

## **Submission by Martin H Seddon (ref: 6026) Strategic Allocation: Cawdor Quarry**

1. I have over 40 years' experience as a chartered town planner, having worked as a manager in development control and conservation with a number of local authorities and, since 2002, as a consultant primarily working for the public sector on planning and environmental proposals throughout England and Scotland. I submit this objection as a local resident of Oker. My home is located next to the Derwent Valley Heritage Trail, popular for local residents and tourists who visit the area to appreciate the quality of the rural landscape and setting of the town of Matlock.
2. In my representation to the emerging Local Plan I supported the restriction of the Strategic Site Allocation to brownfield land at Cawdor Quarry and the Permanite site, but indicated that the Permanite site abuts open countryside, grazing land and can be overlooked from the Peak District National Park. In addition, that the traditional limestone walls and vegetation provide a strong edge and visual screening for the site within the flatter land of the Derwent Valley. Points were made regarding the need for a comprehensive landscape plan, in relation to the cluster of heritage assets in the immediate vicinity, regarding the SSSI and need for ecological assessment, contamination and need for a ground condition survey, including treatment and recycling of materials on-site to minimise HGV movements on the local road network.
3. The preparation of the finalised draft Local Plan was a lengthy, but democratic process. Although there was lobbying by a prospective developer to include greenfield land in the strategic allocation for Cawdor at Snitterton Fields, this was firmly rejected by the Council based upon an assessment of all the submitted evidence.
4. The Inspector has raised questions in relation to the strategic allocation at Cawdor Quarry. These include: *"Should the size and scope of the allocation be increased to ensure that the site comes forward?"* My submission provides evidence that the site can be developed without additional land, and in any event to include greenfield land in this sensitive location at the fringe of the National Park would not be a sustainable solution and would be harmful to the local environment and purposes of the National Park.
5. The only representation seeking additional land appears to be from Williams Management Services Ltd. This is predicated on a suggested need for an uplift in housing numbers together with the incorporation of retail, leisure and commercial floorspace, essentially as an extension to the town centre. I have not seen any detailed evidence to support this suggestion and note that land in the Derwent Valley next to Cawdor Quarry is subject to flood risk, being zone 3 on the Environment Agency indicative flood risk map.

6. Since the Local Plan has been submitted for Examination the land owner at Cawdor Quarry, Groveholt Limited, has lodged a planning application, (ref: 16/00923/OUT) for the development of 586 dwellings, incorporating 78 affordable units, 2800 m<sup>2</sup> commercial floorspace (Class B1), shop and cafe, with associated vehicle, cycle and pedestrian infrastructure at Cawdor Quarry, Permanite Works and part of Snitterton Fields. Groveholt do not appear to have pursued their interest at the draft Local Plan stage through to the Examination, instead relying upon a planning application in advance.
7. Although the application is a separate planning procedure it is a material consideration. The consultation process has provided evidence why additional land is neither required nor justified for the Strategic Site Allocation. Whilst I appreciate the amount of documentation associated with the Examination I draw the Inspector's attention to the results of statutory consultations on that application in respect of the Snitterton Fields element.
8. Savills submitted a Planning Statement on behalf of the applicant (Appendix 1). The justification for including extra land at Snitterton Fields in that statement at paragraph 7.4 is that: *"If the proposed number of dwellings were compressed into the original quarry site then the 'Matlock Spa' concept would be compromised and diluted."*
9. Firstly, the Strategic Site Allocation includes new extra land at the Permanite site to that in the Quarry, which has extant permission for housing. Secondly, the allocation is for around 470 dwellings and not the 586 dwellings proposed in the application. Thirdly, I do not accept that a good quality scheme cannot be designed and built on the Quarry and Permanite site alone. Extra land is not needed to create a good design or sense of place. In terms of housing layout and accessibility to services in Matlock it would be sensible to increase density at the Matlock end of the strategic allocation. The Permanite buildings are of no architectural, aesthetic or historic merit and should be cleared, including the prominent tall existing 3-4 storey building. Housing on the Permanite site should be two storeys nearer the quarry, grading down to single storey and lower density, to reduce the visual impact on the adjoining countryside and Peak National Park and to provide space for additional tree and shrub planting along the boundary.
10. Savills have provided no viability assessment with the application to justify the inclusion of additional land. The Planning Statement advises in paragraphs 7.6-8 that: *"Planning applications are sometimes accompanied by a financial viability appraisal. A conventional financial appraisal sets cost against value to produce a profit (or loss). This is not possible or appropriate to do in this instance due to the particular nature of Cawdor Quarry and its background"*.
11. Representations to the Examination on the potential inclusion of extra land at the Strategic Allocation do not reflect the strong opinion of the local community - that the Snitterton Fields part of the current planning application is unacceptable. This

is partly because the Local Plan process is not readily understood by non-planners and local residents had seen the Council exclude extra land in the final version of the Local Plan. This is also partly because there has been no case put forward by the land owner/developer to the Examination and there was no planning application at the time of the Council's Local Plan Advisory Group meetings. The planning application currently has a substantial number of objections in relation to the inclusion of additional land at Snitterton Fields.

12. Key issues regarding the proposal to develop this additional land are the adverse effect on landscape character and significant visual impact. The local community and visitors to the area value the landscape of fields around the Quarry/Permanite site. In their Planning Statement for the current application Savills recognised there was little difference in the quality of the landscape between the Snitterton Fields part of their application and the adjacent fields, by suggesting that other land could be protected from encroachment by extending the National Park boundary to encompass them. The other key issues are the detrimental effect on the setting of the cluster of heritage assets around Snitterton and conflict with the two main purposes of National Parks.

13. Extending the Strategic Site Allocation into land beyond the current development boundary for Matlock would conflict with a number of saved policies in the adopted Derbyshire Dales Local Plan that have consistency with policies in the National Planning Policy Framework. These include:

*Policy SF3: Development Conspicuous from The Peak National Park*

*Planning permission will not be granted for development that may adversely affect the purposes of the National Park or be harmful to its valued characteristics*

*Policy SF5: Design and Appearance of Development*

*Planning permission will only be granted for development where;*

*(a) the scale, density, massing, height, layout, access, materials of construction and landscaping preserves or enhances the quality and local distinctiveness of its surroundings (b) it reinforces the sense of place engendered by the presence of distinctive local building styles and materials (c) it is well related to surrounding properties and land uses (d) it minimises the risk and fear of crime and disorder (e) it gives priority to pedestrians and cyclists over the movement and parking of vehicles (f) it maximises the energy efficiency of built development*

*Policy NBE8: Landscape Character*

*Planning permission will only be granted for development that protects or enhances the character, appearance and local distinctiveness of the landscape*

*Policy NBE16: Development Affecting a Listed Building*

*Planning permission for development will only be granted where it does not have an adverse impact upon the special character or setting of a listed building.*

*Policy NBE24: Archaeological Sites and Heritage Features*

*Planning permission will not be granted for development likely to disturb or have an adverse impact upon Scheduled Monuments or other nationally important archaeological remains or their setting. Planning permission for development likely to disturb or have an adverse impact upon other important archaeological or heritage features, or their setting will only be granted where it can be demonstrated that; (a) the feature can be preserved in-situ, or; (b) where in-situ preservation is not feasible mitigation measures can be put in place that minimises any adverse impact upon the feature and its setting. Where appropriate the Council will impose conditions or seek to negotiate a Section 106 Obligation to ensure appropriate investigation and recording, before and during development.*

14. Turning to highway impacts, the allocation of any additional land for development at the Strategic Site allocation would cumulatively add traffic to that generated in future by the site itself and development of the Hall Dale Quarry site. The Inspector will be able to see the sub-standard nature of Snitterton Road and the physical restrictions that exist for mitigating the chances of vehicular conflict if traffic increases. Snitterton Road provides access to Sainsburys and Matlock from outlying settlements including Wensley and Winster. It also provides a link to Buxton and Manchester via Newhaven, avoiding the A6.
15. Significant consultation responses to the current planning application in objection to the inclusion of additional land are as follows:

**Peak National Park Authority – (Conclusions)** *“The proposed development on part of Snitterton Fields would have a significant adverse landscape and visual impact and would harm the setting of the National Park. The development would have the potential to adversely affect the ability of visitors and residents to enjoy its special landscape qualities. Furthermore, the development would adversely affect the setting of several Scheduled Ancient Monuments and designated heritage assets, including the Grade 1 listed Snitterton Hall. It is re-iterated that the Authority has no objection to the part of the proposed development that is limited to the Cawdor Quarry and Permanite works sites. The authority would withdraw the objection if the development of Snitterton Fields was withdrawn from the application”. (see Appendix 2)*

**Historic England – (page 2/3)** *“The proposed development extends beyond the previously developed Permanite site and the Cawdor Quarry, spilling out into Snitterton Fields and transforming the landscape context of Snitterton Hall, Manor House and Scheduled Moated Site and Fishponds. Not only do the elements of the development on Snitterton Fields bring the suburbs of Matlock into the agrarian setting of the designated heritage asses but they also undermine the position of the Hall, Moat and Manor House as the focus and hierarchical centre of the local landscape. Redevelopment of the Permanite site and within the Quarry can be achieved we believe with little or no harm to the significance of the designated assets at Snitterton, the harm which we treat very seriously, occurs where it encroaches onto Snitterton Fields”. (see Appendix 3)*

**Derbyshire County Archaeologist** – *“The two fields in question also make an important contribution in maintaining a sense of the rural landscape context and setting of Snitterton and its assets, as a buffer zone between the assets and the urban edge of Matlock. Introducing housing into this area would create an urban edge only 160m from the Scheduled Monument (and 400m from the Grade 1 listed Hall). This is a substantial change within the close setting of these designated assets, and would introduce a sense of urban sprawl into key views towards and across the moated site. This would not be mitigated by the proposed screening clumps of trees in the field between the development and the scheduled site – these would appear visually intrusive and out-of-character in both landscape and historic landscape terms”.* (see Appendix 4)

**Derbyshire County Council Strategic Planning**– (Paragraph 8.13) *“In its current form with the inclusion of the Snitterton Fields area, the application is considered to be unacceptable due to the significant adverse effects on landscape character and visual amenity. The existing vegetation around the western perimeter of the quarry and the former Permanite site provide a logical end to the site and development limited to this extent could then be made acceptable”.* (see Appendix 5)

16. Copies of these consultation responses are attached as appendices.
17. The current planning application demonstrates that there is substantial opposition from the public and statutory consultees to any extension to the Strategic Site Allocation for sound planning reasons. The settlement boundary for Matlock is justified at this point because it reflects the change in landscape character from the brownfield land at the quarry and Permanite site and it respects the transition through pasture land to the Peak Park.
18. I respectfully request that the Inspector confirms the Strategic Site Allocation and settlement boundary for Matlock as set out in the submission version of the Local Plan.

Martin H Seddon BSc DipTP MPhil MRTPI  
Planning and Environment Consultant

21 April 2017