



# Acres Land & Planning Ltd

## 'Acres of space'

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11<sup>th</sup> December 2015.

Mike Hase,  
Planning and Housing Services Department  
Local Plan Consultation,  
Derbyshire Dales District Council  
Town Hall  
Matlock  
Derbyshire  
DE4 3NN

Dear Mike,

**Re: Derbyshire Dales Local Plan Consultation Meeting – Ashbourne  
Derbyshire Dales Local Plan Consultation on Issues and Options.**

I am writing to offer you my personal reflections on the format and the conduct of the public consultation exercise having only recently attended your Public Meeting at Ashbourne. I gather the format and attendance of the Wirksworth and Matlock meetings were very similar.

The future direction of the emerging Derbyshire Dales Local Plan is really important. It is about creating the right climate for boosting the local economy, for accommodating people's legitimate and pressing housing needs and for protecting the attractive and treasured environment and character of the Derbyshire Dales area. Balancing these three issues, and others, is not easy, but it is the essence of good planning.

**Background.**

The background to the current Local Plan consultation is significant. The previous draft Local Plan was firmly rejected by the EIP Inspector, Keith Holland, largely as a result of the major shortfall in housing provision being proposed and the reluctance of other neighbouring authorities to take up the slack. Those, like myself, who attended the two-day EIP hearing in July 2014 heard that the reason the Council adopted this restrictive approach was primarily due to the pressures from the local community who lobbied for a low level of housing provision during the various consultation phases – contrary to the evidence on housing needs derived from the Council's own commissioned research from consultants. That has proved to be a costly mistake.

The decision to opt for a level of future development which was only 2/3 of that which was needed, proved not only to be extremely expensive for the authority (in that the process is

now having to be repeated at huge cost) but also very damaging for the Council's reputation. It has also opened up the authority to a market-led (rather than a plan-led) regime whereby the authority has, for the time being, lost control of its own future. Indeed, it is now critically vulnerable to appeals, although the 'presumption in favour of sustainable development' still ensures that only 'sustainable' sites come through the process.

### **The current consultation.**

Based on my perception of the current Public Consultation exercise, there is a grave danger that history could repeat itself.

Firstly, the Ashbourne public meeting (as is often the case) was largely attended by the middle-aged to elderly with 'conservative' attitudes towards change and negative perceptions about the merits of progress. This is entirely understandable but this is not the age group which the Local Plan is largely catering for – since the plan looks 20 years ahead. Yet it would appear to be they who are determining the outcome of the process and shaping the future of the District. In my view, strenuous efforts should be made to engage younger people in the consultation process (including children in schools and colleges) so that they too can understand and debate the implications of planning and growth and help the District plan accordingly, it might also attract some badly needed recruits into the profession.

Secondly, the format of the meeting was presented as 'them and us' with the officers and councillors sitting on the top table raised above the audience and the attendees sitting down below. After the initial presentation, people were then invited to ask questions and make comments, but the consequence was simply an adversarial exchange whereby officers were forced to defend statements and field questions rather than engage in productive debate and discussion about the merits and the implications of growth and change – or perhaps more important, the implications of **not** doing so,

Thirdly, the content of the presentations, although informative, were punctuated by foreboding about the future, whereby the prospect of development was presented as a 'threat' and a warning that people wouldn't like it, rather than as an opportunity to shape the District and provide new facilities. The inevitable outcome was a series of challenges from the floor against the proposed scale of growth – largely from people who clearly failed to grasp that the housing requirements largely emanate from their own longevity and their children's needs. The need for housing does not arise from aliens or in-migrants – although of course in-movement is a natural phenomenon in the Derbyshire Dales, (otherwise the District would simply dwindle and decline as people gradually die) it comes from local people. Sadly the restraint policy which has been applied through previous plans has resulted in the loss of young people from the Dales and an ageing population – something the Council now acknowledge as one of the principal challenges for the District – a problem which sadly is largely self-inflicted.

Finally, the choices which were presented at the meeting were couched purely in terms of 'housing impact' – thereby encouraging people to view housing development as the overwhelming threat. The genuine problems facing the people of the Derbyshire Dales were barely mentioned. They are for example; the need for jobs, the closure of schools, shops and pubs (due to tougher trading conditions – due partly again to lack of growth), the shortage of local housing, the impact of mineral extraction on communities as a result of dust and heavy lorries, (admittedly a County responsibility) and the poor local public transport services and accessibility etc.

Although the three options; 5300 dwellings (affordable needs only), 6440 dwellings (Meeting current pressures) and 7200 dwellings (boosting economic growth) were presented at the outset – the higher economic growth option and the prospects of promoting investment and jobs was not really discussed at all during the meeting.

Sadly the consultation leaflet comes across in a similar vein. The Survey Monkey exercise asks a series of bald and unconnected questions which are simply designed to provide a statistical answer (and presumably provide a mandate) but give little or no assistance to the reader in reaching a decision. People (especially those retired people, who have the time to respond to surveys), will no doubt vote against development as a means of protecting their interests.

Planning should go beyond simply responding to a popularity contest. The Council have a duty to opt for the strategy which is right for the Derbyshire Dales, not the approach which the elderly, affluent and outspoken would ideally wish to see occur.

### **The key issues.**

The Council need to take an objective, well rounded and positively planned approach towards their own future, which fosters a 'business led' and ambitious attitude towards change in the District. This does not mean sacrificing the character of the towns and villages in Derbyshire Dales but building on the strengths of the District whilst protecting those elements of the character and townscape which give the area its unique advantages.

It means attracting and retaining young people and families, not restraining development so that youngsters are priced out of the market. It means boosting jobs, so that investment returns and the District can thrive. It means building on the special characteristics of the Dales to attract more visitors and holiday-makers who bring prosperity into the area, which in turn bring wealth and jobs to local people.

Derbyshire Dales is extremely diverse with a complicated housing market. As was discussed at the July 2014 Examination in Public, it looks outwards in a variety of different directions – towards Derby, towards Sheffield, towards Manchester and towards the Potteries and the West Midlands. Derbyshire Dales also has a complicated internal market framed by Ashbourne, Matlock and Wirksworth but punctuated by the many smaller villages especially in the southern parts of the District which have a potential and a capacity for growth and are not constrained by landscape or environmental designations. It is not easy calculating the scale and distribution of housing needs, but it is important.

Against that background, it is not an option to simply ignore the needs for housing by deflecting those pressures to other Districts simply because the Derbyshire Dales area is well known for its attractive landscape and countryside. The Strategic Housing Market Assessment identifies the broad scale of housing requirement for the District. Therefore contrary to the message conveyed at the Ashbourne Public Meeting, Derbyshire Dales will not be bowing to Government pressure by catering for 6500+ new homes, it will be catering for its **own internally generated** housing needs. To do otherwise would be to rely on other surrounding areas to help out in accommodating Derbyshire Dales' needs.

Furthermore, there is no logic to the argument that because Derbyshire Dales is partly covered by National Park (and therefore most of the housing must be accommodated within half the area) that the scale of provision should be reduced. On the contrary, is there is an

area of physical or environmental constraint where development is restricted the surrounding area needs to accommodate more by way of compensation. If this housing restraint argument were applied to some towns and cities with more limited geographical areas, some small urban authorities would find themselves building many fewer houses than their needs dictate – simply by virtue of their size.

Derbyshire Dales has ample space and an ample number of potential sites – it simply lacks implementable planning consents and the Council is too easily deflected by vocal constituents, many of them newcomers, who having arrived would prefer the area is protected for their own interests – the drawbridge mentality.

**Pointers for the future.**

The direction is clear. The lessons from the previous Local Plan reminds us that it is counter-productive to grossly under-shoot in terms of required growth simply to placate the anti-development lobby. The role of planning is to encourage, promote, provide and to accommodate growth - in the right places.

The Government is now determined to ensure that local authorities deliver adopted Local Plans quickly and preferably before 2017. Indeed, the Department of Communities has recently appointed Keith Holland, through his role in the PAS, as part of a delivery team to assist local authorities to do so – therefore having presided over the previous Derbyshire Dales EIP he will be fully aware of the background to this case.

The Issues and Options stage of the Plan has been valuable in assembling and collating the evidence base to embark on the new Local Plan. This evidence base clearly needs to be rigorously tested to ensure it is fair, accurate and robust. But the Council must not be blown off course (once again) by bending to pressure from those local interests and individuals who simply wish to prevent growth and change without properly understanding the implications of doing so.

Derbyshire Dales has some very precious and attractive heritage and landscape assets which should rightly be protected. But the broader argument that development and change should be curtailed for nebulous environmental reasons or because it is not 'sustainable' per se, simply deflects pressures to somewhere else – and hence transfers the impact elsewhere. The broader environmental impact simply remains the same.

I hope these thoughts are helpful to you in moving forward with the Local Plan.

Yours sincerely

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