contains no indication as to how it will be achieved.

**KEY ISSUE 3, 4 AND 8**

The plan could indicate that these key issues 3, 4 and 8 are linked more robustly than at present. The plan area has a population where many residents are within fuel poverty. New developments of all buildings should therefore strive to exceed current insulation standards so that the average insulation of properties is increased and the consumption of fuel is reduced. This will also begin to address the issue of fuel poverty if all affordable housing was built to be operationally carbon neutral. Although central guidance has avoided mandating a time-scale for CSH level 6, the fuel poverty in our District, should allow the plan to suggest that these standards may be used in the assessment of planning applications.

**KEY ISSUE 11**

A new Policy (KI 11) needs to be inserted entitled “Enhancing rural communities”. This should detail the need for new housing and employment to support rural communities, as well as the retention of services (schools, shops, pubs).

**KEY ISSUE 14**

KI 4 ‘Meeting Local Housing Needs’ should also address the needs of those who are migrating to the District from other areas, as well as simply those people who are already resident. This means addressing the requirement for market housing as well as affordable homes, and catering for young people (who might otherwise move elsewhere) as well as the elderly who are already settled. The logic of focusing the majority of new development in towns and villages with basic services, as outlined in KI 6, KI 8 and KI 9 is sensible. However, the latter should refer to ‘villages’ as well as ‘Town Centres’ in order to be consistent with the text in paragraph 2, 47 of the Plan.

**KEY ISSUE 19**

Supports the acknowledgement at KI 9 ‘Maintaining and Strengthening the Vitality and Viability of Town Centres’ that ensuring village centres continue to be vibrant and attractive is essential. Recommends that the title to the Key Issue is amended to include ‘village centres’ and should read as “KI 9 Maintaining and Strengthening the Vitality and Viability of Town and Village Centres.”
### CHAPTER 3 – SPATIAL VISION, AIMS AND OBJECTIVES

#### KEY ISSUE

#### PARAGRAPH 3.1

The Town Council wishes to express its lack of confidence in both the process and the content of the draft Local Plan as it affects Darley Dale.

Thank you for providing the opportunity to comment on the Draft Local Plan. Congratulate Officers and Members of the Council on drawing up a robust (other than objections to Snitterton Road site) and imaginative scheme that should serve the District well until 2033. Appreciate difficult task to satisfy the demands of Central Government and ensure future economic, employment and residential development can be undertaken, whilst still protecting those values that make Derbyshire Dales such a unique place.

#### PARAGRAPH 3.4

Last sentence refers to ‘natural and built heritage assets’. Not clear whether this is intentional, but it is recommended that wording reflects that set out in Key Issue one and is revised to read ‘…natural, built and historic environments and their character…’ or similar alternative. In terms of the historic environment, it is recommended that ‘preserved’ be replaced with ‘conserved’ to reflect the terminology of the NPPF.

#### PARAGRAPH 3.4 - SPATIAL VISION

Support for recognition of the need to preserve and enhance ‘the area’s valuable and distinctive natural and built heritage assets and its character’. The Vision helpfully refers to landscape character, the character Market Towns and the character of the district more generally.

Notes that the Vision covers the protection of the Derbyshire Dales landscape, the mitigation for climate change and the enhancement of greenspace areas which is welcome.

Supported, suggested that on page 23 in the 5th paragraph the following words are added ‘…will be supported by the protection and enhancement of areas of open and green space within and around them’. Need to ensure vision is delivered in particular:

The landscape of the Derbyshire Dales is a complex combination of physical and cultural elements, developed over centuries to produce a landscape of particularly high quality which will be protected and enhanced.

The character of the Derbyshire Dales will be protected and enhanced with care taken to ensure new development is well integrated with its surroundings.

The integrity of our towns and villages will be maintained by ensuring that there is appropriate separation between settlements, in particular between Matlock and Darley Dale along the A6 corridor.

Not positively prepared, not a plan that seeks to use planning to gain the best for a community. For example in allocating 741 dwellings in Matlock in addition to the 800 or so existing commitments how is this level of development going to impact upon the community? What
are the impacts on health and social services; on educational services; will there be congestion? What will be the impact on existing leisure services etc., etc. These fundamental concerns if assessed would allow developers to fund appropriate mitigation and give back to the community facilities which protect their existing quality of life. Planning positively requires a vision for each part of the Plan area and an overarching vision for the area as a whole. The submitted Local Plan Spatial Vision is just a series of un-connected statements of intent which do not bind together into a cohesive whole.

<table>
<thead>
<tr>
<th>Broadly support the Spatial Vision identified in the draft Local Plan. Furthermore, it is appropriate for Brailsford to be recognised as a Large Town for which an improved range of amenities and facilities including schools and healthcare provision, will be planned for over the Plan period. However, the Spatial Vision should also acknowledge that such provision (and other community benefits) can be facilitated through the delivery of viable, market housing on greenfield sites and secured via both Planning Obligations and the Community Infrastructure Levy (CIL). Should be acknowledged that residential development plays an important role in ensuring the sustainability and vitality of smaller, more rural communities and can contribute towards improved facilities and infrastructure through planning contributions.</th>
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<tr>
<th>Vision supported as it recognises the sustainability of larger villages such as Doveridge and the role that they can play in helping to meet future housing requirements over the plan period.</th>
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<tr>
<th>Broadly support this policy. Larger villages, including Doveridge, which benefit from a wider range of amenities and facilities will be supported by the modest scale of growth expected within those communities. Doveridge for example, is well-contained, has a wide range of facilities including a primary school and a regular hourly bus service has good road access (via the A50) to wider employment, services and facilities in Uttoxeter. It also has a modest capacity for growth with relatively less sensitive land.</th>
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</table>

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<tr>
<th>The vision does not sufficiently identify the main environmental issues for the District or the improvements to the natural environment that could be achieved over the Plan period. Not clear how the environment will be protected and enhanced. District has many watercourses that are important natural assets in need of protection and enhancement. Vision needs to include the aspiration for the District’s waterbodies to reach and maintain good ecological status. New development can present opportunities to work with the water environment. Vision should be clear on its intentions to bring about positive environmental change whilst supporting social and economic objectives.</th>
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<tr>
<th>How can the green spaces around the villages, which are supposed to be protected and enhanced, act as important resources for recreation use if they are built upon?</th>
</tr>
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<tr>
<th>Keen to see that 'opportunities to secure improvements in accessibility to services and facilities' will be seized.</th>
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</table>

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<tr>
<th>The last sentence of Vision refers to ‘natural and built heritage assets’. It is not clear whether this is intentional, but it is recommended that wording reflects that set out in Key Issue one and is revised to read ‘…natural, built and historic environments and their character…’ or similar alternative. In terms of the historic environment, it is recommended that ‘preserved’ be replaced with ‘conserved’ to reflect the terminology of the NPPF.</th>
</tr>
</thead>
</table>

| DDDC must recognise that funding for delivering affordable houses is diminishing. DDDC must take a pragmatic approach to delivering |
affordable houses through on-site cross-subsidy with open market housing. Most rural settlements require an element of new housing and often this cannot be delivered within the confines of the built area, but could be carefully planned and designed to a high standard adjacent to the settlement.

The Vision does not refer to the historic environment (other than Derwent Valley Mills World Heritage Site) or natural and built heritage assets. Request amendment to specifically refer to the valuable historic environment of Derbyshire Dales and the desirability of conserving and enhancing built and natural heritage assets.

Would like to see a stronger reference to the protection and enhancement of biodiversity and nature conservation within the vision.

Clifton has not been mentioned. Concerned that the support for the local primary school and recreational ground will reduce to allow focus on other developing areas. Would like confirmation that local smaller villages will continue to receive support to allow growth and sustainability in these rural areas?

Darley Dale, the largest and most sustainable village with greatest potential for growth is not mentioned! This is a fundamental flaw in the spatial vision which has distorted policy considerations.

It is stated that larger villages (including Doveridge) will benefit from development with an improved range of amenities and facilities. However improved facilities if they happen at all, will not occur until well after any housing development.

Reliance on the private car is high, having an impact on local traffic and not being sustainable. Fail to understand how the adverse effects of traffic in Doveridge (noise, air pollution, global warming) are to be minimised by this policy.

The statement which says Tansley is to get schools and healthcare provision is very intriguing. This is not the case as a member of the DDDC at the public exhibition conceded.

**PARAGRAPHS 3.5**

Accepts that there is a need for housing in Derbyshire, but the total proposed is too high especially for Brailsford. Present developments are not within keeping of the existing properties. More need for bungalows. The objectives in S03 are not being met nor are those in S04.

Regrettable that objectives SO6 and SO7 have not been given due weight. The failure to fully meet this objective by allocating sufficient land means the Draft Local Plan is not fit for purpose. It is similarly regrettable that objectives SO14 and SO15 have not been given due weight.

**PARAGRAPHS 3.6**

The importance/role of the minerals industry should be given greater prominence throughout the Local Plan because local mineral reserves play a key role in meeting local building demand and growth needs.

The efficient use of minerals resources and, where appropriate, the need for non-mineral development to avoid the unnecessary sterilisation of minerals, should be referenced throughout the Local Plan. Clear from the 'Derbyshire, Derby City and Peak District National Park Local Aggregate Assessment (2015)' that significant limestone reserves exist in the locality, a proportion of which are within inactive/dormant mineral sites. Likely that some of these sites will not be worked in the future/resume production and could more
appropriately be restored to other beneficial uses. The safeguarding of these reserves should be afforded careful consideration on a
case-by-case basis. The Council’s draft Local Plan objectives (do not make any reference to the need to ensure, where appropriate, that
minerals are not needlessly sterilised/ active minerals operations are not unnecessarily hindered by non-minerals development. Would
welcome an additional objective to this effect. Helpful if the Plan made reference to the requirement for strategic housing and employment
proposals to ensure, where appropriate, that the needless sterilisation of minerals is avoided.

The strategic objectives are generally supported, in particular SO2 relating to landscape character, biodiversity and the historic
environment. Request a strategic objective to protect the setting of the National Park, reflecting Key Issue 2 (p18).

**STRATEGIC OBJECTIVE SO1**
Full support expressed.

**STRATEGIC OBJECTIVE SO2**
Full support expressed.
Welcome inclusion of historic environment in this high level strategic policy
Welcome inclusion of conserving and enhancing the historic environment

**STRATEGIC OBJECTIVE SO3**
Full support expressed.

Two consultees who feel objective should read: To ensure that the design of new development is of high quality, promotes local
distinctiveness, is operationally carbon neutral and integrates effectively with its setting

**STRATEGIC OBJECTIVE SO4**
Full support expressed.

**STRATEGIC OBJECTIVE SO5**
Full support expressed.

**STRATEGIC OBJECTIVE SO6**
Objective supported - must be one of the key objectives of the plan to ensure that full objectively assessed needs are met as required by
the National Planning Policy Framework (the Framework
Consistent with the requirements of the NPPF and NPPG.

Needs to be done on a settlement by settlement basis

Objective should also refer to meeting the objectively assessed housing needs of the housing market area (HMA) and not just the
District, to reflect any potentially unmet needs arising under the Duty to Co-operate.

Needs a caveat that meeting housing needs is ‘subject to the consideration of other Strategic Objectives of the Local Plan’.

SO6 states that the Plan will ‘meet the objectively assessed needs of the District, subject to the consideration of other Strategic
Objectives of the Local Plan’. This caveat allows the Council too much freedom to compromise on this objective without addressing the
consequences of providing a shortfall – which the public may not fully appreciate - and which resulted in the withdrawal of the previous Local Plan. The overall requirement for housing should not be constrained below the Council’s objectively assessed need.

**STRATEGIC OBJECTIVE SO10**
Welcomed that there is a specific objective to promote healthy lifestyles.

**STRATEGIC OBJECTIVE SO11**
Only 10% of one of the allocated sites are on brownfield land, while all of the remaining sites are on greenfield land. Contrary to the policy.

**STRATEGIC OBJECTIVE SO12**
Wording should be: To facilitate low carbon development and energy generation from renewable sources, of a type, and scale appropriate to its location. In particular developers should provide evidence of the expected carbon balance of the development. Carbon neutral homes within the affordable housing financial guidance will be regarded favourably. Sourcing materials and skilled craftsmen locally will reinforce the economy and reduce commuting during the build.

**STRATEGIC OBJECTIVE SO13**
Objective welcomed as a means of reducing demand to travel by private car.

Objective should read: To increase the opportunities for travel using sustainable forms of transport by securing improvements to public transport, walking and cycling infrastructure. Consideration will be given to the provision of cycle tracks, secure parking for cycles, facilities for electric cars, and good level footpaths in the market towns.

**STRATEGIC OBJECTIVE SO17**
Objective will not be met for Doveridge, as we cannot get to our ‘local’ market town by any means other than by private car. The environmental role of sustainability cannot be met for Doveridge. Building on open fields, (2 of the 3 sites proposed by the council in Doveridge for development are outside the settlement framework boundary) surely cannot protect or enhance the natural, built or historic environment and therefore it cannot help 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.

**PARAGRAPH 3.8**
Welcome and support the range of environmental issues identified, however ask for the following amendments to be included to Table 2 which shows the links between the key issues and the Strategic objectives: SO9 contains elements of both social and environmental themes which are not intrinsically linked. The Plan would benefit greatly if the water environment is considered as an environmental objective. Ask that references to flooding, and climate change are included under SO5 (as shown below) and a new standalone objective created under the theme ‘Protecting Derbyshire Dales Character’ as follows: To promote development that does not have a negative impact on water quality, either directly through pollution of surface or ground water or indirectly through overloading of the sewerage system and Wastewater Treatment Works. SO1 - To protect enhance and expand the Green / Blue Infrastructure Network. SO2: To maintain, enhance, conserve and protect the areas distinct landscape characteristics including (rivers, canals, reservoirs, streams,
ditches, drains, ponds and wetland areas) biodiversity, and cultural and historic environment. SO5: To address, mitigate and adapt to the effects of climate change on people, wildlife and places, matching the vulnerability of land use to identify flood risk, manage surface water in a sustainable manner and make the most efficient use of natural resources (including water) to reduce the causes of climate change.

| Protecting Derbyshire Dales Character is a highly commendable theme followed through to key issues and strategic objectives. All objectives will benefit the health, wellbeing and quality of life of all sectors of the community. |
| Considered that the links between Key Issues and Strategic Objectives set out in Table 2 are clearly defined. |
| Concerned as to the actual delivery of this objective of protection and management, especially in relation to the Matlock to Darley Dale A6 Corridor and some housing, mixed use and employment allocations. |
| A local plan must be positively prepared. The Draft Local Plan’s Key Issues start with policy KI 1 which is about protecting and enhancing character and distinctiveness of the landscape towns and villages in Plan Area. This essentially sets the tone for a plan which is at its heart is anti-development. Meeting Local Housing Needs is the fourth priority while strengthening the rural economy is the eighth key issue. The plan is not forward looking, it does not embrace change; it does not seek to improve opportunities for young people or for business and it does not meet the assessed housing or employment needs of the area. |
CHAPTER 4 – THE SPATIAL STRATEGY

KEY ISSUE

PARAGRAPH 4.2
It is important that housing is delivered within the settlement in which the need arises otherwise the cohesiveness of the community can become damaged. New housing will also allow movement into the village which can help to sustain and enhance village community.

PARAGRAPH 4.5
Paragraph 15 states that all plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should will be applied locally. The following should be added:
Developers should give an indication of the expected energy consumption per annum to maintain a comfortable temperature for an aging population. A central site for heating and energy provision of a larger development will be regarded favourably.

Wording of this policy should be changed to: Paragraph 15 states that all plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption will be applied locally. I believe the following should be added:
Developers should give an indication of the expected energy consumption per annum to maintain a comfortable temperature for an aging population. A central site for heating and energy provision of a larger development will be regarded favourably.

POLICY S1- PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT
Development can only be sustainable when it is in proportion to the area being considered, the scale of development proposed in tier three settlements is not sustainable.

To be sustainable development should be based on strong environmental principles, exceeding national guidelines.

The policy enables developers to build where they like at the communities expense. The policy and Plan is not sustainable – the Plan directs development towards greenfields, when brownfield sites and quarries are available – this is not sustainable development.

Development within the Plan is not sustainable as the proposed increase in population is not supported by appropriate levels of infrastructure. For instance the proposed additional development of 1700 dwellings in Ashbourne is not sustainable unless solutions to existing infrastructure issues such as roads and supporting community facilities are sought before development commences.

The sites proposed in the Plan are not truly sustainable and do not accord with policy S1, for instance sites are not accessible by sustainable means of transport.

Support for the presumption in favour of sustainable development, however the Plan fails in many ways to meet the requirements of sustainability. It fails to balance employment and housing and fails to deliver housing in sustainable locations to minimise commuting: it fails to protect the environment; fails to address the remediation of derelict brownfield sites and fails to make the area more economically sustainable by making it more attractive for tourism and by helping to create jobs for young people. The Plan fails to meet the economic, social and environmental roles set out within the NPPF.

The presumption in favour of sustainable development should be in favour of protecting the heritage of the Derbyshire Dales and its unique
landscape, the main attraction is tourism and the Draft Local Plan has conflicting policies which will not protect the character and attractiveness of the area. Development should not be detrimental to quality of life or landscape characteristics – the environmental dimension of sustainable development.

Sustainable development means the equitable balance of economic, social and environmental aspects; therefore homes and jobs should be co-located without the need for excessive travel.

The expression of this policy in the Plan and proposed allocations fails to adequately reflect the proper balance demanded for economic, social and environmental roles. The Plan fails to recognise that development should be on land of the right type and in the right place. It fails to prevent development where there is too little infrastructure and ignores the need to protect the natural and historic environment. It allows for the overdevelopment of rural areas which is not sustainable.

The concept of a sustainable new village to accommodate the obligations of the Plan should be considered.

Support the clarity in draft Policy S1 as to how the presumption in favour of sustainable development will be applied in the Derbyshire Dales and the commitment to work proactively with agents to find solutions is welcomed. The policy reflects the positive direction within paragraph 14 of the NPPF and creates a proactive framework for decision making.

PARAGRAPH 4.7

The strength of views from Brailsford village on the proposals means that the developments as proposed cannot be a collective vision as set out in this paragraph.

POLICY S2 – SUSTAINABLE DEVELOPMENT PRINCIPLES

The bullet point relating to travel needs to be amended to allow development in the countryside and rural villages where it would enhance or maintain the vitality of rural communities.

Support for the principles listed within the policy to deliver sustainable development, however the allocations within the Plan do not accord with the criteria within the Policy. The allocations do not make a positive contribution towards sustainable development, with no supporting infrastructure or employment opportunities provided.

This policy identifies sustainable development only by reference to development which “protects, conserves and enhances the built and natural environment of the plan area”. This is a very restrictive view of sustainable development; the policy should contribute to all elements of sustainable development – social, economic and environmental. Policy S2 therefore fails to describe sustainable development properly and elevates the protection of the built and natural environment above all others. It also identifies 17 criteria which is little more than a checklist which has no place in a policy. These three dimensions require local plan policies to contribute to building a strong economy, ensuring that sufficient land is available of the right type in the right locations that development supports strong, vibrant and healthy communities with jobs and homes with good services and a high quality built environment.

The principles of the policy are sound, however development on brownfield land must be a priority and this is not evident within the policy as drafted.

First sentence of the policy should be amended to “which either protects, conserves or enhances”
Policy principles are supported, however sites for allocation are on greenfield land, without any supporting economic opportunities, in locations where accessibility by foot, bicycle or public transport is limited and where there will be environmental impacts such as increasing flood risk and adversely impacting upon biodiversity. Large allocations will detrimentally affect local infrastructure and are not sustainable. The more sites the Plan has to allocate to meet higher housing numbers, the more it has to look to sites that are less compatible with these principles.

Greater emphasis is required for minimising the need to travel by promoting development in locations with a broad range of jobs, a large proportion of residents travel out of the area for employment.

The policy should recognise the need for appropriate infrastructure to ensure development is sustainable. Policy should recognise the need for Drs surgeries, schools etc. to support an increasing population.

Sustainable development principles are excellent; however the Plans proposals are directly at variance with these principles. This is because it is impossible to provide a sustainable solution given unrealistic housing targets imposed upon it unless either (a) a serious attempt is made to address the National Park effects or (b) serious consideration is given to the proposal for a new settlement. Principles in Policy S2 should inform the whole Plan.

Support policy criteria to direct most development needs within or adjacent to settlement boundaries and by having regard to the defined settlement hierarchy.

Policy states that development should be ‘preserving and where possible enhancing the distinct Peak District Character, landscape and townscape, including the setting of settlements both within the Plan area and its surrounding areas including the Peak District National Park’. Proposed developments contravene this policy notably HC2 (aa) which is on the edge of the National Pak and development would significantly undermine the character and landscape of this area of unspoilt countryside.

Additional text to be inserted requiring operational carbon neutral homes or utilising a central site for heating.

Definition of sustainability and the criteria against which sites have been included/excluded are incorrect. A wide range of services are now available online such as access to shopping, post office, banking etc. – sites and locations have been incorrectly disregarded or included unnecessarily.

Kniveton, Hognaston and Carsington should be considered sustainable settlements.

Many areas included in the Plan are not sustainable economically or socially. The proposal are not sustainable environmentally given this is the Derbyshire Dales.

There is no requirement to focus development towards expansion of the main settlements to the extent to which this policy does – the NPPF allows for new properly planned settlements and this option should be considered.

The policy should require the reuse of numerous empty and unused properties.

Object to S2 because its content is not being applied correctly in Tansley. The building on greenfield sites does not meet the criterion of making efficient and effective use of land, the number of houses proposed is not in keeping. Tansley is on the edge of Lumsdale Conservation Area yet plans include a large housing estate right next to this heritage asset. Development in Tansley does not tally with the
Derbyshire County council is planning to withdraw the subsidy for the village’s only bus from October 2017. This will leave the village with public transport, no shops, healthcare and minimal job opportunities. Development in the village will inevitably put a strain on existing infrastructure and facilities.

Welcome the policy as it establishes a framework for the achievement of sustainable development, particularly welcome the principles of preserving and enhancing the Peak District character, minimising damage to nature conservation and ensuring suitable mitigation, ensuring no adverse effects on European Sites and the enhancement of ecological sites and green infrastructure to achieve a net increase in biodiversity.

Support for the policy, in particular the identification that most development needs will be met within or adjacent to existing communities having regard to the defined settlement hierarchy and that development should provide for a mix of house types and tenure to meet the needs of existing and future residents in sustainable locations. It is important that this policy delivers an element of flexibility in the location of new development to ensure that deliverable sites can be brought forward.

Highways England consider that this policy seeks to address the issue of managing travel demand and improving accessibility, through stating that development will be supported that minimises the need to travel by promoting development in locations with minimal reliance on the private car.

The sites proposed in Doveridge are all on greenfields and therefore do not comply with the principles of policy S2.

The Coal Authority supports policy S2 and the identification that land stability issues should be addressed as part of development proposals.

The Council should adhere to the principles of sustainable development and support the intention of adhering to the settlement hierarchy. However the policy should reflect the reality of circumstances in the Dales where few communities have access to a wide range of employment opportunities or regular public transport. The reference to ‘minimal reliance on the private car’ needs to be changed to ‘scope for reduced reliance on the private car’ or something similar.

Support is given to Policy S2 in ensuring that development should be sustainable by reference to the criteria within the policy. In particular Brailsford Parish Council concurs with the first bullet point to Policy S2 that looks to direct most development needs within or adjacent to settlement boundaries and by having regard to the defined settlement hierarchy.

The Policy does not reflect the NPPF – the first sentence requires that development protects, conserves and enhances the built and natural environment, whereas the main focus of the NPPF is a balancing exercise of the harms against the benefits with the presumption in favour of sustainable development being at the heart of decision making.

Bullet point 8, amend text to read - ‘Avoid’ the risk of damage to areas of importance for nature conservation and/or landscape value, both directly and indirectly and ensuring that ‘where avoidance is not possible,’ there is suitable mitigation to address any adverse effects.

Bullet point 9, amend text to read – Encouraging the protection and prudent use of natural resources (including water), by promoting water
efficiency, water conservation, pollution prevention and minimising waste and increasing recycling.

Point 11, amend text to read - Seeking to secure high quality, locally distinctive and inclusive design ‘and layout’ in all development; Point 12, amend text to read - ‘Taking into account the impacts of climate change by’ following a sequential approach to flood risk that directs development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere;

Point 13, amend text to read - ‘Giving priority to’ the use of Sustainable Drainage Systems to limit surface water run-off, provide local amenity value, and improve and protect the District’s water quality and groundwater resources from potentially polluting development in line with the objectives of the Water Framework Directive.

Point 17, amend text to read - Encouraging development proposals to protect, conserve and promote the enhancement of ecological sites, blue and green infrastructure and achieve a net increase in biodiversity overall.

Amend 4th bullet point is recommended that the fourth bullet point begins with ‘Conserving’ in line with NPPF terminology for the historic environment as this would address all heritage assets concisely. ‘Preserve’ by itself could be interpreted as relating to conservation areas only rather than all heritage assets.

Welcome policies in favour of development on brownfield sites. The degree of enhancement of all characteristics – visual and other impacts should be given more weight in the context of brownfield sites redevelopment.

Policy is supported due to the positive benefits for health and wellbeing.

Bullet point 5, it won’t always be appropriate to include a variety of types and tenures on every housing scheme – therefore the words ‘where appropriate’, need to be inserted against this criterion.

Whilst redevelopment of brownfield sites should, of course, be supported in the draft Local Plan, viability issues may prevent other social benefits such as affordable housing being provided at the level required by policy due to high abnormal costs associated with remediation. The Council should, therefore, commit to working with developers and site promoters to address matters of viability on previously developed sites. Policy S2 should recognise that greenfield sites are often free of such constraints and can be delivered relatively quickly. Policy S2 should be reworded to acknowledge the viability constraints often associated with redevelopment of previously developed sites.

PARAGRAPH 4.12 AND 4.13

Whilst the identification of Brailsford as a Large Village is supported, the supporting text at paragraph 4.12-4.13 states that that the highest priority will be to focus development on the market towns where access to services is readily available. Additionally, the supporting text at Paragraph 4.13 states that residential development in market towns will enable affordable housing to be provided in a way that promotes a more sustainable pattern of development. In its current wording, the Local Plan does not recognise that large villages (or other settlements
outside Market Towns) can be sustainably located, albeit the range of facilities on offer would be less than those provided at Market Towns. This also contradicts the Strategic Vision of the draft Local Plan which states that new facilities will be provided in settlements such as Brailsford. Clearly, the delivery of new facilities in places such as Brailsford will, in part, be reliant upon private residential developments in such locations and associated Planning Obligations.

The settlement hierarchy is ill considered and flawed. The Council is adopting the same discredited approach which was criticised by the Local Plan Inspector at the Local Plan inquiry which preceded the adoption of the 2005 Local Plan and resulted in the Council having to abandon its approach to settlement classification with serious adverse consequences for the many villages in the District which have consequently been starved of development over the last 11 years.

The supporting text at paragraph 4.12-4.13 states that the highest priority will be to focus development on the market towns where access to services is readily available. Additionally, the supporting text at Paragraph 4.13 states that residential development in market towns will enable affordable housing to be provided in a way that promotes a more sustainable pattern of development. In its current wording, the Local Plan does not recognise that large villages (or other settlements outside Market Towns) can be sustainably located, albeit the range of facilities on offer would be less than those provided at Market Towns. This also contradicts the Strategic Vision of the draft Local Plan which states that new facilities will be provided in settlements such as Brailsford. Clearly, the delivery of new facilities in places such as Brailsford will, in part, be reliant upon private residential developments in such locations and associated Planning Obligations.

PARAGRAPH 4.15

Paragraph 4.18 identifies Darley Dale as a Local Service Centre, which is an entirely separate category to any other settlement but paragraph 4.15, which sets out the approach to development in the various categories of settlement, fails to mention what level of development will be directed to this Local service Centre. Include reference to ‘Local Service Centre’ in para 4.15.

PARAGRAPH 4.19

Support is given to the principles outlined within paragraph 4.19 and particularly to the last sentence 'As such the scale of new development in any of these villages will generally be relative to their current size and infrastructure.'

POLICY S3 – SETTLEMENT HIERARCHY

Policy recognises that third tier settlements should provide for reduced levels of development, however the hierarchy does not provide any differentiation of the sub classification of third tier settlement. Brailsford and Doveridge has been designated a disproportionate level of housing whilst other settlements in tier three have no allocations.

Support for Brassington being included as a fourth tier settlement, however it is very difficult to maintain current facilities without maintaining the current population and allowing development. As recognised in the Brassington Community Plan development in the village should be supported to maintain the sustainability of the village in population terms and provide an element of affordable housing. The sites identified in the SHELAA as potential development sites should be developed in Brassington.

Support for identification of Middleton as an accessible settlement with limited facilities.

The identification of the market towns as the most sustainable locations and primary focus for growth is supported. These settlements are
appreciably larger and have the greatest concentrations of shops, services, employment and leisure opportunities, which is evidenced by the ‘Settlement Hierarchy’ document and in accordance with the principles of the NPPF.

<table>
<thead>
<tr>
<th>Use of settlement boundaries is too restrictive and there should be provision for development, within or adjacent to the settlement boundary, this would allow for organic growth of settlements.</th>
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</thead>
<tbody>
<tr>
<td>The application of the hierarchy and the allocations are inconsistent with some tier 3, 4 and 5 villages with no housing proposed.</td>
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<tr>
<td>Investment and growth should be shared across the district to benefit all not just placed in a few locations.</td>
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<tr>
<td>Darley Dale has no capacity to support sustainable living, facilities and services are pushed to breaking point. As a local employer we are struggling to expand employment opportunities due to resistance from new residents regarding industrial employment in the area.</td>
</tr>
<tr>
<td>Current level of proposed sites in tier three villages will be over development and have an adverse effect on the character of the villages in tier three. The scale of development is excessive and cannot be supported by shops, public transport, drainage, employment etc.</td>
</tr>
<tr>
<td>Agree with the idea of the hierarchy and concentrating development both housing and employment in the larger settlements. However the existing settlements in Derbyshire Dales do not have sufficient capacity to absorb the proposed expansion. Numerous sites proposed are totally unsustainable and illustrate graphically how impossible it is to meet Government targets.</td>
</tr>
<tr>
<td>Bonsall has sufficient facilities to serve development and should be in the same tier as Tansley. There are a number of sites in Bonsall that should be considered suitable for development. Bonsall should have a settlement boundary which includes the property known as The Cascades, at Clatterway.</td>
</tr>
<tr>
<td>The evidence for the hierarchy relies on accessibility to sustainable modes of transport - this argument is inappropriate as at best bus services are infrequent and many are going to be cancelled.</td>
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<tr>
<td>Rowsley is identified as a third tier settlement, the plan should make it clear that part of the settlement lies within the Peak District National Park and applications in parts of the village will be determined by the Peak District National Park Authority.</td>
</tr>
<tr>
<td>The hierarchy and plans strategy is to push high density development into tier three villages whilst denying smaller villages the small scale development that allows the village to grow at a sensible pace. The Plan should allow for infill or consolidation in small countryside settlements.</td>
</tr>
<tr>
<td>Evidence to support the hierarchy is flawed, tier three settlements are not self-contained – they have hardly any facilities other than a primary school.</td>
</tr>
<tr>
<td>Support is given to the identification of a settlement hierarchy as a means of distributing development needs across the District based upon the size of settlements, their range of services and facilities and their accessibility to larger settlements and areas of employment. Brailsford Parish Council supports the identification of Brailsford as a Third Tier settlement. Currently limitations and imbalances of rate of development attributed to settlements in tier three, suggest that each settlement within tiers 3-5 is given a target for growth proportionate to the function of the settlement within each tier, with policy acknowledging that growth beyond the given range would be regarded as disproportionate and not sustainable. This approach was followed in Shropshire in its Site Allocations and Management of Development Plan. A range of 50-75 houses per settlement in T3 would amount to 600-900 houses which would be much greater than that required.</td>
</tr>
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under the proposed allocations but which would be more equitable in ensuring that the growth of each settlement within the same tier was related to the form and purpose and did not allow certain settlements to accommodate disproportionate levels of growth.

Brailsford and Doveridge are being required to take a combined total of 64% of the whole allocation for Third Tier settlements whilst 6 of the 12 settlements within the same category have no site allocations at all. This imbalance in allocations to Third Tier settlements is further exacerbated when account is taken of existing commitments within each settlement.

No housing allocations are being proposed for Fourth and Fifth Tier settlements however it is recommended that a guideline range for further housing in the plan period should be given for these categories of settlement to ensure that housing applications can be considered against the adopted guideline and that the overall contribution of new dwellings within these 2 categories can be identified as a percentage of the overall housing requirement. Without having an idea of what each settlement category is being asked to deliver within the adopted guidelines, it is not possible to identify how the overall housing requirement is to be distributed across all categories of the settlement hierarchy.

Several settlements in tier three are neither accessible nor comparable with others in terms of access to services and facilities. Northwood is not truly accessible and has no facilities. Darley Bridge is located away from main transport links and has no retail provision. In comparison Cromford, Matlock Bath and Rowsley are on key public transport routes and have greater services to sustain larger populations. Settlements listed in tier three should be reviewed.

Darley Dale has insufficient employment opportunities to support the proposed number of dwellings.

S3 correctly identifies that the fourth tier settlements should make a contribution (albeit limited) to DDDC’s housing needs but no contribution to housing numbers is identified, which could ease the strain on the larger settlements and/or assist in meeting OAN.

Objection to the exclusion of Upper Hackney from the Matlock settlement boundary. Upper Hackney is a continuation of the built-up area of Matlock and should be included within the settlement boundary for Matlock as it is part of the built-up fabric of the town.

A definition of infill and consolidation should be provided and would be useful to interpret the policy.

The final paragraph of the policy is unacceptable – many forms of development will be acceptable near or within such settlements, including gypsy and traveller sites.

The Plan lacks lateral thinking- it focuses development into the northern section of the plan area (Wirksworth – Matlock – Darley Dale) whilst doing relatively little for the southern section outside of Ashbourne. The plan is not a sustainable plan that over develops an already densely populated area in a highly environmentally sensitive area, much of which is physically constrained, whilst leaving a thinly populated and less environmentally sensitive area without investment or economic future. The initiative to create a new large village/small town in the south should be considered.

The evidence base and scoring system applied to the hierarchy is flawed. There are anomalies in the settlement hierarchy as they relate to the scoring which underpins the determination of the hierarchy and the contextual information upon which it is based.

The hierarchy as a list is correct but the emphasis in such a rural areas as the Derbyshire Dales should focus much more on the first and
second tiers with much less emphasis for development in the third tier and below, which should retain much more their rural quality. The levels of facilities in the tier three settlements is exaggerated and will lead to Brailsford and Hulland Ward becoming dormitory towns for Derby.

Middleton should be reclassified as tier 4 rather than tier 3. Incorrect scoring in the settlement hierarchy paper as follows: Primary School score 3; Post Office Score 0 (Middleton currently benefits from a mobile post office service 9 hours a week). Drive time to nearest town score should be 1 as a 7 minute drive.

Development should take place within the smaller villages, without development the communities will die and end up being only holiday lets empty during the rest of the year. Every village should have an addition of a few good family homes.

A small adjustment to the Tansley settlement boundary would allow for organic small scale growth over the Plan period.

In respect of the three fields to the south of Bentley Bridge, the documents supporting the current consultation still show a settlement development boundary ‘to define the existing and proposed built up area of each settlement’ which includes the three fields – these fields must be protected from development and excluded from the boundary.

The District Council has failed to adequately review other options for available housing development. Why has consideration not been given to spreading development around all villages. Planning has been refused for small scale development in surrounding villages despite local requests.

Wirksworth is identified as a Tier 1 settlement due to its status as a market town; this is an unhelpful simplification if applied without regard to factors such as the availability of the town centre parking, school capacity, sewage infrastructure. The withdrawal of subsidies for certain bus routes could reduce the sustainability of Wirksworth to accommodate a large increase in housing without adverse impact on car numbers and parking or access to wider support services for those without private transport options.

Tier three settlements should have a reduced level of development in comparison to higher order settlements to protect their environmental attributes. Doveridge is receiving a disproportionate scale of development. Most of the development is allocated in tier three settlements and yet in comparison Matlock has the smallest allocation proportionally.

The settlement hierarchy states that sites proposed should reduce the need to travel. No additional quality employment is proposed in Brailsford so all new residents will travel to work. While the 16-20 businesses scored to form the settlement hierarchy do exist, they tend to be owner led or lifestyle businesses which offer little new employment opportunity. No ability to make concession to cycling and walking. Hierarchy assessment is contradictory as in further point’s main roads i.e. A52 are stated as a key criterion.

The hierarchy states development should be proportionate to the role and function of the settlement, stating growth above 25 is not desirable in small settlement of less than 400 residents. Brailsford village circa 444 in the village from 2011 census – the scale of development proposed when added to that permitted in the last 18 months doubles the size of the village.

The settlement hierarchy states the population of Brailsford village shown as 925, however the 2011 census population of the Parish is 1161 - the Parish includes some settlements outside the normal boundary. The Brailsford Parish has 3 output areas which do not align with the Parish boundary. On this basis Brailsford is closer to a tier four settlement.
Anomalies in the hierarchy should be addressed – Cromford 5 mins from Wirksworth, Doveridge 10 mins to Uttoxeter – Sudbury is shown as closer.

Land at Northwood Lane, Matlock should be included within the settlement development boundary, its exclusion is illogical.

The settlement boundary for Clifton should be amended.

Identification of Darley Dale as a local service centre is flawed; the term gives the impression that it has major services to which people travel from outside Darley Dale. Apart from DFS there are no major services. Darley Dale should be reclassified as a large village.

Support for the spatial strategy and settlement hierarchy and the identification of Matlock as a Tier 1 Settlement. This reflects the town’s status as one of the largest and most sustainable settlements in the District.

Support for the proposed settlement boundary to Clifton – however the land to the coal yard adjacent to Watery Lane should be included within the boundary.

Lack of investment over the last 30 years has led to the closure of schools, post offices and shops in numerous communities, but the current Local Plan would seem to be an opportunity to enhance many lives and communities. It is precisely these, the tier 4 and 5 settlements in the hierarchy, which seem to be missing out on any housing allocations but would benefit from a few, carefully planned and well-built properties.

Objects to the exclusion of a small parcel of land within the proposed SDB of Northwood which adjoins Northwood Lane. The Derbyshire Dales Local Plan (Adopted) 2005 washes this land with saved policy SF2 (Protection of Important Open Spaces), which indicates this land as being open space and is important to the character and appearance of the settlement. The Draft Local Plan (2016) does not explain why this land is excluded from the SDB and therefore Policy S4 (Development within Defined Settlement Limits). There is no policy within the Draft Local Plan (2016) that protects this land as having natural, ecological or recreational / open space importance. Policy HC13 (Open Space and Outdoor Recreation Facilities) uses criteria to protect open space within the District and has therefore not listed those open spaces. The perimeter of this land is bounded by mature vegetation and fencing and is privately owned and there is no public access within or adjoining the site. There are no views available into the site or from any vantage point along Northwood Lane. The land therefore does not provide a facility for public open space and recreation. It would appear that this land has been excluded from SDB because of saved policy SF2 in the Derbyshire Dales Local Plan (Adopted 2005) and has been carried forward into the Draft local plan (2016). Any proposal seeking planning permission within a SDB will be subject to other planning considerations through the formal development management process and any land within a SDB that has an important interest should therefore be protected by a separate policy.

Support the overall strategy identifying Doveridge as one of the Tier Three settlements. Given the geography of the district the Tier Three settlements of Doveridge and Sudbury in the south of the district play an important role in providing services and facilities both for their residents and the surrounding rural area.

In Paragraph 3.4 of the document makes the rather curious assertion that since 2005 and the adoption of the Derbyshire Dales Local Plan, that: “...it has been an accepted principle of planning policy that the market towns of Ashbourne, Matlock and Wirksworth provide the most effective locations for provision of services and for assimilating future development in a sustainable way”. Whilst it may be an accepted
principle in a local context, it is respectfully submitted that the Framework and PPG have both been introduced since 2005 and the national policy context has transformed over that time.

The draft Local Plan should be positively prepared and effective and seek to meet the housing needs of the District in the most appropriate locations, which may include a greater proportion of growth in the lower tier settlements which are less constrained than higher tier settlements. Indeed, the Landscape Sensitivity Study (August 2015) identifies the risks of coalescence between Matlock/Upper Hackney and Daley Dales/Two Dales, which are Tier 1 and Tier 2 settlements respectively. Similarly, other Tier 3 sites such as Rowsley and Northwood are visually sensitive in terms of views from within the Peak District National Park. These factors suggest that a higher proportion of growth should be directed towards other Tier 3 settlements such as Policy S3 should acknowledge that delivery of the growth required over the Plan period will necessarily require greenfield sites across all tiers being developed for housing and other uses. Whilst the use of previously developed sites should be encouraged, it is inevitable that greenfield sites will also be required and this should be recognised within the Settlement Hierarchy.

A more simplified settlement hierarchy is needed. The second, third and fourth tiers should be combined to create a single group of accessible settlements.

The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. This applies to all settlements whether named within the Settlement Hierarchy or not.

Concern that the hierarchy has been developed upon unsound evidence where a number of factors have been considered as part of the exercise which may be mitigated against through any development proposal and could be dealt with through a site by site basis as part of the planning balance exercise rather than forming an inherent constraint. For instance the presence of a Public Right of Way, impact on landscape character, the presence of a primary school should be considered not whether there is capacity which may be mitigated through S106. New development in settlements not listed in the hierarchy should be considered on their merits, the NPPF is clear development which is sustainable should go ahead without delay.

Darley Dale should be included within tier one settlements. Whilst not performing the same as Ashbourne, Matlock or Wirksworth Darley Dale has a wide range of services and facilities and significant employment opportunities. Darley Dale should be included in tier one and a suitable level of growth allocated to it commensurate with its services and facilities and capacity for growth.

Objects to the proposed hierarchy with Darley Dale separated into a separate tier. Darley Dale could sensibly be included within the larger villages, which together could form a new Second tier level in the hierarchy.

The justification for development in the third tier is not appropriate the term ‘reduced level of development in comparison with high order settlements in order to safeguard their role consistent with maintaining or enhancing key environmental attributes’ is confusing and potentially misleading. The purpose of focusing on these settlements is both to create critical mass in terms of local services and facilities, to protect local services such as schools and to define their role as ‘local hubs’ for surrounding smaller villages and hamlets. Secondly, the
environmental attributes, which vary for each settlement, should be protected, on a case by case basis, irrespective of the size of the settlement. This is not something which is confined to the Third Tier settlements. Ashbourne and Matlock for example have similar heritage and environmental constraints. The plan should make recognition of the accessibility of settlements (and their linkages to other towns and cities possibly outside the District). Brailsford for example is fairly close to Derby which has a very broad range of service and facilities and is less than 25 minutes’ drive (or 30 minutes’ bus ride away). The policy and supporting text (para 4.15) should be supplemented to explain that Tier 3 settlements do not just contain opportunities for development but also legitimate needs for development and that new development serves a valuable purpose and the settlements are not simply reservoirs for new housing. They can also relate well to other towns and cities (as stated in paragraph 4.19) providing the workforce for nearby businesses and helping to boost the wider economy as well as bringing spending power back into the Dales.

The definition of a Settlement Hierarchy in Policy S3 and the supporting text is based on analysis of the range of services and facilities available within each settlement, which could support potential growth. The policy will ensure that growth is directed towards the most sustainable locations in the District, which should help to reduce the need to travel. It should provide more clarity and certainty to the public and development industry.

The settlement boundary for Tansley has been drawn too tightly, particularly around the area of The Knoll, and will not provide the flexibility that the new Local Plan should incorporate. The failure of the LPA to provide sufficient housing land supply demonstrates the need for sufficient flexibility.

The wording of Policy S3 should be expanded to include a reference to tourism uses – a growth sector which contributes significantly to the rural economy, as follows: “… and other economic, community or tourism purposes”

Hognaston Parish Council accepts listing as a 5th tier Consolidation Village and wishes to see confirmation of the reinstatement of the village Settlement Boundary.

**POLICY S4 DEVELOPMENT WITHIN DEFINED SETTLEMENT BOUNDARIES**

The Policy includes a series of principles which relate to other policies within the plan, this is duplication and should be excluded.

Settlement Development Boundaries have not been finalised purely on the criteria set out within paragraph 4.23. The development boundary of Matlock excludes significant areas of built development at Starkholmes, including housing in and around White Tor Road, and in Hackney and Farley. Boundaries must reflect the extent of continuous built development. The boundaries should be re-assessed particularly the Market Towns.

The overarching principles of the policy are supported, however a settlement boundary for Brassington village should be provided to allow for the development we need but to ensure that it maintains the coherence of the existing settlement and does not permit the village to
sprawl in an unplanned way.

Important open spaces in Ashbourne, currently shown as within the Settlement Development Boundary should be protected – for example the hill slope above St Oswald’s church. Although support the principle of S4 (c), important open spaces within the settlement boundary of Ashbourne should be designated for 'non-development', rather than just relying upon policy statements such as S4.

Policy should also apply to lower tier settlements to enable suitable sustainable development to come forward. Defined settlement boundaries should be shown for all tiers of settlement within the plan area.

Policy is non-compliant with the NPPF, particularly paragraph 14, as well as draft LP policy S1. The identification of settlement boundaries might only be regarded as compliant if it is made clear that they are to be treated merely as guidelines rather than hard and firm development boundaries. As time goes by sustainable forms of development that comply with Paragraph 14 of the Framework and with LP policy S1 are very likely to be found outside settlement boundaries.

As some limited growth is to be allowed within lower tier settlements it is necessary to ensure that policies allow for suitable sustainable development to come forward within these settlements. Unless all settlements contain a boundary that affords the opportunity of providing small scale development in accordance with policy S3 the application of Policy S5 will significantly limit windfall schemes coming forward in tier 4 and 5 settlements which would contribute to the overall housing requirement and allow the objectives of Policy S3 to be attained. Policy S4 should apply to lower tier settlements as well or Policy S5 would need to allow for small scale development to come forward within lower tier settlements above and beyond the limitations presently set out.

Stating that development should not "generate traffic of an amount inappropriate for the highway network, the extent of which cannot be mitigated" will prove impossible particularly in light of proposed plans for development along the A52 corridor.

There is insufficient protection for communities like Brailsford and Hulland Ward. Recent developments (such as Miller Homes in Brailsford) show clearly that DDDC have not been able to enforce sufficient protections about the style, density and impact of new developments, particularly on sites within boundaries or on the edge of villages.

Criteria (b) should be redrafted. ‘Edge of settlement’ is generally a term to describe a location that lies adjacent to but outside of a defined boundary. This policy appears to use the term to describe sites within a boundary. An alternative form of wording is required to avoid confusion with the conventional meaning of the term 'edge of settlement'.

Criteria (d) terminology – 'provision elsewhere' is ambiguous.

Criteria d) The concept that it is possible to provide equivalent compensatory provision for loss of valuable habitat is out of date and discredited. You can adequately compensate or mitigate, for example, for loss of ancient woodland or established ponds.

Policy wording should be amended to be positively rather than negatively worded. For example, the first line of the policy should be amended as follows:

“Within the defined settlement boundaries (Policy S3), planning permission will be granted for development that meets the following criteria:…” The bullet points (a) – (g) that follow are better expressed as positive requirements, rather than as a list of reasons for refusal. The second paragraph should be amended as follows:
“Where development accords with the principles listed above, it will be permitted if.” This minimises the risk of policy being used by Nimby’s to resist change.

The defined settlement boundaries should include land on the edge of settlements proposed for allocation – this would aid clarity and make it clear that Policy S4 applies to these proposed allocations and not Policy S5 relating to development outside settlement limits.

The 8 ‘bullet point’ criteria which follow the list of conditions a) to g) appear to set a series of idealistic but potentially insurmountable hurdles which few proposals could possibly meet and to some extent repeat those in criteria a) to g). A further 3 criteria a) to c) are then added which appear to restrict opportunities still further. Criterion b) refers to housing to meet ‘local needs’ which is at odds with the wider Government objectives which refer to meeting objectively assessed housing needs. This policy needs to be simplified to clarify whether it relates to development inside and/or outside the defined settlement boundaries and if only inside, then what criteria apply to specific allocations.

Object to the penultimate bullet in Policy S4 as the test that is applied to highways within the Framework (Paragraph 32) is that development should only be prevented or refused on transport grounds where the residual impacts of development are severe. Policy S4 should therefore be reworded to reflect this guidance.

Support clause (b) of Policy S4 as it supports development on the edge of settlements and follows the balanced approach set out in the Framework. The philosophy set out in clause (b) should be reflected throughout the remainder of Policy S4 and particularly in clauses (c), (d), (e) and (f) which should all be considered within the planning balance exercise of weighing the harms against the benefits, as advocated by the Framework. This should also be carried through to the bullet points made under clause (g) and in particular the first bullet point relating to the preservation or enhancement of the countryside.

The reference to the historic environment within part (g) of this policy is welcomed. However, the wording of the historic environment text does not make provision for other aspects included in NPPF Para 133 which would be relevant in respect of the World Heritage Site within the area as well as other heritage assets in terms of information required to demonstrate a case for loss.

Policy should include an additional bullet point for the Derwent Valley Milles World Heritage Site in a similar way to the Peak District National Park, e.g. ‘it protects the Outstanding Universal Value of the Derwent Valley World Heritage Site and its buffer zone’.

PARAGRAPH 4.25

Policy S5 and the reasoned justification in paragraphs 4.25-4.28 are over restrictive and would prevent the sustainable growth of many rural communities. This would be contrary to the aim of paragraph 55 in the NPPF which seeks to promote sustainable development in rural areas and to the more detailed guidance in paragraph 001 of the Rural Housing section in the PPG. There is no evidence in the Local Plan to substantiate that lower tier settlements should not accommodate growth that isn’t strictly in accordance with Policy S5. Policy S3 specifically advocates the need for limited growth within lower tier settlements. Although Policy HC5 on exception sites does afford some opportunity to allow principally affordable housing led schemes to come forward this Policy is aimed at a specific type of housing.
POLICY S5 – DEVELOPMENT IN THE COUNTRYSIDE

The south of the District is very sparsely populated; development in the countryside should be permitted. The area to the south of the District would benefit from development, especially a New Village, as proposed by Darley Dale Town Council. The modified NNPPF seeks to encourage LPAs to take a pro-active approach to planning for new settlements.

Criterion e) should include sport and recreational uses and not just recreational uses.

This policy is highly restrictive and takes no account of permitted development. It also runs contrary to Paragraph 28 of the NPPF which seeks to support the sustainable growth and expansion of all types of business and enterprise in rural areas both through the conversion of existing buildings and the construction of well-designed new buildings.

Under permitted development the conversion of any substantial rural building can be converted into a range of business uses (up to 500sqm) as a matter of principle and this is not accounted for. Class Q allows the change of use and alteration of agricultural buildings to provide up to 3 dwellings (max 450sqm) and this needs to be considered.

The criteria set out in the second half of the policy are inappropriate as they relate to other policies in the plan and are repetition.

The amount of equestrian development in the countryside should be controlled, there are a lot of such developments which do not fit sympathetically into the landscape and are not linked to farms or farming businesses.

This policy is too restrictive especially when considered with policies HC7 and HC7a. There may be instances of previously developed land outside settlement boundaries where demolition of existing buildings and new build residential development would be appropriate and in line with Policy S1 and the aims of NPPF. These policies should not restrict residential development to a single replacement dwelling or conversion.

Support policy S5 - development must be kept within existing boundaries and greenfield development prohibited.

Whilst support is given to the principle of preventing unsustainable development outside settlement boundaries, the policy needs to acknowledge the need for tier 3, 4 and 5 villages to accommodate growth that is consistent with their form, function and character and with the settlement hierarchy set out in Policy S3. However other than the allocations of sites above 10 units, there is insufficient flexibility in policy S5 to allow villages in tiers, 3, 4 and 5 to accommodate housing growth consistent with the settlement hierarchy.

Policy S5 needs to be afforded greater flexibility to allow growth in those settlements that presently have limited or no housing allocations relative to their status and function, above and beyond infill within settlement boundaries that by its very nature cannot be assured to deliver anything other than very limited growth. This increased flexibility can be facilitated by allowing sustainable extensions to settlements in categories 3, 4 and 5 to come forward through either applications or via neighbourhood plans that may be beyond defined settlement boundaries.
boundaries but which would still have to satisfy policies pertaining to sustainable development.

<table>
<thead>
<tr>
<th>Policy should allow for some conversion / infill development on Brownfield sites / old farm buildings etc. within the countryside.</th>
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<tbody>
<tr>
<td>There is no mention in the policy of the specific exceptions in para. 55 of the NPPF relating to historic assets and enabling development, nor to exceptional quality dwellings.</td>
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<tr>
<th>This policy is ambiguous. It does not explain whether all or only one of the criteria must be met. Even on the assumption that only one must be met, the restrictions are too onerous. The word &quot;significant needs to appear before &quot;adverse&quot; in criterion (a).</th>
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<tr>
<td>In the sixth bullet point on page 40 the requirement for buildings to be converted to be appropriately located is slightly ingenious. If they are capable of conversion and the conversion is an improvement on what is there now, then there should be a presumption in favour of development.</td>
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<tr>
<th>Policy should allow for a criteria-based approach to permitting sites outside but immediately adjacent to the prescribed settlement boundary to allow for a response to changing circumstances through the plan period and to allow for sustainable growth. This is particularly the case given that Fourth and Fifth Tier settlement boundaries do not appear to be subject to consideration/change through this Local Plan. Edge of (but outside) boundary development does not reasonably constitute development in the countryside in the way in which this policy is intended.</th>
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<tr>
<td>Support for recognition that the Best and most Versatile Agricultural land would be protected by this policy which follows the advice in paragraph 112 of the NPPF. The bullet point relating to Best and Most Versatile Agricultural land would however benefit from clarification.</td>
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<th>Development in the countryside in itself is not inappropriate. If it can be demonstrated that a site would deliver sustainable development with a high quality design then it should not be dismissed simply on the basis of its countryside location. New development can support services and help existing businesses remain viable and encourage new enterprises. Policy S5 is unnecessarily restrictive and not in line with the NPPF which requires local authorities to significantly boost the supply of housing. Policy should be redrafted to encourage development that is sustainable and bring benefits to rural areas.</th>
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<tr>
<td>The policy does not distinguish between isolated development in the countryside and development adjoining settlements. Insert to criteria (I) small-scale residential development immediately adjacent to settlement boundaries.</td>
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<th>Currently the first sentence is very long. It would be helpful if the provision relating to 'rural community needs, tourism and economic development' was separated out and clarified.</th>
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<tr>
<td>The second bullet point in the final section resists ‘substantial harm’ but not ‘harm’. In accordance with legislation and National Policy suggest policy reworded to ensure that all harm is resisted.</td>
</tr>
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</table>

| The third bullet point in the final section would benefit from re-wording as it appears to suggest that development harmful to the Peak District’s valued characteristics will be permitted, for example: ‘will only be permitted if… it does not adversely affect the purposes of the |
This policy is incompatible with the final paragraph of policy S3. Policy S3 clearly allows for some open market residential development in category 4 settlements but policy S5 does not allow for any such development. The final paragraph of policy S3 needs to be reflected in policy S5.

Policy is contrary to NPPF. S5 states that new development outside defined settlement development boundaries will be strictly controlled in order to protect the landscape’s intrinsic character. The protection [of countryside for its own sake] has not been carried forward into the Framework. That is not to say that the character and beauty of the countryside, and the impact of development upon it is not an important factor within an overall planning balance, it certainly is. The Framework recognises that there will often need to be a loss of countryside if its wider objectives are to be achieved. The principle that the entirety of the countryside is no longer protected “for its own sake” and that any harm arising should be considered within an overall planning balance and should not result in an inherent brake on sustainable development is an important issue that needs to be considered.

Policy S5 should be significantly reworded to take account of this guidance, and to be consistent with Policy S2 which allows for development adjacent to existing communities. It is suggested that this Policy better relates to isolated development in the Countryside rather than to proposals that are sustainably located on the edge of existing settlements but happen to be located outside the existing settlement boundaries. The Policy should therefore be retargeted towards this type of development.

Object to the bullet point listed at the end of Policy S5 which relates to best and most versatile agricultural land (BMV). The Policy relates to significant diminution of BMV but does not define the scale of BMV that the LPA consider to be significant. This needs to be clearly set out in the reasoned justification of the Policy to be fully Framework compliant as para 112 relates only to significant loss of BMV and paragraph 154 sets out that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the Plan.

Development should only be prevented or refused on transport grounds where the residual impacts of development are severe. The penultimate bullet point of Policy S5 should therefore be reworded to reflect this guidance.

Part (h) refers to a heritage asset of ‘acknowledged importance’ but it is not clear how this is defined. Revised wording or further explanation of what this would constitute is recommended.

The second bullet point of the end list requires clarity, it refers to designated heritage assets only rather than all heritage assets. It is not clear why designated heritage assets have been chosen specifically. It is considered that the wording here makes provision for other aspects included in NPPF Para 133.

**PARAGRAPH 4.30**

It is supported that this OAHN for the District is appropriately set out in paragraph 4.30 of the DDDLP.

**PARAGRAPH 4.32**

Rural site allocations should be detailed for 5 dwellings or more, otherwise housing for rural settlement growth will not be delivered.
Depending on the windfall sites, in fill and rural exception sites will not deliver the houses required for the rural area.

**PARAGRAPH 4.33**

It is welcomed and supported that paragraph 4.33 indicates that DDDC is in discussion with its neighbouring LPAs to determine the extent to which these LPAs are able to accommodate some of the identified shortfall of 425 dwellings.

**POLICY S6 – STRATEGIC HOUSING DEVELOPMENT**

The strategic housing target is too high and the distribution of development is not balanced and disproportionate in tier three settlements. The strategic housing target is too high and should be reduced to take account of the impacts of the National Park and the fact that they provide no housing to meet the identified need for the District.

It is a fundamental requirement of a Local Plan to meet objectively assessed housing needs. The SHLAA and SHELAA methodology is limited in its approach and the Council has chosen not to plan positively to meet its Objectively Assessed Need. Therefore as a minimum, sufficient land should be made available in strategic housing allocations for 3,302 dwellings.

The strategy is flawed and focuses solely on housing matters, where are the new residents of the homes going to work, lack of education facilities and employment opportunities will see many young people leaving the area. High quality employment opportunities need to be available within the Derbyshire Dales to draw back in high skilled and high earners.

The strategy is inappropriate; infrastructure cannot support the proposed increase in population. The schools, medical facilities and highway network are all at capacity and there is insufficient employment in many of the areas identified for development. Residents will be forced to travel out the area to access jobs and other services. Larger scale housing development should be focused in the surrounding cities, notably Derby, Nottingham and Sheffield.

The inclusion of at least 6015 new dwellings is not sustainable. The local plan should be strong enough to stand up to centrally imposed housing numbers and protect the Derbyshire Dales environment. The number of houses should be considered against the “peak park effect” whereby the entire districts allocation is proposed for a small fraction of the area. The local plan will affect the accessibility and appearance of the peak district.

Insufficient consideration has been given to the effect of the National Park. Lewes District Council have had plan approved which has a reduced housing target due to the impacts of a National Park – the same approach and rationale should be applied in the Derbyshire Dales.

The concept of exploring the feasibility of a new village to meet the strategic housing requirement in a sustainable manner with homes, jobs and infrastructure provided has been dismissed out of turn by the authority. The concept of a new village should be given due consideration.

Object – it is not accepted that sites cannot be identified the meet the OAN which are sufficiently unconstrained by landscape and other issues. A review of the SHLAA is required.

If the apportionment of growth to settlements in accordance with Policy S3 is undertaken in a more equitable and sustainable way, it is possible that Derbyshire Dales might be able to accommodate its full OAN by allowing settlements within tiers 3, 4 and 5 to accommodate...
growth proportionate to their function and status. If the Council does not believe that sufficient land can be brought forward by adopting this more proportionate approach, then it should remove the present imbalance in housing growth required under Policy HC2 to settlements such as Brailsford, and increase the currently identified shortfall of 425 dwellings that the Council considers cannot be accommodated within the Council area because it would result in unsustainable development.

The calculation that 2,877 houses can be delivered on sites above 10 units based upon the SHLAA analysis is considered to be unjustified; the SHLAA does not represent an appropriately evidenced or comprehensive basis to determine the scale of growth that could be accommodated within Derbyshire Dales. The SHLAA has largely assessed sites that have been proposed by landowners and developers and has therefore excluded sites that may be more sustainable but which for a variety of reasons has not been put forward and therefore assessed. Accordingly the analysis resulting in the allocations proposed under Policy HC2is considered to be less than thorough and has resulted in allocations that require villages such as Brailsford to accommodate disproportionate levels of growth relative to their status within the settlement hierarchy. The effect is to advocate unsustainable levels of growth to certain settlements such as Brailsford whilst restricting growth in settlements within the same tier.

Further work should be undertaken with neighbouring authorities to assist with meeting the strategic housing requirement. The calculation and evidence to support the strategic housing requirement is not transparent, further information should be supplied to illustrate where the various components of housing supply are derived from.

The housing target should be increased to allow issues of affordability and social housing to be addressed.

Hognaston Parish Council observes that the figure of 6015 represents a shortfall of 425 on the previously proposed figure of 6440. It accepts that this figure is required to satisfy central government directives, whilst having doubts about the validity of the data on which these directives are based.

The strategic housing requirement is too high, will lead to the overdevelopment of the district with the loss of greenfield land and adverse impacts on the high quality environment of the area.

If the OAN figures are proved to be reasonable, the policy should recognise that it is now 2016 (2017 for Plan adoption) and, due to new housing planning permissions, the 2877 dwellings allocated at HC2 may overstate the requirement for the remaining Plan period. The Policy needs flexibility to reflect circumstances as at Adoption.

Plus, to avoid development at densities above that recommended (see SHLAA) "at least" should be deleted and replaced by "a maximum of".

Support for the concept of a new village to meet the strategic housing requirement as promoted by Darley Dale Town Council.

The Derbyshire Dales (local planning authority area only) Local Plan appears fundamentally flawed as it utilises housing needs projections produced for the whole of the Derbyshire Dales district area. As the Peak District National Park Authority only forecasts a need for 400 houses over 20 years then clearly it cannot be facing, or prepared to tolerate, the same percentage demographic and economic growth as would apply to the Derbyshire Dales Local Plan area. There are currently an estimated 19460 households in the DD LP area (31028 x 44700/71266; figures from DDDC-HEDNA and DDLP-HRA). Projected household growth, to 2033, of 14.5% requires 2848 homes, not
4880, plus pro rata for economic growth of say 700, equals circa 3550 homes. This is sufficient for the 8.4% demographic growth from 44700 along with the accompanying economic growth, a population increase of 5455.

The numbers are large and whilst the larger developments will need to happen to make the numbers required a positive view on small scale (1 or 2) market value properties in all villages should be allowed.

Whilst it is necessary to assess OAN, this assessed need is only to be met to the extent that any constraints and material considerations allow. A shortfall against OAN is permissible provided that there is reasoned justification for such shortfall. A number of the allocated sites are highly questionable in terms of suitability and deliverability to the extent that the target of 6015 may be unrealistic.

The approach of the National Park to allow minimal new residential development should be challenged. The view that the Park Authority has that small amounts of well-designed, infill market housing is at odds with their statutory 'conservation' duties shows how little they really understand about how villages can successfully evolve over time. The main need is for smaller dwellings to enable local people to move on from rented accommodation The PDNP is ignoring the fact that there is a wide consensus that its housing policies are no longer fit for purpose. Almost every village has a site or two that is suitable for a small number of new dwellings (a mix of small units to buy, and some to rent). Suggests that DDDC encourage the Council's appointees to canvass opinion in order to try to encourage a public debate.

Supports the Council’s acknowledgement that the housing requirement set out within the Plan should be expressed as a minimum figure and should not represent a cap on development. This reflects the clear intention of the Government to “boost significantly” the supply of housing.

The Strategic Housing Market Assessment methodology which the OAN is based on is about to change. It is essential that the housing requirement is reviewed and updated as soon as the revised methodology for calculating housing needs is published by the Government, which is expected to reflect the recent report by the Local Plan Review Group on this matter. Unless the figure is updated, it is highly likely to be challenged in the Local Plan examination.

Housing need analysis clearly indicates nearly 90% of housing needs are for age 75 plus. The Plan makes no reference to the need to provide homes suitable for this age group

An additional site at RBS in Matlock should be considered to meet the strategic housing requirement.

An additional site at Tansley Cliff garage should be considered to meet the strategic housing requirement.

DDDC is still short of its OAN. This will lead to a second failure at Examination. There are no proposals to explore additional sites as yet, whilst it appears little has been done to explore any possible solutions with neighbouring authorities. DDDC has chosen to pursue an Objectively Assessed Need (OAN) figure and then tried to fit policies to the number rather than prepare a policy lead plan. So we now have the situation where an OAN of 6440 homes is the start and finishing line for the Derbyshire Dales local plan.

The Council should commit to allocating sufficient land to meet the full OAN of 6440 as a minimum.

Fundamentally disagree that the Council has insufficient sites to meet the OAN, the SHLAA assessment of sites is not adequate and does not meet the requirements of the NPPF to undertake a ‘planning balance’ appraisal of the sites. The lack of housing to meet the OAN will have an adverse impact on economic development and worsen commuting, affordability and increase house prices.
Policy S6 should be amended to “The District Council will accommodate at least 6440 dwellings over the period 2013-33. In order to accommodate the requirement, sufficient land will need to be identified to accommodate at least 2918 dwellings on new sites allocated in Policy HC2”

The evidence for the strategic housing requirement is not clear or transparent. The allocation to Ashbourne is significant. The plan should disaggregate the OAN to each settlement level and apportion an increase to each that is proportionate, this approach has been taken by East Staffordshire which has identified a housing need of its major towns and villages and then proposed housing to meet them. The District Council has not undertaken a housing need assessment for Ashbourne and therefore cannot confirm local need. The only justification offered is that the plan is meeting a District wide need.

There is insufficient evidence to demonstrate that the full OAN cannot be met without unacceptable harm in terms of highways, landscape impact and the setting of the Peak District National Park. Even where harm is identified then this needs to be balanced against paragraph 14 of the NPPF. The Council’s approach would lead to significantly adverse consequences in terms of employment growth, affordable housing and market signals.

The OAN Study is flawed for the following reasons and underestimates the OAN for the District; it is questionable that the HMA covering the Derbyshire Dales is appropriate given the connections with the neighbouring authorities; the assessment has not made sufficient adjustments to support economic growth, to address worsening market signals and affordable housing issues. The proposals to under provide by 425 dwellings is not justified. It is also not appropriate for the draft plan to propose not to make provision for the district’s full objectively assessed needs without having reached agreement with neighbouring authorities how this unmet need will be met. It is considered that there are other suitable and deliverable opportunities for housing development that can help to meet the Council’s housing requirements and should be allocated in the plan to reduce any shortfall against the objectively assessed needs to a minimum.

The HMA covers only Derbyshire Dales but the District is not without connections into its neighbouring authorities. As stated in the LPEG Report “... industry concerns of a trend towards the adoption by authorities … of smaller and smaller HMAs in an apparent attempt to avoid the full implications of the Duty to Cooperate and even of some authorities treating their own administrative boundaries as the extent of their housing market area, which seems inherently unlikely to be the case” (para 3.6). Indeed at the previous Local Plan Examination the Inspector found that “the HMA extends across Derbyshire into East Staffordshire and Sheffield” (para 7 of Inspector’s Note on Examination of Derbyshire Dales Local Plan dated July 2014);

Insufficient sensitivity testing of demographic projections. Although the 2012 SNHP draw upon long term trends since 1971 the methodology applied by DCLG means there is a greater reliance upon trends experienced over the last 10 years than to those experienced over the longer term. The implication of this bias is that the latest SNHP continue to be affected by recently observed suppressed trends in HFRs associated with the impacts of the economic downturn, constrained mortgage finance, past housing undersupply and the preceding period of increasing unaffordability. Younger households were particularly affected by these past trends and evidence shows that HFR for these groups are likely to recover as the economy improves (Town & Country Planning Tomorrow Series Paper 16, “New estimates of housing demand and need in England, 2001 to 2031” by Alan Holman). The Council is reminded that at the previous Local Plan
Examination the Inspector also considered it “prudent to assume HFR unlikely to remain suppressed over whole plan period … sensible to return to higher levels” (para 10 of Inspector’s Note on Examination of Derbyshire Dales Local Plan dated July 2014);

Insufficient adjustments to support economic growth. Again the Council is reminded that at the previous Local Plan Examination the Inspector found that “to maintain jobs and support economic growth would require 360 dwellings per annum” (para 11 of Inspector’s Note on Examination of Derbyshire Dales Local Plan dated July 2014);

Insufficient adjustments for worsening market signals. An uplift of only 21 dwellings per annum equivalent to only 7% is overly modest. In comparison, for example, in the Eastleigh Local Plan Inspector’s Preliminary Conclusions on Housing Need a 10% uplift was proposed as a cautious approach to modest pressures on market signals whilst the Uttlesford Local Plan Inspector’s Conclusions found an overall increase of 10% was appropriate to achieve the objective of improving affordability.

No uplift to meet significant affordable housing needs identified. In comparison other Local Plans have included significant uplifts to meet affordable housing needs for example in Canterbury there is an uplift of 30% (paragraphs 20, 25 & 26 Canterbury Local Plan Inspectors Note on main outcomes of Stage 1 Hearings dated 7 August 2015) and in Bath & North East Somerset there is an increase of 44% (paragraphs 77 & 78 BANES Core Strategy Final report 24 June 2014). In conclusion an OAHN of 6,440 dwellings and a housing requirement of only 6,015 dwellings is considered to be too low. Previously the Inspector found that the housing requirement for Derbyshire Dales should be “at least 6,500 dwellings for the plan period” (para 14 of Inspector’s Note on Examination of Derbyshire Dales Local Plan dated July 2014). It is noted that previously the Inspector found that the “SHLAA November 2013 suggested sufficient potential housing land for 6,419 dwellings … get closer to meeting OAHN without serious adverse impact on high quality Derbyshire Dales landscape” (para 5 of Inspector’s Note on Examination of Derbyshire Dales Local Plan dated July 2014). This suggests that OAHN in full could be met in Derbyshire Dales so that no unmet housing needs would occur.

It is contended that the relatively modest shortfall (just 6.6%) could be achieved through a combination of additional or extended allocations. Policy S6 should seek to meet the FOAN for market and affordable housing i.e. identify sufficient sites to meet the full 6,440 requirement identified. This can be achieved via additional or extended site allocations.

The Plan is not sound nor meets the tests of para 182 of the NPPF. The Plan is at odds with national guidance which encourages growth and boosting significantly new house building. The approach fails to adequately seek opportunities to achieve and secure net gains for each of the three dimensions of sustainable development i.e. economic, social and environmental (see Paragraph 7 of the Framework) contrary to Paragraph 152 of the Framework. The draft Local Plan Strategy is likely to be found unsound in its current form. Additional sites should be allocated to meet the FOAN for market and affordable housing, thereby avoiding the need for any unmet need to be met elsewhere under the Duty to Co-Operate.

It is completely absurd for the Local plan to assert that "the Strategic Housing Land Availability Assessment (SHLAA) indicates that there are insufficient sites in suitable locations to meet this requirement, and to release additional land for housing would have a significant impact upon the high quality environment of the plan area". That statement does not stand up to scrutiny. Sites which have previously been identified by the Head of Planning as deserving of allocation for housing but which elected members were dismissed as unsuitable
(without any need to justify their decision) remain unallocated, although some have subsequently obtained planning permission through the appeal process. Any rational assessment of potential housing land opportunities in the Derbyshire Dales would reveal that more than sufficient land is available to meet the objectively assessed need (OAN). The Council is simply repeating the same flawed approach to housing land provision which rightly led to the failure of its last attempt to produce a sound Local Plan. This unsatisfactory situation is compounded by the Council’s spurious claim that it has sufficient land for 6,015 dwellings up to 2033. In reality the OAN shortfall is far greater than the 425 dwellings which it admits to. Many of the sites it relies on to justify this assessment will not be delivered.

As currently drafted the Plan is unsound, further consideration should be given to:- The definition of HMA; The calculation of OAHN (including an uplift to the housing target due to market signals); The demonstration of significant adverse effects of meeting the full OAHN in the Plan area; and If any unmet needs occur the explanation of where these needs will be meet as an outcome of on-going co-operation with neighbouring authorities under the Duty to Co-operate.

The Council need to scrutinise their evidence in great detail and scrutinise carefully the Landscape Character Assessment study to test whether the harm caused to the landscape significantly and demonstrably outweighs the benefits of delivering the full OAN for housing. We do not believe that the Council has undertaken such a planning balance exercise. There are other opportunities within Derbyshire Dales that offer suitable locations for new development that are unconstrained, are not affected by any NPPF Footnote 9 constraints and could accommodate some of the alleged shortfall in housing numbers.

Object to the current Assessment of Housing and Economic Development Needs (AHEDN) as it does not fully reflect the full Objectively Assessed Housing Needs for Derbyshire Dales and is predicated on a pessimistic view of employment growth contrary to the NPPF’s advice that Plans should be aspirational. Employment in the district has grown on average by 1% per annum (para 11.16 AHEDN) since 1981. Whilst this should not necessarily form the basis of forecasting future growth, the Council’s reliance on a 0.2% growth figure would appear overly pessimistic. The AHEDN assesses both Oxford Economics and Cambridge Econometrics employment forecasts for the plan period (0.1% and 0.4% respectively). In order to be aspirational, the Local Plan should plan for an employment growth rate towards the higher end of this range. Given that the AHEDN’s assessment of Market Signals concluded that Derbyshire Dales is characterised by high house prices, has seen a 204% increase in house prices since 1998 and has an affordability ratio of 8.6, an increase of only 8% proposed above the 2012 Household Projections Scenario is too low. This appears to be an entirely inadequate increase to address the affordability crisis in the district and does not reflect recent Inspectors’ conclusions at Uttlesford and Canterbury where increases of 10% and 20% respectively have been applied. Indeed, the recent LPEG recommendations for OAN would suggest an increase of at least 20% for a district with an affordability ratio of 8.6. In addition, the Council has not considered an adjustment to the OAN to address the significant affordable housing shortfall in the district. All of the above issues suggest that the Council’s assessment of OAN is potentially too low to meet the needs of the district. The previous Local Plan Inspector stated that the housing requirement should be at least 6,500 units for the plan period.

**POLICY S7 – STRATEGIC EMPLOYMENT DEVELOPMENT**

The Council has not been pro-active in assessing the employment needs of each part of the Plan Area. In particular the
Matlock/Wirksworth area has a shortage of available land for business development. There are no available serviced sites and no new business units being constructed. This is holding the economy back and lessening the life chances of local people. A strategic site for employment development should be identified and delivered within this sub-area.

<table>
<thead>
<tr>
<th>This is the least amount of employment land that should be allocated. The council should have greater ambition as Strategic sites DS1 and DS8 will deliver at least 14 ha of serviced employment land and buildings over the plan period.</th>
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<tr>
<td>There are no major employers in many of the areas earmarked for development, many employment opportunities are low grade and therefore development will be unsustainable.</td>
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<td>The Local Council should prioritise the development of the internet to create more opportunities for home office, attracting small consultancy business etc.</td>
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<tr>
<td>The plan does not propose enough employment land to meet the needs of the future population residing in the new homes planned.</td>
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<tr>
<td>The reliance on brownfield land for employment allocations is problematic and will result in large areas of employment land not being developed as they will be unviable.</td>
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<tr>
<td>Growth in tourism, as well as agriculture/food and farming and rural enterprise should be promoted within the wider economic aspirations of the Plan.</td>
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<tr>
<td>Small business and working from home should be encouraged to reduce carbon emissions travelling to and from work.</td>
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<tr>
<td>The provision of small industrial units around Wirksworth has been important to encouraging local crafts workers to begin to develop small businesses and employ others. There needs to be provision of both these kinds of small industrial units/workshops but also the kind of flexible space and good internet access that allows creative professional initiatives to take off. The Local Plan should encourage such initiatives.</td>
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<tr>
<td>Policy S7 states that the District Council will maintain and where possible enhance the economic base of the plan area, yet in Policy EC2A no employment sites are available to the South of Ashbourne. There are very limited opportunities for work in Doveridge. Ashbourne is not accessible due to a lack of public transport links. Existing employment sites such as the caravan site in Doveridge has been lost to housing.</td>
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<tr>
<td>The Council should commit to allocating sufficient land to meet the need for new employment land. 15 hectares is grossly inadequate. The relocation needs of those employers, including sites have been identified as allocated housing sites, will take up much of the 15 hectares, leaving very little to meet the aspirations of new businesses. Demand for employment sites is buoyant and this should be reflected in land allocations.</td>
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<td>The policy should consider the wider opportunities for creating and protecting jobs including encouraging home working.</td>
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POLICY S8 – MATLOCK/WIRKSWORTH/DARLEY DALE DEVELOPMENT STRATEGY

| Object to the development strategy and concentration of development in an already densely populated area of the Derbyshire Dales. |
| Agree with support for tourism provided by the policy, however would request that the strategy should encourage a more balanced, less... |
tourism dependent economy.

The policy for growth is undermined by the requirement to promote and maintain the distinct identity of settlements which make up the central area by taking the most sustainable area which is not constrained by topographic, conservation or wildlife designations - the A6 corridor between Matlock and Derby Dale and seeking to maintain a strategic gap. The A6 corridor already has almost continuous development and the policy applied to a series of highly developable sites limits both housing and employment development.

The Policy does not include any specific improvements to infrastructure or the amenities or facilities in the central area. There is no assessment of the impact from existing approved sites and proposed allocations. The lack of infrastructure information is a fundamental omission and undermines the Local Plan.

The Strategy appears to support the extension of the railway to Rowsley – accordingly the strategy should look to concentrate development along the A6 corridor where use of sustainable modes of travel can be made rather than on greenfield sites to the edge of Matlock. The proposed allocations along the A6 corridor contradict the strategic gap required as identified in the policy. The policy to retain a strategic gap between Matlock and Darley Dale is supported. This gap has already been eroded by development and should be protected.

The development strategy for the area is ill-conceived; there is insufficient infrastructure to support the scale of development. Particular issues regarding health care provision and the capacity of the highway network to accommodate development need to be appropriately addressed.

Support for the strategy to focus development within Matlock, Wirksworth and Darley Dale.

The strategy relies too heavily on the delivery of housing on brownfield/former quarry sites with uncertainties surrounding viability and deliverability.

Object to the inappropriate inclusion of a "strategic gap" policy which seeks to inhibit development along the A6 corridor between Matlock and Darley Dale. The policy for growth is undermined by the requirement to maintain the distinct identity of settlements which make up the central area by taking the most sustainable area which is not constrained by topographic, conservation or wildlife designations - the A6 corridor between Matlock and Derby Dale and seeking to maintain a strategic gap. The A6 corridor already has almost continuous development and the policy applied to a series of highly developable sites limits both housing and employment development.

Object to the policy which concentrates development in the Matlock and Wirksworth area. The concept of a new town should be considered, development rates could then be matched to suitable infrastructure and employment rather than shoehorning development into already cramped settlements.

The strategy does nothing to address the improvements required to GP provision in the area. No improvements to resources for local GPs have been provided to reflect increases in population as a result of recent developments i.e. Morledge in Matlock. If future planning is left to the CCG without reference to the local service providers then future improvements cannot be secured. If houses are built with no increase in service provision at a primary care level, waiting times will increase for appointments in practices, footfall at A&E will increase and the
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<th>community will become less healthy overall. GP services are at saturation as it is without additional development.</th>
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<tr>
<td>There is existing building between Matlock and Darley Dale and recommended that this should be developed further. This area is equally close to amenities and well served by public transport.</td>
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<tr>
<td>The policy should place greater emphasis on promoting opportunities for walking, cycling and use of public transport.</td>
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<tr>
<td>Support for the strategy and suggestion that there should be more development taking place with the Matlock, Wirksworth and Darley Dale area of the District.</td>
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<tr>
<td>Policy sub point a) should be amended to make clear that the policy point is &quot;the protection of important open spaces through the Derwent Valley in order to prevent incremental coalescence between the Matlock and Darley Dale Settlement Development Boundaries&quot;. The fields protected by PD11 are merely the pretty landscape fields. The Council should have a proper strategy for prevention of coalescence of each of the various 'Darleys in the Dale' and not just for a few fields at the A6 roadside screening a future urban sprawl. Initiatives that are imaginative, positive and significant, such as designating the whole of the current Warney Brook/Ladygrove green corridor as a local wildlife/protected no development zone would be more appropriate.</td>
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<tr>
<td>The strategy should provide an appropriate balance between shops and restaurants in the Market towns. Furthermore support for the local markets should be encouraged, including the Tuesday market in Wirksworth and local farmers markets. In turn this will support the vibrancy of the towns.</td>
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<tr>
<td>Wirksworth is highly constrained in terms of geography and topography. The sites put forward for housing development are largely unsuitable. There are numerous brownfield sites within Wirksworth which have been ignored merely because they have not been promoted by the owners (the truck yard, the station yard, around the fire station etc…). This approach relies on landowners understanding and engaging with the plan process when many will be largely ignorant of it and the opportunities it presents. The Council should be more proactive and should approach owners of brownfield sites to encourage their release for development. The proposed sites for allocation in Wirksworth are costly and inevitably provide little contributions to infrastructure and affordable housing. Wirksworth cannot support over 300 new dwellings without infrastructure improvements in terms of highways, affordable housing, school facilities and town centre facilities.</td>
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<tr>
<td>Feels that the neighbourhood plan is undermined by the new draft Local Plan. The non-conformity of the new Local Plan with the existing Neighbourhood Plan needs to be addressed.</td>
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<tr>
<td>The densities and capacities for housing allocations should be re-evaluated with multi storey developments in the former quarries considered. In turn this will reduce the need to release large areas of greenfield land in Matlock and elsewhere.</td>
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<tr>
<td>Welcomes the Plans strong commitment to protecting the special character of Wirksworth, the presence of a large number of small independent shops is a strong part of this character. The growth of housing has the potential of benefiting the town, however if new residents shop predominantly out of town and place their children in schools elsewhere the disbenefits will outweigh any benefits. The town has significantly less town centre parking than other market towns in the District - this is a major problem. Protection of town centre car parking is therefore a high priority and the plan should make provisions for this. The heavy good vehicle depot in Coldwell Street should be considered in the Plan for parking.</td>
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</table>
Objection to the RBS site and other sites within the A6 corridor – these are contrary to the proposed policies in the Plan notably S8 and PD11.

Objection to the removal of the exclusion granted in previous Local Plans for development associated with Whitworth Institute, this should be re-instated. The Whitworth Institute provides local educational and leisure facilities, run and totally funded by the Town Council as Trustee of the charity. Since its establishment over 100 years ago, the charity has existed by every 5-10 years selling off parcels of land for development. Without this access to funds, the Charity would struggle to remain in existence.

There is an opportunity with the Cawdor Quarry development to introduce the type of retail accommodation that is currently absent from Matlock to a site that will integrate with the existing town centre footprint. Further retail provision should be considered and addressed through the Plan and inherent strategy.

The promotion of growth in Matlock, Wirksworth and Darley Dale is supported but there is confusion in the strategy. There is no plan showing any defined "central area" to which the policy applies and neither the supporting text nor the policy itself have anything significant to say about the adjacent settlements other than one isolated reference to Matlock Bath. If Matlock Bath is included in this policy then so should be the neighbouring communities of Rowsley, Northwood, Darley Bridge, Tansley, Cromford and Bonsall. This leaves a policy vacuum in relation to many aspects of development strategy in these surrounding settlements. There is a contrast with this approach and that adopted in Ashbourne where separate strategies are put forward for the town and for the surrounding villages.

In order to deliver sufficient new housing to meet the District’s needs, a range of sizes and types of site will need to be identified within individual settlements. Each settlement has its own constraints and opportunities in respect of housing delivery. The Derbyshire Dales Local Plan: Draft Plan (April 2016) refers to the settlement of Matlock as a Market Town (the first tier of the settlement hierarchy) and Darley Dale is identified as a Local Service Centre within the plan (the second tier of the hierarchy). Both settlements are It is imperative that a variety of size and types of sites are allocated for housing in the Market Towns including Matlock and the Local Service Centre’s including Darley Dale which provides choice to the market and headroom for delivery against the objectively assessed requirement and economic growth aspiration of the emerging Local Plan. This approach to allocate a wider range and type of housing sites would be in greater conformity with the NPPF (paragraph 47) and the aim of the planning system overall ‘to boost significantly the supply of housing.’

First point under (a) does not include non-designated sites which play an important role in linking green / blue infrastructure, ‘non designated sites’ should be added to these policies.

The focus of the Local Plan appears to be solely searching for housing sites. A big issue that the Plan needs to address in Matlock is its future role and its future employment base. Ongoing reductions in Local Government employment opportunities in the town need to be considered. Housing provision needs to be well related to employment provision to minimise journeys to work.

The strategy should make reference to the work of the District Council and Matlock Community Vision. The strategy should accentuate the positive and eliminate the negative with a more positive vision for the town of Matlock.

**POLICY S9 – ASHBOURNE DEVELOPMENT STRATEGY**

Support for the strategy proposed, however as a major brownfield site the Ashbourne Airfield development should be extended to include
approximately 2,500 dwellings.

As with Policy S8 the policy does not assess the impact of existing planning permissions or proposed allocations for significant planning permissions or proposed allocations for significant levels of housing development. Over 1870 homes have planning permission or are accounted for in proposed allocations. This has the potential to increase the population of Ashbourne from 8,300 (2011) to 12,600 (2033) increasing the population by over half.

There are implications for traffic congestion, for schooling including possibly a new primary school on the airfield; for health and for leisure services. This level of growth can create a significant source of funds which if co-ordinated and planned can better deliver sustainable development.

Support for the strategy and allocation of Ashbourne Airfield for economic and residential development. Support for the councils aims for economic development with the focus upon the airfield and improvements to access to the existing airfield Industrial Estate.

Ashbourne cannot support significant increases in population, there is insufficient school places, parking, employment, medical, public transport, parking and social activities.

Ashbourne with a population of 8500 is taking 1700 of the 6000 houses that the government demands are built – this is disproportionate. The policy refers to ‘hope’ that the development can be done in partnership with organisations such as schools, GPs etc. to solve the towns existing infrastructure problems. The Plan lacks evidence and clarity upon how these issues will be addressed. Without planned solutions to the infrastructure constraints of the town the plan cannot be supported.

The Plan focuses too much development upon the town of Ashbourne the concept of a new village should be considered.

The Strategy for Ashbourne should include a commitment to provide the bypass to the town to alleviate traffic congestion.

The proposed level of development for the town is disproportionate and will adversely impact upon the historic character of the town.

Little evidence provided to support the Plan and the strategy to allocation significant number of new homes to Ashbourne. No proper housing needs assessment has been done to support the housing numbers and there is no supporting transport or infrastructure study to demonstrate how issues of traffic congestion in the town will be addressed.

The current medical practices only have the capacity for another 3000-4000 patients. To accommodate these numbers the owners of these facilities will need to undertake work to premises. A solution need to be explored in order to provide a longstanding platform of Primary Care delivery in the area if the requirements of the next 5-10 years are to be met. SDCCG and NHS England and the Council need to work together to establish options for addressing future needs, without it existing facilities will be at maximum capacity.

The currently adopted plan explicitly supports an A515 bypass around Ashbourne, yet the 2016 draft is lukewarm on the issue. Given the massive increase in housing planned this is wrong and shows no consideration for the infrastructure issue generated by the new draft.
Where is the evidence base to support this weakening of emphasis when all the evidence points to the increased need for a bypass?

First point under (a) does not include non-designated sites which play an important role in linking green / blue infrastructure, ‘non-designated sites’ should be added to the policy.

POLICY S10 – RURAL PARISHES DEVELOPMENT STRATEGY

In 2011 the village had approx. 200 houses. Under the first draft local plan a ‘major development’ of 50 houses was agreed by the council for Brailsford and although the Draft local plan was withdrawn, since 2013 approx. 79 houses have been built or are in current development.

The new draft local plan proposes four additional sites of ‘major development’ allocated for Brailsford village. This excludes the 79 houses and also the additional housing, where permission has already been granted, including a 15 house development on the Main Road. The number and scale of development being proposed within the draft local plan for Brailsford (a small, rural parish village) is totally disproportionate and result in more than doubling the number of houses and size of the village. This is not sustainable development and does not meet the criteria set out for the rural parish development strategy.

The SHLAA sites have been looked at and considered on an individual basis and strongly urge the council to consider the cumulative impact of all the ‘major developments’ being proposed for Brailsford, in conjunction with the major development currently being built and the 15 house development where planning has been agreed.

The policy should include the following two key issues for rural areas:
1. The protection of existing services and facilities particularly rural village schools which are the bedrock of many rural communities.
2. The provision of starter homes, affordable homes for young people and Code 3 homes for elderly and disabled people to re-invigorate village communities while allowing older residents to remain in their home villages for as long as possible.

The focus on protecting and enhancing settlement identity and historic character is too limited a remit and reflects a restrictive and anti-development policy.

DDDC do not say how they intend to improve access to services and facilities, Tansley has no village shop, no preschool no doctors surgery and residents are reliant on a car to access these services, public transport is poor and subsidies to public transport may be cut, if this happens Tansley will have no bus. Residents who do not drive are reliant upon the bus, there only other way to access shops doctors, will be by taxi, Tansley is not a sustainable village for development.

The strict use of settlement boundaries is likely to be in conflict with this policy and provision needs to be made for development adjacent to
the settlement boundary particularly when such development accords with the spatial vision of "vibrant villages and sustainable communities."

Rural parishes will be completely swamped by the proposed level of development and their character will be destroyed. They are not realistic places for large scale development as residents will have to travel considerable distances for employment, using their own cars. There is insufficient infrastructure to support development.

Brailsford is taking a disproportionate number of houses for the size of the village. The infrastructure cannot support this and neither can the schools and medical facilities.

The scale of development proposed in the rural parishes is inappropriate and will worsen a number of major infrastructure issues such as congestion, GP practices at capacity or simply not available, inadequate provision of local shops or employment opportunities. For the Plan to suggest that developers will be required to make a financial contribution to improve these issues is not a realistic option. The Plan notes the issues within the rural parishes but proposes no solutions and provides little factual detail to explain how they will be satisfactorily resolved.

Strongly agree with the strategy for the rural parishes. The policy commitment to make provision for further housing in the rural parishes is supported.

Continuous development on the edge of existing settlements in the rural parishes is unacceptable. New, fully planned settlements should be considered. Not all greenfield land is beautiful.

I am concerned about the scale of the proposed development for Brailsford, Tansley and Doveridge is unacceptable, the additional number of dwellings should be reduced.

Permission should be in favour of small scale housing development 1-12 houses in other settlements of the rural parishes e.g. Brassington, Tissington, Kniveton, Hopton, Carsington, Ednaston, Shirley. This could provide 100+ houses.

The development strategy for the rural parishes should be reconsidered. The Plan clearly states on housing needs, how you are helping local people to stay local, prove it and allow a few more small homes in each village, your short fall of 425 homes spread amongst all the villages will be easily be met. There should be sufficient flexibility to enable some limited organic growth in rural villages.

In paragraph (c) first bullet point encouraging farm diversification in sustainable locations may mean just allowing diversification on bus routes, yet we know that most transport in rural areas is by car and lorry and we would not wish to see development prevented because it is not on a bus route.

Fine words, but undermined by the permitted development in villages such as Brailsford and Hulland Ward. One of the main themes of this Local Plan proposes to be the protection of the character and appearance of the plan area. Rural Parishes Development Strategy is to protect the character and local distinctiveness of the villages and hamlets. However, there is no protection of character being demonstrated by the council for Brailsford village within this proposed plan.
Objection, S10 is not being correctly applied in Tansley. There has been no attempt to protect the character of this village. Nor does the draft Local Plan include nothing in the way of proposals to "protect and enhance key rural services and facilities".

The districts identity and historic character of individual settlements should be protected. Development in Doveridge would threaten this. There is nothing in any of the proposals which will protect or enhance the rural services and facilities. There is no protection for the open countryside, and nothing to meet local needs for the young or elderly.

S10 should identify the need to consider the concept of a new village to the south of Ashbourne.

Second point does not include non-designated sites which play an important role in linking green / blue infrastructure, ‘non designated sites’ should be added to the policy.

S10 should be reworded to reflect the planning balance exercise of weighing the harms of a proposal against the benefits.

Support the policy and approach to supporting the sustainable growth of local communities, subject to the protection of local character, ecology, environment and services which are an essential pre-requisite to developing new housing sites. Protecting rural employment is absolutely vital. The implementation of this policy will therefore be critical. It should not be imposed as a policy restraint but as a positive strategy.

**POLICY S11 – LOCAL INFRASTRUCTURE PROVISION AND DEVELOPER CONTRIBUTIONS**

The principles of the policy are supported, however there needs to be more evidence to demonstrate how the infrastructure needs will be met and delivered with partner agencies.

Improvements to public transport should be sought by the policy.

Support the policy reference to sport related infrastructure, the updated evidence on sport will help ensure effective application of the policy.

Infrastructure should be provided before or as a minimum in tandem with development, narrow roads and congested streets should be considered before development is allowed. In a number of locations the highway infrastructure is not sufficient to cope with the scale of development proposed and the additional cars generated.

This policy is very 'general', and whilst it is recognised that the Local Plan cannot necessarily promote specific projects the completion of the western bypass for Ashbourne (to get the A515 lorries out of the town centre) is THE MOST VITAL requirement to secure the future of the town. This should be a priority for the Plan, without it the Plan and strategy is unsustainable.

Brailsfords school and medical facilities cannot accommodate the scale of development proposed. Local residents will be forced to access these facilities in other towns. The village and its infrastructure cannot handle the proposed growth.

Section 106 contributions alone will not be enough to facilitate the scale of infrastructure improvement required. Section 106 will only work for a few concentrated locations and that means increased travel. 'Tit for tat' agreements with developers for the future are not good enough and will not provide a comprehensive approach to infrastructure planning.

Wonderful idea, if we have to have development in Brailsford then please can the developers help support our much used playing field, Institute, wonderful but struggling medical centre and poor surface water drainage.
The policy should place greater emphasis on developing Arts and cultural initiatives – such as concert, theatre and exhibition facilities.

This is not nearly strong enough. S11 needs to include the local community as a “partner” to ensure that large-scale developments in villages enable infrastructure works within that village (rather than elsewhere).

It says you will safeguard land needed for future infrastructure but there is no policy to safeguard the land required, such as for the Ashbourne Bypass to the enhanced cycle routes that are referred to through the document. These should be shown as protected on the accompanying maps.

Infrastructure provision is insufficient to support the scale of development both proposed as allocations and current planning applications in Doveridge.

All contributions in full should for the specific benefit of the community from which they arise and should be allocated to the Parish Council/Town Council to spend in accordance with emerging Neighbourhood Plans where applicable.

If Brailsford is identified for significant growth improvements to the Village Hall must be secured.

Education, Public Transport and Health provision in Derbyshire Dales are having difficulty providing for the needs of the existing population. This situation must be dealt with as a priority before allowing any further development.

Any payments / CIL should be for the benefit of the community where the development arises.

Waste water and sewage capacity in Matlock is a significant constraint alongside the management of surface water run-off. The proposed developments in Matlock with exacerbate these issues. The contributions by developers should therefore extend to paying for improvements well outside of their localised planning application boundaries; as total system impact needs to be comprehensively evaluated.

Any community infrastructure levy should be applied to large developers and not to single self build types of projects which often in villages support young family members being able to remain in a village.

The GP practices in the area are, in the main, beginning to reach capacity and need to consider how they work to meet increasing and changing healthcare needs. They may in the future be a need to increase capacity through premises developments. Southern Derbyshire Clinical Commissioning Group (SDCCG) needs to work with current GP providers (who are businesses in their own right) to develop local services and bear in mind the national picture which is moving towards a more collaborative approach to service provision and ‘placed based care’. SDCCG recognise that the South Dales area will require additional and changing healthcare provision over the coming years and it is intended that partnership working is developed to develop a cohesive plan. Support continued approach to S106 and development of CIL.

Further work and evidence is required to address the future employment, education, highway and medical infrastructure needs of the growth of Wirksworth. Comprehensive masterplans for the town’s development and supporting infrastructure need to be developed.

Request an additional bullet point to this policy to allow for provision of green infrastructure and enhancement of ecological networks through developer contributions.
Welcome the pro-active approach in seeking to ensure that infrastructure is put in place, but worry that the ‘shopping list’ of requirements is in danger of making many schemes unviable. The policy needs to make it clear that new development is not capable of funding all society’s requirements and that S106 contributions where they are made must be reasonable in scale, directly related to the site in question and not boosted in order to fund existing infrastructure shortcomings.

The provision of developer contributions should be tested against the viability of schemes through a full Plan Viability Study.

The conservation and enhancement of the historic environment is not mentioned within this policy, as well as public realm and ‘green’ infrastructure all of which are intrinsically linked and important to the infrastructure of the area. It is also recommended that reference to the historic environment is included as part of the policy for consistency since the historic environment and planning obligations are referred to in Policy PD2.

Ensuring the availability of water, flood risk infrastructure (including maintenance to flood defences) and wastewater by working with utility providers’, the Environment Agency and Derbyshire County Council as Lead Local Flood Authority’ to promote a coordinated approach (including the use of CIL or Section 106 agreements) to the delivery of development and future infrastructure works.

The conservation and enhancement of the historic environment is not mentioned within this policy, as well as public realm and ‘green’ infrastructure all of which are intrinsically linked and important to the infrastructure of the area. It is also recommended that reference to the historic environment is included as part of the policy for consistency since the historic environment and planning obligations are referred to in Policy PD2.

The policy helpfully covers a wide range of strategic infrastructure and services including health and social care; education; transport; energy and utilities; telecommunications; flood management; open space, sports and recreation, new waste management; and waste. This is welcomed. The policy goes on to state that development will only be permitted where necessary infrastructure is available or provided via planning obligations or conditions attached to a planning permission. This is fully supported.

The Digital Derbyshire programme in conjunction with BT is investing in the delivery of high speed broadband connections for existing residents and businesses in Derbyshire. The Government has recently announced funding available to developers via BT Open reach to enable developers to provide high speed fibre connections to serve new housing development. Developers should be encouraged to take up this provision through the Local Plan, pre-application discussions, and advisory / informative notes attached to planning permissions.

The policy states that a Community Infrastructure Levy (CIL) will support investment in infrastructure required to address the cumulative impact of household and population growth. Further clarity on how DDDC envisages a CIL operating in conjunction with site specific Section 106 planning obligations should be provided. DDDC should clarify exactly what infrastructure is expected to be delivered via Section 106 obligations, and for which sites. Any Section 106 planning obligations must relate to a very specific project to ensure that there is still scope for CIL to fund more general projects that address a wider need or cumulative impact.
### CHAPTER 5 – PROTECTING DERBYSHIRE DALES CHARACTER

#### KEY ISSUE

**PARAGRAPH 5.4**

The sentence 'However in appropriate circumstances contemporary design may be acceptable’ should be removed from this paragraph. Some previous developments have been an intrusion the inherent character of the village. The sentence implies that development which might not be considered to reflect 'locally distinct character and features of the area’ may be justified. Removing the aforementioned sentence would mean developers would need to provide justification for such design rather than a generalised exception.

The Doveridge Neighbourhood Plan Steering Group are currently scoping policies in the Neighbourhood Plan to address the particular local character of Doveridge.

**PARAGRAPH 5.6**

Amend text to read - ....The use of sustainable design and construction methods (including flood resistant/resilient measures) will be supported as means of reducing the direct and indirect impacts on the natural environment

**PARAGRAPH 5.8**

This paragraph does not make it clear that the Lifetime Homes standard is no longer mandatory following the Government’s Housing Standards Review and has become voluntary element whereby the mandatory standard is applied by the Building Regulations. Paragraph 5.8 should be deleted.

**POLICY PD1- DESIGN AND PLACE MAKING**

Comments received which support this policy which seeks to ensure high quality design.

Each of the villages in the Southern Dales has its own identity which should be protected, this is not happening in Brailsford or Hulland Ward nor Doveridge. Upholding this strategy would make developments much more palatable to residents.

Policy PD1 and supporting text does not identify the defining characteristics of the plan area nor does it refer to an SPD on place making or other design guide. Most of the policy criteria would be better in a validation document. Should be high quality building in traditional manner. Currently not NPPF sound.

Housing in every town is starting to look exactly like any other with unimaginative built environment. Allow those with the means to build grand design housing that will be an asset to the area, more limited development of quality one-off housing designs instead of bland, repetitive housing estates of poor design and build quality. Large scale developments are often unsuitable to the village,
particularly those of urban style with limited gardens. Small well-built and individually designed developments would be more suitable and acceptable.

| District councils should take more notice of Neighbourhood Plans and other local proposals which show more appreciation of actual need and local sensitivity. |
| Should add the following to the policy ‘In particular developments should be operationally carbon neutral during their expected lifetime.’ |
| Proposed new developments are not taking relevant issues on board. Site allocation should accord with all criteria in the policy. Concerned that issues such as place-making, character identity and context will not be taken on board with new developments. |
| Not making new houses mandatory to be suitable for lifetime seems contradictory to the supposed increase in the aging demographic. Will not see a shift in older generations moving out of existing larger houses into smaller housing if it is not suitable for their needs. |

Support this policy, so long as it is adhered to in practice and intrusion to the Peak District National Park is limited.

| Issues should be resolved before sites pass the first tier of planning. Ensure that where trees are removed due to develop that alternative trees are planted. |
| Increased importance of this policy due to the additional number of housing provision in the plan. |
| Support this policy’s encouragement of sustainable design. Should also look to encourage the use of alternative, more sustainable building materials such as straw. |
| Building for life and Building for life 12 should be outlined within this policy as mandatory building standard to ensure good and appropriate quality design in the village. |
| The reference to Lifetime Homes should be deleted as the Government have indicated through a ministerial statement that authorities should use local plans to set additional technical standards for the construction, internal layout or performance of new dwellings. |
| Request an additional bullet point within this policy to ensure that new development includes spaces and opportunities for wildlife |
| Reference to Code for Sustainable Homes is outdated and should be removed. DDDC should refer to the optional technical standard for accessible / adaptable dwellings known as M4 (2) of the Building Regulations. In order for DDDC to adopt this standard it should be justified by meeting the criteria set out in the NPPG including need, viability and impact on affordability. DDDC has not provided sufficient evidence to justify adoption of either of these proposed standards. |
| The reference to Secure By Design in the policy is unnecessary as recent changes to Part Q of the Building Regulations appropriately deals with security measures. |
| References to local distinctiveness and aspects that also have links to the historic environment, and for development to positively contribute to an area’s character, history and identity are welcomed. |
| Policy supported due to its positive benefits for health and wellbeing. |

**PARAGRAPH 5.13**
Revised wording to: The historic environment contains a wide range of assets including listed buildings, scheduled monuments, registered parks and gardens, archaeological sites, and other buildings and areas which contribute to the character of the local area. Heritage assets also make a significant contribution to the sense of local identity and new development should make a positive contribution to the historic character of the area.

**PARAGRAPH 5.14**

Revised wording to: The Council seeks to promote a positive strategy for the conservation, enjoyment and enhancement of the historic environment. The NPPF and National Planning Policy Guidance both stress that heritage assets should be conserved in a manner appropriate to their significance. The Council values heritage assets for their historic, architectural, artistic and archaeological interest and recognises their important role in both national culture and local environment.

**PARAGRAPH 5.15**

Revised wording to: In December 2001, the Derwent Valley Mills in Derbyshire was inscribed as a World Heritage Site. This international designation confirms the Outstanding Universal Value of the area as the birthplace of the factory system where in the 18th century water power was successfully harnessed for textile production, and became the model for factories throughout the world. Stretching 15 miles down the river valley from Matlock Bath to Derby, the World Heritage Site contains a fascinating series of historic mill complexes. Much of the cultural landscape setting associated with the mills and their communities of the 18th & 19th centuries has also survived.

Support for this paragraph

**PARAGRAPH 5.16**

Support for this paragraph.

Revised wording to: Particular scrutiny will be given to proposals relating to development in the World Heritage Site (or its Buffer Zone) which have the potential to impact on its Outstanding Universal Value. Proposals for significant development may be referred, where appropriate, to the World Heritage Site Partnership for detailed appraisal.

**PARAGRAPH 5.17**

Revised wording to: the heritage assets of the plan area, and their relationship with the surrounding environment make a significant contribution towards defining the area’s local distinctiveness, as well as making it an attractive place in which people want to live and work. That character is recognised and identified within Conservation Area Character Appraisals. It also makes the area desirable for visitors and tourists and has considerable benefits for the local economy. The strategy is, therefore, to ensure that the special character and appearance (and significance) of the built and historic environment across the plan area is protected and wherever possible enhanced.

**PARAGRAPH 5.18**

Revised wording to: the historic environment of the Derbyshire Dales extends to many more aspects than the sum total of the designated heritage assets. To protect the distinctive character of the plan area, the District Council will continually review the extent of
Protection offered. This, for example, could include certain assets being given statutory protection by formal designation, that the number and extent of conservation areas are reviewed and that other means of identifying those assets that need protection on account of their local significance are positively identified through the compilation of lists of local buildings of special architectural or historic interest. Furthermore, the Council will continue to review and update Article 4 Directions (which can protect the historic environment), where relevant.

**PARAGRAPH 5.19**

Provides helpful and definitive guidance but currently sits outside of the policy and will therefore be of limited use in determining planning applications. Request that this wording is incorporated into the policy to ensure that it can be used effectively.

The content of paragraph 5.19 should be amended accordingly to reflect paragraph 132 of the NPPF which states that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be.’ And paragraph 135 which deals with non-designated assets – and refers to the need for ‘balanced judgements based on the scale of any harm or loss and the significance of the heritage asset’.

Revised wording to: ensure that development proposals do not have an adverse impact upon the special character and appearance (or and significance) of many of the District’s heritage assets (designated or non-designated), the District Council has adopted Supplementary Planning Documents on the conversion of farm buildings, and shop fronts and commercial properties in respect of design guidance. These will be reviewed once the Local Plan has been adopted to ensure that they can continue to be used in the determination of planning applications.

**PARAGRAPH 5.21**

Should reference the need in some cases for specialist archaeological reports (desk-based assessment and/or field evaluation) as per NPPF para 128.

The first sentence of the supporting text refers to a ‘heritage asset’ but does not mention its ‘setting’. It is recommended that the sentence be revised to read ‘... impact upon the significance of a heritage asset and/or its setting will be required...’

**POLICY PD2 – PROTECTING THE HISTORIC ENVIRONMENT**

Concerned that this policy is not being implicated, demonstrated by a number of proposals.

Concerns that DDDC is unaware of the damage which can be caused due to over population and amount of traffic passing through Ashbourne.

Comments received which support this policy which seeks to protect the historic environment of the Derbyshire Dales. Developments which fail to adhere to the criteria within the policy should be refused. This policy should be carefully implicated as the general area is one of the foundations of the industrial revolution and a significant part of both local and as it is formal.

DDDC should ensure that this policy is adhered to within all proposed allocations.

The preamble to this policy should set out what is meant by a heritage assets, conservation areas and world heritage sites.
Policy relates to matters other than decision making, i.e. proposals to continue to write Conservation Area Appraisals and Article 4 directions. Many of the items listed would be better in a validation document not as a policy. This would enable the policy to be shortened.

Amber Valley Borough Council recognises the importance of a consistent approach across local authority boundaries towards the protection and enhancement of the historic environment and therefore supports this policy. Support for the reference to the Derwent Valley Mills World Heritage Site and the need to ensure that development respects its Outstanding Universal Value and is in accordance with its Management Plan. Wording should clarify that the setting of heritage assets may include land outside the Plan Area within an adjoining local authority.

DDDC should ensure that they support and encourage all local groups seeking to develop tourist attractions related to the rich industrial heritage of Matlock/Matlock Bath.

Due to the high number of grade 2 listed buildings the policy should be less restrictive on these and more so on Grade 2* and Grade 1 which are the more important heritage assets.

Need a focus on the regeneration of unused buildings into useful homes.

The conservation area of Brailsford should be expanded and education of the importance of area and traditional skills encouraged.

Consider the Peak Rail to be a heritage asset.

New development should ensure that it blends in with the historic character of the Dales.

The historic environment is a major asset to the district and coincides with the policy to promote and enhance tourism.

Concerned about the potential of detrimental harm on conservation areas caused by new developments, notably Lumsdale and Greenhill.

The second bullet point only resists ‘substantial harm’ and is therefore not compliant with paragraphs 132-4 of the NPPF which suggests that all levels of harm (not just ‘substantial harm’) to designated heritage assets to be given ‘clear and consistent justification’ and only to be given consent if shown to be outweighed by public benefits. Para 134 applies this to ‘less than substantial harm’ and para 133 to ‘substantial harm’. The Framework states that the more important the asset the greater the weight that should be attached to it. The policy makes no such distinction and is therefore not consistent with the Framework. The Framework states that if harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The policy as drafted make no such distinction.

Provision for archaeological evaluation at bullet point 7 is welcomed. However pre-determination evaluation is not necessary in every case and it might be better to replace ‘archaeological evaluation’ with ‘archaeological assessment or evaluation as appropriate’.

The wording of the last bullet point on ‘development within areas of archaeological interest’ is appears somewhat confused and repetitive and possibly not NPPF compliant. Recommend replacing as follows: ‘Ensuring that archaeological significance is established where development will impact a known area of archaeological interest or an area with potential for previously undiscovered heritage assets. Weight will be placed upon the conservation of significance of heritage assets according to their importance. Where harm to
significance is considered to be outweighed by the benefits of development, planning conditions and/or obligations will be agreed to ensure that archaeological or heritage features are appropriately recorded and that the results of such work are made publicly accessible’.

DDDC should, through the Local Plan, carry out an assessment of the potential impact of proposed development on heritage assets, as set out in paragraph 129 of the framework.

References to the historic environment refer to ‘protect and enhance’ and it is recommended that this be revised to ‘conserve, protect and enhance’ throughout in line with NPPF terminology.

The text of the sixth bullet point of the second list does not make provision for other aspects included in NPPF Para 133 which could be required to demonstrate a case for the loss of a heritage asset.

Welcomes the mention of Derwent Valley Mills World Heritage Site as a specific heritage asset which DDDC will seek to conserve, manage and, where feasible, enhance and that DDDC will ensure that development respects the Outstanding Universal Value and is in accordance with the management plan.

Policy PD2 (and supporting background text) should include a specific requirement that a Heritage Impact Assessment (HIA) should be submitted in support of any development proposals that are located within, or potentially impact on, the Derwent Valley Mills World Heritage Site and / or its buffer zone and the Outstanding Universal Value.

Comments received supporting the positive benefits this policy can provide for health and well-being.

Add “District Council” to criteria twelve. To Read Continuing the District Council's programme of Conservation Area Character Appraisals.

“Add “or where applicable as a condition on any approval” to criteria seven. To Read “Where proposals are likely to affect other known important sites; sites of significant archaeological potential, or those that become known through the development process, an archaeological evaluation will be required prior to their determination or, where applicable, as a condition on any approval.”

Add “or sites” to criteria 15 and ensure Archaeological Interests are not in capitals. Also add “where possible”, replace “and” with “are”, add “based compelling & justifiable reasons” and replace “destruction” with “removal or relocation”. To Read “Ensuring that development within areas or sites of archaeological interest do not have a significant adverse impact on any known, or yet to be discovered, heritage assets. Planning conditions and/or obligations will be agreed to ensure that, wherever possible, archaeological or heritage features are recorded and retained intact/in situ. Where this is impractical, based on compelling & justifiable reasons, such features will be appropriately excavated and recorded prior to removal or re-location.”

This policy appear sound in terms of compliance with NPPF. There is appropriate reference to the Derwent Valley Mills World Heritage Site and Outstanding Universal Value, to designated and undesignated heritage assets, and to the setting of heritage assets.
Replacement of “By improving connectivity between habitats it is anticipated that species will become more resilient to climate change” with “Improving connectivity between habitats will be needed to support species to become more resilient to the impacts of climate change.” To read: “The impacts of climate change on biodiversity will need to be addressed. Evidence from the UK Climate Change Impacts Programme is that some species are already needing to adapt adapting to changes in climate. However there is also an increasing recognition that adaptation to climate change requires consideration at a landscape scale. Improving connectivity between habitats will be needed to support species to become more resilient to the impacts of climate change.”

### POLICY PD3 – BIODIVERSITY AND THE NATURAL ENVIRONMENT

Concerned the measures to mitigate against detrimental impacts upon biodiversity and the natural environment will prove inadequate. Whilst an ecosystem can destroyed easily one cannot be created with such ease.

This policy should also reflect the requirements of other legislation. For specific sites e.g. gang mine an additional policy is required.

TPO’s, geological sites, and SSI’s must be maintained/preserved.

Building on greenfields, which contradicts the NPPF, is against this policy and does not protect biodiversity or the natural environment. Any development adjacent to the conservation areas will be detrimental to biodiversity and the natural environment.

Rigorous environmental auditing and developing a protection plan must precede any development. The protection of the natural environment and its ecological assets is a priority, without this species will be lost.

The statement that priority habitats will be protected is supported however it is noted that this is followed later in the policy by a series of qualifications. Request that a strong statement is included in the policy outlining that ancient woodland should be given absolute protection or, at the very least, (using the wording proposed by the CLG Select Committee) that it should only be developed in "the most wholly exceptional circumstances". Such a high level of protection is justified as ancient woodland dates back many hundreds or even thousands of years and is irreplaceable. The policy would be incorrect in mentioning the achievement of a "biodiversity gain" if ancient woodland has been lost.

Many of the proposed allocations could have adverse impacts on biodiversity and the natural environment. They therefore undermine this policy and its intention to protect them biodiversity and the natural environment within the district. The scale of development is not compatible with this policy.

Insufficient attention is shown to the unique geological character of this area. A proposal to create a National / International Geopark covering not only the Peak Park but also the whole of the Peak District including key sites like the Matlock Gorge, Wirksworth, National Stone Centre, etc. is well advanced. The proposal offers considerable potential to raise the profile and increase the tourism potential of this area This will not be possible if development encroaches upon any of the sites of interest.

The protection of hedgerows should be required as these support a range of species.

Important that due concern is shown in regard to small areas which have no classification but which contribute to biodiversity and the natural environment.

Brailsford is a biodiversity rich village and it’s natural environment should be maintained with more support provided by DDDC.
Policy must be implemented fully. The aim to protect biodiversity and the natural environment must be integral to all policy making and must over-ride any other considerations.

<table>
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<tr>
<th>Witness</th>
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<tr>
<td>There are no circumstances under which the term “no appropriate alternative site” should be used.</td>
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<tr>
<td>Water courses and ecological networks are also important to biodiversity and the natural environment. Ecological networks have been overlooked in recent planning permissions. They are of high importance and areas which, although potentially not deemed of wildlife value, form them should be protected.</td>
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<tr>
<td>Developments should not harm or limit the free movement of wildlife.</td>
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<tr>
<td>Planning restrictions which aim to protect biodiversity and the natural environment should be followed up comprehensively by Planning Officers.</td>
</tr>
<tr>
<td>If proposed developments cannot accommodate the important wildlife residents, then the development should not be granted planning permission.</td>
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<tr>
<td>This policy should be given far more weight.</td>
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<tr>
<td>Concerns over the poor state of Ecclesbourne River’s water and the failure of this policy to identify a strategy to resolve this problem.</td>
</tr>
<tr>
<td>Natural England generally considers that this policy will provide a valuable framework for the protection and enhancement of the natural environment. Natural England provide a number of suggestions which may strengthen and clarify the policy wording. The policy wording which lists of nature conservation sites should distinguish more clearly between the international, national and local sites so appropriate protection can be established commensurate with their status. It should be clarified that the bullet points a –c refer generally to biodiversity and not just to regionally and locally designated sites as the wording currently implies. Welcome the provisions set out in the last two bullet points which encourage a net gain in biodiversity across the District, to establish and protect ecological networks and the restoration of natural habitats. Suggest that DDDC may want to include the consideration of biodiversity at a landscape scale across local authority boundaries to comply with the guidance set out at paragraph 117 of the NPPF. Also suggest that DDDC may wish to consider making reference to the value of ecosystem services within the text of this policy. Specific policy wording should be included regarding the protection and recovery of priority species populations linked to national and local targets in order to reflect the guidance set out at paragraph 117 of the NPPF in addition to the species protection that has been mentioned in the accompanying text for this. Noted by Natural England that the policy requires that European sites which were identified as likely to be significantly affected within the Habitat Regulations Assessment (HRA) are assessed and appropriate mitigation put in place in order to avoid any adverse effects. Natural England are satisfied that the Report fully covers Natural England’s concerns and consider that the emerging draft policies of the Local Plan have undergone a full Habitats Regulations Assessment in line with appropriate legislation and guidance. Accordingly Natural England confirm that they agree with the Report’s conclusions that the Derbyshire Dales Draft Local Plan will not result in any likely significant effects on the identified European sites either alone or in combination with other plans or projects, and no further assessment work is required at this stage.</td>
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| Alterations to the introductory paragraph, replace “conserve” with protect” and add “ water environment” to read “The District Council...
will seek to protect, manage, and where possible enhance the biodiversity and geological resources of the Plan Area and its surroundings by ensuring that development proposals will not result in harm to 'the water environment', biodiversity or geodiversity interests of the following statutory and local environmental designations:

Addition criteria required, as follows: “This will be achieved by:
Ensuring development proposals take into account the objectives of the Humber River Basin Management Plan
The commitment to work with partners as set out in this policy is supported.
There is more scope to highlight the catchment based approach and its role in setting and delivering WFD improvements to DDDC water environments. The work of the Derbyshire Derwent Catchment Partnership is hosted by the Derbyshire Wildlife Trust and has an important role in delivering WFD and other multiple benefits centred around five objective themes that deliver for the environment (1 Improvement of the water environment (urban and rural), 2 Support community action 3 Improve biodiversity 4 Climate change and Urban 5 Support sustainable development). The current focus for the partnership is on developing these themes and Projects groups have been set up to help deliver the partnership objectives by addressing these key issues.
Further information on the work of the partnership can be found at:
http://www.catchmentbasedapproach.org/index.php?option=com_k2&view=item&layout=item&id=32&Itemid=247

http://www.derbyshirewildlifetrust.org.uk/what-we-do/projects/derbyshire-derwent-catchment-partnership

The positive health and wellbeing benefits are supported.

**POLICY PD4- GREEN INFRASTRUCTURE**

Inadequate information has been provided by DDDC for the public.
Policy does not protect green infrastructure.
Comments support the maintenance of wildlife corridors, long distance trails and views. These should be prioritised due to their attraction to visitors.
The policy should ensure that the south of the lane linking Middleton Road and Old Lane is preserved due to the wildlife present and its location bordering the old light railway.
Green Infrastructure must aim to retain and increase levels of biodiversity

The maintenance of green infrastructure is vital due to the historical and landscape value of such spaces. They also act as 'soak aways' averting surface water flooding.

Provision of woodland as one of the criteria within this policy is supported. It is suggested that the terminology "trees and woodland" would be more appropriate in order to include street trees and trees in parks or on recreational areas, as well as woodland. Appropriate provision may vary according to the size and nature of each development.
This principle of this policy, whilst supported, is not being applied through proposals, particularly housing allocations on greenfield sites.
The scale of development also contradicts this policy. Comments received which support this policy which seeks to protect and enhance green infrastructure within the Dales.

DDDC need to ensure that the issue of habitat fragmentation and the potential impacts on wildlife corridors are mitigated. This is particularly an issue along the A6 which is constrained by housing, the Peak Rail and now the cycle track.

An additional criteria “Public rights of way will be protected to maintain existing vistas of the green environment and sites of historic interest. Noise should be limited in developments adjacent to the existing rural footpath network” should be included.

This policy should ensure that brownfield sites are developed prior to the release of greenfield sites.

In order for green infrastructure to be properly protected this policy needs to be fully implemented. The aim to protect the green infrastructure of the Derbyshire Dales must be integral to all policy making and must over-ride any other considerations.

Natural England welcomes the positive approach that this policy takes to the protection and enhancement of green infrastructure. They acknowledge that the wording of this policy potentially requires a HRA for some green infrastructure project. Suggest that in order to ensure that green infrastructure requirements are fully integrated into development proposals the wording of this policy should require consideration of green infrastructure at the outset of the planning process. Natural England also welcome the reference to the potential of green infrastructure to mitigate against the effects of climate change.

An additional criteria should be added to this policy to read “Public rights of way will be protected to maintain existing vistas of the green environment and sites of historic interest. Persistent noise should be limited in developments adjacent to the existing rural footpath network.”

The current development by Miller Homes at Luke Lane provides little evidence of green infrastructure and is contradictory to this policy.

PARAGRAPH 5.38

The text refers to 2003 version of the Landscape Character of Derbyshire. The fourth edition of the Landscape Character of Derbyshire was published in 2014.

PARAGRAPH 5.39

In Table 4: Landscape Character Types in Derbyshire Dales, there appears to be a typo error as the Dark Peak, Open Moorland should be Open Moors.

An up-to-date map of the Landscape Character of the District can be made available should DDDC wish to use it in the Draft Local Plan, or a variation on this

POLICY PD5- Landscape Character

The council’s planning office has a responsibility to ensure that any plans proposed protect and enhance the Character and Distinctiveness of the Landscape, Towns and Villages. The size, scale and number of major developments undermines this responsibility. A number of the proposed allocations contradict this policy, particularly those on greenfield land. The nature of the towns
and villages will be changed forever should the current allocations be progressed forward.

Whilst this policy is supported in principle it is felt that this is not being adhered to in practice.

This policy is vital as the landscape character of the Derbyshire Dales is highly important to the viability of the area.

The mixed woodland to the South of the lane linking Middleton Road and Old Lane should be preserved under this policy due to the wildlife present and its location, bordering of the old light railway.

Concern that that the criteria within the policy which safeguards the setting of the National Park will increasingly be over-ridden by criteria in favour of sustainable development. Development such as wind energy and industrial uses which is increasingly impinging on the setting of the Peak National Park should not be allowed, National Parks form a small percentage of the overall countryside nationally and there are many other parts of the countryside where such development could be sited. Protecting the setting of the National Park is a key element in protecting the character of the Dales outside the Park and should be prioritised both for ecological and for economic reasons.

Dry stone walls are a unique part of the landscape of the Derbyshire Dales and conditions relating to the rebuilding and reinstatement of them should be a criteria within this policy to ensure that they are considered within all relevant planning applications.

A priority within this policy should be to avoid building across the skyline, in order to maintain the landscape character of the Derbyshire Dales.

Amber Valley Borough Council recognises the importance of a consistent approach across local authority boundaries towards the protection, enhancement and restoration of landscape character across local authority boundaries, both for its own intrinsic beauty and for its benefit to economic, environmental and social well-being. The Landscape Types and Landscape Character Areas in the eastern part of Derbyshire Dales also relate to the western part of Amber Valley and much of this area comprises high quality landscape. The Borough Council therefore supports the wording in policy PD5.

The importance of the landscape character of the Derbyshire Dales as a resource to attract people to live and work in the area as outlined within this policy is supported.

The protection of the landscape character could be enhanced through a number of ways. Wooden gates, signposts and bus shelters should be a requirement, as should brick and stone walls. The number of unnecessary signs should be reduced. Additional rough grass should be protected for wildlife purposes.

Land adjacent to the Peak District National Park is detrimentally affected by development occurring there due to the emphasis on the protection of the Park.

Stringent design conditions which aim to protect the landscape character should be included within this policy. All development should have reference to rural style buildings and local building materials.

This policy should be fully implemented. Many local enterprises rely on the landscape of the Derbyshire Dales as the basis of their business. Mitigation is insufficient.

A number of current developments with planning permission do not adhere to this policy.
Natural England welcomes the reference to the Derbyshire’s Landscape Character Assessment and the table of landscape character types. Also acknowledge reference to the Peak District National Park Authority’s Landscape Strategy and Action Plan which is particularly relevant when considering development which may impact on the setting of the National Park. Advise that DDDC may also wish to refer to the National Character Areas (NCAs) which divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. The Local Plan should also give consideration to areas of tranquillity where appropriate. Tranquillity is an important landscape attribute and there may be areas worthy of protection within the District.

The terminology ‘intrinsic beauty’ should be removed from this policy. The term infers that all the landscape is of high quality, which is not the case.

The use of the term ‘maintaining’ in the first bullet point of the Policy infers that there will be no change. The Policy references *The Landscape Character of Derbyshire Assessment (LCDD)* and not the *Landscape Character of the Derbyshire Dales (LCDD)*. Both should be referenced. The policy makes no reference to managing change. It would be wrong to infer that the Landscape Character Assessment is a mechanism to stop change. Neither LCDA or LCDD invite the preparation of Landscape Character Assessments at a more detailed level for projects or sites. The policy does not deal with this shortcoming potentially excluding the ability to determine landscape character at a site or project scale. The policy should recognise and draw attention to statements in the *Landscape Sensitivity Study* (LSS) that acknowledge the Natural England three key levels of assessment. The Policy does not: seek assessment at a detailed scale for a site or project to assess its sensitivity to and capacity for change; advise that the LSS is a strategic study only; name or reference the document *Areas of Multiple Environmental Sensitivity* produced by Derbyshire County Council. The statement in the third bullet point of the policy to ‘protect or enhance’ does not acknowledge change. To include the phrase stops development. With regard to the fourth bullet point, further clarification is needed. Also propose that a Landscape Impact Assessment is required for a site or specific project.

Within the final paragraph of the policy the word location should be omitted as it is dealt with elsewhere in the policy.

The National Trust generally support this policy. The fifth bullet point indicates that the Council will resist ‘development which would harm or be detrimental to the character of the local and wider landscape or the setting of a settlement as identified in the Landscape Impact Assessment’. It is unclear whether this refers to a landscape impact assessment carried out by the Council, or by the developer. It is of course possible that the Council will disagree with the developer’s assessment of levels of impact and harm. Therefore suggest that this criterion is re-worded slightly to clarify that (i) developers will be required to carry out a Landscape Impact Assessment at the Council’s discretion, and (ii) the development will be resisted if there would be harm [whether assessed by the developer, the Council or the Secretary of State as the case may be].

A Gladman commissioned study undertaken by FPCR to review the Council’s Landscape Sensitivity Study was undertaken to critique the methodology and approach used by the consultants in undertaking the study. The information required to critically analyse the
results of the study is not provided within the study. It is impossible therefore, to check the assumptions and reasoning used. As much of the study relies on professional judgement, this is particularly important. The field assessment sheets could have been provided as a series of appendices but have not been. This lack of information means that the study cannot be rigorously tested, and the conclusions cannot therefore be relied upon in making important decisions regarding land use planning.

Historic England welcomes the inclusion of this policy within the plan.

Derbyshire County Council support this policy. They do however have some concerns that some of the housing, mixed-use and employment land allocations could have a detrimental effect on landscape character and quality, without appropriate mitigation.

A policy should be included to protect all agricultural land in Doveridge.

**POLICY PD6- Trees, Hedgerows and Woodlands**

Comments received outlining concern that trees, hedgerows and woodlands will not be adequately protected.

Proposed allocations contradict this policy and its aim to protect trees, hedgerows and woodlands, particularly those proposed on greenfield sites.

The requirement to replace lost trees, hedgerows and woodlands and to mitigate against detrimental impacts should be enforced by DDDC.

This policy as currently worded lacks context. It lacks information on tree cover, loss of hedgerows and the creation of woodlands and should be more focused.

This policy should ensure that all ancient Woodlands and individual trees with Tree Protection Orders are fully and comprehensively protected.

The wording of the policy should be altered and the term “unacceptable loss” with regard to ancient woodland removed. There are no circumstances in which the loss of ancient woodland is acceptable.

The policy should include a criterion that commits developers to providing two trees in replacement of the loss of an individual non-ancient tree in streets or in other locations. This would recognise that a young sapling will take years or even decades to provide the same amenity or biodiversity value as a mature tree which it is replacing.

There are too many Tree Protection Orders which blight development opportunities for individual householders. TPO’s should only be given to trees over a certain age.

A requirement should be included within this policy which prevents the removal of hedgerows and trees.

This policy should include provision for selective felling which could greatly improve the landscape quality in many areas. Trees on key sites should be controlled in order that they do not lead to the loss of important views.

Comments received which support this policy and its aim to manage and maintain important features. They are an important asset to the local wildlife and environment and should be properly managed and protected.

More trees and hedgerows should be planted under this policy.

The trees, hedgerows and woodland of the district should be kept intact and where possible improved. Local skilled tradesmen should
be employed to create hedgerows and ditches.
The policy should adapt to the needs of the local community over time.
Greater importance should be placed on retaining and improving hedgerows.
This policy must be integral to all policy making and must over-ride any other considerations.
Natural England welcomes this policy particularly the reference to veteran trees but would suggest that the policy wording should specifically include “ancient woodland” which has a specific definition.
National Trust Request generally support this policy. They request that the second paragraph is reworded to include ancient as follows: “Development that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of protected trees, hedgerows, orchards, ancient, veteran or notable trees or woodland (including those that are not protected but are considered to be worthy of protection) will not be permitted.”

The mixed woodland to the South of the lane linking Middleton Road and Old Lane should be preserved under this policy due to the wildlife present and its location, bordering of the old light railway.

PARAGRAPH 4.47
Support that carbon reduction will be addressed as a key issue.
Advise that climate change impacts should have a wider focus than carbon emissions in isolation. The climate will continue to change, irrespective of any reductions to greenhouse gas. Increased flooding is expected as a result of climate change and will affect people, properties, infrastructure and the environment. Biodiversity is already declining due to habitat loss through new development and diffuse pollution and climate change places even more pressure on wildlife. Additionally, climate change impacts on the demand for water as well as its availability and quality. Derbyshire Dales District Council is a co-deliver for the Water Framework Directive and an enhanced water environment should feature as a key indicator for the benefit of people and wildlife
Suggested flood risk is mentioned.

PARAGRAPH 5.52
This paragraph notes that the Government has withdrawn support for the Code for Sustainable Homes (CSH), suggesting that local planning authorities should only require developments to achieve optional building regulation standards if it can be shown that such requirements are necessary and viable. It is noted that the policy does not include any requirement to achieve these optional standards. This approach is supported as there is not the evidence to demonstrate these requirements are either necessary or viable in the district.

POLICY PD7 - Climate Change
This policy should plan should plan for the worst case scenarios in terms of the potential detrimental impacts of climate change.
Sufficient drainage required to mitigate against increased adverse weather conditions.
This policy does nothing to require a low carbon future or the built environment to adapt to climate change and to mitigate the effects of climate change through measures such as carbon capture. A more comprehensive approach towards climate change with a number of
Further requirements is needed. Development should be located in sustainable locations which minimise the need to travel and where there are a range of low carbon travel options. Low carbon energy production including wind and solar energy is required in addition to energy conservation particularly in the construction and operations of homes, businesses and in leisure and community facilities. The adaptation of houses and buildings in areas liable to flooding to make them flood resilient and in areas subject to high winds robust is needed. Policies for climate change such as this one should also be linked to flooding and flood risk; low carbon energy production, building standards and building adaptation; policies for travel and transport including the promotion of walking and cycling and policies for afforestation and the use of green building techniques.

Climate change is global issue for which little can be done at this scale.

The local population should be provided with a share of any profits made from new build and solar panels. They are affected by noise and disturbance in the area and this would provide them with ownership and engagement.

Many of the proposed allocations are contrary to this policy and its aims to move to a low carbon future for the Derbyshire Dales particularly those in areas at risk of flooding. More stringent measures need to be enforced to ensure established residents do not suffer because inadequate measures have been adopted to ensure the correct management of surface water.

The aim of this policy is highly important and is currently not adequately addressed within the sustainable development principles.

In order for a significant positive impact to be made upon climate change new development will have to conform to the highest environmental standards which are not enforceable in traditional buildings. This can only be delivered in a new settlement.

Comments received which support this policy its aims to move to a low carbon future for the Derbyshire Dales particularly those in areas at risk of flooding.

Controversial applications for the ‘fracking’ practice for oil & gas should be refused due to their consumption of huge amounts of already scarce water and potential contamination.

An additional criterion should be added to the policy to read: “Consideration will be given to the provision of cycle tracks, secure parking for cycles, and facilities for electric cars, and good level footpaths in the market towns.”

Close attention should be paid by DDDC to local environment initiatives.

Reliance on privately owned cars should be reduced. Residential development should, for this reason, only be allowed within tier 2 settlements.

This policy must be integral to all policy making and must over-ride any other considerations.

This policy should have more willingness to encourage wind turbine development with a more proactive approach.

High energy efficiency should be mandatory for new houses.

Natural England supports this policy and welcomes the acknowledgement that HRA would be required if a renewable energy installation would have an adverse effect on the integrity a European site. Natural England also welcome the reference to Green Infrastructure which can help to mitigate the effects of climate change.

The National Trust supports this policy. However they feel that the wording of the first section which applies to ‘any of the principles
listed above’ is confusing. Question whether this section (including criterion a-e) relates to proposals for renewable and low carbon energy development (shadow flicker is specifically referred to)? The four remaining paragraphs of the policy also appear to relate to renewable energy development.

Criteria 3 and 10 should be combined into one positive statement to read: “Supporting developments that avoid (wherever possible) flood risk and minimise and mitigate against future flood risk and which protects and enhances the quality of the District’s surface and groundwater.”

Environment Agency advice additional wording is added“(including flood resistance/resilient measures)” to criteria 4 to read: Promoting the use of sustainable design and construction techniques (including flood resistance/resilient measures) including the use of recycled materials in construction. Also advise additional wording “and water” to criteria 11 to read: Promoting energy and water efficiency and the use of renewable / low carbon energy in new development and through retro-fitting or refurbishment of existing buildings. Advise removal of “encouraging the” and replacing with “supporting the” and additional of “blue” to criteria 15 to read “Supporting the use of green and blue infrastructure to help mitigate the effects of climate change and ensure climate change adaptation and resilience.” Also advise additional criteria should be added to read “Supporting development that promotes water efficiency measures and incorporates water conservation techniques, including rainwater harvesting and grey water recycling”. This wording has been taken from PD8 as it is felt that this would fit better under the issues of climate change.

Historic England advice that towards the end of the policy, it is recommended that the point (a) reference to ‘historic features’ be replaced with ‘the historic environment and heritage assets as well as their setting’ for the avoidance of doubt.

By definition, tackling climate change is an inter-national as well as a national priority and needs to be addressed as such. Climate change is not assisted by ‘exporting’ housing needs elsewhere or trying to deflect Derbyshire Dales’ housing provision to neighbouring authorities.

There is no logical reason for including the protection of best and most versatile land within this policy. This should be removed.

Policy supported due to its positive benefits for health and wellbeing.

This policy should additionally outline that the baseline for all development, small or large, commercial or community, should be code 6 or passivhaus or zero carbon.

The Environmental Agency have adopted new guidelines which should be taken note of.

Value could be added to this policy by referring to specific areas in the Local Plan Area rather than simply technical guidance from the NPPF.

**PARAGRAPH 5.60**

States that SuDS must be designed in accordance with the National Standards for Sustainable Drainage Systems. This document remains in draft aimed at the creation of the SuDS Approval Body (SAB). This guidance has been superseded by the Non-statutory technical standards for SuDS.
<table>
<thead>
<tr>
<th>POLICY PD8- Flood Risk Management</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Value could be added to this policy by referring to specific areas in the Local Plan Area rather than simply technical guidance from the NPPF.</strong></td>
</tr>
<tr>
<td>Comments received which support this policy and its aim to manage flood risk within the district. Development should not occur in flood risk areas as this heightens the risk of flooding and property damage.</td>
</tr>
<tr>
<td>Some allocations within the plan are in areas of flood risk, this contradicts the policy. This is of particular concern for sites where DCC have recommended refusal due to flood related issues.</td>
</tr>
<tr>
<td>Concerns over current water quality.</td>
</tr>
<tr>
<td>In order to accommodate the scale of additional residential development significant capital investment will be required in order to masterplan for requirements, particularly in Brailsford.</td>
</tr>
<tr>
<td>Consultation with DCC required.</td>
</tr>
<tr>
<td>Planning should always take flood risk into account and building on flood plains should never be allowed. This would greatly reduce the need for flood defences, reducing the costs, protecting rare environments and ensuring unsuspecting purchasers will not suffer from the distress flooding causes, refusal of insurance and unsalable property in the future.</td>
</tr>
<tr>
<td>The term ‘where appropriate’ is ambiguous and could allow developers to build on inappropriate land.</td>
</tr>
<tr>
<td>This policy must be integral to all policy making and must over-ride any other considerations. Flood risk should be prioritised as a major issue.</td>
</tr>
<tr>
<td>More emphasis should be placed on protecting uplands to prevent water runoff into flood plains and rivers. Upland areas should not therefore be built on.</td>
</tr>
<tr>
<td>Natural England generally welcome this policy and particularly support the acknowledgement that sustainable drainage can provide valuable areas for biodiversity and green infrastructure.</td>
</tr>
<tr>
<td>Natural Trust state the first sentence of the policy would benefit from slight rewording or separation into two sentences. Currently the second part of the sentence could be interpreted as meaning that “if avoiding areas of flood risk would make development unviable then the requirement to do so would not apply”.</td>
</tr>
<tr>
<td>The grey water recycling requirement within this policy goes way beyond the current government policy and could impose an unrealistic and expensive condition which could be impractical and unviable in many cases.</td>
</tr>
</tbody>
</table>
Environment Agency ask that the following text in the introductory paragraph be removed from the policy wording as it weakens the overarching principle of flood risk avoidance “The District Council will support development proposals that avoid areas of current or future flood risk and which does not increase the risk of flooding elsewhere and compatible with other polices aimed at achieving a sustainable pattern of development”. Additional wording as following should be “When considering planning applications, the District Council will also have regard to the ‘Humber Flood Risk Management Plan, the Humber River Basin Management Plan’ and the Local Flood Risk Management Strategy.”

The policy includes in its heading ‘Water Quality’, however the content does not make reference to improvements in water quality and has some factual errors. The following should be added “Development will be supported where it is demonstrated that there is no deterioration in ecological status in line with the Water Framework Directive, either directly through pollution of surface or ground water or indirectly through overloading of the sewerage system and Wastewater Treatment Works.” In part A ‘National Planning Practice Guidance’ to the NPPF ‘and in accordance with the updated Derbyshire Dales Strategic Flood Risk Assessment’ should be added to read “a sequential test as set out in the National Planning Practice Guidance to the NPPF and in accordance with the updated Derbyshire Dales Strategic Flood Risk Assessment demonstrates that this is the only site where the development can be located. In part C ‘National Planning Practice Guidance’ should be added to read: where necessary an ‘Exception Test’ as set out in the National Planning Practice Guidance to the NPPF demonstrates that the proposed development can be accommodated with an acceptable degree of safety. Within part d ‘and takes account of the predicted impact of climate change’ to read a site specific flood risk assessment shows that the site is protected adequately from flooding, or the scheme includes adequate flood defences or flood risk management measures and takes account of the predicted impact of climate change. Within part e ‘access to watercourses for maintenance or existing flood defence and flood risk management structures or measures.

Points 1 and 5 of Part f mention ‘ecological flood storage value of the water environment ‘ and 'It uses the natural environment including woods and trees to deliver sustainable solutions' which are processes of natural flood risk management (NFM). The policy would be enhanced by expanding on the benefits of NFM i.e. reductions to flood peaks and timings and the restoration, enhancement and alteration of natural features without using traditional flood defence hard engineering that can disrupt these natural processes. Environmental, social and other benefits (such as reduced soil erosion) can be provided simultaneously with reducing flood risk. Along with making existing flood defences more resilient to climate change, NFM also helps in achieving Water Framework Directive, Floods Directive and biodiversity goals. NFM measures typically cost less to implement and maintain than traditional 'hard' engineered defences. Working with all catchment stakeholders is fundamental to the delivery of NFM.

Other wording changes to the policy are also suggested as follows. Point 2 should have the wording ‘watercourse and/or removes all redundant structures within the watercourse (such as weirs, outfalls, and bridge abutments) where safe and practicable to reduce flood risk, provide flood plain storage, create a wildlife and/or green access corridor’ to read: It opens up any culverted watercourse and/or removes all redundant structures within the watercourse (such as weirs, outfalls, and bridge abutments) where safe and practicable to
reduce flood risk, provide flood plain storage, create a wildlife and/or green access corridor. ‘Flood risk’ should be added to point 3 to read ‘It improves flood risk and water efficiency through incorporating appropriate water conservation rainwater harvesting and grey water recycling’. The following should be added to policy 4 ‘sustainably, giving preference to the use of Sustainable Drainage Systems having regard to the surface water disposal hierarchy’ to read ‘It discharges surface run-off sustainably, giving preference to the use of Sustainable Drainage Systems having regard to the surface water disposal hierarchy.

Sustainable Drainage Systems (SUDs) are key to managing flood risk by the control of the flow rate and volume of surface runoff to reduce the risk of flooding and water pollution. SUDs also reduce pressure on the sewerage network and can improve biodiversity and local amenity. Waste water should therefore be added to point 6 to read “It connects ‘wastewater’ to the main foul sewer network. ‘The SuDS approval body for the area’ within the fourth paragraph should be replaced with ‘SuDs schemes will require the approval of Derbyshire County Council the Lead Local Flood Authority’.

Derbyshire County Council state that as Schedule 3 of the Flood and Water Management Act 2010 will not be enacted, the County Council will not become the SAB or have the legal framework to adopt and/or maintain SuDS features. Therefore, it is important to determine at the early stage of an application which responsible authority/organisation will be adopting and maintaining any proposed SuDS features for the lifetime of the development. The County Council are currently in the preliminary stages of producing local guidance, with character areas inclusive, which is aimed at supporting developers to implement SuDS which will be most appropriate/effective for a particular area. Whilst this remains in its infancy, they are looking to have it ‘live’ around autumn 2017. It may be worth incorporating this into this policy to ensure it is considered by developers in conjunction with other plans/strategies, as described.

Policy supported due to its positive benefits for health and wellbeing.

**POLICY PD9- Pollution and Unstable Land**

A number of allocations within the plan are contradictory to the aims of this policy to protect people and the environment from unsafe, unhealthy and polluted environments. Greenfield sites in particular are not sustainable and encourage car transport which increases pollution levels.

Comments received which support this policy and its aims to protect people and the environment from unsafe, unhealthy and polluted environments. Consultation must be undertaken with DCC.

This policy, as written, does not provide a clear indication on how a decision maker should react to a development proposal. In order to be useful the policy needs to include specifics.

Noise pollution is a problem in some villages, notably Doveridge. Odour issues are also a problem notably in Brailsford.

This policy must be integral to all policy making and must over-ride any other considerations.

DDDC must ensure that comprehensive checks are in place and that landowners are legally bound to comply.

Building on brownfield sites clears areas which have unknown pollutants and which without development are unusable. This should be encouraged.
Natural England generally support this policy. They suggest that the protection of soils is specifically mentioned within the policy. Soils are a finite resource and it is important that they are protected and used sustainably. The plan should recognise that development usually has an irreversible adverse impact on soils and mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soils management during the construction process.

Doveridge Parish Council recently had several noise surveys undertaken, which accord with the Defra documentation (Environmental Noise Regulations (England) 2006, First Round Major Roads Lden), that areas close to the A50 are subject to high noise levels. Another Defra document (Noise Action Planning, First Priority Locations for Major Roads and Major Railways outside agglomerations, 2009), highlights the A50 through Doveridge as a first priority location for noise action planning. Currently there is no major noise action or remediation planned or remediation for Doveridge contrary to Defra and this Policy. This level of noise will clearly affect allocated and potential developments in Doveridge at Sand Land, Old Marston Lane, Babbs Lane and others. This would create an increase in traffic volume (making village roads less safe) and traffic noise as well as being subject to A50 noise and therefore harmful to amenity and increasing the stress caused to inhabitants by the A50 noise issue. While it is possible to control noise inside new homes, this does not extend to their gardens. Noise should be dealt with simultaneously once and for all rather than on an application by application basis. New housing development anywhere in Doveridge would increase pressure on the sewage system creating an unhealthy situation.

The Coal Authority supports this policy and the recognition that the Council will seek to ensure that ground conditions and issues relating to land instability are considered and addressed as part of the development process.

The Environment Agency suggest that the following point taken from PD8 "Promoting the use of appropriately located brownfield land" should be incorporated within this policy as it more suited to the themes within this policy. The Environment Agency are also of the opinion that the policy does not set out in a sufficient and clear manner what is to be expected for future planning applications, with particular reference to land contamination. They suggest that a much stronger policy is needed that sets out when applications will be supported or resisted. Also note that whilst one of the key messages from the Review of Policies, Plans and Programmes that have arisen from the Sustainability Appraisal process is to reduce land contamination there is no specific overarching policy for land contamination and there are many other historic land uses in addition to quarrying and mineral extraction that can lead to contamination of underlying aquifers. Natural England advise that a standalone policy for land contamination would be appropriate for the Plan. They suggest the following wording:

Planning permission will be granted for development on land potentially affected by land contamination provided effective and sustainable measures are taken to assess, treat, contain or control the contamination so as to ensure that it does not:-
(a) expose the environment or occupiers of the development and neighbouring land users to any unacceptable risk;
(b) lead to or allow the contamination of any watercourse (rivers, canals, reservoirs, streams, ditches, ponds or wetlands) or groundwater;
(c) cause or allow the contamination of adjoining land.
The District Council will impose conditions relating to the assessment of remediation and verification processes where appropriate.

### POLICY PD10 - Ashbourne Royal Shrovetide

Strong support for this policy. The policy must ensure that the tradition preserved at all costs, it is a major attraction to the town and is an important part of Ashbourne’s history.

Concerned over potential effects on businesses in the town centre.

It is requested that this policy be removed from the draft plan as it prejudicial to the good relations that exist between the Shrovetide Committee and the landowners. Landowners support the Shrovetide Football match and their cooperation has enabled the football game to be played. The policy is not needed due to the strict controls which currently exist on development in the open countryside. All the hundreds of acres of land in question featured in Draft policy pd10 around the two goals is open countryside.

Proper consultation has not been undertaken by DDDC on this matter.

Consideration should be taken of existing structures and flexibility to improve, repair or replace should be given.

### POLICY PD11 - Matlock to Darley Dale A6 Corridor

Comments received which support this policy and it’s aims to safeguard the intrinsic character and quality of the open spaces through the Derwent Valley between Matlock and Darley Dale, and to prevent the further coalescence of the settlements of Matlock and Darley Dale.

Whilst many support this policy in principle it is felt that recent developments, approvals and the allocations within this plan are contradictory to this policy.

This part of the District is sustainable with a range of facilities and transport opportunities. An almost continuous albeit fragmented urban development is present in this location and provides an opportunity to integrate new development into an already built up area sensitively to meet the objectively assessed housing need in a sustainable location. The 32 housing sites identified by the Council (Policy HS2) do not meet the shortfall in housing land. The Council also depends on all the sites coming forward within the plan period and there are issues of deliverability on some sites; particularly those on previously developed quarry sites within the Matlock and Wirksworth area. The A6 corridor could accommodate a significant further proportion of the housing needs of the central area while enhancing the area by improved landscaping and tree planting and the enhancement of key locations. As a key development location the Council should identify highway improvements (i.e. the junction of Old Hackney Lane and the A6) and the capacity of existing fixed and social infrastructure to better accommodate development, providing gains for existing residents to outweigh the harm from increased pressure on resources In landscape terms the A6 corridor along the valley floor is not high sensitivity and with its urban and suburban character and a generosity of space along the sides of this former trunk road development here can bring significant enhancements. DDDC should undertake a capacity study and landscape assessment to evaluate the true potential for sustainable development and enhancement with a target of perhaps 500-600 homes. A comprehension strategy can then come forward balancing...
development, local improvements to infrastructure and landscape enhancement; a proactive plan which will steer development through the plan period. Development here would reduce pressure on greenfield sites. The policy is currently overly restrictive and prevents development in a natural area for development.

Development in this location, and the associated increase in population, would have serious detrimental effects on the infrastructure which could not be mitigated due to geographical constraints. The lack of balance between housing and employment would be exacerbated leading to even greater road gridlock.

This type of policy which seeks to maintain a ‘strategic gap’ has been deemed inappropriate elsewhere and is not compliant with the NPPF. The general countryside protection policies of S5, PD4 and PD5 offer adequate protection.

There is no evidence to support the allocation of this policy. The accompanying landscape assessment mentions areas elsewhere in the district that are worthy of protection but other than this case, it has not led to the application of any specific policies. There is a lack of consistency across the District.

As there is already development on one side of the A6 sensitive development should be allowed on the other side of the road.

This area should remain protected with development concentrated in the South of the District.

Land such as that included within this policy should not be exempt from development simply as it can be seen from the park, this restricts residential development.

The area provides important views into and out of the National Park and nearby settlements notably Oker. This policy should be implemented to ensure these remain.

Addition of "settlement boundaries" within the first paragraph to read: "safeguard ... between the Matlock and Darley Dale Settlement Development Boundaries". As it stands people may mistakenly believe that coalescence has already occurred as the boundaries to Matlock Town Council adjoins that of the Darley Dale Town Council.

The map demonstrates that the chosen protected open spaces are simply the tourist areas with views SW from the A6 to the Peak Park which, whilst valuable enough in that respect, do little to safeguard the intrinsic character of the Darley Dale corridor. DDDC need to implement a comprehensive strategy for prevention of coalescence of each of the various 'Darleys in the Dale'. Initiatives that are imaginative, positive and significant, such as designating the whole of the current Warney Brook/Ladygrove green corridor as a local wildlife/protected no development zone would be more in line with what is really needed and a readily achievable objective for any council.

Access to the A6 is difficult during peak times, there should be no more development located there.

Indicated that this policy does not do what it aims to and merely protects a small number of green spaces, much of which is hidden behind existing buildings.
### CHAPTER 6 – HEALTHY AND SUSTAINABLE COMMUNITIES

#### KEY ISSUE

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<th>POLICY HC1 - LOCATION OF HOUSING DEVELOPMENT</th>
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<td>Object to Policy approach of squeezing additional development into already overloaded towns and villages, the concept of a new village should be considered. Scale and requirement for housing is too large.</td>
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<td>As no development can be provided within the Peak District National Park the number of dwellings required to be met in the plan area should be reduced proportionally. The District Council should challenge the National Park and the lack of housing supply in this part of the District.</td>
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<td>Policy approach to re-use land, redevelopment, conversion and change of use supported.</td>
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<td>The location of new housing proposed by the strategy in the Plan is too limited and should be more evenly distributed across the Plan area as a whole. Housing should be provided in tier 4 and 5 settlements to support these villages.</td>
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<td>Policy should be extended to include sites adjacent to settlement boundaries as well as previously developed land outside settlement boundaries.</td>
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<td>The scale and location of housing development proposed in tier three settlements is disproportionate</td>
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<td>To be a truly sustainable plan to location of housing development should tally with the location of employment opportunities.</td>
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<td>The proposed significant housing development in Wirksworth is not consistent with the Neighbourhood Plan, the scale and location is not acceptable and will negatively affect the town.</td>
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<td>Support to the principles set out within the policy.</td>
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<td>A number of the proposed allocations do not meet the Authorities own criteria for the location of housing development established in policy HC1.</td>
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<td>Policy should encourage a more equitable distribution of housing throughout the plan area, and focus more development to be located on brownfield rather than greenfield sites.</td>
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<td>The plan should do more to encourage small scale infill and self-build plots including eco homes.</td>
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<td>The policy on the location of housing should not be viewed in isolation with proposals considered together with education places, medical provision and supporting infrastructure.</td>
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<td>The Plan should do more to look at and consider alternative and additional sites for development.</td>
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<td>Objection - Third bullet point as currently worded is unnecessarily restrictive and contrary to the message in the Framework that “housing applications should be considered in the context of the presumption in favour of sustainable development.” As currently drafted the third bullet point suggests that development on unallocated sites outside a settlement boundary would not be supported. Simply because a site falls outside a defined boundary does not mean that it is not a sustainable location for development and that planning permission should be refused. The policy should be amended to read “supporting housing development which it has been demonstrated address the three dimensions to sustainable development: economic, social and environmental.”</td>
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The Policy precludes development outside of the boundaries of settlements in the hierarchy. The Framework is clear that development which is sustainable should go ahead. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework.

As currently drafted the Plan will prevent windfall development coming forward. Suggest HC1 is amended to reflect emerging national policy, and to enable small scale, organic growth. with the addition of the following bullet point:

- Supporting appropriate, small-scale development on sustainable sites immediately adjacent to settlement boundaries.

This change would reflect the presumption in favour of sustainable development, and the approach that is increasingly being taken by the Planning Inspectorate towards development boundaries, which can no longer be regarded as an immutable barrier to development, and which case law suggests should remain a material consideration. Tensions can be caused if local communities are not aware that a settlement development boundary is more flexible than it has been in the past.

It is important that the plan sets out a sufficiently flexible strategy to ensure that it can deal with changing circumstances without the need for review. This should include the allocation of additional suitable sites. The Council may also wish to consider a reserve site approach to ensure that where allocated sites are not delivering, there is a mechanism to bring forward additional land without the need for a local plan review.

The final sentence of the policy needs to provide a clear trigger to cover the circumstances whereby the Local Plan should be reviewed. Location of Housing Development sets out a proposed review mechanism but the policy is too weak to be effective. The policy should specify the triggers which would prompt a review of the Local Plan.

Within Policy HC1 specific trigger points should be included to ensure that any shortfall in housing being delivered can be addressed as expeditiously as possible. The trigger point should be considered both in relation to the 5-year housing land supply position and also in response to slippage in the delivery of allocated sites and the delivery of the proposed housing trajectory. If sites are not developed quickly enough or the housing land supply position drops below 5.25-years then the Council should address this through the release of sustainably located sites in or on the edge of existing settlements.

We support the Council approach to developing specific sites through the site allocations process, however, additional sites should be identified to meet the FOAN identified in the Council’s own evidence base documents.

**POLICY HC2 – HOUSING LAND ALLOCATIONS**

The emphasis of the search for housing sites has been reactive and not proactive, the principle of a sustainable new village should be explored as a concept. Darley Dale Town Council notes the lack of effort made by DDDC to identify a site for a potential new village
anywhere in the District for planning purposes, despite pressure from the Town Council and many individual residents of both Matlock and Darley Dale.

DDDC has limited resources available for searching for available land for housing, the search through the call for sites process has not been comprehensive or analysed potential alternatives. The sites included have therefore been an easy option for DDDC whereby any sites put forward have been accepted rather than the best and most sustainable locations across the district. A more proactive and entrepreneurial approach is required. Limited work has been done on the duty to cooperate with neighbouring districts. East Staffordshire and South Derbyshire both have development opportunities which may be of interest to DDDC. In addition to Local Authorities the police and network rail should be contacted as they own vast swaths of land. Evidence of this should be provided publically.

The scale of the development proposed in Brailsford is disproportionate, both in comparison to other tier 3 settlements and in comparison to the size of the village. The allocations would double the size of the village. The allocations also account for 30% of all tier 3 allocations, 60% of all tier 3 allocations have been placed in two settlements which is not a fair distribution. The amount of development would alter the character of the area, from a village to a town. The village will become like Hilton, a large housing estate.

Proposed developments in Brailsford are not in keeping with the style of the village. They are of an urban style. The village should not loose its identity and become an urban sprawl.

Many of the sites proposed within Brailsford are inappropriate, with many having been turned down previously. Development here is unsustainable and not NPPF compliant. Greenfield sites have been allocated above brownfield and 3 out of the 4 allocations lie outside the settlement boundary. Agricultural land is also allocated. Greenfield land is brought forward due to developer profits rather than community need. No loss of environmental character is acceptable.

The development proposed in Brailsford goes against policy S10.

The existing limited facilities and infrastructure in Brailsford will be placed under further strain due to the large number of allocations. The school, medical centre and recreational facilities will not be able to cope with this level of housing. The new schools was built to accommodate the 50 new homes on the Miller site, not this level of development, and does not properly plan for parking. The school will need to be expanded on to two fields which were initially available for use by members of the public. Also issue of the increased development at Ashbourne preventing children from Brailsford being within the catchment area of QUEGs. Improvements to drainage and sewerage will be required. The water pressure has already worsened with the completion of recent developments. The medical centres is now at full capacity with very limited car parking, it could not cope with increased development. One of the proposals will therefore need to provide space for a new medical centre. The village hall is small and cannot accommodate new developments.

Little money will be gained from the S106 agreements on the developments and no improvements to these facilities will therefore occur.

The issue within Brailsford of road safety and maintaining the highways has not been considered comprehensively. There is already significant traffic coming through the village, particularly the A52 and Luke Lane, which will be further exacerbated by the new
developments, as will back streets used as rat runs. There have been an increasing number of accidents and fatalities in recent year. The roads in Brailsford were not built to accommodate for their current level of traffic, let alone any increase on this level. In addition the A52 is becoming a major trunk route of convenience from the A38 to and from Manchester, for which the road is unsuitable. HGV access on A52 to and from Markeaton roundabout should be restricted and instructed to use other trunk roads. Alternatively HGVs should be restricted from using the road between the house of 6am and 10pm except for access. The concentration of houses to the North of the A52 will increase the hazards for parents and children who will be walking or driving to school, the drop off point for the new school is inadequate and may cause problems. Significant improvements to the A52 in relation to speeding and access from Church Lane and Luke Lane will be required, including traffic lights at this junction and perhaps roundabouts at either end of the village to ensure traffic is restricted to 30mph and not the current average speed which is significantly higher. Traffic from proposed allocations in nearby locations will also worsen the issues. The closure of roads for construction will cause huge disruption. Bicycle and pedestrian walkways should be provided along the major routes to facilitate commuting, currently it is dangerous for pedestrians due to the traffic.

Proposed development in Brailsford does not meet the needs of the community, it does not serve the elderly wishing to downsize or first time buyers. The provision of bungalows on The Plain has provided help in allowing some elderly residents to remain in the village, new developments must contain a similar or higher proportion rather than large houses. Smaller developments suitable for downsizers within the village would be beneficial and provide a mixed age community.

Once built upon the countryside surrounding Brailsford cannot be replaced. This will be detrimental to wildlife and birds which many residents currently enjoy. Visitor numbers will also decrease as a result of loss of wildlife which will affect the local tourist economy.

Questions whether consideration has been given to the issue of increased Fly tipping and litter which will be associated with additional housing numbers in Brailsford.

Improved bus services and public transport will be required to serve the additional population associated with proposed allocations in Brailsford. Currently there is only one bus an hour to Derby and Ashbourne for the elderly. This is also insufficient for commuters. The buses transporting school children to Ashbourne are also standing room only which is dangerous.

A number of the housing allocations should not be included within the plan on landscape character grounds. Proposals intrude into the countryside and destroy agricultural land.

The proposed allocations within Brailsford are contradictory to the sustainability principles of policy S2.

The proposed allocations within Brailsford are contradictory to the policy S3.

The proposed allocations within Brailsford are contradictory to the policy S4.

The proposed allocations within Brailsford are contradictory to the policy S5.

The proposed allocations within Brailsford are contradictory to the policy S8.

The proposed allocations within Brailsford are contradictory to the policy S9.

The proposed allocations within Brailsford are contradictory to the policy S10.
The proposed allocations within Brailsford are contradictory to the policy S11.

The proposed allocations within Brailsford are contradictory to the policy S16.

The SHELLA assessment did not take account of cumulative effects and assessed sites individually. This methodology is inadequate. This is notable in Brailsford.

The number of dwellings per allocation should be stated as a maximum.

Significant mitigation measures will need to be put in place in Brailsford in order to eliminate the flooding which occurs regularly on Main Road when it rains heavily without the addition of yet more houses, which will feed water ever more rapidly into the already overloaded drainage system. The plan has no specific proposals to resolve these problems and it therefore cannot be supported

Support for the sites allocated under this policy.

Concern that not enough housing is provided under this policy and that too much reliance has been placed on all sites coming forward. The discount of only 10% on the housing trajectory is insufficient to account for a potential failure to deliver housing on some of the sites and further land should be allocated.

Lack of planned infrastructure alongside the housing allocations is a major weakness of the plan.

Would support small scale sustainable development in Brailsford, the proposals do no align with this.

The development proposed for Brailsford could be split across the regions, with smaller scale developments in a range of places. The influx of housing in Brailsford is reducing house prices and Miller's have struggled to sell a number of their properties.

There are no employment opportunities for new residents to Brailsford, they will therefore commute worsening traffic issues on the A52. Support for DDDC refusing a Millers development on the Old Dairy site to retain employment.

Additional sites should be allocated under this policy where it can be demonstrated that any adverse impacts would not significantly and demonstrably outweigh the benefits of doing so, and there would be no other conflict with the policies of the NPPF.

SHLAA site 478 should be included within this policy as a proposed allocation. Further development of a modest scale in Tansley is consistent with the spatial strategy of the Plan, which has been supported by the Sustainability Assessment, Tansley is also a tier 3 site within the settlement hierarchy. The SHELLA correctly records that there are no environmental constraints to development of the site; the site is located in flood zone 1; no ecology constraints have been recorded (which has been supported by the owner’s Phase 1 habitat survey), and similarly no harm is considered to arise to heritage assets or archaeological interests (similarly confirmed by owner’s Archaeological Desk-Based Assessment). The Landscape Officer has also concluded that there is capacity for development across the site without harm to landscape or settlement character and visual amenity. Owner’s Landscape Consultant has similarly concluded that views of the housing will be negligible due to the nature of the wooded landscape and restricted views, and that development would not change the discrete settlement pattern of Tansley nor the well settled landscape character. The site is also correctly recorded as being accessible to local services and facilities and public transport and capable of overcoming local infrastructure constraints. It is also correctly recorded as available and achievable. The assessment concluded, however, that the site was unsuitable for development on the basis of perceived access constraints due to insufficient land at the site frontage with Whitelea
Lane to provide requisite visibility and safe access for pedestrians. It has been demonstrated that sufficient land is available to provide the necessary visibility and pedestrian footpath connection to access the Whitelea Nursery site. The benefits of allocation of the Whitelea Nursery site in boosting the overall supply of housing, and reducing the scale of unmet housing needs, outweigh any degree of harm that development of a greenfield site in this location could be deemed to cause. The site is therefore suitable and deliverable.

The large amount of housing along the main road in Brailsford will have little to screen it from increasing noise and pollution. Brailsford and other larger villages in the area appear to be being allocated a disproportionate number of housing because the National Park is excluded from development plans.

For those currently in the process of creating a Neighbourhood Plan, there is a disheartening sense that consultation is not effective, and that goal posts keep moving with additional housing allocated within villages such as Brailsford.

New homes should be provided in Brailsford through infill rather than a large number of major developments.

The electricity system cannot cope with the influx of potential users associated with the proposed housing in Brailsford, electricity already cuts out on a weekly basis. Broadband is also slow.

Future applications for Brailsford should be refused.

Request that alongside the proposed allocations for Brailsford that detailed design conditions are stipulated for style, building materials, boundary fencing, street scene, planting and public realm to protect the rural character of the village and does not continue to destroy further the landscape. The Miller homes are of a poor design which is not in keeping with the village, permission for a second phase of development should not be granted unless they demonstrate that this will be more in keeping. Request any CIL is retained for the benefit of village. No public consultation was undertaken on the Miller Homes site.

Request that SHLAA177 remains out of the plan, the site is unsuitable. It has a highly dangerous exit onto the A52, around the Allotments which afford protection. It is a few hundred yards from historic buildings recorded in The Dooms Day Book, one of which is a Grade 1 Listed. An archaeological dig will be necessary which will be costly and time consuming rendering the site undeliverable. There is already "The Green" in the area of the ancient settlement which is an existing attractive asset to the Village.

The Plan does not give a clear view of the proposals for Tansley, new sites are constantly coming forward in an opportunistic way preventing residents from being able to comment on the full level of development. The Local Plan should provide a finite allocation of homes for the settlement, rather than piecemeal development.

Greenfields surrounding Tansley are being unfairly proposed for housing development in order to provide developer profit. Any medium sized development, like those proposed, will alter the character of the village. Green corridors should be maintained and proposals outside the previous settlement boundary dismissed. The 30 new dwellings proposed previously should remain the maximum amount of development. Tansley will be more similar to a housing estate than a village should these proposals be implemented. This will affect tourism. The loss of greenfields will also affect wildlife in the area. The greenfield originally maintained the distance between Tansley and surrounding towns and villages, this aim should remain.
Tansley lacks the appropriate services and facilities needed for the proposed number of allocations, which is contrary to policy S2. This includes a lack of public transport, and village shop. The village also has a lack of recreational facilities or play areas for children and leisure facilities for adults. Additional services should be provided including a pre-school. The services available to Tansley residents with regards to education and medical facilities are already overstrained. Recent correspondence between Tansley Parish Council and NHS England states that the DDDC needs to ensure Health and Education facilities are adequate for a given area. In this respect there should be extra provision for the Matlock area, to include Tansley. Questions raised at recent meeting related to extra health care, particularly GP services were answered by DDDC, the impression was that discussions had taken place. The local CCG state that no discussions have taken place as yet, some are planned. DDDC are therefore unaware if there will be an improvement in GP access for present residents.

Tansley lacks the appropriate road system and parking to accommodate the proposed number of allocations. Public safety will be affected alongside the increase of cars, particularly where members of the public have to cross the A615. There will also be problems for larger vehicles in navigating the streets of Tansley. Traffic associated with construction would damage the older houses of the village. Queuing of cars on the main road would affect air quality. Snow is also an issue which affects Tansley and the road system.

Proposals which include a preschool for Tansley would not be beneficial to the village, it would encourage young families to the village and the primary school is already at capacity.

Development around Tansley and Matlock will affect the safety of children walking to Highfields School. Concerned also about parents and children crossing the A615 in Tansley to access the school.

SHLAA350 has been assessed incorrectly and should be developable as highlighted by recent appeal decisions.

The Oker / Snitterton Road will not be able to cope with the significant developments proposed in the vicinity. This is a narrow road used by hikers, cyclists and horse riders. Roads in the vicinity will also suffer, many have no pavements which deters pedestrians.

Request that SHLAA site 478 at Whitelea remains unallocated. The site has poor access and the number of houses would further strain infrastructure in the area.

In recent years there has been a growth in population in Middleton. During this time there has also been a reduction in services. Increasing the population further in light of the reduction in services is inappropriate. The full scale and impact of this development has not been considered.

The cumulative effects of the Cawdor Quarry, Halldale and Snitterton Fields would have large impacts on the road system. The build-up of traffic on Matlock Spa Road would require changes to the road system. The services and facilities must also be able to cope with the influx of people.

Housing allocations are too highly concentrated in the narrow A6 corridor around Matlock where the topology strongly argues against further development. Increased traffic along the A6 will worsen an already unsatisfactory situation.

The further development of in-filling small sites within existing villages and small towns is leading to the detrimental urbanisation of once attractive residential locations. Over development increases congestion and overloads community services such as healthcare,
schools. Present approach is unsustainable and at some point DDDC will run out of available in-fill sites.

More development should be provided within the South of the district where employers are located. Villages there need development to sustain essential community facilities.

Developments within Brailsford are not having regard to safety of children, recreational areas are being proposed at the edge of developments where they will not be overlooked by other houses.

Brownfield site should be considered a priority for developments. Greenfield sites should not be chosen above brownfield.

The proposals in Brailsford and Hulland Ward will affect the character of the Dales. They are contrary to the vision for the plan and make the villages less sustainable. Also in conflict with the key issues.

The location of Brailsford means it is either the first or last settlement seen when visiting the Dales, the new developments will be visibly out of place and will dominate the scene. Developments already approved are intensive and the further proposals will not be able to be implemented without undermining K1.

The elevated rates of carbon emissions will be worsened by further developments in Brailsford.

The density and location of the developments in Brailsford means they are unlikely to have green space. This is contrary to the vision of the plan and KI6-7.

The allocations in Brailsford are against policy S2.

It is unclear how the Northern developments in Brailsford contribute to the vitality of the village centre, contrary to KI9.

Increased housing numbers could be provided on some of the quarries in order to prevent the release of greenfield sites.

The scale of proposals for the tier 3 settlements of Brailsford, Doveridge and Hulland Ward is disproportionate. Further allocations should be made to other tier 3 settlements to reduce the burden. The process of evaluation of sites should also be reviewed. Places with higher levels of sustainability such as Tansley and Cromford have much fewer allocations.

The selection of sites has been inconsistent; many of the sites included in Brailsford have many of the characteristics which have been used to rule out sites in other settlements such as agricultural land, impact on landscape.

Despite allocating the correct number of sites the inclusion of the entirety of the sites has indicated to developers that the full site is available and that a wider opportunity exists.

Miller Homes development in Brailsford is somewhat beneficial due to the provision of the school SHLAA381 should be allocated within this policy and be seen as an extension to Matlock. This site could alongside Hc2aa, Hc2bb and Cawdor provide a significant number of housing towards meeting the OAN.
SHLAA257 should be allocated within this policy. The site assessment was carried out on the basis of a false presumption that the site “contains woodland” rather than it being one that is vegetated by overgrown nursery stock. The site’s location as part and parcel of the built framework of the area lying between Bakewell Road and Old Hackney Lane means it should be included. Although there is a reference to a Tree Preservation Order that does not incorporate the site to which this objection refers. The vegetation on the site should be regarded as a “crop”. With the exception of considerations relating to environment ecology, landscape and those in respect of trees and hedgerows, this site scores favourably. The site is in a similar location with regards to facilities as 170, which although greenfield has been allocated.

SHLAA 284 should be allocated within this policy. It is accepted that it contains significant areas of open land, again vegetated by former nursery stock. However, there is frontage land lying to the south-west of Hackney Road that could be developed. It is clearly desirable that that area should be reclaimed and it is not considered that there are material planning considerations that militate against favourable consideration being given to a modestly-proportioned housing development on the frontage to that land also.

SHLAA285 should be allocated. Greater weight should be been given to the nature of the site as part of the former nursery grounds. This is not traditional woodland but the remnants of a planted nursery. The Assessment was made on the false premise that this site contained “significant areas of woodland”. Planting could part of an attractive housing development. The situation with regard to accessibility to services and facilities is similar to those in respect of Site 170, which has been allocated.

Comments received which request further clarification on the progress of the Whitelea site.

SHLAA177 should remain unallocated. Development of this site would create excessive traffic on what is a small country lane. The junction to the A52 is dangerous with near misses occurring.

Policy Hc2 should include the land to the north of Derby Road Doveridge as a further allocation to provide 50 dwellings. Land to the north of Derby Road, Doveridge provides the opportunity for further development to provide between 40 and 50 dwellings to help meet the identified objectively assessed needs in the district. The land is well related to the existing settlement form being bounded by the strongly screened A50 to the north and Derby Road to the south. Existing residential development forms the site’s eastern boundary. A new burial ground is located to the west of the site. Development on the land would not result in any unacceptable landscape impacts and in many respects would cause less harm than the land to the south of Derby Road proposed for allocation under Hc2(q).

Brailsford Parish Council have commented with the following: The Plan does not match homes to jobs and the size of development proposed will be detrimental to the integrity of the village, the Parish overall, and to the quality of life experienced by its residents. None of the Brailsford sites comply with the NPPG requirement to match homes and jobs and reduce travelling, as Brailsford no longer appears to have any specific employment land designation. The level and rate of growth proposed for Brailsford Village is also much more significant than the Plan and its supporting documents may suggest as the population of the village is recorded as 925 which is more in line with that of the Parish as a whole (2011 census). The actual population of Brailsford will be c 450; on this basis Brailsford is closer to being recognised as a Tier 4 settlement. 150 Additional homes with an occupancy of 2.4 (2011 census) could result in a...
growth of 360 or an increase of c80% on the current population. The recognition of the need to implement high standards of design is a crosscutting theme underpinning the draft LP. The current allocations to Brailsford are not consistent with this aspiration, and are likely to lead to urban type estates, which while commercially attractive are detrimental to maintaining village integrity and distinctiveness of the Derbyshire Dales.

Current developments under construction off Luke Lane show inadequate private social space. The proposed layouts should be designed to allow more external space, both private and public.

The guidelines of percentage types of dwellings per development should be made mandatory.

Potential to increase some of the development on some sites notably Hc2 (f) in order to remove more sensitive sites.

The development proposals within Brailsford will split the village into two halves.

Sites which failed stage b of the assessment should have been reassessed and contact made with the landowner to allow further assessment with the opportunity to overcome some of the limitations identified. Crucially DDDC has not sought to identify specific locations where development should take place. Paragraph 157 of the NPPF requires a Council to indicate broad locations for strategic development nor has it identified the quantum of development needed to meet its objectively assessed need. DDDC has not identified additional works to local infrastructure which could unlock sites in sustainable locations. In fact no assessment of infrastructure is provided within the draft Local Plan. The sites the Council consider to be undeliverable can often be delivered. The methodology used has not provided sufficient housing land to meet the Objectively Assessed Need. This lack of pro-active planning approach is very poor and undermines its effectiveness in delivering change. As such the plan fails to be positively prepared and it undermines its effectiveness, key tests of soundness and the requirements of Paragraph 182 of the NPPF.

Plan is over reliant on a high number of smaller green-field sites. Such sites would inevitably lead to a more piecemeal form of development rather than delivering more comprehensive and coordinated development.

SHLAA site 472 should be allocated under this policy. It is no less sustainable than other allocations notably Hc2v. This site could balance supply from larger greenfield sites.
Some villages are being allocated a disproportionate number in comparison to other villages of the same tier. This is unsustainable, unjustifiable and harmful to the villages.

Although the government want more housing it is questionable whether demand is there in small towns.

Objections received to the building of housing on greenfields.

The scale of development proposed for Doveridge contradicts many of the principles of the plan. Development should be significantly reduced.

Any site assessed as having medium to high sensitivity within the SHELAA should be excluded from this policy and should not be allocated.

More allocations should be made for tier 4 and 5 settlements. Small villages often actually need more homes and inhabitants to maintain a viable village community, perhaps to keep a school, a pub or a shop in existence. The exclusion of these tiers from development contradicts the NPPF.

Wirksworth is highly constrained in terms of geography and topography. Some of the sites put forward will be costly to deliver and there will inevitably be a negligible contribution to affordable housing and the necessary infrastructure needed to support the numbers of market housing that the developers will need to realise. Wirksworth cannot support over 300 new dwellings without infrastructure improvements in terms of highways, school facilities and town centre facilities.

The proposals for Tansley will totally change the character of the village and force it to become a suburb of Matlock. This will affect quality of life.

The amount of residential development proposed for Tansley is disproportionate compared to other villages.

Tansley has a number of greenfields which are being targeted by DDDC as an easy option to develop and by developers wanting to make as large a profit as possible.

In the Spatial Vision, it states -'larger villages including Tansley, Doveridge and Brailsford will benefit from development with an improved range of amenities including schools and healthcare'. Although DDDC have secured a new doctors surgery in Doveridge it is unclear as to the new amenities Tansley is to receive, the plan does not seem to mention any improved amenities or facilities for Tansley.

The Plan and this policy in particular does not reflect the spirit of the Localism Act, land assessed in Tansley has not been brought forward for public consultation. DDDC have not asked the community what facilities are required to make this additional development acceptable.

Sensitive greenfield areas on the edge of Matlock should not be developed due to the potential landscape impacts.

The scale of development on the edge of Matlock is too large and will cause traffic implications.

With the large amount of housing proposed for Brailsford how will key features such as allotments, playing fields, institutes and open spaces be retained?

Consideration should be given to sites which can offer jobs, transport and affordable housing.
SHLAA site 176 should be included within the plan, its previous assessment was incorrect. Additional work has been done by the owner in order to demonstrate that the site is suitable and deliverable. There is no evidence that the site was ever parkland and within the plan some land would be provided for this use improving environment ecology. The site currently offers no facilities for recreation, it supports grazing cows occasionally. New open space would be provided as part of the proposal. The site would support NBE9 as it provides open space, this policy also contains a specific exclusion for development aimed at improving the facilities of the Whitworth trust. The site is virtually and functionally separated from the Whitworth centre by the cemetery and football pitch and would not impact on the landscape. The site cannot be seen from the centre and the centre cannot be seen from the site. The housing would not threaten the character of the adjacent parkland, which is, and always has been, a football pitch protecting the historic environment. The owner is aware of their responsibilities over trees and plan shows their retention virtually everywhere with numerous opportunities for enhancement. Owner disputes the claim that this site would have any visual impact whatever on the heritage assets. Their parkland proposal maintains the green space on the A6 and provides a new pedestrian route from Churchtown to Darley Dale Station. Development plans indicate that an appropriate access design can be achieved off the A6. Classification of the site as amber in the SHELAA under services and facilities and education is an error as the report wording states a good range of services and Churchtown school is 400m away. By the summer of 2016 the multi-purpose trail will run partially through the site, further paths could be established as per the submitted plan. The Peak rail has very light traffic with none at all in some months. Housing will be some distance from the railway line and therefore any impact on the houses will be positive and popular. The opportunity for partial development of the site has also not been comprehensively assessed.

Concerned as to how the narrow roads at Old Hackney Lane will cope with the influx of traffic caused by development.

The visions and statements of the plan are not reflected in the allocations within this policy.

Incorrect information has been provided within the Highways reports with regards to Brailsford.

The proposals for Wirksworth have not been considered cumulatively and consideration of the 130 bed Mount Cook Adventure Centre. The increase in traffic will affect the B5036 which provides access to the A52.

SHLAA site 342 should be allocated within the plan. It is incorrectly shown on the map as open countryside. This site is a small steeply sloping site mainly covered in bracken with some trees not in beneficial use. Limited residential development (1-2 houses) would be a beneficial use in a District where there is a long-term significant shortage of housing land and where with appropriate good design it would not be out of place and be in keeping with the locality. It would not be an intrusion into the countryside and is in line with policy S4.

SHLAA site 343 should be allocated within the plan. The site is a pasture field the south-western part of which is steeply sloping and the north-eastern part is relatively flat. Houses on steeply sloping sites are common in and around Matlock where they are a common feature given the hilly nature of the terrain. Access to both parts of the site is possible from Farley Hill. Part of the site in the south-west adjoins Upper Hackney and if the site was developed it would be linked to the built-up area of Matlock. It would also link Farley which is to the north of the site with Matlock. In terms of distance to services the site is about 1.6km from the centre of Matlock. It is further in
distance to Darley Dale. It is contended that the proximity to Matlock is such that the site is sustainable in terms of development the steep part of the site could be developed separately from the remainder of the site.

Evidence to justify the large increase in the proposed number of allocations within Ashbourne when compared to the previous plan. The only reason provided is that the housing will meet a district wide need. This is not an adequate justification as if the demand is not within Ashbourne, and such demand has not been illustrated, no developer will invest there. Once local need is met, regardless of district wide need, additional homes will not be built. Currently people will live in Ashbourne and work in south Derbyshire. So if Ashbourne’s housing allocation is to service the economic needs of Derby and other south Derbyshire and Staffordshire commercial centres, Ashbourne will increasingly become a dormitory town. Although the new village suggestion has been dismissed, the proposals for Ashbourne particularly on the Airfield are of this level and have significantly more issues than with a new village.

Deliverability is critical however it appears little has been done to bring sites forward or confirm their deliverability within the plan period.

Requirement for more houses to suit the need for young people within Ashbourne to encourage economic growth.

The brownfield SHLAA site 434 should now be considered, as the adjoining site at Middlepeak has been provisionally allocated. Its location is close to Wirksworth town centre, making it easily accessible by public transport and close to medical services and schools. It will appear as an organic extension to the town, being considerably closer than both parts of the proposed Middle Peak Quarry development and other existing dwellings in Wirksworth making it a sustainable location. The site is large enough and does not fall within a flood zone or a special area and has low nature conservation value. There are no known natural environment related constraints and there is the opportunity to enhance the natural environment. There is low landscape sensitivity and no adverse impact upon landscape setting with opportunities for improvement and enhancement. Development of the site is likely to result in minimal or no impact to/on the significance/setting of a listed building (I,II*,II); a scheduled monument; a registered park or garden (I,II*, II); world heritage site & its buffer zone, a conservation area; a non-designated heritage asset. It is likely that no mitigation is required. There are limited trees on the site and none are designated as a TPO. Opportunities for improvement and enhancement. Site will have no impact on the purposes of the National Park and presents opportunities for enhancement. There are no known contamination or unstable land issues, or risks of the need for remediation. The topography would have an adverse impact, although it could be mitigated and the site developed. There is either the opportunity to enhance the local character or there is no adverse impact. There is sufficient access to the site and no adverse impact on the highway network. There would be no loss of recreation or open space facilities. Site is in accordance with material policy. There are no Red stage B issues. There are only three amber stage B issues. One, the topology is such that there is a slope on the site but the slope is minor and would not cause a development issue, and two, there is currently a footpath to the site but no cycleway, and three, the medical centre is slightly more than 800m away. The footpath is through Middle Peak Quarry and could be improved to include a cycle path. All other stage B criteria are green. A small
development at Norbreck Farm would enhance the visual appearance of the town by replacing current steel, concrete and asbestos cement buildings with more traditional pitched roof dwellings. The dwellings would be nice places to live being both close to the town centre and having a mainly southerly aspect, thereby with the potential for enhanced daylight and solar power.

The SHLAA sites 211, 214, 205, 223, 218 and 480 should be allocated under this policy. The sites are located in sustainable locations and would aid DDDC in meeting its Objectively Assessed Needs (OAN).

The SHLAA site 215 should be allocated under this policy. The site is located in sustainable locations and would aid DDDC in meeting its Objectively Assessed Needs (OAN). It was previously identified as a high priority housing site and has only been excluded from allocation due to a misunderstanding about the intended access location, which can be relocated to the north where adequate visibility can be achieved.

The SHLAA site 181 should be allocated under this policy. The site is located in sustainable locations and would aid DDDC in meeting its Objectively Assessed Needs (OAN). Although located within flood zone 3 this issue could be overcome.

The SHLAA site 213 should be allocated under this policy. The site is located in sustainable locations and would aid DDDC in meeting its Objectively Assessed Needs (OAN). Alternatively it should be included within the settlement boundary.

The allocations in Brailsford under this policy contravene the evidence provided by the clear lead consultants. They advise a reduction in car travel, which the Brailsford proposals contradict as car use there is necessary for most journeys. The employment opportunities within the proximity of Brailsford would take up to 2 hours on a bus, rather than 30 minutes in the car which encourages commuting by car and increase car usage.

SHLAA site 240 should be allocated within this policy and could contribute to meeting the housing shortfall. A planning application was recommended refusal on the site and it was then withdrawn to overcome issues raised in the report, this is to be resubmitted in summer 2016. The SHLAA assessment of the site was inaccurate and not all the red indicators were mentioned in the reason for refusal of the planning application. Historic environment should not be red, although the building is listed heritage consultants argue that the development would not be substantial harm. DDDC should apply the NPPF guidance and assess whether the harm is substantial or whether it could be outweighed by other benefits. The public benefits of the development include provision of market housing in a local service centre where there is no 5 year supply, provision of affordable housing, high quality exemplar design, the reinstatement of parkland topography and parkland tree planting, the management of existing trees, enhanced bio-diversity, a surface water drainage system to capture water runoff in a controlled manner, the removal of incongruous metal railing from the listed boundary wall along the Whitworth Road frontage. A small number of trees would need to be felled, there are opportunities to mitigate with considerable scope for additional parkland trees planning within the SHLAA site and other land owned by the client. Whilst previously developed land scoring is accepted but this is in common with most sites. The assessment states that development would mean the loss of a cricket pitch and running track however both have not been used for 20 years, since the Hall was a school and during that time were not open to the public. The land should be allocated and could provide a sustainable development.
SHLAA 159 within Shirley should be allocated for modest development of 5 units. The village has few infill opportunities and therefore without some scale development of this nature is likely to stagnate, particularly due to the restrictive nature of policy S3. Previous surveys in the village indicated that accommodation for the elderly, enabling them to downsize and freeing up family homes, is required in the village. This could be provided on site 159. Five new dwellings would represent a growth in the number of houses in the village of under 5%, which is commensurate with the scale of this rural settlement.

The detailed site assessment within the SHLAA states that the principle constraints relate to the landscape impact of development and the inability to secure a satisfactory access to the highway. The site is within an area of high landscape sensitivity. However, all of the SHLAA sites within Shirley with the exception of site 227 are similarly affected, and that site is constrained by its proximity to heritage assets. Site 159 is not situated on the steeper eastern or northern sides of the village, it is situated on a very gentle slope to the south of the village and would not be as prominent within the landscape. The site has clearly defined boundaries and is a logical extension to the village. The southern hedgerow is a defensible boundary and a logical limit to development. With regard to highway impacts, the site has a wide frontage to Mill Lane. Whilst it is accepted that there is currently a difference in levels between Mill Lane and the site, the frontage is entirely within the site owner’s ownership and as such there is scope to provide an access with acceptable geometry and sufficient visibility. It would also be possible to widen Mill Lane across the site frontage if required.

Darley Dale Town Council indicate that while the population of Darley Dale has increased over the past two decades little infrastructure improvements has been made. The A6 is already congested. Both the major sites in the area will have their sole access off the A6, which will exacerbate the issue.

Darley Dale Town Council indicate that the development of nearly 250 houses on the 2 largest proposed sites in Darley Dale without accompanying infrastructure improvements in the form of controlled road junctions, schools, health and leisure facilities threatens to swamp Darley Dale with houses, cars and people in an unplanned and unsustainable way therefore reduces the quality of life for residents. The character of Darley Dale will be lost and it will become part of Matlock.

The proposed new development along the A6 does not accord with the need in the area, family homes are being provided but the road is dangerous for young children. There is a blind corner and not enough pavements. Accidents will occur.

The one greenfield site proposed in the draft Neighbourhood Plan (SHLAA176), with some 40 houses, was classified as "undevelopable" but there were several errors in the assessment, which errors DDDC have since acknowledged. Darley Dale Town Council feel that this development could be beneficial as this land would provide financial assistance to the Whitworth Trust, a local charity, to enable it to continue to provide educational and leisure facilities.

When allocating sites DDDC is reminded by the Home Builders Federation that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are
available to meet the widest possible range of demand. On adoption of the Local Plan the Council should demonstrate a 5 YHLS otherwise the Plan would be unsound for failing to be positively prepared and effective. Taking account of the evidence and the market signals it is clear that need for new housing is very strong in District and accordingly an uplift should be applied to overall housing target as applied by Inspectors at other Local Plan examinations such as Eastleigh and Canterbury. For the Derbyshire Dales Local Plan to be found sound under the four tests of soundness as defined by the NPPF (para 182), the Plan should be positively prepared, justified, effective and consistent with national policy. It is suggested that the Council gives further consideration to the above mentioned concerns in order to produce a sound Local Plan. Without further amendments the Plan would be unsound because of inconsistencies with national policy, not positively prepared, unjustified and therefore ineffective. This further re-consideration should include :-

The definition of HMA;
- The calculation of OAHN (including an uplift to the housing target due to market signals);
- The demonstration of significant adverse effects of meeting the full OAHN in the Plan area; and
- If any unmet needs occur the explanation of where these needs will be meet as an outcome of on-going co-operation with neighbouring authorities under the Duty to Co-operate.

| Land at Old Hackney Lane should be allocated under this policy considering its similarities to the site allocations HC2(l), HC2(k) and HC2(x). The site was discounted at stage A of the SHLAA process due to being located within an unsustainable location. However the neighbouring proposed allocations demonstrate the site is suitably located for housing. The site subject to this representation is currently agricultural land with built form to the street frontage which is currently in use for residential purposes. The southern site boundary and site frontage for Sites HC2 (l) and (x) are currently open and therefore the impact of future development at these locations would be significantly higher on the existing street scene than development on the site subject to this representation. Access can be achieved to Old Hackney Lane and a suitable visibility is considered achievable at the proposed point of access. Old Hackney Lane has adequate capacity to accommodate the additional vehicle movements and it is considered that there are no highway reasons why the site cannot be serviced from the existing highway network. It is the developer’s intention that any additional vehicular activity can be mitigated against and therefore the highway system will not be compromised to an unacceptable degree. The site has the capacity of approximately 190 dwellings (based on 75% developable area at a density of 30 dwellings per hectare). There is a strong interest in taking this site forward for residential development within the next five years. There are no ownership constraints which would deem the site unavailable. There are no physical constraints to suggest that carefully designed residential development could not be brought forward during the plan period. The site is available for residential development now, suitable in a sustainable location for growth with development readily achievable to commence within the next five years of the plan period. The allocation of this site for housing would help achieve the Government’s aims and objectives regarding the delivery of additional residential stock throughout the Country and serve to meet the specific objectively assessed housing need. There are no insurmountable physical constraints which |
would prevent the efficient use of this site for residential development. The site is within a sustainable location in terms of access to essential shops, services and infrastructure. The site is within close proximity to the settlement boundary and would support the growth aspirations of the emerging Local Plan.

Objection to urban sprawl from Matlock through to Snitterton & Oker. Modern building should not be proposed within close proximity of a Grade 1 listed properties. These are greenfield sites adjacent to the national park.

SHLAA site 326 should be allocated within this policy. The assessment was inadequate and the site was considered as one rather than two separate sites. The two sites were not considered suitable for inclusion in the emerging Local Plan. The reasons given for excluding the sites were that the sites were unrelated to the existing settlement pattern; the site is below the site threshold; and that the site is in an unsustainable location. As part of a late call for further sites a larger piece of land (See Appendix 2) – sufficient for eight houses - immediately to the west of the cemetery was put forward on 29th January 2016 for inclusion in the Local Plan. This site was not put forward by the Council at the Local Plan Advisory Committee on 29th February 2016. No reason was given. Both sites have previously (in 2015) been refused for planning permission based upon the constraints raised through the SHLAA process and no affordable housing proposed as part of those schemes. The applicant (the current objectors) have since then considered a further scheme upon site SHLAA326 which was subsequently refused by the Council. The objector’s case is that the inclusion of some or all of these sites in the Local Plan would: a. Help meet the shortage of housing in the District b. Help meet the housing needs in the village. c. Meet the need for affordable 3-bedroomed family housing in the village. d. Add vitality to the village e. Not harm the landscape or the nearby Conservation Area. f. Not have an adverse impact on local character g. Bring benefits to the village greatly outweighing any perceived harm.

The viability and deliverability of the hugely increased allocation of housing in Ashbourne has not been properly tested, notwithstanding the fact that the majority of the Ashbourne sites are greenfield sites with no obvious concerns about viability.

The proposed allocation for the Matlock / Wirksworth / Darley Dale sub-area is significantly below previous levels (as a proportion of the overall figure) and the majority of the sites proposed for allocation are much more questionable in terms of viability and deliverability.

SHLAA site 209 should be included as an allocation, this could provide much needed housing within the Matlock/Wirksworth sub area and is in an extremely sustainable location for new housing. This fact was acknowledged by officers in the report to committee within the previous application on site. The site is flat and benefits from good level access to a wide range of services and facilities, with Darley Dale centre only a 5 minute walk away and a primary school within 300 metres. It also has very good public transport provision with a bus stop adjacent to the site providing ready access to the facilities in Matlock. It abuts development with DFS adjacent to part of the western boundary, housing to the south and a children’s nursery to the east. In terms of pure landscape and visual considerations, the site is not visually intrusive. The Landscape and Visual Impact Assessment (LVIA) submitted with the previous application clearly demonstrates that the site is not easily visible from the Peak Park, being shielded by the mature trees along the Old Road promenade. For this same reason the site does not afford significant
views towards the Peak Park. It is also only visible along a short stretch of the A6. The proposed layout within the previous application took account of the spaciousness of the A6 frontage by setting the houses back behind a widened pavement and a landscape buffer. This approach is consistent with the generosity of space associated with this former trunk road. The LVIA concluded that the highest visual impacts would only occur in close proximity to the proposed development. Within the wider landscape the significance of visual effect would be minor or negligible. The council argues that the Warney Brook provides a defensible boundary and a natural end point to the extension of Darley Dale. However, the Warney Brook is not a significant feature in the landscape and a significant strip of undeveloped land would remain on either side of the brook, unaffected by the proposed development. The A6 corridor must accommodate more development. In this context, any landscape harm must be weighed against the social and economic imperative to meet the district's housing needs.

The shlaa site 271 should be allocated within this policy. DDDC assessed the site as 'undevelopable', primarily on the grounds of landscape and highways. Highways-The assessment states that there is limited frontage onto the A615. However, there is enough to create a wholly new access or to use the existing farm access which could be modified and used to serve both the farm and the development. Landscape. The Landscape Sensitivity Study (LSS) designates the site as medium landscape sensitivity. The field itself is visually well contained on a plateau and with substantial vegetation around its peripheries. That leaves an access road through the field to the south. This could be constructed and lit to minimise landscape and visual impact. It would also be landscaped so that within 10-15 years the road would not be readily visible from the A615 and from properties to the west and southwest. The allocation of SHLAA site 271 for residential development could provide a broad mix of housing and cater for a demand that would not otherwise be met. The site is one of few sustainable locations within the village.

SHLAA site 304 should be allocated within this policy. Yeavely has a demand for some small development to allow the elderly to downsize. The built form of Yeavely means there are no obvious infill plots which could be developed which would be allowed under policy S3. This site should be developed in order to meet the need and would be commensurate with the scale of this rural settlement and would provide a modest number of bungalows, dormer bungalows and houses. The development would also cater to first time buyers.

SHLAA site 302 should be allocated within this policy. The site comprises a field which slopes downwards from east to west, set below a ridgeline running north to south. The site marks the transition between countryside to the north forming an entrance to Matlock. Surrounding land uses include countryside and a Golf Club to the north and west, a wooded ridge to the east and residential development to the south. Planning permission was granted for residential development for the area immediately to the south of this site. The site is enclosed and divided up by dry stone walling. There are also a number of properties that lie adjacent to the site along Quarry Lane and Chesterfield Road. Matlock is one of the most sustainable locations within the District as a Tier 1 settlement, identified within Draft Policy S3 of Emerging Local Plan. Matlock is one of the District’s main Market Towns and are the primary focus for residential development. The SHLAA concludes that the site is undevelopable due to constraints primarily in relation to adverse
landscape and local character impact. Land owner fully objects to this conclusion. The site is located between existing residential properties, adjacent to planning permission recently granted for residential development sharing a similar context. Potential impacts can be mitigated through the higher levels of the site remaining undeveloped, protecting the wooded ridgeline which provides a firm backdrop. The site is not designated as part of a special landscape area and will be viewed in the context of an approval, which will be developed out in the near future, alongside existing built development. Accordingly it is believed that, given the sites location on the edge of a market town which is to be the focus for significant growth and well served by public transport, it provides a sustainable location for residential development where any adverse landscape impacts can be mitigated through good design, the appropriate use of materials and a well-considered landscaping scheme. The site is in a sustainable location and could contribute to the needs of the district.

SHLAA site 279 should be included as an allocation within this policy. The site comprises a field which slopes gradually from north-east to south-west. The site relates particularly well to the built framework of the village and benefits from a low visual prominence. Surrounding land uses include a farmyard to the north, open countryside to the east and residential properties to the south and west. Marston Montgomery is one of the Tier 4 settlements identified as suitable to accommodate limited growth within Draft Policy S3 of Emerging Local Plan. The Primary School within the village is significantly under capacity and would benefit from housing development within the village to increase the number of pupils attending. Development would also help to maintain the viability of the Public House, Village Hall and Church. The village comprises largely detached dwellings with a few smaller properties. There is currently limited scope for younger generations to remain in the village and for elderly residents to find appropriately sized accommodation which is suited to their needs. Accordingly we believe that there is a demand within Marston Montgomery for appropriate properties to allow older members of the community to downsize without leaving the area. This would in turn free up under-occupied larger properties in the village for new families to move into. Smaller family homes and starter homes would allow younger members of the community the opportunity to remain within the village and continue to support local services. Policy S3 allows for limited development to meet local needs and maintain services. The assessment in the SHLAA is welcomed where it identifies the site as developable, however the site can easily accommodate more than 9 dwellings. There is a serious risk, if Policy S3 is applied in an overly restrictive manner, despite its aim, it could threaten the ongoing viability of services within the village. The NPPF recognises the benefits of limited growth in rural areas which can help to sustain local services and strengthen communities. The current planning application demonstrates a commitment to the site and identifies it as deliverable early in the plan period.

There are a number of sites within the proximity of Brailsford which could benefit from increased density. This would provide a large number of houses and reduce the need for housing within Brailsford.

SHLAA site 264 should be included as an allocation within this policy. This site has been assessed as including land on both sides of Oddford Lane whereas the two parcels of land were submitted separately. In carrying out the assessment no one sought to involve the landowner [or agent] to consider constraints and opportunities. For example the northern parcel lies immediately alongside the primary school which has a surplus of land. Not only is it a highly sustainable location near the school and other services and facilities but a
comprehensive development including surplus school land might be very beneficial. In addition there would be a huge benefit from the widening of Lane which currently is overloaded with traffic generated by the garden centre. The issue of flood risk was identified, but that is only applicable to the lower part of the site. That area could remain as open space whilst the rest is certainly developable. This is an example of the lack of depth in the site assessments.

<table>
<thead>
<tr>
<th>SHLAA site 252 should be included as an allocation within this policy. The issue of highway access is easily dealt with. It relies on the fact that a narrow strip of land lies between the site and Old Road which denies it direct access to a public highway. However this should not be regarded as a constraint, but as an opportunity. It is owned by DDDC is not easily visible. The one landscape argument that might have some validity is the limited view across part of the site from the direction of the A6 towards Oker Hill. They suggest that this can be protected by the inclusion of a substantial area of public open space extending from the present open space alongside Old Road down to the railway line. In particular the positioning of roads should be ignored other than the point of access. The whole site is some 4.8 hectares in extent, but when the open space is removed it would net down to about 3.5 hectares of developable land. This would make a serious addition to the housing land bank and it is requested that it be given serious consideration.</th>
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</thead>
<tbody>
<tr>
<td>Concerns raised over the deliverability of a number of sites notably Ashbourne Airfield and Stancliffe Quarry.</td>
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<tr>
<td>In regards to Brailsford the 9 dwellings p/a have been planned. This is a modest figure which could be exceeded in order to assist in meeting housing needs for the sub-area in a sustainable ‘Third Tier’ village which is well-suited for modest growth, has a good range of services and facilities including adequate space in the new school and scope help serve the needs of Derby. There is both the scope and the need to provide a further site at Brailsford Green (SHLAA177) to the south-west of the village. A draft scheme for around 40 dwellings linked to a new village green for Brailsford, which would create a genuine asset for the village whilst protecting the character of the Conservation Area and the key listed buildings within it has been submitted. This has been designed by a full Consultant’s Team, has been exhibited locally and has received a generally positive reception. Further details on exhibition available in letter.</td>
</tr>
<tr>
<td>SHLAA site 177 should be allocated within this policy.</td>
</tr>
<tr>
<td>SHLAA 289 should be allocated within this policy for 5 dwellings. This proposed site (approx 0.6ha) forms part of a larger field that is gently sloping up towards the village of Shirley adjacent to Hall Lane, and includes Hall Farm Bungalow. Once planning consent is achieved this site development could start within eighteen months and would take just over a year to complete. Access to the site could be achieved either by using the existing residential access to Shirley Hall Farm, off Hall Lane or by creating an access in the vicinity of the existing Hall Farm Bungalow. The site falls outside the Shirley Conservation Area. Whilst there is currently no national policy requirement to deliver onsite affordable housing or starter homes on sites of less than 10 units, a proportion of these would nonetheless fall into that category. The siting and design of these dwellings would be developed in full consultation with the village. Many of the allocated sites have previously been protected for landscape and wildlife values and are highly valued by the community. Cllrs should work together to either reject the current plan or adopt a lower target.</td>
</tr>
<tr>
<td>Tansley is located adjacent to the Lumsdale Conservation which should be given more weight in terms of allocations.</td>
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</tbody>
</table>
Under this policy a large percentage of starter homes, rented accommodation and social housing should be included.

The over development of Tansley is contrary to policy S10.

Comments received which are concerned that the proposals for Tansley, which is needed to meet future houses, will not be accompanied with the required infrastructure.

The proposed developments within Brailsford will affect the attractiveness of the area which will negatively impact on tourism. Whilst it may be preferential to support strategic employers, the reality is that the Dales plan area is made up of any micro businesses and it is these which actually ensure the economic sustainability of which communities depend and thrive. The importance of tourism should be a priority.

The views of Brailsford residents on the disproportionate amount of development have thus far been ignored in a top down approach. If Brailsford had been listened to, then sites would have been excluded at the Special Council Meeting in March. The reason for inclusion of many unsuitable and undeliverable sites was merely to achieve the housing numbers set out by the planning inspector with the DDDC and Councillors fearful of what may come next if Central Government are involved. There still is no evidence of any cooperation with neighbouring authorities or other public bodies. The draft Local Plan fails to deliver a collective vision

Enough housing has already been provided within Brailsford to accommodate for the need there.

The allocations in Brailsford are contrary to policies SO2,3,4 and 11.

Large developments have been planned for Brailsford in order to claim large sums of S106. Other options have not been properly explored.

The allocations within Tansley are outside the Settlement Development Boundary.

The allocation of greenfield site will mean that more complex brownfield sites will not be brought forward by developers. The plan does not explain how active measures will be taken to ensure brownfield sites are maximised. There are a number of funding options for brownfield development which could be explored. Should employment not come forward on mixed use sites this could be provided as housing land. The Local Plan should contain, alongside this policy, a site allocation of specific brownfield sites linked to a policy on their development (perhaps as Strategic Sites) as a means of encouraging developers to come forward with proposals tailored to the nature of each of the sites.

The neighbourhood plan for Brailsford indicates that there is a requirement for specialist accommodation for the elderly, this has thus far not been address through applications and should considered within allocations.

SHLAA292 should be allocated under this policy. Old Hackney Lane has been identified as a sustainable and suitable location for development by the DDDC through other allocations within the Draft Local Plan. The site subject to this representation is located immediately to the south east of sites HC2 (l) and (x) therefore cannot be considered as any less sustainable given the proximity to local services and facilities. The overall aim of the plan should be to meet the OAHN of the District. When allocating sites DDDC is reminded that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased
housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available.

**POLICY HC2(a) – Land at Lathkill Drive, Ashbourne**

Support policy with conditions that the traffic issues in Ashbourne are addressed.

Observes that Derbyshire Wildlife Trust have identified the site to have high nature conservation value and any potential loss of the habitat should be mitigated against. The effects of this loss are also identified within the Sustainability Appraisal (SA3). This policy must accord with Policies PD3 & PD4 and ensure that mitigation is required and a net increase in biodiversity sought.

Objection to the allocation of this site given the assessment of high landscape value and high nature conservation value. Development of the site will not accord with other policies within the Plan that cover Wildlife and Landscape.

Concern regarding the proposed development and damage to trees and the ground nearby Bradley Wood, Ashbourne. This contains two further BAP species, namely Purple Hair Streaks and White Letter Hairstreak and therefore DDDC should create a Local Nature Reserve there, the grassland at the top of the wood also contains two BAP butterfly species, namely Dingy Skipper and Small Health.

**POLICY HC2(b) – Former Mirage Hotel, Derby Road, Ashbourne**

Support for this as it is an example of the redevelopment of Brownfield land.

The scheme for this site should consider housing for the elderly, small dwellings but which allow independence.

**POLICY HC2(c) – Land at Ashbourne Airfield, Ashbourne**

The Ashbourne Airfield allocation site is not within the Ashbourne parish boundary, but sits within a number of smaller settlements categorised a Tier 5 in the settlement hierarchy which are unsuitable for this scale of development. Deliverability of the site is questioned and build out rates assumed seem optimistic. There is no evidence of phasing of the site within the Plan period. The policy should ensure that a proportion of the new homes on this site will be for young families to live in Ashbourne to support the local economy, rather than providing for the elderly.

The Airfield is Ashbourne’s largest and most logical development site. Special care needs to be taken to ensure that development maintains the surrounding countryside, including woodland to the north. Screening may be needed around future development.

Support for the site with a condition that the traffic issues within Ashbourne are addressed as part of the development of the site.

Support for this allocation. The housing allocation also forms part of a strategic mixed use allocation in policy DS8 which identifies it as phase 2 of the airfield development. There are no constraints which would prevent the development proposed by this allocation from being delivered as part of a comprehensive development with phase 1 which is allocated as a strategic site under policy DS1. The
Landowners are working together to bring forward the comprehensive development of the airfield site. A trajectory will be submitted to the Council in due course setting out how the site is proposed to be developed. In bringing proposals forward the landowners will support the council in the allocation of this site and will provide the information necessary for the Local Plan Examination.

**POLICY HC2 (d) – Land off Cavendish Drive, Ashbourne**

Observes that long-range views should be considered as part of a residential scheme on the site. The development should come forward in the longer term part of the Plan period and focus upon brownfield sites first.

The site is assessed as high landscape sensitivity in the Landscape Sensitivity Strategy document. The SHELAA assessment identifies that development of the site could have potential adverse effect on landscape and visual amenity which should be appropriately addressed.

Support for this site where traffic issues within Ashbourne are addressed as part of the development of the site.

**POLICY HC2 (e) – Land to the North of A52, Brailsford**

Site specific objection is raised to the proposed allocations HC2e, HC2f and HC2h which would individually and collectively result in a scale of growth of Brailsford being disproportionate and unsustainable. Hc2e would constitute unsustainable development by reason of harm to important environmental considerations (greenfield land with Grade 2 agricultural land, high impact from housing, landscape impact).

Access is dangerous on the brow of the hill and will be congested at peak times. It also conflicts with a mains water pipe and wayleave. Traffic levels on the A52 will be too high through the village.

Destroys integrity of Brailsford village.

Other brownfield sites should be considered first over this greenfield site.

The development will alter the settlement pattern as it is not in keeping with the linear pattern and will lie outside the settlement boundary.

Brailsford is not sustainable enough to accommodate this growth. The cumulative effect of this allocation alongside other developments will do disproportionate harm to the village of Brailsford compared to the limited value of the additional houses that they will deliver against the housing allocation target.

Current village infrastructure is inadequate to accommodate this amount of potential growth in the village, in particular drains overflowing, and ensuring adequate sustainable drainage systems are in place as part of the development. The level of service and facilities provision has not been given adequate consideration to accommodate this amount of growth in the village, including shops and the medical practice.

The swale proposed as attenuation for surface drainage will flood areas and properties at the rear of the Plain, plus there is a lack of capacity for foul water drainage downstream.

This policy does not conform to policy PD5 which seeks to protect landscape character in Derbyshire Dales.

The current character and appearance of Brailsford attracts high number of tourists in the summer months. This development will
destroy the appearance of the village. Brailsford is a gateway to the Dales and these developments will be detrimental to the character and identity of the Dales as a tourist destination and place of beauty. There will be an unbalanced pattern of new and old housing across the village.

<table>
<thead>
<tr>
<th>Disproportionate to the existing village settlement.</th>
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</table>

It is not clear how the cumulative impact on the conservation area and wider landscape have been considered during the plan process. There is no reference to this policy in SA part 3 Annex A. It is therefore not compliant to the NPPF.

<table>
<thead>
<tr>
<th>Observation that this housing allocation site is possibly the most acceptable.</th>
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<tr>
<th>HC2 (f) Land to the North of A52, Brailsford</th>
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</table>

Object to the development due to the detrimental visual impact upon the character and appearance of the village. Should be in keeping with historic linear pattern.

Objects to the access arrangements. The entrance to the site runs between a house and a small development and is severely restricted, leading onto a curve on the A52 where visibility is not great. There have been several accidents on this part of the A52. Traffic calming measures should be introduced as part of any new scheme. There is no evidence from Highways that there is acceptable visibility at the entrance to this land.

The development would cause an adverse impact upon the local landscape.

Preference should be sought for brownfields sites, not greenfield which should be protected for agricultural uses.

Object to the proposed development as it does not seek to create housing opportunities for local people. Not only does the plan demonstrate insensitive and rapid growth as a result of the urban style estates that are in it, but the mix of houses is not providing what local residents have consistently indicated is needed. Indeed you and your staff have acknowledged the need to provide suitable accommodation for the ageing population but you fail to demonstrate an adequate provision in recent planning approvals and the plan should be rejected without specific demands for the correct type of housing being specified.

Observes that the provision of bungalows on The Plain has provided help in allowing some current residents to remain in the village but the new developments must contain a similar or higher proportion. The developers prefer profit from larger houses but they must be forced to innovate in order to ensure this need can be met.

Observes that ownership of land and of access is in doubt. Ransom strips are held.

Land is unstable. This plot is on a steep slope. Many existing homes surrounding this field are below the water table. The land would need major work to stabilise it. Also to stop the flooding that occurs coming down the field and culvert from the upper field and plantation and which already causes flooding in homes on the Main Road. There is an old Victorian underground reservoir in these field - pumping machinery still operating - rights of villagers to draw water.

The allocation of the site ignores other policies within the Plan itself.

Other reasonable alternative sites across the District have not been reasonable assessed or explored. There are far too many houses
allocated within Brailsford and no infrastructure planned to support the growth.

Following previous assessments it was reported that the land to the east of Throstle Nest Way (SHLAA235) was ruled out as being "unsuitable for development" yet this is now seen as suitable and viable option. No clear explanation as to why this has changed. Pressures of targets do not suddenly change the character or viability of a piece of land with so many detrimental issues. The SHLAA Assessment recognises some of the drawbacks it represents.

- Of particular note is that the site is in "an elevated position and highly visible . . ." to the extent both that dwellings would be looking down on the roofs of existing houses, and that its elevated position would present a blot on the countryside.

What is not mentioned in the Assessment is that current properties are already suffering the effect of inadequate drainage from the fields in question, right down to the A52. This, together with the doubtful feasibility of satisfactory vehicular access, suggests that further, more rigorous study should be given to this option before it is considered further.

No consideration has been given for the impact upon the views and skyline beyond the site.

This site has issues with technical deliverability and viability.

Significant flooding issues. Exacerbated by the inability of the drainage to cope. There has also been very extensive surface water running off the access track to this field to the west by the pedestrian crossing and onto the A52.

Observe that adequate provision of shops should be included as part of the development scheme. One of the new proposed developments should include a shop. Preferably Hc2(f) as this is nearest to the city centre.

Observe that bats live in the adjacent Throstlenest Plantation.

The habitats and wildlife will be adversely affected by development, particularly in the vicinity of Throstle Wood.

Object to the proposed drainage plans to direct drainage via alley walk, which could pose a significant risk to existing properties.

Development here would cause considerable light pollution, in contravention of Planning policy.

The land is high quality agricultural land.

This site has already been ruled unsuitable for development in the examination of the earlier Local Plan and more recently by the Authority when determining the location for eh50 homes previously approved.

A smaller scale development carried out by small, local developers and self-builders would be more appropriate. Self builders would allow a greater diversity in the proposed houses and would be more likely to integrate into the community.

Developments of this scale would be more appropriate closer to employment opportunities.

This development would result in the indiscriminate and obtrusive spread of housing into the countryside, outside the SDB. This will detract from the open nature of the surrounding area.

No evidence to suggest that development is needed to support current facilities, No improvement to any facilities outlined and would be detrimental to the local environment.
The size and number is not proportionate to the current village size, would be causing a 20% increase to the Parish. It is a greenfield site and would not be sustainable, it would not enhance the quality of life of residents or visitors.

<table>
<thead>
<tr>
<th>HC2(G) - LAND OFF LUKE LANE, BRAILSFORD</th>
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<tbody>
<tr>
<td>Proposal is excessive and disproportionate to the village.</td>
</tr>
<tr>
<td>Access is already difficult due to its location on a sharp bend. There are numerous accidents on this bend each year, this would be exacerbated with traffic from this development. There are no alternative routes when the A52 does get blocked by accidents. Road safety for the school is already poor and would worsen. The issue of congestion will increase, particularly on Luke Lane.</td>
</tr>
<tr>
<td>This development would lead to the village being seen as a large housing estate, with views of the countryside and the appearance of the village detrimentally impacted upon.</td>
</tr>
<tr>
<td>The existing properties on the Luke Lane development are not in keeping with the village and are more of an urban style.</td>
</tr>
<tr>
<td>Land drainage will be effected with increased run off.</td>
</tr>
<tr>
<td>The infrastructure of the village is already at capacity and cannot cope with this development. This includes the school, road system and sewage system. The medical centre is at capacity and has few parking spaces.</td>
</tr>
<tr>
<td>The allocation for a maximum of 26 units is supported. This is subject to the delivery of a well-designed scheme in accordance with the suitability policies of the plan and cognisant with the housing needs and facilities of the village. The unimaginative housing design, mix and layout of the scheme currently being implemented on contiguous land should be avoided.</td>
</tr>
<tr>
<td>Brownfield sites should be used with agricultural land left for growing food.</td>
</tr>
<tr>
<td>Increased flood risk would be caused by this development.</td>
</tr>
<tr>
<td>This development is outside the settlement development boundary.</td>
</tr>
<tr>
<td>Environmental and landscape impacts.</td>
</tr>
<tr>
<td>Further housing than that previously agreed will spoil the village.</td>
</tr>
<tr>
<td>Houses currently being built are more in keeping with towns and city houses. More family homes are needed. The proposal encourages large scale urban developments which are not in keeping with the village.</td>
</tr>
<tr>
<td>No provision for recreational services for children and teenagers.</td>
</tr>
<tr>
<td>A diversion of Luke Lane is needed to allow for school drop offs.</td>
</tr>
<tr>
<td>Issue of litter associated with this and other housing proposals.</td>
</tr>
<tr>
<td>This development swamps the character and integrity of Brailsford.</td>
</tr>
<tr>
<td>This area should be retained as agricultural land.</td>
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</table>
Insufficient water pressure for future developments.

Greenfield site outside the existing built up area.

Full support for the proposed allocation and can confirm the site is suitable and deliverable in the short-term. Technical work to support a planning application for residential development on this site is currently being undertaken.

The development should include housing for first time buyers and the elderly.

Site should be excluded since it is wholly disproportionate and was included very last minute prior to Special Council Meeting in March 2016 (and shown to be half the size).

It will adversely affect local tourism business which the draft LP policy says it will support.

Site is developing a linear village in a disproportionate way.

The development of this site will take away the farming way of life which many residents enjoy.

Privacy of neighbours’ property would be diminished and there would be overshadowing with houses built affecting the light into gardens and homes. Noise pollution would cause stress to the elderly and disruption of a quite village.

The development would adversely affect wildlife. Bats live in the adjacent Throstlenest Plantation.

Concerns about the landscape and visual sensitivity and the suitability for development and the potential adverse effect on landscape and visual amenity. High landscape sensitivity identified by the LSS study and secondary or primary sensitivity in the AMES

Support for DDDC’s recognition that the site identified as ‘land at Luke Lane / Mercaston Lane, Brailsford’ provides a suitable location for sustainable development and should be allocated for residential development. The site is situated in an accessible location, within a short walking distance of the existing services and facilities at Brailsford. The location of the site reduces the reliance on the private car and promotes healthy lifestyles. Through the delivery of up to 71 dwellings the development of the site will provide substantial economic benefits including the provision of construction employment opportunities and an increase in economic productivity. The development of the site will result in additional household expenditure in local shops and facilities which can help sustain these services.

A Landscape and Visual Impact Assessment (LVIA) of the site at Luke Lane / Mercaston Lane has been prepared and will be submitted in support of the forthcoming planning application for the delivery of the whole site. The LVIA concludes that whilst the site occupies an area of gently sloping land beyond the current settlement boundary rising land beyond the current settlement boundary, a sensitive design response, with existing vegetation retained, protected and enhance, legible development offsets and a commitment to the provision of a softened development frontage on the approach to Brailsford from the north, can be assimilated within this Medium sensitivity landscape.

HC2(H)- LAND AT LUKE LANE/MERCASTON LANE, BRAILSFORD

Too many houses proposed.

This is a highly dangerous location with the combination of heavy traffic, a blind bend and a school with inadequate drop off facilities.
The site will have huge visual impacts as people enter the village.
The vast majority of traffic from this site will need to exit via the Luke Lane/A52 junction which is already under pressure and with housing close to the junction, cannot be extended. There is very heavy traffic in the form of HGVs coming from the quarries which would make entrance and egress to this site, as well as pedestrian access to the east side of Luke Lane, extremely dangerous. In winter, these roads are very poorly gritted and salted.

Would cause landscape and environmental impacts.

Would be an unwelcome extension to the settlement boundary.

Brownfield sites should be developed prior to this and other greenfield and agricultural sites.

The natural drainage into the brook proposed with regards to this site in practice does not occur. Heavy rain cause flooding issues.

Traffic at the Luke Lane /A52 junction is becoming a significant problem. The speed of traffic in this location is also a problem.

The proposed access to this development is opposite the new school and as such will complicate the traffic situation more than it currently is by compounding the situation regarding drop off and pick up of schoolchildren.

This site is outside the settlement boundary, a massive development for a small village without adequate infrastructure, destroying the village community.

The open drainage ditch and Swale will be a hazard to school children.

Greenfield which therefore should not be developed. Will affect the character of the village. Will destroy the integrity of the community.

This proposal encourages large urban style estate development inconsistent with Local Plan policies.

The scale of any development here would be too great relative to the size of the village and the large number of properties would detract from the individual characters of the many unique properties and small developments of the past.

Development on this site is contrary to a number of other policies.

Proposed site is outside the settlement boundary in open countryside

Site is unsustainable on all grounds.

No plans to support this allocation with increased infrastructure.

Issues cannot be mitigated.

A main water pipe runs across the access, this is owned by a third party.

Will have adverse effects on wildlife.

Obstructs the skyline.

Development will be overdevelopment.

No employment.

Access during construction would be a problem.

Development will use of car and carbon emissions, therefore conflicting with green policy.
It too dangerous to walk on pavement at night, there is no police in dark rural areas

Not suitable on prime agricultural land which has scenic quality, especially when approaching from North Lane
HC2(I) LAND AT SLINTER MINING LTD, CROMFORD HILL, CROMFORD

This allocation is supported due to its use of brownfield land.

Access to the main road is already dangerous at this location.

A specific requirement of a Heritage Impact Assessment (HIA) should be submitted in support of development. This would ensure a clear understanding of the possible impacts on the Outstanding Universal Value of the DVMWHS.

Some concerns raised over the potential incompatibility of the housing (which is a relatively sensitive land-use) and the operational quarry in terms of noise, dust/air quality, blasting and HGV movements. Essentially the development of potentially sensitive uses at the Slinter Mining site (or any other potential future development site in proximity to Dene Quarry) should not unreasonably hinder or fetter the current/future operation of the quarry.

It is not clear from the information available how the impact of the housing allocation site on the WHS buffer zone and Cromford Conservation area has been assessed during the plan process. It is noted that the proposed site is much smaller than the SHLAA site considered as part of the SA, and it is also noted that the SA Part 3 Annex A considers the SHLAA site likely to cause negative effects on the historic environment. Therefore questions whether the anticipated number of dwellings could be achieved within the site without having an adverse impact on the historic environment and its setting. This is not NPPF compliant.

HC2(J) LAND AT BRIDGE GARAGE, DARLEY BRIDGE

This field is already waterlogged, development will exacerbate the issue.

Traffic in the area will increase hugely with this development. The area also suffers from excess traffic due to a number of lorries in the area. This is contrary to the aspirations of Key Issue 5 to reduce travel demand and draft policy S2 to minimise the need to travel.

The site is located within an unsustainable location, despite being within the settlement boundary. Darley Bridge should not be classed as tier 3 settlement.

This site is remote from the shops and services of both Darley Dale and Matlock. More appropriate development sites that have been demonstrated to be available and deliverable (e.g. site SHLAA 164) are located closer to the core of Darley Dale.

This allocation is supported due to its use of brownfield land.

It is not clear how the impact of the housing allocation site has been assessed in respect of the historic environment including the Grade II* Listed and Scheduled Monument Darley Bridge, in addition to the Grade II Potters Cottage and nearby public house. It is noted that the SA Part 3 Annex A sets out that the proposal may result in a harmful negative impact on the historic environment. Therefore questions whether the anticipated number of dwellings could be achieved within the site without having an adverse impact on the historic environment and its setting. This is not NPPF compliant. This is not NPPF compliant.

HC2(K) LAND AT OLD HACKNEY LANE, DARLEY DALE

Too many houses are planned for this area, more are needed within the South of the district closer to the employment opportunities of Derby and Nottingham.

The development of this greenfield site within a prominent location has the potential to affect long range views.

The development of this site would break the proposed green corridor.

Concerns raised regarding the number of houses proposed for this site, where the access will be and whether enough parking will be provided.

The Blackrocks avenue cannot cope with further traffic, some residents park on the road reducing it to single lane and cars on driveways need space to reverse out. There are also issues with the refuse lorry gaining access to the top of the avenue. If access to
the new buildings uses Black Rocks Avenue, the heavy wall at the top of the avenue would need to be re-built to act as a land retaining wall. Alternatively the entire proposed site would need to be lowered. There will be a severe loss of amenity in a quiet cul-de sac.

Value of properties may be reduced as the field in question is so much higher than other properties.

The proposed site acts as a soak-away area for the existing houses. During periods of prolonged rainfall some houses in Black Rocks Avenue experience flooding in their gardens. Further building will exacerbate this issue for the lower houses. There is already a lot of ground water in this area as experienced in the development at Poppy-Fields. There is also a stream on the side of Black Rocks Avenue.

Considering the small amount of housing proposed for this site and the issues it will raise, it would be less detrimental to add the requirement to a larger developed area.

Concerns raised regarding landscape and visual sensitivity. The land was high landscape sensitivity by the LSS study and secondary or primary sensitivity in the AMES.

**POLICY HC2(L)- LAND OFF OLD HACKNEY LANE, DARLEY DALE**

The LSS states (6.5.8) that ‘Land to the north-west is important in preventing coalescence between Upper Hackney and Darley Dale’.

The development of this site could infill the small hamlets on the valley side, and merge neighbourhoods. Whilst only providing a small number of dwellings it could have a significant adverse effect on the character of the area, without appropriate mitigation.

Concerns raised about the landscape and visual sensitivity and the potential adverse effect on landscape and visual amenity. Land was identified as high landscape sensitivity within the LSS study and secondary or primary sensitivity in the AMES.

This site should be added to those protected by Policy PD11. The site should be maintained to separate Matlock and Darley Dale.

**HC2(M)- LAND TO THE REAR OF FORMER RBS PREMISES, DARLEY DALE**

Area is currently not being used and therefore would be a possible place for new housing.

This proposal is supported, provided that some retail facilities are included. It is considered that this site provides significant potential for the establishment of a new focus or hub for new retail and service provision to serve the wider settlement, particularly as the site already directly adjoins the existing defined District Centre area of Chesterfield Road, which could be expanded and consolidated.

DDDC is therefore requested to give further consideration to this issue in consultation with the site promoter.

The proposal will change the character of Darley Dale, from that of a village to a town.

Too many houses are planned for this area, more are needed within the South of the district closer to the employment opportunities of Derby and Nottingham.

Development would be a massive visual intrusion.

Development of this site should be completed in the longer term, once brownfield sites have been developed.

Development of this site is contrary to policy PD11 and would break up the proposed green corridor between Matlock and Darley Dale.
Comments of support for this policy received.

This site should be removed as it contravenes the objectives of Policy S8 and the Wardell Armstrong report that DDDC has adopted as part of its evidence base.

**HC2(N)- LAND OFF NORMANHURST PARK, DARLEY DALE**

Too many houses are planned for this area, more are needed within the South of the district closer to the employment opportunities of Derby and Nottingham.

Access on to the 40mph road is poor, a number of accidents have already occurred. Traffic is excessive in this location, made worse by parked cars.

Poor pedestrian facilities, footpaths are not full width. The very narrow pavement is also blocked in a number of places. There is no pedestrian crossing which is dangerous.

Brownfields should be developed prior to this greenfield site bordering the Peak Railway.

Strong objections made to this site.

The allocation of this site conflicts with policy PD11. The field transects the open corridor which protects increasing coalescence in the Matlock to Darley Dale A6 Corridor. The corridor has long been protected by Policy NBE9, and planning applications for this site have repeatedly been refused in the past. Though no longer mandatory, this policy is still in force only modified by the NFFP.

Proposed allocation contradicts policy PD4. The development will cause habitat fragmentation by impacting on the wildlife green corridor which is already constrained on the north side by the ribbon development on the A6, and on the south side by the Peak Rail, now to be reinforced by a cycle track.

Site is outside the settlement boundary and therefore is classed as open countryside. Development of the site contravenes policy S5. If it were to be considered within the settlement boundary policy S4 still applies. The development is contradictory to this in a number of ways. The proposed density of housing is not in keeping with the existing development. It will be an intrusion into the countryside in that it is taking 100% green field from which a crop of hay is taken each year. The residents of Normanhurst Park have a contract to maintain and use this field as amenity green space which will be lost. It is used for general walking and nature observation, dog walking and play by the children associated with the families. It will destroy a locally valued habitat which has been used by a variety of wildlife.

The development is contrary to PD1. The site is not approved within the Darley Dale Neighbourhood Plan. The site transects the long view from Riber in the south and Stanton and Hillcarr Wood at the north end in the Peak Park. For half the year when the trees are bare, the housing will also be visible from the hills on the other side of the Derwent Valley. Development would cause unacceptable effects by reason of visual intrusion, overlooking, shadowing, overbearing effect, noise, light pollution, or other adverse impacts on local character and amenity as the gardens of the properties adjacent to the field have been landscaped with minimal boundaries to create continuity with the field and the wider landscape.

The trees and crops on site are protected by policy PD6. A number of the trees are subject to TPOS.
The small number of housing provided does not justify the potential adverse effects of the development.

The presence of a major foul water drain parallel to and some 10 metres from the fence line of the existing properties will have an impact on the development of the site.

Houses constructed on site would be subject to noise from the Peak Railway. It would also limit any expansion to the railway, although this is unlikely to happen.

Site is exposed during the Winter.

Development of this site should be completed in the longer term, once brownfield sites have been developed. If possible refurbishment to Shand House should be completed alongside the development.

Previous planning applications have been refused on the site on the basis of overdevelopment of the Green Valley. It was indicated that development would continually be refused.

The site is located within 100 metres of the Peak Rail Line, other sites within this locality were refused. The Peak Rail Line causes pollution which would be a health hazard to future residents, particularly children. Noise pollution would also be an issue. People will not want to live in these houses due to these issues.

The quality of life of residents is seriously affected by infilling.

Views will be destroyed and the way of life will be detrimentally impacted upon.

This could have impacts on a highly sensitive landscape and separate the physical and visual continuity of the green space along the valley corridor. Development at present stands off from the recreational railway and the proposed White Peak multiuser trial. Careful consideration would need to be given to how these potential impacts could be adequately mitigated as part of any development proposals for the site. Concerns raised about the landscape and visual sensitivity and the potential adverse effect on landscape and visual amenity. Land was identified as high landscape sensitivity within the LSS study and secondary or primary sensitivity in the AMES.

This site is possibly the best nature reserve in the Dales, with a range of species including a number of rare ones using it. It is currently leased to 6 households and therefore hedgerows, brambles and grass has been allowed to flourish.

A CPO would be needed to access this site, which DDDC stated would not be needed in relation to the Local Plan.

A new village would be a much more appropriate option and would be in the location of the need.

**HC2(O)-LAND AT STANCLIFFE QUARRY, DARLEY DALE**

Too many houses are planned for this area, more are needed within the South of the district closer to the employment opportunities of Derby and Nottingham.

This site is well hidden from view and would not affect any other traffic flow.

The housing density should be increased on this site.

Support for the redevelopment of brownfield land.
The setting of Listed Building needs to be maintained.
This site should be developed prior to the development of other greenfields.
Housing should be reduced to 60 dwellings.

The north west boundary of the site immediately abutting the clients land is unstable. The owners insurers have now agreed to repair part of this face but in reality the entire quarry face adjacent to clients property needs stabilisation- estimated cost in excess of £1m. Access will also be costly as rock will need to be removed and extensive engineering undertaken-estimated cost £500,000. This will need to be completed prior to the development of houses and will deter investment of housebuilder- site is undeliverable. The council is already under delivering and to meet their target set all sites must be deliverable. the delivery of 100 houses on this site is undeliverable.

Stancliffe Quarry is not previously developed land as it has restoration requirements.
Original planning consent for tourism this is the only site in Matlock which would meet the stated criteria for policy EC8.
The site contains a significant area of protected woodland, high landscape sensitivity to housing development and considerable variation in levels within the site. Development outside of the quarry itself is likely to result in harmful impacts on the identified significance of the proposed allocation and its relationship to Stancliffe Hall. The land was assessed as high sensitivity by the LSS and secondary or primary sensitivity in the AMES. Other constraints include a TPO, the existing land form and the quarry floor which comprises quarry tipped material; and the need to stabilise the rock face below Stancliffe Hall, which is currently subject to an ongoing Breach of Condition Notice served by DCC, with which DCC is seeking compliance.

It is not clear whether the number of houses can be accommodated on site without detrimental harm to the setting of the listed building. It is noted that the SA Part 3 Annex A sets that there would likely be negative effects on the historic environment, and that the allocation site has been reduced to that put forward within the SHLAA. Currently not NPPF complain.

**HC2(P)-LAND AT CAVERNISH COTTAGE, DOVERIDGE**
The redevelopment of the brownfield part of the site is supported. Edging is required to maintain village character and screen the bypass road.
No objection to the development in longer term, once Brownfield land is exhausted.
Loss of this facility would do nothing for the economic benefit/tourism industry of the area and would be against EC8.
Detrimental to the safety of users of the national cycle route, contrary to policy EC10.

**HC2(Q)-LAND AT DERBY ROAD/HALL DRIVE, DOVERIDGE**
This is a Greenfield site outside the existing built-up area.
Detrimental to the safety of users of the national cycle route, contrary to policy EC10.
Comments received in support for this allocation. The site is currently subject of an outline planning application for 85 dwellings. The developer has worked closely with the community to try and ensure that they tailor the scheme to suit local needs and design. The
application is expected to be determined at the next Planning Committee on 12th July 2016 (once the seasonal specific great crested newt and bat surveys have been undertaken) and so they confidently expect that this site will be delivered within the plan period – indeed within the 5 year time horizon. Allocation is supported by the wardell armstrong study which identifies it as a ‘less sensitive site’

This allocation would be contrary to paragraph 5.20.
This allocation would be contrary to paragraph 5.36

**HC2(r)-LAND AT SAND LANE, DOVERIDGE**

This is a Greenfield site outside the existing built-up area

Concerns raised about the landscape and visual sensitivity and the potential adverse effect on landscape and visual amenity. Land was identified as high landscape sensitivity within the LSS study and secondary or primary sensitivity in the AMES.

**HC2(S)- LAND OFF WHEELDON WAY, HULLAND WARD**

Taken with the other developments in HC2 for Hulland Ward, this is too big a development for a small village without adequate infrastructure, fundamentally changing the village community and character. It ignores the very policies set out elsewhere in the Plan.

No objection to development in longer term, once Brownfield land is exhausted.

Support received for this allocation.

From the information available it is not clear how the impact on the nearby Grade II listed Church has been taken into account as part of the site allocation process, including the views to and from the Church and between the Church and the historic core of the village.

It is noted that the SA SHLAA assessment indicates there would be no negative effects on the historic environment but it is not clear whether the Church has been taken into account or not, or whether the cumulative impact of this allocation and HC2(u) has been taken into account and, if so, what conclusion was drawn. Clarification on these issues is required. This is not NPPF compliant.

**HC2(T)- LAND AT EAST ARDENNES, HULLAND WARD**

Greenfield site outside the development boundary and away from the built up area.

Development of the site will add more housing to a village where houses stay on the market and do not sell for years at a time

Development will add more commuter traffic on to the A517.

Taken with the other developments in HC2 for Hulland Ward, this is too big a development for a small village without adequate infrastructure, fundamentally changing the village community. It ignores the very policies set out elsewhere in the Plan.

Concerns raised about the landscape and visual sensitivity and the potential adverse effect on landscape and visual amenity. Land was identified as high landscape sensitivity within the LSS study and secondary or primary sensitivity in the AMES.

**HC2(U)-LAND OFF A157 AND DOG LANE, HULLAND WARD**

Development of the site will add more housing to a village where houses stay on the market and do not sell for years at a time

Greenfield site outside the settlement boundary, within the neighbouring parish of Biggin. Would extend Hulland Ward into Biggin and expands into the green fields.
Taken with the other developments in HC2 for Hulland Ward, this is too big a development for a small village without adequate infrastructure, fundamentally changing the village community. It ignores the very policies set out elsewhere in the Plan.

No proper provision for drainage.

From the information available it is not clear how the impact on the nearby Grade II listed Church has been taken into account as part of the site allocation process, including the views to and from the Church and between the Church and the historic core of the village. It is noted that the SA SHLAA assessment indicates there would be no negative effects on the historic environment but it is not clear whether the Church has been taken into account or not, or whether the cumulative impact of this allocation and HC2(S) has been taken into account and, if so, what conclusion was drawn. Clarification on these issues is required. This is not NPPF compliant.

HC2(V)-LAND OFF GRITSTONE ROAD/ PINEWOOD ROAD, MATLOCK

Greenfield site outside the settlement boundary unsuitable for development, particularly of this scale. Potential to affect long range views.

The site is liable to surface water flooding, there are a number of natural springs in the area. Drainage in the area is poor and placing tarmac on these fields will increase the risk of flooding. Flooding is already a problem for residents seeking to insure their homes. Although developer state this could be mitigated it is questioned whether this would be possible and if so would cost excessive amounts, disrupting existing residents.

There is poor access to the site via the existing road network, will homes need to be knocked down to facilitate access. The site was previously deemed undevelopable due to this reason and nothing has since changed. Traffic within the existing road network is already an issue for residents, this is particularly chaotic when larger vehicles such as refuse lorries access the area. Other developments are taking place in the area which will exacerbate the issue and were this development to be approved the situation would become unbearable with a potential increase of around a thousand cars. This will also have safety implications, particularly for school children accessing Highfields. A recent study by DCC has indicated that due to the recent loss of the crossing patrol the road does meet the minimum Road Safety GB criteria and that the County Council will now be actively recruiting a crossing patrol person on Chesterfield Road at its junction with Smedley Street. Accidents are already occurring on some of the roads due to parked cars.

The proposal would adversely affect wildlife and habitat. Established trees and hedgerows are seen on site and the site is used by a wide range of species. Greenfields and the associated wildlife are one of Matlock’s greatest assets.

The development of this land would totally alter the settlement pattern.

The site was previously deemed unsuitable and planning permission has been refused.

The allocation contains playing field land. The playing field land has not been shown to be surplus to requirements and there is no proposal for replacement provision to meet the requirements of NPPF Paragraph 74 and Sport England's Playing Fields Policy.

The disruption which will be caused during the lengthy construction will seriously affect existing residents.

The loss of value of houses will force some people to work to a greater age to recoup a pension fund which would affect health levels.

The safety and health of current residents and children has not been considered.
Agricultural land such as this should not be built upon.
This is a good area to extend housing upon.
Concerned about education provision with local schools at capacity.
There are a number of more feasible housing sites options which should be explored prior to the development of this site. Brownfield sites should be developed first.
Development would lead to light and noise pollution, which is against the NPPF. There would also be an issue over privacy of existing residents.
Although it was stated at the meeting that there are no plans to increase medical services it is well known that the current situation is inadequate.
Answers to public questions on this site’s viability were not answered comprehensively at the meeting.
This site is above the snowline and is affected badly during the winter months.
There is a lack of services in close proximity to the site which encourages car usage.
The infrastructure of the town cannot cope with this influx of housing.
It is already very difficult for emergency vehicles to access houses due to narrow roads.
Large number of objections received to the development of this site.
This development will devalue many of the properties in this location.
Development of this site will affect landscape sensitivity and the quality of life of many of the residents. The development will be a visual intrusion on the landscape.
Traffic surveys have been completed which show the extent of traffic passing through the area.
Concern raised over the detrimental effect of future development on lighting to existing residents.
The proposal of a new village would be more appropriate than placing houses in this location within Matlock, which is almost at capacity.
No employment opportunities in the proximity of the site. This area will become a dormitory commuter village. Future residents would have little affinity with Matlock.
This development would not fit with the prescribed growth in population of the elderly, the sites elevation makes it unsuitable for them. It is unreasonable to expect that they can access services on Smedley Street, the steepness of Bank Road prevents this.
Development such as this sets a precedent for further greenfield development and expansion.
Needs a travel plan which must cover safe layouts, accommodate the efficient delivery of goods and supplies, provide access to high quality public transport facilities and consider the needs of people with disabilities by all modes of transport. Matlock will not be able to employ or educate the additional resident who will then have to travel long distances to work and school. None of the key facilities such as primary schools and local shops listed are within walking distance of either proposed area which goes against para 38.
This proposal will change the character of this location at the edge of Matlock.

Development of this scale should be constructed on open land between Matlock and Chesterfield.

It has been predicted growth estimates are incorrect. This will create an environment where sensitive greenfields are developed but brownfield sites are left undeveloped.

Detrimental effects of sprawling development such as this will be had on Matlocks picturesque tourist image.

Development on this site would be contrary to many policies within the NPPF.

If the proposal goes ahead speed controlling measures are required.

Bus services are already limited and are under threat which would increase the reliance on the car.

Development is out of proportion to Matlock.

The density of the development is much higher than others and is out of proportion compared with brownfield sites.

The site is of historic importance due to the significant archaeological layout.

This allocation is supported in principle.

A larger site area than currently proposed should be allocated.

Poor pedestrian and cyclist access to the site.

The nature of the site and its elevation means it is exposed to the weather, including snow and wind.

Additional cars and traffic will increase pollution and affect health.

The site is in close proximity to the Lumsdale conservation Area and would cause detrimental impacts.

From the information available it is not clear how the impact on the nearby heritage assets and historic environment has been taken into account as part of the site allocation process. It is noted that the SA SHLAA assessments indicate a negative effect on the historic environment and its setting. Policy DS4 sets out a requirement for a Historic Environment Assessment in respect of heritage assets but it is not clear at present whether the anticipated number of dwellings could be achieved satisfactorily on the site without having an adverse impact on the historic environment and its setting. Clarification on these points is required. Not NPPF compliant.

Will lead to the suburbanisation of an unspoilt part of the town.

Further time should have been spent by the LPAC in considering this site as a housing allocation.

The effect of the Peak district National Park should be further considered and the inspector encouraged to reduce the number and remove unsuitable sites.

**POLICY HC2(W)- LAND AT HALLDALLE QUARRY/MATLOCK SPA ROAD, MATLOCK**

Development would need to be done in the right way.

Too many houses are proposed in this area. More are needed in the South of the district close to job opportunities.

The development of this brownfield site is supported, this site should be built upon first and then extended.

Concerns raised about traffic and the effect on narrow roads in Snitterton and Oker with limited possibility of improvement without
detrimental effects. Traffic should be required to turn right towards Matlock. Construction based vehicles should not be able to exit the site via Snitterton and Oker.

Housing would have little visual impact due to the enclosed nature of the Quarry.

"Policy DS5 states that development would be subject to certain documentation and reports, however, the list does not include a comprehensive assessment of the status of and threat to: European Protected Species, and NERC Section 41 priority habitats and species. This site is of very high landscape and wildlife value, yet no comprehensive up to date ecological information is available for the site. Surveys from 2009 are now significantly out of date and the current ecological appraisal was conducted at suboptimal times for a number of species groups, therefore inevitably under-valuing the site. In spite of the above point the surveys still provide evidence of a number of priority species and habitats being present on, and using, the site and any mitigation proposed is inadequate given that the 2009 survey is out of date and the 2013/14 survey unsuitable. The council has a duty under the NERC Act of 2006 to have regard to biodiversity in pursuing its business. The council is showing disregard for biodiversity by allowing development on this site. No plans for construction of the proposed scale can adequately avoid damage to priority habitats and species and retain landscape character. This site is long since disused as an industrial site with natural colonisation having taken place and therefore should now be viewed as having moved from Brownfield to Greenfield status due to its high landscape and ecological value.

There are a number of constraints on this site which may prevent it from coming forward for residential development. A number of potential adverse impacts were outlined within the strategic housing assessment of this site including views from higher parts of Matlock in the north and north east, settlement pattern, potential adverse impact upon local landscape, amenity, light pollution, ecology and outstanding issues in relation to site viability.

It is not clear from the information available how the impact on the nearby heritage assets and historic environment has been taken into account as part of the site allocation process. The SA SHLAA assessment in Part 3 Annex A sets out that there would be minimal effect on the historic environment, but it is not clear whether the setting of the adjacent Conservation Areas to the east have been taken into account in addition to the cumulative impact of allocation sites HC2(aa) and HC2(bb), and also the individual and cumulative impact on Grade I Snitterton Hall to the west of the sites outside the District Council’s administrative boundary. Policy DS5 makes no provision for the requirement of a Historic Impact Assessment in relation to heritage assets and their setting, or for an archaeological survey when there could be unknown historic mining evidence at the site. Clarification on these points is required. Not NPPF compliant.

At the time mineral working ceased, there were reserves of 2,750,000 tonnes of Carboniferous Limestone for aggregate use. This is not a significant amount in terms of the overall land bank, but the issues of national and local planning policy safeguarding still apply and should be taken into account in the assessment of this proposal. Reference to these national and local planning policy requirements should be made in the supporting text in paragraphs 8.15 to 8.17 and in Policy DS5.

**POLICY HC2(X)-LAND AT OLD HACKNEY LANE, MATLOCK**

Too many houses are proposed in this area. More are needed in the South of the district close to job opportunities.
<table>
<thead>
<tr>
<th>No objection to development in longer term, once Brownfield land is exhausted.</th>
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<tbody>
<tr>
<td>The development of this site breaks the proposed green corridor between Darley Dale and Matlock.</td>
</tr>
<tr>
<td>Support for this site in a sustainable location close to amenities and facilities including good public transport links along the nearby A6. The site has no technical limitations to development, there is good access, mains services are available nearby and the amenities of local residents will not be adversely impacted upon. Development of this site can be integrated into the wider patchwork of built development and additional tree and shrub planting on higher land above the site allocation but within the applicant’s ownership can be developed to mitigate impact of the housing by adding ecological and visual interest to the semi-rural character of the hillside. The planting will be undertaken in accordance with Landscape Character guidance.</td>
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<tr>
<td>The LSS states (6.5.8) that ‘Land to the north-west is important in preventing coalescence between Upper Hackney and Darley Dale’. The development of this site could infill the small hamlets on the valley side, and merge neighbourhoods. Whilst only providing a small number of dwellings it could have a significant adverse effect on the character of the area, without appropriate mitigation.</td>
</tr>
<tr>
<td>Concerns about the landscape and visual sensitivity and the suitability for development and the potential adverse effect on landscape and visual amenity. High landscape sensitivity identified by the LSS study and secondary or primary sensitivity in the AMES. Should be added to Policy PD11. Hackney Lane is very narrow in places and has no footway at critical points - it is not suitable for additional traffic. The sites are a long way from Primary Schools with no footway on the route to All Saints school. Should be maintained to separate Matlock and Darley Dale.</td>
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<tr>
<td><strong>POLICY HC2(Y)-LAND TO THE NORTH OF PORTER LANE/EAST OF MAIN STREET, MIDDLETON BY WIRKSWORTH</strong></td>
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<tr>
<td>Further building would impact on an already accident black spot junction of Porter Lane/Middleton Road. There is limited parking at many dwellings along Rise End and more traffic would only increase the likelihood of accidents in this area. Further construction work would continue to affect local residents, especially in adverse weather.</td>
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<tr>
<td>Light and noise pollution would affect local wildlife and present residents amenities.</td>
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<tr>
<td>Support for this allocation. The site is a sustainable location for residential development which will support the level of growth in the District generally, as well as meeting an identified housing need. DDDC’s evidence base takes into account the needs of the residential and business communities and explains how Middleton acts as an accessible settlement, which can accommodate growth of an appropriate type and scale. This makes the settlement a sustainable location for development. The site also has the benefit of a positive assessment in the Council’s Landscape Sensitive Study (August 2015), which is part of the evidence base for the emerging Plan. Moreover, the NPPF states that allocations of land for development should prefer land of lesser environmental value. Accordingly, the site is located in an area of Medium Sensitivity as defined in the Landscape Sensitivity Study. Very few sites are located in low or medium areas of landscape sensitivity as the majority of the District is assessed as being high. The Study acknowledges the site and states that: ‘there is an area of land to the south-east of the settlement adjacent to land which is currently being developed, which has low visual prominence and is enclosed by strong tree belts and the B5035’. The site would not affect any key environmental designations. Furthermore, the whole of the site lies within Flood Zone 1 meaning it has the lowest risk of</td>
</tr>
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</table>
flooding. There are no known ecological, air, noise or contamination issues with the site. Surface water drainage would be dealt with by the way of Sustainable Urban Drainage methods. The land immediately to the south of the site has recently been developed for housing, thus further establishing the acceptability of Middleton as a sustainable location for new residential development and setting a precedent for residential development outside of the settlement boundary. This development has been well received and sold very quickly, reflecting the demand for new housing in the area and the ability to deliver high quality development at an affordable level. The existing access road for the adjoining site derives access via Porter Lane. It will be utilised but upgraded to serve this site. It has been confirmed that, subject to modifications, this road has sufficient capability and capacity to serve the additional 45 dwellings proposed. Any increased traffic onto the local highway network will be negligible.

The policy states that the site, HC2(y), is considered to be capable of delivering 24 dwellings. Since this assessment however, a larger site area has become available, which follows the defined ownership boundary and is shown on the accompanying location plan. The site measures approximately 1.5 hectares and is capable of accommodating up to 45 dwellings. The additional parcel of land was previously excluded following the identification of a sough however; the layout of the site will be such that the position of sough within residential rear gardens and the inclusion of landscaping will overcome any potential future constraint. The development of up to 45 new dwellings will making more efficient use of the site and further contribute towards meeting an identified local housing need, as encouraged by the NPPF.

The late submission of this site has prevented the public from having the proper opportunity to make comment.

It is not clear from the information available how the impact of the housing allocation site on the Middleton Conservation area has been assessed during the plan process. It is noted that the SA Part 3 Annex A considers the SHLAA site likely to cause negative effects on the historic environment including prehistoric and lead mining remains. Suggested mitigation is strict design control to conserve the Conservation Area. Is the District Council satisfied that the anticipated number of dwellings could be achieved within the site without having an adverse impact on the historic environment and its setting? Not NPPF compliant.

**HC2(Z) - LAND AT MATLOCK TRANSPORT, NORTHWOOD ROAD, MIDDLETON**

Too many houses are proposed in this area. More are needed in the South of the district close to job opportunities.

Although located within the proposed settlement framework boundary for Northwood, the site is in a largely unsustainable location, reached via a very steep gradient from the A6. Northwood’s inclusion as a tier 3 settlement under draft policy S3 is odd considering other local tier 3 settlements such as Cromford, Matlock Bath and Rowsley have far greater sustainability credentials in terms of location and facilities. Site HC2z is remote from the shops and services of Darley Dale and development of this site would inevitably increase car usage to access the services in nearby towns, contrary to the aspirations of Key Issue 5 to reduce travel demand and draft policy S2 to minimise the need to travel. More appropriate development sites that have been demonstrated to be available and deliverable (e.g. site SHLAA 164) are located closer to the core of Darley Dale.

The redevelopment of this brownfield land is supported.
**HC2(AA)- LAND AT SNITTERTON FIELDS, WEST OF CAWDOR QUARRY, SOUTH DARLEY**

The assessment of this site states that it is of high landscape sensitive and secondary or primary sensitivity in the AMES. It is in the centre of a beautiful valley, visible from several angles, which is characterised by small settlements and individual houses. An 'estate' of 50 houses would be highly visually intrusive both from Snitterton Road and from the higher ground within the National Park. It would spoil the setting of Snitterton village and of the National Park landscape. It would bring a suburban feel to the area, which it lacks at the moment, being essentially rural and tranquil.

Too many houses are proposed in this area. More are needed in the South of the district close to job opportunities

The site is within the countryside and its development would be against the policies to protect the countryside.

The proposed 50 dwellings on this site will make it the second highest density development of all sites within the Local Plan.

The site is a green field site that is outside of the Matlock settlement boundary and should have been excluded at earlier stages as a substantial number of other sites scored significantly better and yet where discounted in favour of this site.

The site is also located adjacent to historic monuments and is highly visible from within the Peak District National Park. Development would be contrary to policy PD5.

South western boundary should be extended to include enlarged land at Cawdor Quarry

Brownfield sites should be developed first.

The road through Oker and Snitterton is unsuitable for further traffic. It is one lane for the most part and is seriously affected by bad weather in the winter. Flooding also affects the road. The traffic at peak times will be unbearable. Inevitably there will be an increased risk of accidents, the roads are already dangerous. It is not suitable for pedestrians or cyclists.

Flooding on the field means that surface water flooding tends to remain around for weeks or even months at a time. This is an inconvenience to owners of the field who may want to put their livestock on the field, but would cause more than an inconvenience to owners of newly built properties: the flood damage can be considerable. This situation is confirmed in the Matlock Strategic Flood Risk Assessment, published by Derbyshire Dales District council that states: ‘There is a risk of flooding from surface water during rainfall events. Interrogation of the sewer records provided by DDDC shows numerous outfalls to the River Derwent from the storm water/combined drainage system’.

Site has poor access to public transport.

The site is used by a variety of wildlife including a number of rare species.

This site was the worst assessed site of the SHELAA and is inappropriate for development.

Will lead to further urban sprawl between Matlock and Snitterton.

This site is within the countryside and its development would be contrary to policy S10. The development would also set a precedent for developers to submit further applications on sites within the countryside.

The development of the two quarries will put enough strain on rural roads, further development should not be allowed within this area.

This policy goes against policy S3, Snitterton is not classified as a settlement within the settlement hierarchy and should therefore be
regarded as open countryside.

Development on this site would be contrary to policy PD2 as it would have a detrimental effect on heritage assets, including Snitterton Hall and gardens which are grade 1 listed. The Snitterton ancient monument also lies within 150 metres of the site and three lead mine shafts in close proximity.

Employment land allocated above the 15 hectares required should be reallocated as housing.

Services including electricity, water, sewage and telephone/internet will need improvements to cope with this level of development.

The Derwent Valley Heritage Way skirts the perimeter of this site and is a major tourist attraction.

The site is high quality grazing land and would be in breach of policy pd7.

Residential development on the site would increase light pollution to other residents.

There are clear boundaries in the form of a dry limestone wall between the site and Permanite, development should not encroach onto this site.

The loss of habitat will be contrary to So1, the site is home to a wide variety of species.

The allocation of this site will make an important contribution to addressing unmet and future housing needs and contribute to the delivery of the wider Cawdor site.

It is not clear from the information available how the impact on the nearby heritage assets and historic environment has been taken into account as part of the site allocation process. The SA SHLAA assessment in Part 3 Annex A sets out that there would be negative effects on the historic environment, but it is not clear whether the setting of the adjacent Conservation Areas to the east have been taken into account in addition to the cumulative impact of allocation sites HC2 (v) and HC2 (bb), and also the individual and cumulative impact on Grade I Snitterton Hall to the west of the sites outside the District Council’s administrative boundary. Clarification on these points is required. Not NPPF compliant.

Support received for this allocation and the extension of the site boundary

More control should be taken by DDDC on the issue of holiday lets and second homes prior to the building on greenfield sites.

**HC2(BB)-FORMER PERMANITE WORKS, WEST OF CAWDOR QUARRY, SOUTH DARLEY**

The redevelopment of this brownfield site is supported. Density on this site should be increased.

Access to this site should be from Matlock (East) of the site only to keep traffic thought Oker and Snitterton to a minimum.

The trees on site should be maintained to limit the visual impact of the development in line with policy S2.

Should be accessed only via Cawdor Quarry.

Too many houses are proposed in this area. More are needed in the South of the district close to job opportunities

Access to the former Permanite works site is along a private driveway leading from Snitterton Road, midway between Snitterton and Oker. There are major limitations of the local highway infrastructure and the roads should not be adopted

Should only be developed only after Cawdor Quarry as an extension to it; and preferably also after Halldale Quarry.
The allocation of this site will make an important contribution to addressing unmet and future housing needs and contribute to the delivery of the wider Cawdor site.

It is not clear from the information available how the impact on the nearby heritage assets and historic environment has been taken into account as part of the site allocation process. The SA SHLAA assessment in Part 3 Annex A sets out that there would be negative effects on the historic environment, but it is not clear whether the setting of the adjacent Conservation Areas to the east have been taken into account in addition to the cumulative impact of allocation sites HC2 (v) and HC2 (aa), and also the individual and cumulative impact on Grade I Snitterton Hall to the west of the sites outside the District Council’s administrative boundary. Clarification on these points is required. Not NPPF compliant.

Concerns raised about the landscape and visual sensitivity and the suitability for development and the potential adverse effect on landscape and visual amenity. High landscape sensitivity identified by the LSS study and secondary or primary sensitivity in the AMES. Whilst previously an industrially developed site, it is detached and isolated, set amongst a highly sensitive landscape and close to the PDNP.

The wider impacts of traffic in Oker, Snitterton and South Darley should be considered.

**HC2(CC)- LAND AT THATCHERS CROFT, TANSLEY**

The site is currently vacant within the existing built up area and is surrounded by houses, it therefore would not extend the village boundary and could provide infill development. Impact would be minimal.

The site is located on the opposite side of the A615 and away from village facilities. Accidents would occur with people crossing this busy road. A pedestrian crossing is needed.

The site would have a visual impact on the village. Important historic views will be lost forever.

The site has had two appeals refused already.

The road network is unadopted and the junction is dangerous. There are no pavements or street lighting.

The green corridor linking Dethick and Matlock should not be lost.

The greenfield currently acts as a soakaway.

Site is outside the village boundary and will set a precedent of housing creeping into the countryside. The character of Tansley will be eroded.

Development will finalise the development and allow developers to provide infrastructure.

The road network in Tansley is already strained.

The provision of medical facilities in Tansley is already overstretched.

The limited facilities in Tansley have not been a consideration within this allocation.

Dwellings on the site should be of a decent quality, in keeping with the village and affordable for young people. Adequate parking would also need to be considered.
Surface water drainage has not been established.

Concerns over the landscape sensitivity which is assessed as high within the LSS and secondary or primary in the AMES/

Although greenfield the site is overgrown and an eyesore, development here would be accepted should this prevent other applications elsewhere.

The site is screened by trees and is almost obscured.

A play area is already in place for young families.

**HC2/DD- LAND AT TANSLEY HOUSE GARDENS, TANSLEY**

Greenfield site outside the settlement boundary. Site contains a public footpath and an area of woodland/river.

Disproportionate to the size of the village and in comparison to development proposed to other villages.

The village does not have the infrastructure or facilities to support this level of development.

Within previous assessments this site has been assessed as unsuitable. A number of reasons were provided including the impact on biodiversity and loss of open land.

The application on the site stated that the lower part of the site would be retained as a buffer between housing and the conservation area. A buffer is required for protection.

Development of this site will increase traffic on an already busy junction, this is dangerous. Church in particular is of concern.

Wildlife will be affected by this development.

A traffic plan is required alongside this development. This should show how the network will cope with additional traffic.

Development will increase traffic on an already overstretched network, creating a dangerous

Development of the site would be contrary to the views of DCC archaeologists.

Uncertainty regarding the tenure and possible covenants of the land.

The original development was already too large for the village and further development should be not be approved. Provision for extra vehicles and road safety was not made with the initial development.

Nothing in the plan relating to the provision of a play area or green space.

Development of the site will affect landscape and will be detrimental to the village.

A balancing pond will be required adjacent to the Lumsdale conservation area. However considering the frequent floods it cannot be guaranteed that this will not overflow and infiltrate the water source.

The provision of medical facilities in Tansley is already overstretched.

The limited facilities in Tansley have not been a consideration within this allocation.

Traffic in Tansley is already problematic.

Development has not been properly thought through.

Greenfields surrounding Tansley should be maintained to prevent urban sprawl.
Development of this scale would put a strain on all infrastructure.
The development would result in a dense area of housing which would change the nature of the village.
Development within the village should be split into small pockets of development.
No possibility of mitigating noise from the industrial estate.
Significant impact will be caused to landscape.
There are better and safer options.
Development of sites such as the brownfield site next to the mills in Lumsdale should be considered over this site.
Previously this land was to be let to the Parish council as a green space for the enjoyment of the village.
It is not clear from the information available how the impact on the nearby heritage assets and historic environment has been taken into account as part of the site allocation process. The SA SHLAA assessment in Part 3 Annex A sets out that there would be significant negative effects on the historic environment, but it is not clear whether the setting of the adjacent Conservation Areas to the south west and loss of medieval strip fields within the historic landscape has been taken into account, in addition to the cumulative impact of the sites to the north east which already benefit from planning permission. The SA suggests that some negative effects could be mitigated but it is not clear how loss of a heritage asset could be mitigated. Clarification on these points is required.
The Parish Council objected to the original application for 27 dwellings on the following grounds: traffic flow into Church Street, impact on the local landscape, proximity to a conservation area and an industrial estate. These objections were overruled by DDDC based on the impact of 27 dwellings. The proposed increase to 50 dwellings will dramatically alter the situation and require a whole new reappraisal of impact, particularly in relation to traffic. DDDC is requested not to grant any further applications until the full housing plan in Tansley has been considered in the round.
Most suitable of all sites recommended in Tansley.
**HC2(EE)- LAND OFF MIDDLETON ROAD/CROMFORD ROAD, WIRKSWORTH**
Site is too large an area.
Development of the brownfield part of the site is supported. Greenfield parts around the edges should be retained and landscaped for screening.
Site is within the settlement boundary.
A Heritage Impact Assessment should be required in support of development.
Concerns expressed above re protection of the light railway line and the woodland to the south of the path linking Middleton Road and Old Lane, this should be incorporated in any approval.
The greenfield element should be removed. Houses proposed for this part of the site could be incorporated into the Middle Peak application.
Proposed mixed use on the site is supported.
Western part of the site is a landscape of considerable historic interest and character and contains evidence of lead mining activity and other industrial archaeology. Any development should respect this strong character. The western most part of the site would be a good location for allotments. The western part of the site is historically and visually sensitive.

<table>
<thead>
<tr>
<th>Request that an Historic Impact Assessment be carried out, to ensure a clear understanding of the possible impacts on the Outstanding Universal Value of the DVMWHS.</th>
</tr>
</thead>
</table>
| HC2(ee), & HC2(ff) adjoin each other, separated only by Middleton Road, and should be regarded as one. The local plan should include a strategic study of the effect of such a large scale of development on a settlement where only modest development proposals have been accommodated for the last 20 years. Before completion and submission of the local plan, there must be more thorough impact statements – on the natural, built, social and economic effects of the developments, the impact on the town and communities of Wirksworth and the desirability of the permanent sterilisation of the minerals and the need for jobs in the quarrying and transport sectors – than have so far been produced. They should also consider highway and public transport links and recommend solutions which would help the new development to integrate well with the existing settlements of Wirksworth and Middleton. Those studies should be the subject of meaningful and genuinely involving consultation with local people, particularly with local people in their teens, twenties and thirties, who are those who must live most of their lives with what could be a very different Wirksworth. If those studies and statements show that HC2(ff) is justified, policies HC2(ee), & HC2(ff) should be amended as follows: they should mention the sites’ relationship with Wirksworth; the ‘comprehensive layout’ and ‘site masterplan and phasing programme’ should be prepared in the context of a Concept Statement produced by the district council, in cooperation with Future Wirksworth and/or Wirksworth Town Council, and should:
| I. Cover the development of the combined sites; |
| ii. Be based on the Wirksworth Neighbourhood Plan policies; |
| iii. Cover a wide range of subjects, including: |
| iv. Transport routes, town centre vitality and viability, town centre parking, employment, education and health facilities and consideration of which ‘community facilities’ would desirably be provided within the new development or preferably be expanded within Wirksworth itself. |

The western part of the site is immediately adjacent to the boundary of a Scheduled Monument relating to nationally important lead mining remains at Nether Ratchwood and Rantor Lead Mines, and to the boundaries of the Middleton-by-Wirksworth and Wirksworth Conservation Areas. The site has archaeological and historic landscape importance with preservation of historic strip fields and lead mining remains, and forms an important contributor to the significance of the Scheduled Monument through its setting, and also to the significance of the two conservation areas by preserving a sense of separation between the two historic settlements. Although the eastern part of the site could accommodate some development, advise that allocation of the western part could be judged ‘unsound’ because of historic environment harms as outlined above.

| The SA SHLAA assessment in Part 3 Annex A sets out that there would be negative effects on the historic environment and, in |

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particular, that archaeological issues may be substantial and not possible to mitigate for. It is not clear from the information available how the impact on the nearby heritage assets and historic environment and their setting has been taken into account as part of the site allocation process and/or what additional evidence has been applied to the site assessment for it to progress to allocation stage. Policy DS6 requires an archaeological survey and a Historic Environment Assessment but is the District Council satisfied that the site can be suitably developed with the anticipated number of dwellings and mixed use development without having an adverse impact on the historic environment? Clarification on these points is required. Not NPPF compliant.

| Support received for this policy. |
| Statement of common ground should be completed for the site which reflects policies. |
| This allocation will improve housing supply in Wirksworth. |
| This along with the Middle Peak should be considered as a new residential led strategic urban extension (SUE) for Wirksworth. |

**POLICY HC2(ff)- LAND AT MIDDLE PEAK QUARRY, WIRKSWORTH**

Allocation is fully justified. Middle Peak was identified as the most sustainable development location in the town in the report to Special Council March 2016. Will provide a mix of house types including a large number of affordable houses and employment land. The enlargement of the site can also provide significant social infrastructure including local neighbourhood retail facilities, site for a primary school, police post, community facility, new allotments for the town and significant green infrastructure. Smaller development proposal would not do this.

| Supports the policy |
| Support - if done right |
| Support redevelopment of brownfield land |
| Site is contaminated land situated outside the agreed Settlement Boundary for development and should be deleted from the Plan. |
| This land is nearer to Middleton than Wirksworth so more public consultations should be staged to involve Middleton residents. |
| How can the present highways infrastructure support the proposed residences? |
| Will mature trees be preserved? |
| Where will the extra services required to support the increase in population be located? |
| Will local wildlife be protected such as the well-established Tawny Owl population? |
| Will a proportion of the planned residences be supported housing for locals as we already have executive type housing in close proximity on Porter Lane? |
| What will be done to minimise local disruption during building works, we have already suffered nearly 3 years of construction noise and surface disruption of Porter Lane including mud on the road, loss of road markings and uneven road surfaces due to services constantly digging it up. The disruption on Middleton Road by significant construction traffic over an extended period of time will be both disruptive and destroy the local character. |

| 145 |
Once completed, there will be significantly more vehicular traffic with its noise pollution, air pollution and the overloading of the junctions at either end of the road particularly at the bottom of the road where it joins the Cromford Road opposite the infant school.

How can the amenity at Stoney Wood be protected when in such close proximity?

Site access if from Greenhill / The Dale or West End would be totally unworkable and would lead to severe congestion in these very narrow roads. The only access to be considered would be via Middleton Road which in itself would create hold ups at the connections to each end where it joins the other two major routes. Greenhill Road is shocking, regularly breaking car's suspension, wheels, etc. The Council clearly cannot cope with the roads and traffic as is, let alone the associated traffic of these extra houses. As well as this, these houses are additional to the c80 houses recently given permission in the town. The roads around the site and the wider area of Wirksworth, such as the A6, are not physically suitable or able to cope with a large increase in traffic that would be generated by large scale housing development in the quarry.

Traffic at school run times through the narrow main road in central Wirksworth would make it very dangerous and would have severe hold up potential.

Increase housing density on this site

This allocation includes various areas of land which should be removed from the allocation. The greenfield/wooded areas will be far easier to develop; it is noted that the policy DS7 suggests that these parts would not necessarily be appropriate for development but they are still included and by doing so, the Council will come under great pressure to allow development on these areas. Best remove them now. Similarly, the old access route to Dale Quarry from West End is included; this suggests that an access to the site may be achievable via this route but such an access is absolutely impossible to achieve sustainably due to West End's already highly restricted size, nature and on-road parking burden. Accordingly, this part of the allocation should be removed.

At the public meeting it was indicated that the number of houses on Middlepeak Quarry may exceed the quoted figure of 220 new homes. Apprehensive about just how large this new figure may be.

This amounts to a proposal for a new community. The scale of the proposal in relation to the size of the town requires preparation of a 'masterplan' and 'design code' and requires a standalone public consultation exercise. The site is identified for 220 homes but with extensive remediation the 56.68ha site is capable of accommodating a significantly greater number. The total number should be limited by a number which if exceeded within the plan period, would damage the character of the town. The local plan should include a strategic study of the effect of such a large scale of development on a settlement where only modest development proposals have been accommodated for the last 20 years.

Recommend that the site should be considered in three zones - the former Dales Quarry, the Middleton Road Zone and the Middleton by Wirksworth Zone. There are existing mineral planning permissions on the site - these outstanding conditions must be complied with - most importantly the work needed to fulfil the promise to create a park from the former Dale Quarry. No development should be allowed in this zone. The northern most part of the former quarry relates to Middleton by Wirksworth - development here should be planned as an extension of Middleton by Wirksworth, thereby assisting in developing and underpinning community facilities in
Middleton - such as a village shop.

A master plan for the entire site should provide the opportunity for some self build development.

Employment uses for some parts of the former quarry would help to meet sustainability objectives.

Connectivity of the site is an issue to be addressed. Opportunity to create pedestrian links to the town centre via The Dale and Greenhill. Danger that development of the former quarry could be an enclave separate from the town if pedestrian infrastructure is not put in place.

Opportunity to create a new road access other than off Middleton Road needs to be explored and through the other site identified for mixed use, to the west of Cromford Road.

Opposed to any remodelling of Middleton Road and Cromford Road junction that would create roundabout.

HC2(ee), & HC2(ff) adjoin each other, separated only by Middleton Road, and should be regarded as one.

Before completion and submission of the local plan, there must be more thorough impact statements – on the natural, built, social and economic effects of the developments, the impact on the town and communities of Wirksworth and the desirability of the permanent sterilisation of the minerals and the need for jobs in the quarrying and transport sectors – than have so far been produced. They should also consider highway and public transport links and recommend solutions which would help the new development to integrate well with the existing. These studies should be the subject of meaningful and genuinely involving consultation with local people, particularly with local people in their teens, twenties and thirties.

If recommended studies and statements show that HC2(ff) is justified, policies HC2(ee), & HC2(ff) should be amended as follows:

- they should mention the sites’ relationship with Wirksworth;
- the ‘comprehensive layout’ and ‘site masterplan and phasing programme’ should be prepared in the context of a Concept Statement produced by the district council, in cooperation with Future Wirksworth and/or Wirksworth Town Council, and should:
  i. cover the development of the combined sites; ii. be based on the Wirksworth Neighbourhood Plan policies; iii. cover a wide range of subjects, including: iv. transport routes, town centre vitality and viability, town centre parking, employment, education and health facilities and consideration of which ‘community facilities’ would desirably be provided within the new development or preferably be expanded within Wirksworth itself.

This development doesn't have any regard for the Neighbourhood Plan

In the Town plan that was consulted on, voted on and ratified by local people and council, it had stipulations for eco housing, but there are no eco elements to these new houses, and they include only an undefined criteria for just 30% affordable housing!?

Lack of environmental building guidelines is a concern

Low level of affordable housing is a concern

Welcomes the restriction of the proposed housing allocation to the footprint of the former quarry, therefore ensuring conservation of the
historic field system to the west.

Not clear from the information available how the impact on the nearby heritage assets and historic environment and their setting has been taken into account as part of the site allocation process and/or what additional evidence has been applied to the site assessment for it to progress to allocation stage. Policy DS7 requires an archaeological survey and a Historic Environment Assessment but is the District Council satisfied that the site can be suitably developed with the anticipated number of dwellings and mixed use development without having an adverse impact on the historic environment? Clarification on these points is required. Not NPPF compliant.

There are remaining reserves of around 29 million tonnes of Carboniferous Limestone in the quarry. The total land bank of aggregate limestone in Derbyshire is around 750 million tonnes. Although the reserves at Middle Peak Quarry are not highly significant, therefore, in the context of the overall land bank, the sterilisation of the reserves would still have implications, as the Carboniferous Limestone is an important resource in national terms. It will be important that this issue is taken fully into account in the assessment of the suitability of this proposal. Should take into account local and national mineral policies that seek to protect minerals resources of national and local importance, in taking forward the proposed allocation of land at Middle Peak Quarry. The supporting text to the strategic allocation in paragraphs 8.23 to 8.28 and the proposed Strategic Policy DS7: Land at Middle Peak Quarry, Wirksworth should include reference to the national and local planning policy requirements above.

Given the scale and extent of Middle Peak Quarry and the proposed area that has been identified in the allocation the proposed allocation may have potential to accommodate a new primary school to meet the future growth needs that are proposed in the Plan for Wirksworth.

The scale of the site in the proposed allocation could also potentially accommodate other uses, such as business and commercial uses which, together with the 220 dwellings and potential site for a school, could provide for a sustainable mixed-use development.

There is an existing mineral planning permission with an approved landscape restoration scheme. The land in the south-east (Dale Quarry) part of the site is part of Wirksworth Conservation area. Any development should not prejudice the approved landscape restoration of the quarry but could also provide the opportunity to further enhance the restoration of the site.

Tarmac has ambitions to build 1,200 dwellings. 1,200 dwellings would be unacceptable as it would be totally out of scale with the settlement of Wirksworth and the existing range of services and facilities it has available.

Large-scale housing development would have significant impacts on drainage and sewerage treatment.

Development would need to be carefully planned to ensure that it did not have adverse impacts on the landscape and protected trees and woodland on the site.

Part of the site is also a Site of Special Scientific Interest that will need to be protected.

250 dwellings is the maximum capacity for the site for it to be sustainable development.

The site should also be used for other uses, including new employment development and a new school.

The Local Plan sees quarry sites as being suitable redevelopment brownfield sites. But many quarry sites are not brownfield sites.
where they have been dormant for a long time and have been assimilated into the landscape. They are therefore greenfield sites.

Would like the housing numbers on the site to be increased with a slightly modified allocation boundary of 62.67 ha to 650 dwellings. Wirksworth is one of the most sustainable developments in the district. The council should be supporting and facilitating further development here in order to provide a 'better balanced settlement'. Request a statement of common ground be completed for the site which reflect policies. Have included master plans for the site which focus on delivering sustainable development. Through this the housing supply within Wirksworth will be improved. The incorporation of large scale sites such as this one will balance supply from greenfield sites and would add security to housing delivery and soundness to the local plan. This along with the Middleton road should be considered as a new residential led strategic urban extension (SUE) for Wirksworth. The site presents an opportunity for the restoration of a vast area of quasi 'brownfield land' and the development of a characterful residential extension with a distinct sense of place.

Six individual development components have been identified within the dormant quarry and surrounding disturbed land. A substantial amount of cut and fill will be required to achieve appropriate and safe gradients and access to housing development platforms. A number of development platforms have been identified as presented in the attached Conceptual Platform Design (PlanMQP6). The illustrative master plan shows how the residential density within these areas will be varied overall, including opportunities for bespoke self build plots.

The quarry including the quarry void will be restored to a biodiversity rich landscape which retains a waterbody with opportunities for nature conservation enhancement.

Work has commenced on the quantification of abnormal costs associated with restoring the site.

Technical reports indicate four issues where mitigation is required (Biodiversity, Geodiversity, Landscape and pollution and water). These are not overriding constraints and will be managed through the development management process. No part of the development lies within the floodplain. Not within a high sensitive landscape area as it is screened by existing vegetation on the northern boundary and additional landscaping will be provided within open space. Avoids using land that is in agricultural use. Will provide facilities with clear options for pedestrian routes and improvements to public transport frequency via Middleton road and B5035. Through restoration and landscaping of the site with retention of existing landscape and geological features the site can play an important part in facilitating social interaction and creating healthy, inclusive communities providing a safe coherent ecological network that is more resilient to current and future pressures. No historic assets within the site.
<table>
<thead>
<tr>
<th>POLICY HC3 – SELF-BUILD HOUSING PROVISION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comments received which supports the aims of this policy to provide self-build provision where there is a proven need. Provides an opportunity for individuals to build dwellings to the highest standards of energy efficiency, incorporating insulation and other members, providing a model for others.</td>
</tr>
<tr>
<td>Thus far very little evidence of self build can be seen across the District.</td>
</tr>
<tr>
<td>Land should only be made available for self-build provision within the settlement framework boundaries.</td>
</tr>
<tr>
<td>Individual pieces of land should be available of suitable size to enable decent sized 3/4/5 bedroom houses with garages/workshops and decent gardens with a high level of privacy, in order to enhance the built environment.</td>
</tr>
<tr>
<td>This policy should be extended to include land within sustainable locations, not simply those within settlement boundaries.</td>
</tr>
<tr>
<td>Previously self-build applications have been refused, notably in Brailsford. This is contrary to this policy and also increases land allocated for housing under policy Hc2.</td>
</tr>
<tr>
<td>The register and opportunity for self-build should be publicised more to encourage cooperative building.</td>
</tr>
<tr>
<td>The provision of self-build plots should not occur on greenfield sites.</td>
</tr>
<tr>
<td>The definition “proven need” used within the policy requires further explanation. As the wording currently reads it is too ambiguous.</td>
</tr>
<tr>
<td>Design statement guidelines need to be enforced alongside this policy. The provision of self-build needs to be carefully supervised by DDDC to ensure developments are sympathetic to the local area.</td>
</tr>
<tr>
<td>Monitoring self build projects across the district would require a significant increase in the numbers of planning and building control officers. Currently DDDC are not monitoring residential development projects properly.</td>
</tr>
<tr>
<td>Specific land should be allocated for the provision of self-build housing.</td>
</tr>
<tr>
<td>Provision should be made for self-build within rural areas, outside the listed defined settlement areas. Small rural communities in hamlets or other similar settlements need to accommodate natural organic growth. This needs to happen in a rural context just as much as in larger defined settlements.</td>
</tr>
<tr>
<td>Self-build plots should be restricted to small self-contained sites or individual plots. DDDC should be looking to identify potential sites suitable for self-build/custom build in the Strategic Housing Land Availability Assessment (SHLAA) rather than applying an arbitrary requirement on larger sites. There is concern over the practicality of introducing self build plots as an integral part of major housing allocations. Access to construction sites will often have to be strictly controlled and this is not conducive to the evening and weekend hours of the self-build. Different timescales for completion for self-build and traditional dwellings will have a negative impact on sales. Self build houses could look incongruous in otherwise co-ordinated schemes. Within the Local Plan Examination for the East Devon Local Plan, the Inspector in his report on the 18th January 2016 considered a policy requiring developers to make plots available for sale to small builders or for self-build. He commented that he could not see how the planning system can make developers sell to potential rivals and recommended a modification to the policy to seek to encourage rather than require provision. Rather than provision additional land supply DDDC through this policy are simply changing house construction from one type to another.</td>
</tr>
</tbody>
</table>
There is no certainty that demand for self-build will be forthcoming, a self-build area cannot be set aside indefinitely. All sites should be assessed on their merits and reference to 'as part of all housing allocations included within this Local Plan' should be deleted from the Policy.

Any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through a viability assessment of the Local Plan to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk. Urge DDDC to ensure the policy has added flexibility as there is no guarantee that these units will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of housing. Any specific requirement needs to include a mechanism whereby if the self-build plots are not taken up within a given time period then these revert back to market housing to be provided as part of the wider scheme.

**POLICY HC4-AFFORDABLE HOUSING**

Comments received which support this policy and its aim to maximise affordable housing across the area.

The issue of the affordability of housing is not being addressed comprehensively, particularly in rural villages where most of the houses being built are in the higher price range.

The policy fails to take into account the Governments small site exemption policy of five or less dwellings in rural areas and ten or less in urban areas. This has been used within a number of recent High Court decisions.

Prior to the provision of affordable housing DDDC should make the necessary improvements to the infrastructure across the district.

DDDC should be providing a minimum of 60% affordable housing.

There is too much emphasis on affordable housing.

The level of affordable housing provision should not have been reduced within the Draft Plan from previous levels. Evidence provided by DDDC alongside the Draft Plan indicates that there is in an increasing ageing population and that the income in the Derbyshire Dales area is below average, both of which indicate a large need for affordable housing.

Young people are being forced out of the housing market due to the high price of housing. More affordable housing, particularly that available for purchase, is needed for them to remain in the villages in which they grew up, this is notable in Brailsford.

The population predictions included within the evidence base suggest that sustainable developments catering for elderly people within close proximity to town centres are required above affordable housing.

Affordable homes should be monitored carefully by DDDC to ensure the correct mix of people occupy them.

The wording of this policy excuses planning regulations in order to pass proposals which would otherwise be refused.

The Thatchers Croft development is currently all social housing, therefore within any extension to the site affordable housing is not required.

Concern that whilst the policy is sound in principle developer may not conform to the affordable housing quotas.
The requirement of the policy to provide 30% affordable housing may be too high and may prevent developers from investing in the district.

Unsure as to where the need is located within the district as recently built affordable houses, notably in Matlock, have remained unoccupied for some time, having been in the end occupied by people from as far away as Derby and Nottingham rather than local people.

Affordable housing should be linked to self-build with plots earmarked for local people wanting to build their own houses. This would achieve many of the aims of the policy.

House prices are still too high for single people, something must be done in order to revise prices.

Covenants should be placed on houses to ensure they are sold to local people. The local ties which qualify a person to access to affordable housing should be clearly outlined within the policy.

Providing 80% of affordable housing in the form of social rented accommodation is too much. A higher proportion of affordable housing should be provided in the form of starter homes in order for young people to remain in the area.

A precise target figure for the number of affordable houses to be provided should be outlined within the plan. Progress against this target should be reported upon within the Annual Monitoring Report.

Affordable housing should only be provided in locations where no detrimental effects will be had on nearby residents. Those residents should be able to dictate whether such effects would be had.

Additional criteria should be added to the policy as follows:

‘Planning applications should state how the development will achieve at least 30% of the net dwellings proposed as affordable housing, in all residential developments of 3 dwellings or more or on sites of 0.1 hectares.’

When providing affordable housing the needs of older people should be incorporated, houses should have small gardens to reflect those within real villages.

Whilst Hognaston Parish Council agree strongly with this policy. They do however have reservations about how affordable housing is to be defined and to the potential for developers being allowed to avoid the commitment due to flexibility within the policy.

Currently there is not enough affordable housing in many parts of the district.

Affordable housing should only be provided when the need arising from housing shortages, taking account of current rental stock, has been clearly identified.

The definition of homelessness should be made clear.

This policy should require a maximum 20% affordable housing provision.

A significant number of affordable housing needs to be provided, both for sale and rent.

All housing within the district should be priced within an affordable range. Smaller family houses rather than mansions should be provided.

Affordable housing within villages should be in keeping with the character of the development.
Affordable housing should be placed in close proximity to the town centres on good public transport routes, not on the outskirts of town with little infrastructure.

This should be a higher priority within the plan.

Greenfield sites should have a lower affordable housing provision proportion than brownfield in order to encourage brownfield sites to be developed.

This policy should be refined in order to take account of commercial and economic positions.

No better than previous policies on affordable housing.

Affordability was central to the debate on housing within the Wirksworth Neighbourhood Plan; therefore it should be further strengthened within the Draft Plan.

Doveridge Parish Council agrees with the evidence which forms the basis of this policy, their own evidence documents used within the preparation of the Doveridge Neighbourhood Plan supports this. They agree that a mix of affordable housing types should be provided. However they question exactly how CIL would work considering that younger people cannot afford to purchase a house there.

The wording of the policy should be altered from ‘at least 30%’ to ‘up to 30%’ in order to take account of viability.

Support for the part of the policy which allows for some or all of the affordable housing to be provided offsite through financial contributions, this allows for situations whereby the identified affordable housing need has been accommodated for through other schemes.

This policy should go further in supporting Registered Providers and allocate specific sites for affordable housing.

The policy as currently worded is too ambitious and possibly unrealistic for a number of reasons. Whilst a target of 30% may be reasonable setting this as a minimum does not take account of potential viability issues. ‘Subject to viability’ should be added to read: ‘subject to viability a target of at least 30% affordable housing will be requested’. The definition of high, medium and low market areas is somewhat arbitrary. The evidence used is inaccurate. Doveridge should not therefore be regarded as a high priced area (and incur a higher affordable housing quota accordingly) whilst more prosperous parts of the District including Matlock and Ashbourne should be lower.

The interpretation of the background evidence and the implementation of the affordable housing policy therefore needs to be treated with flexibility. Finally not content with the expectation that 80% of the affordable housing contribution should be provided as social rented accommodation. This is unreasonable, unrealistic and contrary to current Government policy and the approach currently being taken by the HCA. There also needs to be provision in the final draft of the Local Plan to accommodate a larger element of starter homes.

DDDC should acknowledge that as a consequence of the Housing & Planning Act 2016, other recent Government consultations and the Court of Appeal judgement on The Secretary of State for Communities & Local Government this policy may change prior to the Local Plan being submitted to Examination.
Viability and contextual considerations should be taken into account when determining residential development applications.

Derbyshire County Council outline that the provision of necessary infrastructure to support new housing development, and the viability of development, particularly when other infrastructure costs are taken into account, is an important consideration for them, whether new development is funded though developer contributions or CIL. In this context the Policy HC4 is fully supported.

In addition to securing s106 agreements with developers there are other substantial practical difficulties in securing affordable development to meet housing needs of local people. So while there will be general agreement on the need to provide appropriate housing for local needs, securing this is not just a matter of allocating land. It depends on the funding made available to Housing Associations and the scale of subsidy from housing developments that private developers are willing to make. There will inevitably be consequences for the price of the ‘non-affordable’ houses. There is a huge disparity between local incomes and local house prices. A situation could be created where local people who do not meet ‘affordable housing’ criteria are forced out of the area because the 70% of ‘non-affordable’ housing is literally unaffordable.

It is noted that the NPPF dictum that ‘requirements for affordable housing, standards, infrastructure contributions or other requirements’ shall be sacrificed where necessary in order to ‘provide competitive returns to a willing land owner and willing developer’. (quoted on DDDC website ‘Evidence Base’) So when the NPPF ‘advises that economic, social and environmental gains should be sought jointly and simultaneously’ (Draft Plan, 4.1), it is clear that not only do economic gains outweigh the others, they do so as narrowly defined by profits to ‘willing’ land owners and developers.

**POLICY HC5 - MEETING AFFORDABLE HOUSING NEED (EXCEPTION SITES)**

Whilst this policy is supported in principle it is felt that a number of allocations do not adhere to it and undermine its aims.

Exception sites should only be considered where they are to provide affordable housing for local people.

The policy fails to address rural affordable housing needs and the needs of smaller communities for affordable housing. There should be no limit placed upon settlement size because rural affordable housing on exception sites should be built where it is needed, as traditionally occurred in the past. Local housing need should be addressed in all settlements to ensure viability.

Comments received which support this policy and its aim to provide affordable housing across the district.

This policy is objected as it is felt that affordable housing should be provided within the allocations for residential development in order to protect additional land.

Brailsford Parish Council indicates that this policy should be in accordance with their housing needs survey and should include an overall number for provision.

Within the plan too much emphasis is placed upon affordable housing.

The Peak District National Park should be contributing to affordable housing provision.

The type of housing provided in any location should be related to the market.

This exception policy should only be enacted when all reasonable land has been exhausted.

There is a need for affordable housing within the district. This should be sensitively designed.
No sites should be an exception, every site needs careful evaluation.
The development of affordable housing in tier 4 developments would detrimentally affect the character of the Dales which the plan aims to protect.
The need for exception sites will only arise should developers not provide sufficient affordable housing on other sites. DDDC should ensure that sufficient affordable housing is provided on allocated sites.
Housing need must be addressed in the community in which the need arises. Lack of accessibility to services should not be reason to refuse affordable housing otherwise too many rural settlements that are so important to DD will be subject to a future of decline. The plan should provide for mixed affordable and open market housing to be the norm for delivery in rural areas, especially as central government funding becomes more restricted.
Cross-subsidy proportions should be driven by a viability assessments but the open market proportion could exceed 50%.

**PARAGRAPH 6.12**

It is welcomed and supported that paragraph 6.12 in the DDDLP sets out details of the Derby, Derbyshire, Peak District National Park Authority and East Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA), which was published in August 2015 and jointly commissioned by DCC, Derby City Council, the eight district and borough councils in Derbyshire, the Peak District National Park Authority (PDNPA), East Staffordshire Borough Council and the Derbyshire Gypsy Liaison Group (DGLG).

**POLICY HC6- Gypsy and Traveller Provision**

Comments received which support this policy and its aims to provide for the accommodation needs of gypsies and travellers. Support also provided for the allocation of a specific site.

Sites to be allocated for gypsy and traveller need should be in walking distance of services and facilities.
The allocated site is not in an appropriate area.
Existing sites should be used wherever possible.
Existing provision should be maintained, however there should not be an increase in provision.
Unclear as to why the policy timeframe is to 2034 which differs from the Plan Period is to 2033.
Sites should not be allocated which cause detrimental impacts to local communities. Brownfield sites should be used as a priority.
Major issue with the Watery Lane site as allocated within the plan. This site lies within the by-pass route, which is much needed within the area. It would also affect tourism within the town. The application on the site is currently under investigation by the Ombudsman and cannot therefore provide any certainty as an allocation. DDDC has not provided any information publically about potential alternatives and their consideration.
This policy does not accord with national policy as set out in Planning Policy for Traveller Sites. It does not provide for an adequate supply of sites and offers no mechanism to do so.
Criteria (c) is totally unacceptable. A suitable site should not be refused just because another site has not been extended. Every application must be determined on its own merits.
The policy does not, as required set out criteria to determine applications where no need has been identified. The pre-requisite for "need" must be deleted from the final set of criteria.

The allocated site is in the wrong location.

Sites for gypsy and traveller accommodation should be moved around yearly.

Sites should be attached as extensions to caravan and camp sites within the National Park. DDDC should approach the Peak District National Park through the duty-to-cooperate on this issue.

The Homesford site was unfairly dismissed due to it not being a permanent site, despite Watery Lane being held in trust by DCC for other purposes, and that it only provides for 3 pitches. This site could still be included in the Plan.

The Plan provides for too many pitches, less pitches are required.

DCC state that this policy appropriately sets out a requirement that provision should be made for 9 pitches over the period 2014 to 2034 in the District, which was recommended by the GTAA and is therefore supported.

It should be noted that DCC owns the land at Watery Lane which is subject to the proposed allocation and that planning permission was granted in June 2015 subject to conditions for a proposed use of the site for 4 Gypsy and Traveller pitches under an application by DGLG. DCC does not, however, have any capital funding available to develop the land in accordance with the proposed policy allocation. Having regard to DCC's interest as land owner, before any development of the land by any other party could take place, a lease or agreement would need to have been completed with DCC on terms satisfactory to DCC.

It should be noted that the Mid Derbyshire Badger Group has previously indicated that there are likely to be badger setts located in the vicinity of the site. This issue will require further investigation prior to any use of the site, in consultation with Natural England, whose consent may be necessary to mitigate the existence of badgers on the site.

HC7: REPLACEMENT DWELLINGS

Comments received which strongly support this policy and its aims to only allow replacement dwellings outside settlements development limits where they align with certain criteria set by DDDC.

Replacement dwellings provide a good option where existing building cannot be upgraded without significant expense.

This policy is too restrictive. Many examples of dwellings built in the past have provided much needed homes in what would be regarded now as "unsustainable locations'.

Derelict and unused properties should be replaced as a priority, particularly where these can provide affordable housing.

This misses an opportunity to reuse buildings that are in disrepair but with no current residential use, this would provide a more effective use for them and due to the small numbers of these buildings available would not have any detrimental effects.

Historic England welcomes this policy.

The wording in policy HC7 in relation to ‘architectural significance’ is of concern and will make it difficult to counteract professional statements to the contrary (notwithstanding that there are many degrees of architectural significance pertinent to particular contexts).

HC7A: CONVERSION AND RE-USE OF BUILDINGS FOR RESIDENTIAL ACCOMMODATION
Comments received which support this policy and its aims to allow the conversion and/or re-use of existing buildings to residential uses from other uses in exceptional circumstances. Particular support for the conversion of holiday lets to permanent residential.

The re-use of buildings outside settlement development limits for housing from other uses should not be in “exceptional circumstances”. This stance is contrary to paragraph 55 of the NPPF and takes no account of Permitted Development of rural buildings nor the right to change commercial and other buildings for residential use. The policy should be further amended, given the rights that exist to remove HC7(A) clauses b), c), e), and f).

The policy must take into account the small site exemption policy which means that the Council cannot require an affordable housing payment when holiday use only conditions are removed on sites of five or less dwellings.

This policy needs to be enhanced in order to save further green belt sites.

Buildings should be changed as little as possible, should a building be changed because there is no longer an agricultural need for the building then another agricultural building should not be allowed

Provision should be made for the redevelopment of previously developed sites for housing that include the demolition of existing structures and allow for new build, as opposed to solely the re-use or conversion of existing buildings.

This policy should only be enforced when an inspector verifies that the existing use is no longer sustainable.

This policy should also be enforced within the Peak District National Park, where there are a number of derelict buildings.

Policy is too restrictive and is open to subjective interpretation.

Within this policy a mindful and flexible approach needs to be taken.

The requirement (in part (f)) for a financial contribution towards the provision of affordable housing does not comply with what is likely to be national planning practice guidance following the recent Court of Appeal (West Berks and Reading) judgement. This part of the policy should therefore be deleted.

Policies HC7A (a) - (e) run contrary to the permitted development rights in Class Q of the GPDO. It is suggested that this policy needs amending to comply with Class Q. Also, the policy should allow non-agricultural buildings in the countryside to be converted on a similar basis to agricultural buildings.

This is the most sustainable way to develop. It extends the life of buildings and retains them as part of the community.

This should be a number one priority within the plan.

Criteria f of the policy will create an unnecessary brake on "self-conversion" of rural non-residential buildings which otherwise meets the criteria.

**HC8: RESIDENTIAL SUB-DIVISION OF DWELLINGS**

Comments received which support this policy to ensure criteria are met when considering proposals for the sub-division of existing dwellings into two or more self-contained residential units.

Criteria c of the policy should be removed due to the rights under permitted development to convert agricultural buildings to dwellings and the right to convert existing buildings under paragraph 55 of the NPPF.

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<table>
<thead>
<tr>
<th>Comments received which support this policy and its aims to allow the conversion and/or re-use of existing buildings to residential uses from other uses in exceptional circumstances. Particular support for the conversion of holiday lets to permanent residential.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The re-use of buildings outside settlement development limits for housing from other uses should not be in “exceptional circumstances”. This stance is contrary to paragraph 55 of the NPPF and takes no account of Permitted Development of rural buildings nor the right to change commercial and other buildings for residential use. The policy should be further amended, given the rights that exist to remove HC7(A) clauses b), c), e), and f).</td>
</tr>
<tr>
<td>The policy must take into account the small site exemption policy which means that the Council cannot require an affordable housing payment when holiday use only conditions are removed on sites of five or less dwellings.</td>
</tr>
<tr>
<td>This policy needs to be enhanced in order to save further green belt sites.</td>
</tr>
<tr>
<td>Buildings should be changed as little as possible, should a building be changed because there is no longer an agricultural need for the building then another agricultural building should not be allowed.</td>
</tr>
<tr>
<td>Provision should be made for the redevelopment of previously developed sites for housing that include the demolition of existing structures and allow for new build, as opposed to solely the re-use or conversion of existing buildings.</td>
</tr>
<tr>
<td>This policy should only be enforced when an inspector verifies that the existing use is no longer sustainable.</td>
</tr>
<tr>
<td>This policy should also be enforced within the Peak District National Park, where there are a number of derelict buildings.</td>
</tr>
<tr>
<td>Policy is too restrictive and is open to subjective interpretation.</td>
</tr>
<tr>
<td>Within this policy a mindful and flexible approach needs to be taken.</td>
</tr>
<tr>
<td>The requirement (in part (f)) for a financial contribution towards the provision of affordable housing does not comply with what is likely to be national planning practice guidance following the recent Court of Appeal (West Berks and Reading) judgement. This part of the policy should therefore be deleted.</td>
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<td>This should be a number one priority within the plan.</td>
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<tr>
<td>Criteria f of the policy will create an unnecessary brake on &quot;self-conversion&quot; of rural non-residential buildings which otherwise meets the criteria.</td>
</tr>
</tbody>
</table>

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157
Given the government’s small site exemption policy the resulting additional dwelling should not be subject to an affordable housing payment.

Policy must ensure clear planning permissions and penalties for those breaking the rules.

**HC9: EXTENSIONS TO DWELLINGS**

Comments received which support this policy and the criteria for the approval of proposals for extensions of residential dwellings.

Extensions should not reduce the number of affordable and smaller houses. The district has too many unnecessarily large properties.

This should be a simple process and only neighbour objections which outline a clear breach of planning guidelines should warrant refusal.

This policy should be removed from the Draft Plan.

This policy meets local needs.

Historic England welcomes this policy, especially reference to ‘the site’s wider setting and location’ since this reflects the importance of the special character and quality of the Derbyshire Dales.

**HC10: HOUSING MIX AND TYPE**

Comments received which support this policy and its aims to ensure an appropriate mix and type of housing is provided across the District.

The proposed housing mix is considered to be unrealistic in terms of securing viable development sites in the District. The restrictions placed on the amount of 4+ bed dwellings in particular do not allow for a broad mix of homes on developments, limiting choice for families who may desire larger new build homes. The provision of housing mix should be driven by market demand and not purely on statistics.

This policy should be amended to commit the Council to minimum space standards in line with the ‘London’ standard.

The table should be removed from the policy and mix should be determined on a site by site basis.

Whilst the policy is supported in principle it is felt that recent applications and proposals, notably in Ashbourne and Doveridge, have not adhered to this.

Suitable mix and type of housing is required to reflect the village character, notably in Brailsford.

Elderly people do not ordinarily need 3 or 4 bedroom properties. There is not enough provision for elderly people who do not want to move into an institution.

Demand for bungalows has been expressed within Tansley, this has only been considered in a limited way through proposals submitted.

Control of overall mix and type is extremely difficult when spread over a number of smaller developments with different characters. This would be much easier in a new settlement.

Annual Monitoring Reports should be produced by DDDC in order to update on the progress of this policy.
Hognaston Parish Council believes that it is essential that the mix of properties reflects adequately the needs imposed by the demographic structure of the Dales including the requirements of an ageing population to downsize to smaller and single-storey properties.

This policy needs to be carefully administrated taking into account the fluctuating trends in the housing market.

Far more bungalows and chalet bungalows need building to address the increasing population of older people.

Low-rise apartment blocks in towns might provide good starter homes for younger people trying to get on the housing ladder.

The housing mix within the policy must be applied with flexibility in order to ensure sites continue to be viable. If sites become unviable they will not be delivered which may result in the Council being unable to demonstrate a five year housing land supply.

Policy has no recognition of market considerations. The proposed mix, which requires 90% of all market dwellings to be 2 and 3 bedroom units, simply would not be contemplated by the vast majority of house builders. It would be uneconomic and adhering to such a prescriptive mix will not deliver housing by commercial house builders.

The Deregulation Act 2015 specifies that no additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings should be set in Plans other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings. The policy proposes that 90% of all houses are built to the higher optional standard of M4(2) adaptable / accessible homes of the Building Regulations and 10% of all houses are built to M4(3). As set out in the NPPG, this policy requirement should be justified based on need and viability tested. Policy HC10 also introduces the nationally described space standard. If DDDC wishes to adopt this standard it should be justified by meeting the criteria set out in the NPPG (ID 56-020) including need, viability and impact on affordability. The proposed requirements set out in the policy are not justified by available evidence of need and have not been the subject of viability testing. DDDC should provide further supporting evidence to justify Policy HC10.

The provision of bungalows on site and the housing mix policy in general should also be tested through the Whole Plan Viability Assessment as these issues can have a massive impact on the viability of a site coming forward.

Space standards are not in line with the guidance given in the National Planning Practice Guidance (NPPG) which states that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies including evidence of need and viability. DDDC has not produced such justification.

Size distribution should be treated as a guideline. Therefore second sentence of the policy is supported.

Support for the suggestion that homes are built where necessary to adapt to home working.

The requirement for 90% of homes to be built to Accessible and Adaptable standards (Part M 4 (2)) which Government Planning Practice Guidance is not supported. Despite the high proportion of elderly residents within the Dales, not all homes will be occupied by the elderly and young people buying dwellings which are built to Part M 4(2) standards, will find themselves paying a premium for doing so.

Support for this policy due to the positive health and wellbeing benefits.
Whilst different types of housing should be provided the materials used and associated street scape and signage should remain in keeping with the village. Although providing accessible is commended this needs to be accompanied by accessible surrounding infrastructure including dropped curbs to ensure people can go out and about in the district.

**POLICY HC11: ELDERLY PERSONS ACCOMMODATION**

<table>
<thead>
<tr>
<th>Agree with policy.</th>
<th>Supported due to positive benefits for health and wellbeing.</th>
</tr>
</thead>
<tbody>
<tr>
<td>As the profile of residents in Derbyshire Dales is ageing it is vital that there is a selection of quality smaller units which are suitable for residents to downsize without having to leave the area they have lived in, often for many years. Smaller developments of bungalows with small gardens would be most suitable. This would also free up larger houses for growing families.</td>
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<tr>
<td>Need specific action on quality houses that can accommodate progressive infirmity in a mixed age group community.</td>
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</tr>
<tr>
<td>No realistic aim to help older residents live in their villages.</td>
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<tr>
<td>Support the converting of annexes to accommodate carers, but more needs to be done to ensure that there is appropriate housing for the retired population. Surveys show that the populations of 60+ and 75+ are going to increase drastically in the next 15-20 years. Need to find a way to prepare for this change and build houses that can accommodate this population, e.g. elderly communes or similar.</td>
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<tr>
<td>Given demographics, this is an important issue. Allowing development in non-central poorly connected sites without facilities does not solve this problem.</td>
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<tr>
<td>Developing homes suitable for the elderly within a level walk of the town centre will encourage down-sizing releasing larger family homes.</td>
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</tr>
<tr>
<td>Accommodation should not be confined to merely annexes and extensions, but also single story separate houses within a rural settlement so that the elderly can continue to live independently within their community.</td>
<td></td>
</tr>
<tr>
<td>The restrictive nature of this policy suggests that it should only be applied outside of settlement boundaries.</td>
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</tr>
<tr>
<td>Unclear why there are two policies on elderly person’s accommodation. One policy should encompass all requirements.</td>
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</tr>
<tr>
<td>Mix of houses is not delivering what local residents have consistently indicated is needed. Although the need for elderly accommodation is acknowledged provision is not being provided. The provision of bungalows on The Plain (Brailsford) has proved a big help in allowing some current residents to remain in the village but it would make sense if all new developments could contain a similar or even higher proportion of homes suitable for the elderly.</td>
<td></td>
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<tr>
<td>Yes accommodation on flat areas not in areas above snow level.</td>
<td></td>
</tr>
<tr>
<td>The area from Gritstone Road and Pinewo...</td>
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</tr>
</tbody>
</table>
inclement weather already mentioned and the lack of public transport. Nothing is accessible without transport for most able bodied people, never mind the elderly.

However again site HC2(v) is a completely unsuitable site for elderly housing.

The Dales population is forecast to be an ageing one, therefore putting housing at one of the highest points above the town centre is not sensible or feasible for that target group. The severe gradient of the hill from the town centre to the new development is simply insurmountable for older people.

Great idea for our ageing Brailsford population, maybe built west of Miller Homes near the A52 so residents can easily access public transport.

Bungalows/apartments in Brailsford - 8 apartments could be provided making very suitable elderly accommodation in the old school building

Extend / add private units to existing care homes and warden assisted housing e.g. St Mary's nursing Home, Ednaston - have they been approached pro-actively by DDDC?

Matlock to Darley Dale is already a geriatric corridor. Build more specialised accommodation and more elderly people will move in until it becomes "Costa Geriatrica" of the Midlands. Do not create ghettos of old peoples accommodation the A6 is beginning to look like a "care corridor "

**POLICY HC12: AGRICULTURAL AND RURAL WORKERS DWELLINGS**

Agree with policy

If building is to be allowed it has to be tied to the farm.

Not necessary - sufficient available or use affordable local needs housing

More needed to support these important workers.

This policy is different to that in paragraph 55 of the NPPF and introduces requirements which are not part of national policy, notably the need to demonstrate that there is a functional requirement; that the employment is full-time and that the development is financially sound. Para 55 only requires that there is an essential need and there are court decisions which omit the need for financial viability and information. It is suggested that this policy is deleted and replaced along the lines of the policy in the NPPF.

Allow conversions to assist in low cost accommodation for farming families but not for short them holiday rentals.

The Council should never rescind ties on such property. The owners never market at a realistic price for a young farmer or agricultural worker, so then the tie is released and the property value rockets.

The final paragraph is not compliant with national guidance.

Please include the following wording as an additional point within the policy: 'The site is not situated within an area of unacceptable
flood risk’.

**POLICY HC13: OPEN SPACE AND OUTDOOR RECREATION FACILITIES**

**Agree**

Supported due to positive benefits for health and wellbeing.

Support the policy overall but forthcoming updated evidence will be required to replace the Peak Sub Region Sport and Recreation Study which is out of date. The Standards in Table 5 are based on out of date evidence and so this aspect of the plan needs to be changed and reviewed as recently highlighted in discussions and correspondence with the Council. An up to date assessment is needed prior to the plan being put forward for public consultation.

Any policy which seeks to protect areas of open space should be predicated on a robust and fully justified evidence base. The Local Plan should only seek to protect valued open space and this should be through the planning balance exercise advocated by the Framework. Policy HC13 should therefore be supported by a clear evidence base assessing why particular open spaces are considered to be valued and should be reworded to reflect the planning balancing test contained in the Framework.

There is a shortfall in provision for older children how is to be addressed?

- Keep playing fields and allotments and provide more open space in rural manner between houses
- These need to be ring fenced and protected
- In larger developments what constitutes improvements and what constitutes vicinity? Concern is that vicinity will not be that close because the land a new play space would occupy will be wanted for another few dwellings.
- Play areas are important, should be compulsory
- ALL new development sites must provide play space, of a high quality, that is safe and insured
- Important that parks, gardens & open spaces are managed to make sure there is no vandalism & anti-social behaviour.
- The final bullet heading should include provision for Management Companies as well as Community Owned Trusts.
- Natural England’s ‘standards for accessible natural greenspace’ (ANGSt) provides a set of benchmarks, which should be used to ensure new and existing residential development has access to nature. More information can be found on Natural England’s publication, ‘Nature Nearby, Accessible Greenspace Guidance’ (March 2010), available on our website publication reference NE265
- Playing fields need to be protected and more sports facilities
- Like to see DDDC work with owners of open spaces to see if actual use can be made of them. Many examples of small fields/plots within settlements that are just not used and in some instances are a bit of an eye sore.
- Should be provided 1:1 until range of facilities complete - retain playing fields and create more along boundaries so no visible housing from street.
If increase number of dwellings presumably we have to increase this provision quite considerably- is this really possible?

Provide more funding for this and insist that monies paid over by developers who fail to provide enough outdoor play space is given back to the community for this purpose

Cross reference this policy to Policy PD4 on Green Infrastructure. One important function of Gl is the provision of new opportunities for access to open space

All larger housing developments should incorporate on-site play facilities even if this reduces the number of houses that can be accommodated

More needed to satisfy existing social needs.

Agree with the idea of community owed trusts but a big task for residents to maintain

Certain parks may be in environs but already over populated and other smaller parks should not be removed but supported and developed.

With Ashbourne’s population likely to increase with 50-60% (due to additional 1700 + houses) we will need an additional increase in open space, sport and recreation facilities of 50-60%

Protect Brailsford Plain Playing fields. Give this to the community in lieu of CIL

The management of development around Carsington Water does not relate to the protecting maintenance and enhancement of open spaces, sport and recreation and the criteria should be dropped

More people living in Doveridge would create the paradox of less open space available and more people requiring open space. Not in line with the policy.

The Matlock corridor is a set of scattered centres. It is not economic to provide facilities at all of them. Provision of them for a new settlement that is self-contained is far more cost effective.

This policy dictates that the playing field within HC2(v) must be retained.

However building on site HC2(v) will remove open space, destroy wildlife habitat and remove much needed greenfields.

Matlock Hall leys gets too busy

Park at Starkholmes where often kids can get to without crossing road at an awkward point needs more work

There does not seem to be any provision for play areas on either of the Tansley sites, the Thatchers Croft site being too far from village facilities, and the play area on the West yard site being of a very poor standard and neglected.

The Meadows is a valuable area of open space, remains a lung of open space between the old town and the housing estates built in the 1960’s to 80s. The site is much valued by the community and its footpaths well used. The view of the old town which can be enjoyed across the open land from its south west corner centred on the medieval tower of the Parish Church is outstanding and unique. The site allows views of the medieval parts of the towns and includes burgage plots and archaeological assets. The mature trees to the northern boundary contain the open space and give further distinction to the character and appearance of The Meadows.
Any housing development of The Meadows should be limited to one plot deep along the western edge, thereby preserving the qualities described. The remainder should remain open and undeveloped as a recreational amenity for the townspeople.

Land at The Meadows in Wirksworth was a notified school site but has been de-notified by DCC as it is too small to accommodate a new school of the size needed in Wirksworth. The site is the only flat area of open space left in the centre of Wirksworth, It has two Rights of Way crossing the site. It is important that this area of open land is protected as Public Open Space and formally allocated in the Local Plan as an area of Public Open Space and a Community Asset. The Wirksworth Neighbourhood Plan proposes that The Meadows area should be protected as Public Open Space with some housing around the periphery.

**POLICY HC14: COMMUNITY FACILITIES AND SERVICES**

**Agree.**

Support due to positive benefits for health and wellbeing.

Support the policy on the understanding that all 3 criteria would need to be met. Suggest adding 'and' between the second and third criteria.

How will DDDC do this - at moment they are just being destroyed.

Against any development that will include loss of community asset or facilities, even though it is no longer financially or commercially viable. If it is a community asset it should be supported by the Council and financial viability is therefore not relevant. With the increase in population across the district we need to take care of any community facility we have.

Criterion (c) is unduly restrictive and unnecessary.

Ashbourne will need to re-open its Magistrates Court and staff its Police Station sufficiently to meet the demand from all proposed.

Brailsford has a village institute which requires considerable updating and enlarging. It is dated and too small.

HC2(v) is not accessible to existing community facilities so, if this goes ahead, then it will need to include such facilities.

Brailsford has a medical centre that is close to capacity. Need relocated medical centre with more parking

Brailsford is poorly served for facilities and will be worse off with a doubling of its population

Need a new multi-purpose hall in Brailsford. Brailsford Institute needs to be a multi-functional new building along the model of Parwich village hall.

New rustic/wooden bus shelters needed in Brailsford

Money should be spent supporting local charities like the Joseph Whitworth Trust to help with the upkeep of the park and building for community use

These are lacking in Doveridge

Schools are another area of concern, as is the provision of public transport to the area, access to local shops is virtually impossible for
people without their own transport, there are no shops on the estate, the nearest, of which there is a very limited choice, are on Smedley Street, with the full choice being in the town centre, which is about a mile down a very steep hill.

The area from Gritestone Road and Pinewood Road is far from any facilities and services such as doctors, hospitals, shops. The local primary and secondary school cannot cope with the increase in population.

Currently medical services in the Matlock area are struggling to cope with the current population, obtain a doctor’s appointment is nigh on impossible, Put another 500 properties, 1000 plus people into the mix and unless extra medical facilities are provided then present services will be overwhelmed.

As provider of local health services as a GP in Matlock, we saw NO increase or improvement in resource to provide for the increase in local population. Not consulted at all about the effects MORLEDGE would have on service provision by either the Council or the CCG, Very concerned that if left just to the CCG without reference to the local service providers that a similar situation will occur again. If houses are built with no increase in service provision at a primary care level, waiting times will increase for appointments in practice, footfall at A&E will increase. We are at saturation at present as it is.

The need for additional healthcare through additional doctors’ surgeries is being ignored, there is no indication of how shortages will be addressed in Matlock.

New Arc development a very worthwhile and well used facility but it's not enough to provide for the total local community

There are very few community facilities in Tansley, we need to travel to do a weekly shop, there is no village shop, there is no doctor, pre-school, post office three hours per week, the bus service is poor, the village is reliant on a car for its daily needs.

The Middle Peak and Old Lane developments will affect the enjoyment of Stoney Wood, Wirksworth’s millennium woodland

The County Council’s recent policy decision to remove the protection of The Meadows as a ‘notified site’ for the development of a new combined infant school came too late for the draft plan to include a new policy for the site. This needs to be corrected.

**POLICY HC15: PROMOTING SPORT, LEISURE AND RECREATION**

Agree. Important that playing fields etc are manged & located in safe environments Key to health and fitness

Supported due to positive benefits for health and wellbeing.

Support outdoor gyms in rustic style - cycle shelters, tennis courts, studios for classes (yoga, Zumba, boxing, etc)

The work of the Peak District Mountain Rescue Organisation and Derby Mountain Rescue Team (which covers DDDC) should be recognised with DDDC seeking to assist in funding this totally voluntary service

Support the inclusion of a policy on the subject but suggest some wording modification to ensure new facility provision is informed and steered by evidence of need. For example, whilst criterion a) and co-location will often be very desirable, a facility may be needed that is not connected to and associated with existing facilities and so this should not be absolutely excluded. In line with comments on related policies, updated evidence base is required to support effective application of the policy.

Derbyshire Dales does not sell itself as a destination for recreational and outdoor activities, thereby missing an important economic
opportunity.

I disagree:

1) that development of new recreation/sport/leisure places have to be in connection/associated with existing facilities.

I think it is fine if new facilities are build independent of existing facilities.

2) I only support the second part of this policy for the "c option". that only if the loss of area is replaced by equivalent or better provision

The opening times at Ashbourne Leisure centre are a joke. It’s a LEISURE centre but closes early at weekends! This must be reviewed.

HC2(n) is an informal amenity space rented by and used by Normanhurst Park residents and their families.

How can sport, leisure and recreation be encouraged if the very fields that could provide these things are built on? This is a conflict with policy HC15. Recreational and community facilities need improving. Doubts over the provision of this fearing that financial contributions from developers would be the favoured way forward leaving Doveridge without the required facilities. A play area was promised when the Waterpark estate was developed but this did not materialise. Many developers make financial contributions in lieu of actual provision but this may lead to a situation where money is made available but facilities are not provided where required.

Why don't you add a squash court or two onto The Arc - squash and racquetball players from the local area have to travel over ten miles to find a court and that surely can't be sensible. It's an excellent facility but this is an obvious gap.

Tansley has a football club, no other sporting facility.

**PARAGRAPH 6.53**

"Highways England notes that the Highways Agency" is quoted as the name of the organization throughout the document. Should be noted that from April 2015, “the Highways Agency” became a government owned company, under the new name – “Highways England" and it considers that the document should be amended in this regard."

**PARAGRAPH 6.55**

These statements are confusing due to the recent communication to change the way the Rural Community Bus Service is run. Would like confirmation that transport services for those less abled will continue as a matter of priority to surrounding villages. A clear plan is required here. All the plan states are a lot of proposals.

**PARAGRAPH 6.56**
Highways England notes that the Highways Agency is quoted as the name of the organization throughout the document. Should be noted that from April 2015, “the Highways Agency” became a government owned company, under the new name – “Highways England” and it considers that the document should be amended in this regard.

While supported in principle this paragraph is not being applied to Doveridge.

**PARAGRAPH 6.57**

Questions whether this paragraph will be applied to the A50. The old A50 currently has no speed limiting measures and is dangerous.

**POLICY HC16: PROVISION OF PUBLIC TRANSPORT FACILITIES**

Strongly agree.

Poor public transport, no transport on Sunday.

Better public transport needed, yet there are proposals to significantly reduce local public transport. Is the Council really going to subsidise buses to all of these unsustainable new locations?

Development in the villages should be encouraged and the bus operators expanded to allow for the development of the more rural areas.

Tram service needed if all built as proposed to connect with Derby train station and centres of employment.

Public transport cannot cope with the inclement weather so elderly and vulnerable will be isolated during these times.

Do not cut local bus services to villages, maintain trains to Derby.

Not convinced by the Highways Agency. Seem more pro developers rather than safety.

Provide better information systems to the public to let them know when busses are available.

Must be integral to all policy making, and must over-ride any other considerations.

Policy not be applicable in Doveridge as public transport is extremely limited and Doveridge is not a sustainable location. An improved public transport system providing a link to other towns within the county would go a huge way to promoting accessibility.

Better bus/rail integration is needed in Matlock. Having two bus stations creates confusion.

Would have liked to have seen a separate policy which supported the re-introduction of Rail Mainline services from Matlock to Rowsley to Bakewell to Buxton. A partnership approach with High Peak, National Park, DCC etc.

The inclusion of HC2(v) is in contravention to this as buses are not able to access the site via Cavendish Road.

Understand there is not to be a regular bus service serving Tansley from next year which puts quite a big hole in the settlement framework hierarchy and sustainable development policies.

**POLICY HC17: ACCESSIBILITY AND TRANSPORT**

Strongly agree.

Supported due to positive benefits for health and wellbeing.
Community transport essential

Congestion on A6 at peak times: Too many houses and people are being shoehorned into the A6 corridor these already have the highest concentrations. Focus development in the south with easier to Derby and Nottingham for work.

Current infrastructure is inadequate

The current plan is not consistent with the aspirations set out.

The plan is unsound on traffic and risk management. No account has been taken of cumulative developments in Neighbouring authorities

Object to Policy HC17 as the test that is applied to highways within the NPPF (Para 32) is that development should only be prevented or refused on transport grounds where the residual impacts of development are severe. Policy HC17 should therefore be reworded to reflect this guidance.

When considering the 10+ developments, please make sure that at least two cars per household are included in the impact statement and that access roads are not narrow.

Improvements to segregate cyclists from cars and lorries would help to encourage cycling for commuting as well as recreational.

A rail network between Ashbourne and Derby could be a consideration

The plan talks about the railway line as if it has the capacity to cater for year 2033 populations and commuter needs. This is an old (albeit maintained) infrastructure, whose capacity is limited by the number of carriages per train and by its single track. Improvement is not within the Council's control.

Need to see a clear strategy due to substantial cumulative developments from Derby to Ashbourne and radius.

This is what is going to cause the Plan to fail, even if it gets past the Inspector.

Question whether accessibility criteria have been used effectively in housing site selection. This point has not been given due consideration in proposing the development of sites SHLAA 380, 384 and 435. Proposed SHLA A24 and 25 sites will exacerbate current access and this will deteriorate further in bad weather.

As long as it still allows for development of the minor villages (don't mean the Brailsford or Doverige developments). Without support to rural transport minor villages will die and the farmers will be so isolated that they too will give up, leaving the landscape/farming land unkempt, and the character of the Peak District lost.
The Ashbourne proposals do not indicate how the roads through town will be improved, no mention of bypass, No 'reserved' routes for bypass or cycleways.

None of the sites in Brailsford comply with the NPPG requirement to match homes and jobs and reduce travelling. Brailsford has no employment designations and those businesses identified represent very little employment opportunity. Incomers to the new homes will have to travel by car to access employment opportunities. Additional traffic will have an adverse impact on the highway network. The Highway Authority have not registered any specific objections to the sites proposed however their statement does identify that no full assessment has been made of the cumulative effects of development, including that proposed for Ashbourne.

Luke Lane (Brailsford) is already busy and exiting onto the very busy A52 can be dangerous as traffic fails to adhere to the speed limit. The extra cars down Luke Lane is going to be a major problem and cause queues and traffic chaos. Logistics companies (HGV's) high proportion of traffic through village and Luke Lane with inherent danger to pedestrians, school children, cyclists.

Policy HC17 will not be applicable in Doveridge as public transport is extremely limited and Doveridge is not a sustainable location: there is a lack of facilities, employment and jobs. Policy HC17 cannot be applied to Doveridge at all. An improved public transport system providing a link to other towns within the County would go a huge way to promoting accessibility.

The area from Gritstone Road and Pinewood Road, if built will have a massive impact on the transport in the area and, consequently on the whole town. There is currently only one road accessing Cavendish Park, which is narrow and at times not passable for large vehicles. The increase of a possible extra 1000 cars is unthinkable and will make life for residents almost impossible. We will not be able to get off the estate. It is already difficult to get off the estate at peak times and on a Saturday when there are football matches on the playing fields. Emergency vehicles currently struggle to get on and off the estate. In the past we have instances of elderly people being wheelbarrowed off the estate to get them to ambulances. Mountain rescue had had to be used instead. The road still bears the scars from the last major development on the estate when construction vehicles struggled to get on and off the estate. How do we get to work with such congestion? The area will grind to a halt. No one will be able to sell up and go elsewhere. Alternatively the access onto Chesterfield Road from Gritstone Road will be a danger to both pedestrians and drivers and will cause gridlock. There is a secondary school opposite this site with a population of 1000. This is dangerous and unfeasible.

Building on site HC2(v) is contrary to NPPF policies around sustainable travel. The site is at one of the most elevated areas of Matlock with an infrequent public transport network. Due to being above the snow line the site is frequently inaccessible and residents already struggle to get off Gritstone Rd due to ice and snow. A car is a necessity to live at that altitude and this is contrary to the NPPF p9. It is also a considerable distance away from amenities - 1200m to local shopping centre on Smedley street with severe hill gradient. Not ideal for the projected "ageing population" that DDDC claims will be the fastest growing group of residents in the future.
Policy HC17 states that new developments should be ‘safely accessed in a sustainable manner’. However, expert comments in the Stage 2, ‘Detailed for Assessments by Settlement’ accompanying the report to the Local Plan Advisory Committee (20.1.2016) identified ‘likely issues with connection to Snitterton Road… due to the limited highway infrastructure to support sustainable residential development and limited visibility at its junction’. As such, any access to Snitterton Road would be neither safe nor appropriate. This point has not been given due consideration in proposing the development of this site. Should this site go ahead, access should be only through Cawdor Quarry if it is to be safe and sustainable. A further consideration here is to limit the amount of further traffic on unsuitable roads through the villages of Oker, Snitterton and South Darley.

The road through Oker and Snitterton has one lane with "passing bays" at intervals. Several houses and stone walls flank the road, it has tight bends, and is steep in part, creating invisible horizons. During the winter, because of the risk of skidding from snow and ice, the road is often impassable for several days.

The traffic is mixed, and includes cars, lorries, farm vehicles, motor bikes, horses, runners, walkers and cyclists. The opening of Sainsbury’s superstore in Matlock resulted in a steep increase in traffic density at all times of day. The proposed building of houses is likely to put another 80 – 100 cars on the road. Because most couples, even with children, now work, this will mean a massive surge in the traffic at peak times. There inevitably will be an increased risk of accidents. Particularly vulnerable are people rushing to and from work, and teenagers who walk home from Matlock at night. The Department for Transport state that accidents on rural roads accounted for 31% of all traffic accidents in 2014, and 69% of user fatalities. Similarly, 19.5% of accidents on rural roads led to serious injuries compared with 8.6% on urban roads. Research indicates road width impacts on accident density. Our local road is very narrow, the risk of serious accidents will assuredly increase if there is more traffic on the road. Jams or delays caused by the traffic density will add further to air pollution. Cyclists, walkers and runners are not likely to use a busy road without a curb contrary to Strategic Objective 13.

No mention in the Plan of how the cumulative impact of development in Tansley will be mitigated at the junction of Church Street with the A615. Proposed development at Thatchers Croft does not address the fact that there are no continuous footpaths to village amenities, there is no pedestrian crossing. Tansley's streets are not suitable to include significant numbers of new houses and the resulting traffic and space for parking. Public Transport is being severely reduced.

**POLICY HC18: CAR PARKING STANDARDS**

Agree.

In many parts of the country, and the continent, parking is free to encourage visitors, not a cash cow. Remove all paid parking in Matlock it's ruining trade

Nothing in Plan to suggest the lack of parking spaces will be addressed or reasonable pricing.

Scepticism expressed about policy stating parking provision should not have a detrimental impact on the local road network.
In addition to two parking spaces per home, there should be a requirement for a visitor’s car parking area. Care should be taken to ensure the minimum sizes are adequate for current vehicles. Some garages too small to accommodate all but the smaller cars on the market. The spaces should accommodate an average medium sized (by today’s standards) at least.

It is suggested that the Council re-checks this policy and Appendix for compliance with national policy as set out in the Written Ministerial Statement dated 25th March 2015 which states “This government is keen to ensure that there is adequate parking provision both in new residential developments ... The imposition of maximum parking standards under the last administration lead to blocked and congested streets and pavement parking. Arbitrarily restricting new off-street parking spaces does not reduce car use, it just leads to parking misery. It is for this reason that the government abolished national maximum parking standards in 2011. The market is best placed to decide if additional parking spaces should be provided. However, many councils have embedded the last administration’s revoked policies. Following a consultation, we are now amending national planning policy to further support the provision of car parking spaces. Parking standards are covered in paragraph 39 of the NPPF. The following text now needs to be read alongside that paragraph: “Local Planning Authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.”

Plan is over reliant on the car and does not reduce carbon emissions.

Major problem on Luke Lane (Brailsford) with the new school and lack of parking and drop off points. This can only get worse if Miller Homes and the Mercaston / Luke Lane Corner Housing developments are approved. Major problems envisaged with car parking for the new school already.

Fail to see where the extra car parking can be provided in Matlock. It has already reached its capacity without further development.

This policy cannot be fulfilled by HC2(v) - congestion is already a serious issue in the area.

Free long stay parking for the town needed.

Please do not bring in parking permit schemes into Matlock. The majority of Matlock’s parking issues are created by Council staff. If the council staff parking requirements were adequately accommodated, then on-street parking would be better.

Parking is a great issue in Tansley there is not sufficient. On road parking in Tansley is a problem already and will be compounded by new build.
| CHAPTER 7 – STRENGTHENING THE ECONOMY |
| KEY ISSUE |
| POLICY EC1: NEW EMPLOYMENT DEVELOPMENT |
| Overall support for policy and approach |
| Strongly Agree. Priority is to redevelop Brownfield land in previous industrial / employment use. |
| Create an environment that will attract consultants and other working from home people, and you will attract high income for this we could use 1) high internet speed (RELIABLE). 2) business / service.. e.g. administrative providers. |
| The plan's projected demographics confirms that less employment development is needed - not more. |
| Planning refused for an expansion of business in Darley Bridge after far too long a decision taken, thus making the commercial opportunity redundant. No commercial sites have been put forward yet in this policy. |
| Considerable imbalance between housing and employment allocations will only make this area less economically sustainable and encourage out commuting along inadequate roads. Lack of employment opportunities in the Plan Area is a huge negative and will only get worse. |
| This Plan appears to damage the potential for increased tourism jobs. |
| What is being done to sell the area as a base for high skill jobs, especially ones that allow home working and thereby decrease transport pressures? |
| Where is fibre broadband? Suggest adding "the provision of fast broadband across the District". This would relate to the development of high value and knowledge based industries. |
| Too many houses and people are being shoehorned into the A6 corridor these already have the highest concentrations. focus your development in the south with easier access to Derby and Nottingham for work. |
| Visitor industry is typically lower paid. But this industry will have to increase significantly before a brand is created strong enough to attract business that feels it has value to be associated to said brand. As such you are promoting more of the low paid jobs and people will continue to commute outside and all the extra housing will just create more traffic. That traffic in addition to the increased visitor traffic. |
| The draft local plan is flawed in providing any incentive for local employment. Where is this coming from? Where is the skills base? Distribution and existing airfield employers are low wage and employ few. Ashbourne will compete with other more strategic towns for such employers. |
| Businesses are not created to take up the spaces built, but provision for them to grow is important |
| Missing our tourist centre- peak rail building currently not working- something like the Bakewell TC would be ideal- more central & with exhibition possibilities or support Matlock train station vast improvement ...MB train station support DWT in conversion? |
| Important to recognise that site selection is commercially driven, and that sometimes it will not always be suitable and/or viable for development to take place within defined centre boundaries due to retailer’s business requirements, even with a degree of flexibility. |
Instead, when it can be demonstrated that there are no suitable and viable sites available within centre, edge-of-centre sites, followed by out-of-centre sites can be considered suitable locations for town centre uses, such as retail (Use Class A1).

Support plan with incentives to small and medium sized employers.

There are no facilities in surrounding villages, all residents would need to drive to work

Easy to plan, difficult to guarantee and/or thereafter sustain.

Policy needs to acknowledge that site selection is commercially driven and it is not always suitable or viable to develop within town centres due to retailer's business requirements, even with a degree of flexibility. In these circumstances where no suitable or viable sites are available in the centre, edge-of-centres followed by out-of-centres can be suitable for town centre uses such as retail (use class A1).

With the increase in housing around 7/8000 jobs will be needed, DDDC propose only 1,700. Major employers in the district are in the public sector and tourism, 48% travel outside.

Much greater effort needs to be made to promote economic growth. Only with economic growth will the plan generate the demand for the new housing. Only from promoting appropriate investment into the area from high tech and quality added value businesses will the plan stimulate growth and develop a local economy able to support local people with wage levels which enable them to buy local houses. This must be seen as an essential part of the plan not just an add-on as it appears at present. Much more work is required to address this area of the plan.

This element of the Local Plan is fundamental to the rest of the spatial proposals and therefore should logically be put right at the beginning of the Local Plan. The Council need to place economic prosperity and social sustainability at the heart of the Local Plan and ensure that the three strands of ‘sustainable development’ as outlined in the NPPF are properly balanced – a point which the public does not always appreciate.

The restriction which prevents the expansion of businesses which are not easily accessed will prevent some well established businesses achieving their potential. The policy should make it clear that such development does not have to meet every one of the 5 of the criteria set out at the end of the policy.

Amend Bullet Point 19 to read: Enable provision of infrastructure in ways consistent with cutting carbon dioxide emissions and adapting to changes in climate (including ‘flood risk’, SuDS and green infrastructure).

Cannot support anything which smacks of creeping suburbanisation and threatens rural character. Once a field has been built on it is no longer a field. It has ceased to exist. We question whether building on agricultural land, except perhaps the most marginal agricultural land, is by any rational measure truly ‘sustainable’.

**POLICY EC1A : EMPLOYMENT LAND ALLOCATIONS**

Agree.

Instead of developing employment opportunities, brownfield sites should be dedicated to homes for the elderly. Any land allocated for employment will become redundant and will be a blight on the area.
Might be sufficient to make the area economically sustainable if there were no additional housing! Employment land is totally inadequate and is largely concentrated in Ashbourne, which already has much better access to fast travel to work corridors than the A6 area. You either have to create significantly more local employment in the A6 corridor or greatly upgrade the A6 itself, which looks highly unlikely.

<table>
<thead>
<tr>
<th>Priority is to redevelop Brownfield land.</th>
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<tbody>
<tr>
<td>Agreed, but over optimistic re the development of brownfield sites.</td>
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<tr>
<td>Too many houses and people are being shoehorned into the A6 corridor these already have the highest concentrations. Focus development in the south with easier access to Derby and Nottingham for work.</td>
</tr>
<tr>
<td>Retain Old Dairy Luke Lane for employment use.</td>
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<tr>
<td>No more residential.</td>
</tr>
<tr>
<td>Seem reasonable although all are concentrated next to the towns in the district, the other larger settlements should expect some employment development if planned to place 1000s of homes there.</td>
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</table>

On the proposals map the former permanite site bears the reference EC4 Regenerating an Industrial Legacy, EC1A(b) Employment Land and HC2(bb) Housing. On the lists of sites under Policy EC1A and Policy EC4 in the main text of the Draft Plan, the site references and proposed uses specifically relate to Cawdor Quarry, and not to the former Permanite site. The list under Policy HC2 of the document does include reference to housing on the former Permanite site. Not found elsewhere in the main text of the document any reference to anything other than proposed housing for the site.

Concerned that Policy EC1A only allows for the allocation of 3 ha as employment land in Wirksworth, whilst substantial allocation is made for Ashbourne. Given the likely increase in the size of Wirksworth due to housing developments on sites such as Middle Peak Quarry, the allocation of 3 ha seems wholly inadequate. Avoid creating a “dormitory town” by ensuring that any strategic plan provides sufficient opportunity for employment within the town.

| SHLAA387 should be allocated. |
| SHLAA221 should be allocated. |

The plan should be more than just a housing target. Needs to promote economic development. This is attempted through the allocation of some land around Ashbourne Airfield industrial estate which is welcomed. However need to support and promote this to encourage investment in the area from new companies rather than relying on natural expansion. This could be through the introduction of collaborative working with local and regional economic partners, much stronger support of improving local transport networks for all from lorries to bicycle users or something as simple as a schedule of S106 projects and targets. A full masterplan for the airfield could be developed and approved before further consents with a greater effort to promote economic growth.

Insufficient land has been allocated.

Uses should not be restricted to Classes B1c and B2. In the case of Middleton Road (EC1ad) such uses would be appropriate.

Proposal to develop 1700 new jobs is unrealistic particularly given that the UK is in recession.

**POLICY EC1A: LAND AT ASHBOURNE AIRFIELD**
Support redevelopment on brownfield land

Support the allocation. There are no constraints which would prevent the development proposed by these allocations from being delivered and the landowners are working together to bring the site forward to deliver a comprehensive development.

Employment development should be taken wider to include C1, D1 and D2 uses which reflect the range of activities and businesses currently operating on the Airfield and which are major employers in their right.

Inadequate local community support with local manned facilities Police Fire and Ambulance

The Plan is drawn incorrectly and omits part of the EMP1 (f) area which form part of the existing current Local Plan and is in our ownership. The excluded land is currently awaiting decision of an employment application for offices for a local company and therefore must be shown. This land also currently has all major utilities either on-site or immediately adjacent. The Plan as drawn incorporates a large percentage of EMP1 (f) but not 100 per cent which to be correct it must. This land area does not interfere with housing, therefore, would have none of the objections from residents currently encountered by numerous operations on the existing Airfield.

Site is already built on

Welcome the allocation of land for employment around the current Ashbourne airfield estate. However nothing as yet shown in the Plan to support or promote this land for use other than through the natural expansion of existing companies. Call for much more positive action to be taken to promote and encourage investment into the area from new companies, be this through the introduction of collaborative working with local and regional economic partners, much stronger support of improving local transport networks for all, from lorries to bicycle users, or something as simple as a schedule of S106 projects and targets. At the very least a full masterplan for the Airfield site needs to be developed and approved before any further consents are considered. This will need to demonstrate how new inward investment in the form of knowledge based and creative employment, required by the DDDC Local Plan, can be provided within the Plan period.

**POLICY EC1A(b): LAND AT CAWDOR QUARRY**

Support - if done correctly

Support redevelopment of this area of brownfield land.

Too many houses and people are being shoehorned into the A6 corridor these already have the highest concentrations. Focus development in the south with easier to Derby and Nottingham for work.

Increase housing density on this site

South western boundary of site should be extended to include enlarged land at Cawdor Quarry

Not clear from the information available how the impact on the nearby heritage assets and historic environment has been taken into account as part of the site allocation process. The SA SHLAA assessment in Part 3 Annex A sets out that there would be negative effects on the historic environment, but it is not clear whether the setting of the adjacent Conservation Areas to the east have been taken into account in addition to the cumulative impact of allocation sites HC2(v) and HC2(aa), and also the individual and cumulative impact on Grade I Snitterton Hall to the west of the sites outside the District Council’s administrative boundary. Clarification on these points is
<table>
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<tr>
<th>POLICY EC1A(c) : LAND AT HALLDALY QUARRY</th>
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<tbody>
<tr>
<td>Not clear from the information available how the impact on the nearby heritage assets and historic environment has been taken into account as part of the site allocation process. The SA SHLAA assessment in Part 3 Annex A sets out that there would be minimal effect on the historic environment, but it is not clear whether the setting of the adjacent Conservation Areas to the east have been taken into account in addition to the cumulative impact of allocation sites HC2(aa) and HC2(bb), and also the individual and cumulative impact on Grade I Snitterton Hall to the west of the sites outside the District Council’s administrative boundary.</td>
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<tr>
<th>POLICY EC1A(d) : LAND AT MIDDLETON ROAD/CROMFORD ROAD</th>
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<tr>
<td>B2 use enabled by Policy is totally inappropriate; by definition B2 permits activities which may cause detriment to the amenity of a residential area and should not be permitted on sites which are to be predominantly residential.</td>
</tr>
<tr>
<td>The SA SHLAA assessment in Part 3 Annex A sets out that there would be negative effects on the historic environment and, in particular, that archaeological issues may be substantial and not possible to mitigate for. It is not clear from the information available how the impact on the nearby heritage assets and historic environment and their setting has been taken into account as part of the site allocation process and/or what additional evidence has been applied to the site assessment for it to progress to allocation stage. Policy DS6 requires an archaeological survey and a Historic Environment Assessment but is the District Council satisfied that the site can be suitably developed without having an adverse impact on the historic environment? Clarification on these points is required. Not NPPF compliant.</td>
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<tr>
<th>POLICY EC1A(e) : LAND AT PORTER LANE/ CROMFORD ROAD</th>
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<tr>
<td>Objection due to impact on views from Black Rock. The high visual amenity of this location with the provision of the High Peak multi user trail and Black Rocks beauty spot attract a high volume of visitors for walking, cycling, riding and climbing.</td>
</tr>
<tr>
<td>Object as development is outside existing built-up area.</td>
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<tr>
<td>Objects to the proposal to extend the existing employment site northwards, beside Cromford Road as this would visually damage the eastern entry to the town. Much better would be an extension westward beside the new road. Need to maintain gap between Cromford and Wirksworth.</td>
</tr>
<tr>
<td>Site should be deleted. It would extend the unfortunate impact of the existing industrial site further into the rural break between Wirksworth, Middleton and Cromford.</td>
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</table>
| The Landscape Sensitivity Study identifies this area as being of high landscape sensitivity. The site is a field enclosed by dry stone walls characteristic of the White Peak, in a highly visible location and it makes a significant contribution to the separation of the historic and distinct settlements of Cromford, Bolehill and Wirksworth. This allocation would significantly add to the cumulative effect with the existing industrial sheds. In addition, this allocation could have a negative effect on the separation of settlement indeed it would contribute to the creeping coalescence between Cromford, Bolehill and Wirksworth. It is of concern that the proposal could cause an unacceptable visual impact on the local character in terms of its siting, scale, materials and site coverage, which could not necessarily be mitigated to an
<table>
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<tr>
<th>POLICY EC1A(f) : LAND AT ASHBOURNE AIRFIELD (PHASE 2)</th>
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<tr>
<td>Support the allocation. No constraints which would prevent the development proposed from being delivered and the landowners are working together to bring the site forward to deliver a comprehensive development. Employment development should be taken wider to include C1, D1 and D2 uses which reflect the range of activities and businesses currently operating on the Airfield and which are major employers in their own right.</td>
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<tr>
<th>POLICY EC2 : RETENTION OF KEY EMPLOYMENT SITES</th>
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<tr>
<td>Agree. This policy will prevent the redevelopment of existing brownfield sites in urban areas and in villages for housing. This is contrary to the Council’s stated “brownfield first” policy and to the NPPF. The Council seeks to protect key employment sites in policy EC2 (A) which addresses this concern. Instead of developing employment opportunities, existing, under-utilised, sites should be dedicated to homes for the elderly. Any land allocated for employment will become redundant and will be a blight on the area. Change of use of employment sites should be clearly restricted to those that have been derelict for some years and should under no conditions be allowed on active sites. This policy is unacceptable and is incompatible with other policies and some residential allocations. It is important that the two employment sites at Kingsfield and Ravenstor are maintained. especially as the Middletown Road / Cromford Road site was an employment land allocation but is now proposed for housing The Middle Peak Quarry site should also be used for some employment development The Breasley Mill employment site is a significant employer in the town. Should it be reused, the site has the potential to be used for other employment uses that would not need to be served by HGVs. It is important that the Local Plan ensures that there is economic growth in Derbyshire Dales District and that it is matched by the provision of new housing. There is an important need to increase the number of jobs in the District and the level of incomes. There are a lot of people in the District who are on low incomes, which needs to be addressed by more better paid jobs.</td>
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<tr>
<th>POLICY EC2A: RETENTION OF KEY EMPLOYMENT SITES</th>
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<tr>
<td>Agree. No mention of the Cromford Mills site which, if a Masterplan is progressed, has the potential to offer employment (and not just for sole traders). No employment sites available in Doveridge This is ill thought out and the selection of sites for protection lacks logic and consistency.</td>
</tr>
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<tr>
<th>POLICY EC2A(a): ASHBOURNE AIRFIELD INDUSTRIAL ESTATE</th>
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</table>
Support redevelopment on brownfield land

The Plan is drawn incorrectly and omits part of the EMP1 (f) area which form part of the existing current Local Plan and is in our ownership. The excluded land is currently awaiting decision of an employment application for offices for a local company and therefore must be shown. This land also currently has all major utilities either on-site or immediately adjacent. The Plan as drawn incorporates a large percentage of EMP1 (f) but not 100 per cent which to be correct it must. This land area does not interfere with housing, therefore, would have none of the objections from residents currently encountered by numerous operations on the existing Airfield.

Site is already built on

| POLICY EC2A(b): HENMORE TRADING ESTATE, ASHBOURNE |
| Inadequate local community support with local manned facilities Police Fire & Ambulance |

| POLICY EC2A(d): LAND AT PORTER LANE EAST, CROMFORD |
| Any change of use should be well publicised for consultation. |

| POLICY EC2A(f): BROOKFIELD INDUSTRIAL ESTATE, TANSLEY |
| The industrial estate must be confined and not allowed to impact upon the Lumsdale Conservation Area |

| POLICY EC2A(h): SCHOLES LANE, TANSLEY |
| Any change of use should be well publicised for consultation. |

EC3: EXISTING EMPLOYMENT SITES IN THE COUNTRYSIDE

Agree.

Would want an increased emphasis being put on the requirement regarding minimising the visual impact. This is frequently interpreted to mean the need for some tree planting but it should be much more comprehensive and thoroughgoing. Examples at Longcliffe in Brassington parish are instructive, where, with some exceptions, there is a need to do much more to minimise the visual impact of industrial operations. This is not only an aesthetic issue but also an economic one in terms of minimising the negative impact on tourism, which is one of our key projected growth sectors. Employment sites in the country should not be allowed on elevated land that is visually intrusive, as has happened in Tansley.

No need to "restrict" employment in the countryside, more jobs are required.

Too many houses and people are being shoehorned into the A6 corridor these already have the highest concentrations. Focus development in the south with easier access to Derby and Nottingham for work.

Except quarry land which should be phased out as minerals are extinguished and housing replaced - this should be within the 2033 time line. Reduce reliance on quarries and use these brownfield sites allocate as housing. They are NOT prohibitively expensive to remediate.
and with lakes, sand paths and hills are very attractive. (see Bedfordshire examples and Stoke on Trent)

Numerous small developments are evident throughout the Derbyshire Dales and present a great local employment opportunity. Subject to suitable local environmental alignment no reason for these sites to take on some of the required expansion needs for industry in the areas.

This policy is unduly restrictive and its relationship to policy EC1 is unclear and raises inconsistencies.

**PARAGRAPH 7.21**

Doveridge does not fit the criteria under this policy to be classed as a local centre.

Agreement that the availability of shops and services within an area is important to the sustainability of communities and quality of life

**EC4: REGENERATING AN INDUSTRIAL LEGACY**

Agree. Support re-use of previously developed Brownfield land and reclamation of industrial legacy sites.

Small scale supported

Yes in Matlock and Wirksworth

DDDC currently on verge of destroying Lumsdale Heritage site by building expensive housing.

This policy adds nothing and should be deleted. Policies for Cawdor, Halldale, Middleton Road and Middle Peak are included elsewhere in the draft Local Plan.

There's no point in allocating brownfield sites for employment as the population growth is exclusively by the elderly.

Supported provided that any important industrial archaeological sites / buildings are safeguarded

Surprised at the small number of locations.

Why?

Bailey's Mill near Tansley / Lumsdale in Matlock should be regenerated for modern industrial or housing.

On the proposals map the former permanite site bears the references EC4 Regenerating an Industrial Legacy, EC1A(b) Employment Land and HC2(bb) Housing. On the lists of sites under Policy EC1A and Policy EC4 in the main text of the Draft Plan, the site references and proposed uses specifically relate to Cawdor Quarry, and not to the former Permanite site. The list under Policy HC2 of the document does include reference to housing on the former Permanite site. Not found elsewhere in the main text of the document any reference to anything other than proposed housing for the site.

Welcome recognition that Cawdor Quarry requires regeneration in the form of mixed use development.

The proposed Strategic Site Allocations include a number of former quarry sites, some of which are likely to have gained biodiversity value in their own right. Opportunities for combining recreation with biodiversity should be explored in former quarry sites with ecological interest, e.g. Cawdor and Halldale Quarries.

The references to heritage value are welcomed. A typing error requires the points being referenced a-d rather than all as ‘a’. Heritage concerns in relation to some of the ‘regeneration’ sites cited in this policy and allocated as employment sites under policy EC1A.
It is not clear from the information available how the impact on the nearby heritage assets and historic environment and their setting has been taken into account as part of the site allocation process and/or what additional evidence has been applied to the site assessment for it to progress to allocation stage.

The SA SHLAA assessment in Part 3 Annex A sets out that there would be minimal effect on the historic environment, but it is not clear whether the setting of the adjacent Conservation Areas to the east have been taken into account in addition to the cumulative impact of allocation sites HC2(aa) and HC2(bb), and also the individual and cumulative impact on Grade I Snitterton Hall to the west of the sites outside the District Council’s administrative boundary. Policy DS5 makes no provision for the requirement of a Historic Impact Assessment in relation to heritage assets and their setting, or for an archaeological survey when there could be unknown historic mining evidence at the site. Clarification on these points is required. Not NPPF compliant.

The SA SHLAA assessment in Part 3 Annex A sets out that there would be negative effects on the historic environment, but it is not clear whether the setting of the adjacent Conservation Areas to the east have been taken into account in addition to the cumulative impact of allocation sites HC2(v) and HC2(aa), and also the individual and cumulative impact on Grade I Snitterton Hall to the west of the sites outside the District Council’s administrative boundary. Clarification on these points is required. Not NPPF compliant.

Policy DS7 (Land at Middle Peak Quarry) requires an archaeological survey and a Historic Environment Assessment but can the site be suitably developed with the anticipated number of dwellings and mixed use development without having an adverse impact on the historic environment? Clarification on these points is required. Not NPPF compliant.

This policy adds nothing and should be deleted. Policies for Cawdor, Halldale, Middleton Road and Middle Peak are included elsewhere in the draft Local Plan

**POLICY EC5: TOWN AND LOCAL CENTRES**

**Agree**

Supported due to positive benefits for health and wellbeing.

Policy fully in accordance with the policy requirements for town centres and retailing in paragraph 23 the NPPF. The policy also appropriately incorporates the sequential and retail impact tests set out in the NPPF. The requirement in the policy for retail proposals of 200 square metres (sq m) (net sales) or more located outside of the defined town centres to be supported by a retail impact test, is fully supported. Given the relatively small scale nature of the defined town centres in the District, the 200 sq m threshold appears to be wholly appropriate and is compliant with advice in paragraph 26 of the NPPF, which permits local authorities to set their own locally derived thresholds for requiring impact assessments with applications for retail proposals outside town centres.

The 200sqm criteria for town centre uses should be amended to 500sqm to comply with existing rural permitted development rights and national planning policy.

Draft Policy EC5 ‘Town and Local Centres’ requires proposals for town centre uses of 200sqm (net sales for A1) or more, located beyond the defined centres to be supported by an Impact Assessment, alongside a sequential test.

Firstly, it is noted that the promoted threshold of 200sqm is significantly lower than the NPPF threshold of 2,500sqm, and secondly no
justification has been provided by the Council for threshold promoted. A review of the Council’s 2015 Retail Study, highlighted that no analysis has been undertaken by GL Hearn on local thresholds in line with current guidance. On this point, the NPPG states that, in setting a locally appropriate threshold, it is important to consider a list of criteria, which cumulatively inform the locally appropriate threshold. In addition, wider material benefits of planned investment, and the positive effects this can have on the vitality and viability of centres should also be taken into consideration. A full review should be undertaken by the Council to justify the threshold set. Requirement is onerous on smaller developers.

Provision of adequate and affordable parking is essential to town and city centres. A look at the difference between Swadlincote, and Ilkeston would highlight this. It was the subject of a television programme around a year ago at these two towns which have a history of industry and current size in common.

Developer contributions should be sought from large businesses looking to locate and the impact on the viability of existing businesses considered.

Ashbourne will become a dormant museum town for low cost/caravan tourism

The car park at Sainsbury’s Ashbourne falls outside the defined boundary. Given that the Ashbourne Sainsbury’s car park forms one of the main car parks serving the town centre, request that it is included in the town centre boundary.

Ashbourne - Bypass needed. Car parking should be cheaper, and allow all day parking to encourage visitors to stay for the day. Leisure centre should give a refund against parking if you are doing a class there.

Darley Dale - Needs something. Road crossing at the Whitworth Centre and the A 6 needs addressing

Site HC2(v) does not support this policy as residents there will have to drive and park to town centres - HC2(v) is not sustainable.

The proposals to date for re-development of Matlock riverside (between two bridges) are unambitious and fail to capitalise on a prime site. Support policy but feel Matlock town centre has been drastically let down over the years making it a poor choice for shopping needs

Site HC2(v) does not support this policy as residents there will have to drive and park to town centres - HC2(v) is not sustainable.

The proposals to date for re-development of Matlock riverside (between two bridges) are unambitious and fail to capitalise on a prime site. Support policy but feel Matlock town centre has been drastically let down over the years making it a poor choice for shopping needs

Support the proposed extension of the town centre boundaries at Matlock and Ashbourne, as shown on the Derbyshire Dales Local Plan Draft Plan Policies Map – Appendix 3. The existing Sainsbury’s represent anchor stores for the town centres, helping it meet local shopping need and are key employers for the local economy. The 2012 Retail Study recognised that the Sainsbury’s stores in Matlock and Ashbourne were the primary food shopping destinations for the centres. The stores include good pedestrian and cycle links to the existing town centres, allowing for linked trips. The more recent 2015 Retail Study states (paragraph 2.19 and 2.42) that both Sainsbury’s stores have a good pedestrian flows and movements from the centres to these stores.

Despite representing a major food shopping destination in the centre the Matlock Sainsbury’s is not proposed to be allocated within the town centre boundary. The Matlock store is recognised as a key store which has helped to reduce leakage from Matlock to Chesterfield in convenience retailing; thereby improving the vitality and viability of Matlock Town Centre. The Council are seeking to protect and enhance existing retail provision at Matlock. The inclusion of the Sainsbury’s store within the Town Centre Boundary would help to achieve this.

Allowing 400 houses+ (1300 people +) in the Wirksworth area will prove very detrimental to the town centre in terms of traffic movement etc - it is a very historic town with many Georgian houses and narrow streets. Parking is currently a problem in the town and will worsen
<table>
<thead>
<tr>
<th><strong>POLICY EC6: PRIMARY SHOPPING FRONTAGES</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Agree</strong></td>
</tr>
<tr>
<td>All very well to encourage retail but not at the cost of boarded up or vacant shops or excessive number of charity shops. Should be more open to imaginative re-use, anything interesting and attractive should be welcomed.</td>
</tr>
<tr>
<td>The role of a town centre is changing and the Importance of A1 uses to anchor a town centre has reduced. Given the flexibility for change of use available through the GDPO and the generally small unit sizes found in the centres of Ashbourne, Wirksworth and Matlock a primary shopping frontages policy serves no useful purpose.</td>
</tr>
<tr>
<td>Sites in the town could be developed for prime residential riverside properties with quality shopping frontage on the road side.</td>
</tr>
<tr>
<td>Need to make sure these are sustainable and could not be better used for housing</td>
</tr>
<tr>
<td>Only for restaurants/cafes unless business rates and car parking issues are addressed, in 10 years we will not have a town centre.</td>
</tr>
<tr>
<td>Only if business rates halved - otherwise unsustainable</td>
</tr>
<tr>
<td>The Ashbourne Sainsbury's is not proposed to be allocated as a Primary Retail Frontage (PRF). In not allocating this site within the PRF, the Council has not taken into account the important retail role that the store provides to the centre's retail economy. The store is a key anchor store and should be recognised as such within local policy.</td>
</tr>
<tr>
<td>Matlock - Marks and Spencer will hopefully improve it</td>
</tr>
<tr>
<td>Please ensure our town in Matlock is as attractive to shop in and walk around as Bakewell.</td>
</tr>
<tr>
<td>Redevelopment of Firs Parade in Matlock is a disgrace</td>
</tr>
<tr>
<td>Wirksworth: Designated area does not cover all of the existing shop frontages so needs to be extended.</td>
</tr>
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<table>
<thead>
<tr>
<th><strong>POLICY EC7: PROMOTING PEAK DISTRICT TOURISM AND CULTURE</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Agree</strong></td>
</tr>
<tr>
<td>Proposals to promote Peak District Tourism are applauded.</td>
</tr>
<tr>
<td>The work of the Peak District Mountain Rescue Organisation and Derby Mountain Rescue Team (which covers DDDC) should be recognised with DDDC seeking to assist in funding this totally voluntary service.</td>
</tr>
<tr>
<td>Support policy - the inclusion of the Derwent Valley Mills World Heritage Site here is also welcome.</td>
</tr>
<tr>
<td>Tourism is a mixed blessing. I would like some provision to encourage and develop heritage and environment focussed tourism, discourage more tat, 'amusement' &amp; games establishments, etc.</td>
</tr>
<tr>
<td>More houses in Wirksworth will make it a less attractive tourist town, just when it was getting on the tourist map.</td>
</tr>
<tr>
<td>It would help if it didn't take over 30 min for the visitors to get through Ashbourne on their way into the Peak District.</td>
</tr>
<tr>
<td>On bank holiday weekends and any other &quot;change day&quot; during a holiday, the queues down Clifton Road and Mayfield Road in Ashbourne</td>
</tr>
</tbody>
</table>
are so long that the reach A52 and A515, causing complete chaos. This is deterring tourists from coming. Several visitors have mentioned that they will find alternatives and avoid Ashbourne and the Peak District.

The local plan does not support this policy - the over-development of Matlock will change its character and will detract from the visitor experience.

A key issue to consider is that Matlock is essentially an administrative and tourist centre, one of the aspirations of the Local Plan is to promote Peak District tourism. This makes good sense given the town’s location in relation to the Derwent Valley, Riber and Masson hills and the Matlock Dale Gorge - clearly demonstrating the beauty of the Derbyshire Dales does not stop at the boundary of the Peak District National Park. To compromise the intrinsic attractiveness by building large estate in sensitive greenfield areas on the edge of the town makes no sense as there is a real risk that visitor numbers will drop if the town is seen to lose its rural charm.

Parking charges being implemented in Matlock Bath - again contradicting your own policy regarding motorcycle tourism.

Numerous examples have been given of ways in which the tourism potential of the area could be better exploited. However that is not possible if unsustainable development, such as that proposed is allowed to go forward. Geology, outdoor pursuits, industrial heritage, natural environment - none of these are fully utilised at present.

How can ripping up our countryside as mentioned in areas such as the area from Gritstone Road and Pinewood Road help promote Peak District tourism and culture. Not only this, but the ensuing gridlock will put tourists off visiting the town.

As Brailsford is known as "The gateway to the Peak District" it would seem appropriate to have a notice to this effect and to keep the rural look of the village to set the scene for the many tourists who pass through.

Building on greenfield sites and destroying wildlife habitat is no way to encourage tourism.

The Peak Park managers should be required to build more housing in the Park to relieve the pressure on the surrounding settlements.

Need a centre for culture and a performing arts venue.

Not enough done. Matlock could be much more vibrant if it promoted is natural assets

More promotion and focus needed; Derbyshire Dales environment needs protection and enhancement not destruction. The proximity of Dovedale and the Peaks is DDLP Unique Selling Point - a major source of revenue. Focus within the plan to protect the Derbyshire Dales and support/create rural enterprise - agri-tourism - food, technology, agriculture, education, arts, festivals should be high on the agenda to encourage inward investment.

For Brailsford, the A52 is the gateway to the Peaks, Dovedale only 20 minutes away. The A52 is the major route to the Peaks and it is critical to retain the gradual rural landscape from Derby to Ashbourne

Should be main priority in the local Plan which it isn’t currently.

Already at capacity and is reducing the quality of life for residents. In addition promotion as a tourist destination is encouraging second (often vacant) properties, pushing up housing costs and skewing demographics through increases in retired population.
In encouraging tourism the number of holiday cottages should not let villages become ghost towns with the subsequent impact on schools etc.

This policy is unduly restrictive and its relationship to policy EC1 is unclear and raises inconsistencies.

**POLICY EC8: HOLIDAY CHALETS, CARAVAN AND CAMPSITE DEVELOPMENTS**

Agree

Not in favour of any increase in chalet type provision and am absolutely opposed to more caravan sites (traffic, high impact and low economic return), camp sites or eco-friendly cabins should be encouraged.

The second criteria in the policy should be amended as follows:–

“any visual impact would be well screened or will be well screened by existing and proposed landscape features ……”

Criteria four should be deleted. Caravan and camp sites can be important for farm diversification and there are major tourism locations and features such as Carsington Water and cycle routes within the open countryside which are a significant draw for tourists. Increased tourist accommodation within the Derbyshire Dales will help to serve improved spend within the District and help to manage visitor demand in the Peak Park.

The camp site is for holiday use only not residential

White static homes /caravans are an eye sore. They can easily be clad with wood to help blend in to the landscape

Seen some inconsistency in policy, with applications refused even though there are examples of successful developments in more remote locations.

Blight on the landscape

The caravan site is allocated by the council for development, contrary to this policy.

Camping and caravanning are key to the peak park and the outdoor lifestyle and a lot more in character to the area than hotels.

There is a plentiful supply of this type of tourism which contributes little to the local economy.

Derbyshire Dales should include a plan for a 4 or 5 star hotel (at Osmaston Park?)

Too many of this accommodation already. Provides little economic value to the area

Include the following wording as an additional point within the policy: The site is not situated within an area of unacceptable flood risk

The second criteria in the policy should be amended as follows:–

“any visual impact would be well screened or will be well screened by existing and proposed landscape features ……”

Criteria four should be deleted. Caravan and camp sites can be important for farm diversification and there are major tourism locations and features such as Carsington Water and cycle routes within the open countryside which are a significant draw for tourists. Increased tourist accommodation within the Derbyshire Dales will help to serve improved spend within the District and help to manage visitor demand in the Peak Park.

**POLICY EC9: FARM ENTERPRISES AND DIVERSIFICATION**
Agree, to be encourage
Use a large farm site in the south and make a new town or village
Yes - there is demand for a Daylesford style farm shop with local rural enterprise in Brailsford on the Dairy site.
The four criteria in policy EC9 are all denoted as (a).
I understand the requirement on traffic in the fourth point but if small improvements are required in rural roads surely that is what the Council area wants and needs, not setting rural infrastructure in aspic.
The first point on stimulating new economic activity would seem to completely contradict the travel criteria.

**PARAGRAPH 7.47**
It is welcomed that paragraph 7.47 sets out details of the vision for the White Peak Loop, which is to create a 60 mile circuit connecting the existing High Peak, Tissington and Monsal Trails into Buxton, Bakewell and Matlock. The vision includes the creation of links between Matlock and the Monsal Trail to the north, and the High Peak Trail to the south via Cromford.

**POLICY EC10: PROTECTING AND EXTENDING OUR CYCLE NETWORK**
Support and compliments on work done so far
More cycle routes would be fabulous, it would be wonderful to have easier access to Ashbourne by bike from Brailsford!
Supported due to positive benefits for health and wellbeing.
As long as it gets them off the roads
Consider extending the cycle network with cycle paths in the towns, such that the locals can use it as an alternative to the car.
e.g. the cycle/foot path made behind the Henmore estate in Ashbourne is fantastic. If cycle paths could be made across town, this could solve a lot of the traffic problem and would be an environmental solution.
In favour of developing cycle network from matlock to Rowsley and beyond.
Essential for reducing car use.
The development sites put forward by the Council would be detrimental to safe use of the cycle network.
I wouldn't bank on a huge reduction in everyday journeys by car but will increase recreational use and maybe increase appeal for visitors.
For local journeys and not for cycle races
Connect with the train station without going on road
And cycle lanes
CHAPTER 8 – STRATEGIC SITE ALLOCATIONS

KEY ISSUE

GENERAL POINTS RELATING TO STRATEGIC SITE ALLOCATION POLICIES

The site at Cawdor Quarry should be included within this section with a specific strategic site allocation policy. The redevelopment and regeneration of the Quarry is critical to the Local Plan’s spatial strategy and overall vision. Although having the benefit of an existing permission the scheme is not viable and does not respond to the need for additional retail, leisure and business floor space in Matlock.

The Plan should include a strategic site allocation for 790 dwellings, minimum of 30,000 sqm retail and leisure floor space; minimum of 3,000 sqm commercial office floor space. No technical issues to prevent the land coming forward for development. Council should secure a comprehensive masterplan for the site which should be included in the suite of strategic site allocation policies.

Potential developers of strategic housing and employment sites are advised to seek early advice on archaeological issues, in order to identify any pre-application studies to meet the information requirements at NPPF para 128.

Environment Agency raise concerns regarding possible capacity issues at Ashbourne Sewage Treatment Works - water quality modelling may be required to determine the impacts of future treatment requirements and how this will be aligned to when the site allocations are built out. Continued engagement with the utility providers will be vital to prevent deterioration in the environment as required by the WFD. Capacity issues at Sewage Treatment Works require further investigation, there is no indication in the Plan as to which treatment works the site allocations will discharge to. There may be environmental capacity pressures that should be considered for all relevant site allocations that impact on Waste Water Treatment Works.

POLICY DS1- LAND AT ASHBOURNE AIRFIELD (PHASE 1), ASHBOURNE

The site should be extended further to provide a fully self-contained village with all associated supporting services, facilities and infrastructure.

Support for the site allocation and commitment from landowners to bring forward development on the site in a comprehensive and sustainable manner with necessary services and facilities within the Plan period.

The existing highway infrastructure within the town is at capacity and cannot accommodate the proposed scale of development envisaged at the Airfield site. A proposed new junction onto the A52 will be worthless unless the existing problems with the highway network in Ashbourne are resolved – this should include provision of the bypass.

The density and capacity of development for this site is too low and should be increased. In light of the site areas of DS1 and DS8 the overall density is lower than sites elsewhere within the plan area.

Support the allocation at the former airfield.

The site should incorporate cycle routes to the town centre.

The layout and design of development should consider the sites proximity to the industrial estate and likely amenity issues – noise, odour, light etc.
New junction provision onto the A52 supported, recommend that this is a roundabout.

The proposed development is too intense and the site should be safeguarded for valuable employment uses only.

Object to the sites encroachment onto Bradley Wood

This Plan omits existing EMP1 (f) land which is part of the Existing approved local plan and needs to be amended. It apparently has been drawn around just one planning application and is not representative of the actual planning applications received or indeed as detailed the existing Structure Plan.

The proposal is contrary to a number of policies in the Plan, notably the settlement hierarchy as the site lies on the parish of Bradley which is a tier 5 settlement and Yeldersley which is in open countryside. The proposed site is not related to the centre of Ashbourne and is not sustainable.

Policy provisions for a comprehensive landscaping plan including a landscaping buffer to protect Bradley Wood and enhancements to green infrastructure are welcomed.

Amend bullet point 16 to read - ecological assessment (i.e. desk based assessments, habitats/species assessments/mitigation proposals).

Include the following as an additional bullet point:

“Development shall have regard to the need to ensure sufficient capacity in the local sewage network and receiving sewage treatment works.

**PARAGRAPH 8.6**

Disagree with the assessment of site. Site has been vigorously protected by the District Council up to now and emphatically supported by appeals inspectors. Other sites are equally suitable for a new medical centre.

**POLICY DS2 – LAND TO THE REAR OF FORMER RBS PREMISES DARLEY DALE**

Support for the site, it is in a sustainable location

The site is contradictory to the principles of maintaining a green gap between the settlements of Darley Dale and Matlock. The site should be protected from development. Infill development along the A6 is not acceptable and brownfield sites should be developed ahead of valuable greenfield sites such as the are under DS2.

Development will have an adverse impact on traffic congestion along the A6, flood risk matters and result in a visually intrusive development within the landscape.

Retail provision should be included within the site

Site should only be developed for a replacement medial practice and not for housing.

The site is contrary to a number of policies within the Local Plan. Only development on the south western corner of the site and surplus
storage land is acceptable the rest should be landscape to provide valuable green infrastructure and habitat.

Object to the site being developed. The site is a much valued green space which contributes greatly to the character and distinctiveness of Darley Dale.

Site has previously been vigorously protected by inspectors at appeal, who have declared the site to be of considerable local sensitivity. There are other sites equally suitable for a new medical centre, including a part of the Town Council’s own site (as Trustee of the Whitworth Trust), which has been offered to the local medical practice free of charge. Other sites are equally suitable.

Point 9, amend to read - ecological assessment (i.e. desk based assessments, habitats/species assessments/mitigation proposals)

Include the following wording as an additional point within the policy: “Development shall have regard to the need to ensure sufficient capacity in the local sewage network and receiving sewage treatment works”

Given the scale of development proposed within Darley Dale considered that the settlement should accommodate a new retail and service provision to meet the needs of the growing population over the plan period. The policy requires for a comprehensive masterplan to be submitted incorporating community facilities proportionate to serve the needs of the local community. The scope of the site to provide new retail and service provision should be explored to support the wider settlement and complement the existing facilities in the District Centre area on Chesterfield Road.

POLICY DS3 – LAND AT STANCLIFFE QUARRY DARLEY DALE

Object to the number of dwellings proposed – the site should only accommodate 60 dwellings.

The site should accommodate more than 100 dwellings, with the overall density of the site increased.

Due regard to the impact of development on the setting of Listed Buildings, notably Stanciffe Hall requires further consideration.

Existing planting and tree cover fronting the A6 should be retained for screening.

The site should be built upon first or early on within the plan period ahead of greenfield sites.

The policy requirement for a historic impact assessment to be submitted as part of a development scheme is welcomed, however Historic England has concerns in respect of the strategic site allocation DS3 in relation to the historic environment.

Existing woodland is to be removed as part of this proposal, which is contrary to Policies PD3 & PD4 that seek ‘net overall gains for biodiversity’. It is not clear whether mitigation for the loss is to be included in the Woodland and Landscaping Management Plan. The policy should detail the mitigation proposals for the loss.

Include the following wording as an additional point within the policy.

Development shall have regard to the need to ensure sufficient capacity in the local sewage network and receiving sewage treatment works”.

Amend bullet point 11 to read - ecological assessment (i.e. desk based assessments, habitats/species assessments/mitigation proposals)

The proposed Strategic Site Allocations include a number of former quarry sites, some of which are likely to have gained biodiversity value in their own right. National Trust requests that opportunities for combining recreation with biodiversity are explored in former quarry
sites with ecological interest, e.g. Stancliffe Quarry.

Concerns expressed regarding the impact that this development may have on the setting of the Peak District National Park which is less than 1km away and therefore request that a Landscape & Visual Impact Assessment would be required as part of any proposal.

Support allocation of a brownfield site, however due to issues with remediation etc. recommend that a lower affordable housing contribution should be sought to ensure the site remains viable and deliverable.

Object to the development of the site and nearby site along the A6 corridor – concerns regarding capacity of surrounding highway network particularly the A6 to cope with additional traffic generated.

**POLICY DS4 – LAND OFF GRITSTONE ROAD/PINEWOOD ROAD, MATLOCK**

Object to the proposed development, the site cannot be accessed adequately and the surrounding highway infrastructure cannot accommodate the large scale of development proposed.

Planning applications have been refused on the site in the past, the circumstances have not changed and the site should not be developed.

The allocation contains playing field land. The playing field land has not been shown to be surplus to requirements and there is no proposal for replacement provision to meet the requirements of NPPF Paragraph 74 and Sport England's Playing Fields Policy.

The site is not in a sustainable location, the site is at the edge of the town and at the top of a hill. Walking or cycling into the town is not feasible from this site and hence is contrary to the principles within the Local Plan

Development will have an adverse impact on the landscape character of the area and result in valuable greenfields within provide a buffer to the edge of the town and the wider countryside

Development on brownfield sites should take precedence over greenfield sites. Over 200 sites were put forward for consideration in the Local Plan however only 31 have made it through the assessment process, other sites, particularly brownfield sites should be developed first with higher density schemes proposed on the former quarry sites around the town – for instance Halldale Quarry should accommodate more than 220 dwellings.

Development will have an adverse impact on road safety, the proposed would result in potentially hundreds if not thousands of extra traffic movements each day on an already small, congested, residential road. The increase presents a danger for residents, especially children and the elderly. This will be exacerbated when considered in combination with additional development at Asker Lane, Moorcroft which will all access onto Chesterfield Road.

Development and loss of greenfields will impact on wildlife and habitats. Various wildlife (bats, badgers, foxes, birds, bees) have been spotted on the site and the loss of such habitats is contrary to the NPPF which requires the planning system to contribute to and enhance the natural and local environment.

Consideration should be given to developing a whole new village with appropriate supporting infrastructure rather than developing greenfields to the edge of settlements.

The allocation should be reduced significantly.
Access to the site is via essentially a single lane from Cavendish Drive, this will be dangerous with the high volumes of traffic proposed especially at times when the local playing fields are used. To state that there will be no adverse impact on the highway network is unacceptable.

Development will lead to increased issues with flooding for neighbouring properties. There is already flooding on the site at the Wolds Rise end on Moorfield and Amberdene. The development will also increase flooding around Cavendish Park and Wellington Street.

Local services and facilities are unable to accommodate the additional scale of development proposed, doctors and schools area already at capacity.

The Local Plan emphasises the aging population of the District- the site at Gritstone Road is close to no local amenities, with the town centre a long walk away and at significant gradient. The site is not in a sustainable location.

School pupil safety - Any increase in the numbers of pupils at either the Highfields school or St. Joseph's, will create a greater risk/likelihood of serious incidents. Access on foot to both of these schools already carries risk, but increasing the traffic around these locations as a result of developing these sites into residential development, will surely create unacceptable risk to pupil health.

Light pollution – affecting current households. Any development could significantly extend light pollution on the north edge of Matlock. “Planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”. P29 NPPF.

Noise pollution – affecting current households – Development would cause significant visual and noise related disruption to existing residents for many years. The NPPF states that the planning system should enhance the local environment by “preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability” P26 NPPF

Disruption during build caused by construction traffic - Unless all access routes come from Chesterfield Road directly, without using existing residential roads, then the disruption, safety, quality of life for the existing local residents will be intolerable.

Development proposed will overwhelm the existing Victorian town of Matlock.

The assessment of the site is flawed, simply stating that issues of impact on wildlife, the highway network / traffic congestion and flooding matters can be mitigated it not acceptable. Clear information and guarantees as to how these issues will be overcome should be provided to enable local residents to make an informed view of the proposals and clarify whether in fact residents will not be adversely affected.

The site is in a prominent exposed location to the edge of the town, development will be visually obtrusive and adversely impact on local character and the landscape.

There are no employment opportunities for the future residents of the proposed development, residents will have to commute to nearby towns and cities to access jobs – this not sustainable development and contrary to the principles within the NPPF.

Support for the proposed allocation and recommend that a larger area of land be allocated. The area outlined as the site allocation is not sufficient to provide the number of dwellings proposed when open space, SUDS and access considerations are taken into account.
Access solutions are fettered by the narrow link. Recommend that the site area is amended.

The landscape assessment of the character to the north of the town is inaccurate and the Councils analysis is in consistent, various parcels of land to the north of the town and area of land covered by DS4 should be re-evaluated.

Bullet point five should be amended to read “where appropriate and in due consideration of the safety of future users of the open space dry stone walls that are considered to be key landscape features are retained, repaired and made safe within the open space.”

Environment Agency note issues raised with regard to flood risk within the area and advise that any impacts both on and off site should be investigated further. Recommend that DS4 should highlight this issue and the following information should be added.

Point 11, amend to read - ecological assessment (i.e. desk based assessments, habitats/species assessments/mitigation proposals).

Please include the following wording as additional points within the policy.
A site specific flood risk assessment in accordance with the findings of the Derbyshire Dales Strategic Flood Risk Assessment and focuses on other sources of flooding (including surface water and groundwater). Development shall have regard to the need to ensure sufficient capacity in the local sewage network and receiving sewage treatment works.

Historic England welcome the requirement for a historic impact assessment to be provided as part of the development scheme, however express concern in respect of the evidence base for the historic environment.

POLICY DS5 - LAND AT HALLDALE QUARRY/MATLOCK SPA ROAD, MATLOCK
Support for the allocation of a brownfield site, this site should be developed ahead of greenfield sites to the edge of the town.

As a brownfield site the proposed development should accommodate a significantly higher number of dwellings rather than requiring greenfield release. The site density is too low.

The District Council should apply for grants and subsidies to ensure that the site is redeveloped and delivered on time.

The site is not suitable for housing, the former quarry floor is dark with little sunlight in winter. The site is more suitable for employment and leisure/commercial uses.

Support the development but enhance pedestrian and cycle access to Matlock using the Old Snitterton Road should be required as part of the policy

Support the policy criteria that requires an air quality and hydrogeological assessment to be undertaken to identify any potential effects and mitigation measures necessary to avoid impacts on the Peak District Dales SAC.

A landscape and visual impact assessment should be undertaken for the site.

National Trust notes that as a former quarry the site may have gained some biodiversity in its own right, opportunities for combining recreation and biodiversity should be explored within the site.
Point 13, should be amended to read - ecological assessment (i.e. desk based assessments, habitats/species assessments/mitigation proposals).

Include the following wording as an additional point within the policy.

Development shall have regard to the need to ensure sufficient capacity in the local sewage network and receiving sewage treatment works.

Historic England welcome the requirement for a historic impact assessment to be provided as part of the development scheme, however express concern in respect of the evidence base for the historic environment.

**POLICY DS6 – LAND OFF MIDDLETON ROAD/CROMFORD ROAD, WIRKSWORTH**

Object to the proposed development it will have an adverse impact on the visual amenity of the town and landscape character of Wirksworth.

The light railway line and woodland to the south of the path linking Middleton Road and Old Road should be incorporated into the proposal.

The scale of development proposed in combination with land at Middle Peak Quarry is too large and will have an adverse effect on the surrounding area, particularly the highway network leading to congestion issues within the town.

Support the remediation & redevelopment of this Brownfield land. However the greenfield part of the site should be excluded from development and maintained as a Local Nature Reserve & community facilities.

This site could accommodate small-scale business units.

Welcome the criteria in the policy to require an assessment of air quality and recreation to be undertaken to identify any potential effects on the Gang Mine SAC and appropriate mitigation.

The Sustainability Appraisal states 'the land at Middleton Road allocation site could result in potential significant negative effects relating to biodiversity as the development is likely to result in the irreversible loss of open mosaic habitats. This policy must accord with Policies PD3 & PD4 and ensure that mitigation is required and a net increase in biodiversity sought.'

Point 14, amend to read - ecological assessment (i.e. desk based assessments, habitats/species assessments/mitigation proposals)

Historic England welcome the requirement for historic impact assessments to be submitted as part of a development scheme in principle. Historic England has concerns in respect of the evidence base for the historic environment which in turn raises concern about strategic site allocation DS6 in relation to the historic environment.

The SA SHLAA assessment in Part 3 Annex A sets out that there would be negative effects on the historic environment and, in particular, that archaeological issues may be substantial and not possible to mitigate for. It is not clear from the information available how the impact on the nearby heritage assets and historic environment and their setting has been taken into account as part of the site allocation process and/or what additional evidence has been applied to the site assessment for it to progress to allocation stage. Policy DS6 requires an archaeological survey and a Historic Environment Assessment but is the District Council satisfied that the site can be suitably developed with the anticipated number of dwellings and mixed use development without having an adverse impact on the
historic environment?
Include the following wording as additional points within the policy.
Site specific hydrogeological assessment into the potential impacts of the development and mitigation measures required to ensure the ongoing protection of groundwater in the underlying Source Protection Zone 1 of a public water supply

POLICY DS7 – LAND AT MIDDLE PEAK QUARRY, WIRKSWORTH

Object to the proposed development, the site will adversely impact and reduce the desirability of Stoney Wood for local people to use as a place of recreation.

The site in combination with the proposed allocation at Middleton Road provides for a significant increase in the level of housing, this will have an adverse impact on the surrounding highway network. The development will lead to congestion, noise and air pollution particularly on Middleton Road and at the junction with Cromford Road.

This land is a unique ecological site containing rare and unexplored habitats and wildlife. It is a massive wilderness resource for the local community and cannot be considered for housing.

Object to the development of the site which is outside the settlement boundary as defined by the Wirksworth Neighbourhood Plan. The impact of development with be inconsistent with the principles and consultation undertaken in preparing the Neighbourhood Plan.

Development will adversely impact upon the historic character of Middleton and Wirksworth with negative effects on the conservation areas.

This site has now developed its own natural beauty in terms of wildlife and a green environment. This is now a site of SSI which is extremely important and should be protected.

The site is too large and the scale of development will overwhelm the nature and character of the town.

Please continue to protect the historically significant area of the Dale and Greenhill, along with the SSI site in Dale Quarry by keeping any development visually away from one of the oldest parts of this town. The topography of the site could allow for housing to be built to the right of the longest footpath over the quarry (as you view it with the town behind you). Any building near Coral Island and Dale Quarry will overlook the Dale and Greenhill and change the nature and feel of the quaint and historically significant part of town.

Strongly support the proposal to remediate and redevelop the site.

The infrastructure in the town cannot cope with the scale of development proposed, particularly in addition to the development at Middleton Road.

The land is heavily contaminated from quarrying and blasting, works to remediate the site will be unsustainable, expensive and intrusive. Housing density on the site should be increased.

The site includes areas valuable for nature conservation, wildlife and ecology and should not be developed.

Object to parts of the site allocation, greenfield and wooded areas should be removed from the allocation boundary. DS7 suggests that these parts would not necessarily be appropriate for development but they are still included and by doing so, the Council will come under
great pressure to allow development on these areas. Similarly, the old access route to Dale Quarry from West End is included; this area should be removed as access from this point would be completely unsuitable. The only suitable access point to the development if from Middleton Road and should be specified in the policy.

The site borders some of the most sensitive parts of the Wirksworth Conservation area and in particular the former mining community cottages on The Dale and Greenhill. The history and contextual setting of this area is inextricably linked to the quarrying activity of, in particular, Dale Quarry and this would be lost if new housing development were to be allowed to encroach. For this reason, and given the extent of the site being promoted, the housing allocation should be located well away from Dale Quarry and the Dale/Greenhill loop.

National Trust notes that as a former quarry the site may have gained some biodiversity in its own right, opportunities for combining recreation and biodiversity should be explored within the site.

The Sustainability Appraisal states ‘the land at Middleton Road allocation site could result in potential significant negative effects relating to biodiversity as The development is likely to result in the irreversible loss of open mosaic habitats. This policy must accord with Policies PD3 & PD4 and ensure that mitigation is required and a net increase in biodiversity sought.

Include the following wording as an additional point within the policy.

Site specific hydrogeological assessment into the potential impacts of the development and mitigation measures required to ensure the ongoing protection of groundwater in the underlying Source Protection Zone 1 of a public water supply.

Point 14, amend to read - ecological assessment (i.e. desk based assessments, habitats/species assessments/mitigation proposals)

It is not clear from the information available how the impact on the nearby heritage assets and historic environment and their setting has been taken into account as part of the site allocation process and/or what additional evidence has been applied to the site assessment for it to progress to allocation stage. Policy DS7 requires an archaeological survey and a Historic Environment Assessment but is the District Council satisfied that the site can be suitably developed with the anticipated number of dwellings and mixed use development without having an adverse impact on the historic environment. Clarification on these points is required. Not NPPF compliant.

The site allocation should be increased 650 and include community facilities such as a retail based hub.

The HRA report identified this policy as having a likely significant effect on the Gang Mine SAC. Note that this policy therefore includes the requirement for an assessment of air quality and recreation which will identify any potential effects and mitigation measures necessary to avoid adverse effects on the SAC.

POLICY DS8 – LAND AT ASHBOURNE AIRFIELD (PHASE 2), ASHBOURNE

Site allocation should be larger and the scale of development proposed increased.

Support for the proposed allocation and commitment expressed from the landowner to bring forward development on a comprehensive basis.

Development on brownfield sites should take place ahead of greenfield sites in the town.

Support for the policy requirement for open space/green infrastructure.

Policy should require the creation of safe cycle and pedestrian routes to the town centre.
The proposed development needs to consider the sites proximity to the Ashbourne Industrial Estate and noise, air, odour and light pollution issues.

The infrastructure within the town is already at capacity and cannot cope with the additional scale of development. The town centre is congested and the additional traffic on the A52 and into Ashbourne will exacerbate the existing issues.

The proposed development is unsustainable, the housing is not supported by infrastructure improvements or employment opportunities.

Object to the development of 1100 new homes, this is disproportionate to the size of the town with a population of 5000.

A significant buffer zone should be secured between the proposed development site and the existing industrial estate, with housing situated away from the main industrial uses.

Point 11, amend to read - ecological assessment (i.e. desk based assessments, habitats/species assessments/mitigation proposals).
DERBYSHIRE DALES LOCAL PLAN – DUTY TO CO-OPERATE UPDATE

PURPOSE OF REPORT

The purpose of this report is to summarise the current position with regards to the District Council’s obligations in relation to the Duty to Co-operate.

RECOMMENDATION

That the Committee notes the current position with regards to the District Council’s obligations in relation to the Duty to Co-operate.

WARDS AFFECTED

All Wards outside the Peak District National Park

STRATEGIC LINK

The Derbyshire Dales Local Plan will be a pivotal tool in the delivery of the Council’s Corporate Plan and the Derbyshire Dales and High Peak Sustainable Communities Strategy

1 BACKGROUND

1.1 Section 110 of the Localism Act sets out a ‘duty to cooperate’ for local planning authorities, County Councils and other prescribed bodies in relation to planning for sustainable development when preparing Development Plan Documents, other Local Development Documents and other plans relating to strategic matters. Specifically, the duty:

- Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a County Council;
- Requires that Councils set out planning policies to address such issues;
- Requires that Councils and public bodies to ‘engage constructively, actively and on an ongoing basis’ to develop strategic policies; and
- Requires Councils to consider joint approaches to plan making.

1.2 The ‘prescribed bodies’ which the Council has a duty to co-operate with, in addition to the County Council and other local planning authorities, are set out in the Town & Country Planning (Local Planning) (England) Regulations 2012 as amended by the
National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013 are:

- Civil Aviation Authority
- Clinical Commissioning Groups – East Staffordshire CCG, North Derbyshire CCG and South Derbyshire CCG
- Environment Agency
- Highway Authorities - Highways England & Derbyshire County Council
- Homes and Communities Agency
- National Health Service Commissioning Board
- Natural England
- Office of Rail Regulation

1.3 Whilst Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs) are not subject to the Duty to Cooperate, local planning authorities are advised that they should have regard to their activities. Accordingly, cooperation with D2N2 - the Derby and Derbyshire, Nottingham and Nottinghamshire LEP, the Sheffield City Region LEP and the Lowland Derbyshire & Nottinghamshire LNP, is a part of the Local Plan preparation process.

**National Planning Policy Framework**

1.4 Paragraph 156 of the National Planning Policy Framework (NPPF) sets out that local planning authorities should identify their **strategic priorities** for the area in their Local Plan. This should include:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities;
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.5 Paragraphs 178 to 181 in the NPPF set out that local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for
instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the Framework.

1.6 The Framework also advises that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. It suggests that cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

National Planning Practice Guidance

1.7 The NPPF is supplemented by a web based resource known as the National Planning Practice Guidance (NPPG) which provides further guidance of a technical nature. The NPPG clarifies that the duty to cooperate is not a duty to agree, but states that local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

2 DERBYSHIRE DALES DRAFT LOCAL PLAN – DUTY TO CO-OPERATE

2.1 The Examination in Public (EIP) of a previous version of the Derbyshire Dales Local Plan opened on 22nd July 2014 for a period of two days. During the two days of the EIP, the Inspector considered the District Council's position in respect of the Duty to Co-operate and the Objectively Assessed Need for housing. Although the Inspector concluded that the Derbyshire Dales Local Plan was unlikely to be found sound because of the inadequacies of plan in relation to the housing provisions he did conclude that

“The Council has clearly sought cooperation with a large number of stakeholders over several years. It has been actively involved in discussions with other planning authorities, including initially working on a joint Core Strategy with High Peak Borough Council. Albeit very late in the day, the Council did seek help to address the anticipated unmet housing need before submitting the plan for examination. Hence I do not consider that the Council has failed the legal test relating to the Duty…”

2.2 As Members will be aware the District Council subsequently withdrew the Local Plan from the Examination in Public and resolved to undertake a comprehensive review of its evidence base to underpin the emerging Local Plan. The preparation of much of the new evidence base has been subject to review and consideration by the various statutory bodies including for example Derbyshire County Council as highways authority in respect of the traffic and transportation assessment and the Environment Agency in respect of the revised Strategic Flood Risk Assessment.

2.3 Other statutory bodies including Historic England have been involved in the review of emerging policy and the assessment of sites through the Strategic Housing Land Availability Assessment. There have been on-going discussions with the three Clinical Commissioning Groups that have responsibility for healthcare in Derbyshire Dales in respect of the provision of medical facilities required in relation to the proposed level of development set out in the emerging Local Plan.

1 http://planningguidance.planningportal.gov.uk/blog/guidance/duty-to-cooperate/
2.4 It is considered that through the on-going nature of the dialogue with the various statutory agencies during the preparation of the Local Plan that the requirements of the Duty to Co-operate are currently being met.

2.5 However the NPPF is clear that Local Plans should seek to plan to meet the full Objective Assessed Need for Housing, and that supply constraints can be a relevant factor to take into consideration in setting a local plan housing target. As Members will be aware the identification of potential housing through the SHLAA process has involved extensive consultations with key consultees such the District Council’s Landscape Officer, Design and Conservation Officer and Environmental Health Officers. It has also involved external consultation with officers at Derbyshire County Council, the Environment Agency and the Derbyshire Wildlife Trust.

2.6 The evidence from the SHLAA indicates that there are insufficient sites in suitable locations to meet the OAN, and to release additional land for housing would have a significant impact upon the high quality environment of the plan area. As such the Derbyshire Dales Draft Local Plan identified that taking into account the contribution from development in the Peak District National Park, existing completions and commitments, and windfall development on sites of less than 10 dwellings, the District Council has at this time sufficient land for 6,015 dwellings up to 2033 - a shortfall of 425 dwellings against the identified Objectively Assessed Need.

2.7 In drawing up local plans, paragraph 182 of the NPPF makes it clear that local authorities should meet objectively assessed development requirements “including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”.

2.8 Consequently under the auspices of the Duty to Cooperate the Corporate Director and the Chair of the Committee wrote to the Head of Planning and Leaders of the neighbouring and nearby local planning authorities to determine the extent to which any are able to accommodate some of the identified shortfall.

2.9 At the current time, no local planning authorities have indicated they could accommodate any additional dwellings and contribute to meeting the identified shortfall. The latest responses from local planning authorities on accommodating any part of the shortfall are summarised in Table 1 below.

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Response</th>
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<tbody>
<tr>
<td>Amber Valley Borough Council</td>
<td>Amber Valley Borough Council accepts that it has a duty to cooperate with the District Council, in circumstances where the District Council has concluded that it cannot make provision to meet all of the housing need arising within Derbyshire Dales, by considering whether some or all of its unmet housing need could be accommodated within Amber Valley. However Amber Valley has a housing requirement that already includes an allowance to meet some of the needs of Derby City Council and those areas most related to Derbyshire Dales comprise of scattered rural villages in the West of the District or</td>
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<tr>
<td>Local Authority</td>
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<td>the area around Belper where there is a high quality landscape which has the potential to constraint future housing development in the vicinity of the town. Amber Valley Borough Council therefore considers that it would be not be able to accommodate any of the unmet housing need for Derbyshire Dales, within Amber Valley. However, it has indicated that it remains committed to ongoing discussion with the District Council, under the requirements of the duty to cooperate, in relation to this matter and any other matters of a strategic and/or crossboundary nature.</td>
</tr>
<tr>
<td>Bolsover District Council</td>
<td>No formal response received, although at Officer level it has been agreed that the relationship between the 2 local planning authorities is of such a limited nature that it would be unreasonable to expect Bolsover District Council to meet any of the Derbyshire Dales shortfall.</td>
</tr>
<tr>
<td>Chesterfield Borough Council</td>
<td>Chesterfield Borough Council have indicated that it is currently in the process of reviewing the availability of sites to meet its own future housing requirements, and is at present having difficulty being able to identify sufficient land to meet them. Chesterfield Borough Council has acknowledged the relationship between the two local authorities is such that there is an overlap with Housing Market Areas and indicated that whilst they are unlikely to be able to assist in meeting any of the District Council’s existing shortfall at this time they will continue to review the situation as part of the ongoing Duty to Co-operate requirements.</td>
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<tr>
<td>Derby City Council</td>
<td>Derby City Council have indicated that they are not able to meet their own housing needs in full and have been working with Amber Valley &amp; South Derbyshire to address this. Given this, the Derby City is not in a position to help with meeting any other authority’s housing needs. Derby City Council have indicated that should another authority agree to take part of the Derbyshire Dales housing need, it would not support this being located within or close to Derby’s urban area. Derby City Council have indicated that they would be very happy to continue talking to Derbyshire Dales both under the duty and as part of more general planning issues as they arise.</td>
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<tr>
<td>East Staffordshire</td>
<td>No reply received at time of writing report.</td>
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<td>Local Authority</td>
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<tr>
<td>Borough Council</td>
<td>Erewash is not in a position to help. It has an adopted local plan and an early review is not expected. Erewash is in the Nottingham Housing Area and this is not congruent with meeting the needs of Derbyshire Dales. The Nottingham - Derby Green Belt severely constrains capacity in Erewash.</td>
</tr>
<tr>
<td>High Peak Borough Council</td>
<td>The Borough Council would be unable to assist in accommodating unmet housing needs arising in Derbyshire Dales. The letter notes that in his report on the Examination of the High Peak Local Plan, the Inspector agreed that the Borough Council was justified in declining a previous request on this matter.</td>
</tr>
<tr>
<td>North East Derbyshire District Council</td>
<td>No formal response has yet to be received from North East Derbyshire. However on the basis of discussions at Officer level it is understood that the future ability of the North East Derbyshire District Council to meet its own needs is still subject to review. As such the North East Derbyshire District Council are unlikely to be able to assist in meeting any of the District Council’s existing shortfall. North East Derbyshire District Council has however indicated that it will continue to review the situation as part of the on-going Duty to Co-operate requirements.</td>
</tr>
<tr>
<td>Peak District National Park Authority</td>
<td>The indicative figure of 400 remains the best estimate for delivery of housing with that part of the Derbyshire Dales District which falls within the National Park. This has been the consistent advice of the National Park local planning authority to the Derbyshire Dales local planning authority. An arbitrarily higher figure in order to accommodate unmet needs in the remainder of the Derbyshire Dales would be the wrong spatial logic when considering the impact of National Park purposes.</td>
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<tr>
<td>Sheffield City Council</td>
<td>No reply received at time of writing report</td>
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<tr>
<td>South Derbyshire District Council</td>
<td>Due to the advanced stage of the South Derbyshire Plan it would not be appropriate to consider accommodating further growth from another Authority.</td>
</tr>
<tr>
<td>Staffordshire Moorlands District Council</td>
<td>The Staffordshire Moorlands Strategic Housing Market Assessment (SHMA) completed in 2014 did not identify Derbyshire Dales as an area that shared material housing market relationships with the District. The Housing Requirement of 320 homes a year that is included in the 2016 Staffordshire Moorlands Preferred Options plan.</td>
</tr>
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</table>
Consultation is a reflection of the constraints to development in the District. These include the Peak District National Park and Green Belt. In relation to the latter, the Council has prepared a comprehensive Green Belt Review to identify land that may be suitable for release in exceptional circumstances. Consequently the District Council is unable to assist in meeting the housing needs of Derbyshire Dales.

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Table 1 - Summary of Responses from Neighbouring Local Planning Authorities

2.10 The District Council is required to submit a statement which sets out how it considers it has complied with the requirements of the Duty Co-operate. The preparation of this statement is an on-going process and is continually being updated to reflect the latest situation.

2.11 At this time, it would appear that it is unlikely that any of the neighbouring local planning authorities will be able to identify any land for housing specifically to meet the shortfall in the Derbyshire Dales housing provision. Whilst this does not absolve the District Council from the requirements of the NPPF in regards to fully meeting its Objectively Assessed Housing Needs, it is considered that by demonstrating that the District Council has sought and been unsuccessful in achieving this, the risk of the Local Plan not being found to comply with the statutory requirements is reduced, but not necessarily removed.

3 RISK ASSESSMENT

3.1 Legal

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Not having an up to date Local Plan in place which provides adequate land for housing places the District Council at risk to residential development being brought forward on appeal rather than on a plan-led basis.

3.2 Financial

The cost of preparing the Derbyshire Dales Local Plan, including any consultation is contained within the District Council’s budget. The financial risk is, therefore, assessed as low.

3.3 Corporate Risk

The Derbyshire Dales Local Plan will be a pivotal tool in the delivery of the Council’s Corporate plan and the Derbyshire Dales and High Peak Sustainable Communities Strategy. In order to fulfil this role it is necessary to ensure that robust evidence-based and “sound” documents are prepared. Failure to do so will undermine the ability of the District Council to achieve its key aims and objectives. In light of the Inspector’s Report the Corporate Risk associated with the preparation of the Local Plan has been reviewed and identified as Medium Risk.
4 OTHER CONSIDERATIONS

In preparing this report, the relevance of the following factors has also been considered: prevention of crime and disorder, equalities, environmental, climate change, health, human rights, personnel and property.

5 CONTACT INFORMATION

Mike Hase, Policy Manager
Tel: 01629 761251
E-mail

6 BACKGROUND PAPERS

<table>
<thead>
<tr>
<th>Description</th>
<th>Date</th>
<th>File</th>
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<tbody>
<tr>
<td>Individual Responses to Key Issues Consultation</td>
<td>November/December</td>
<td>G/5/P1</td>
</tr>
<tr>
<td>Reports to Local Plan Advisory Committee</td>
<td>July &amp; September 2015</td>
<td>G/5/P1</td>
</tr>
<tr>
<td>Report to Council</td>
<td>October 2015 &amp; March 2016</td>
<td>G/5/P1</td>
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<tr>
<td>National Planning Policy Framework</td>
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