



Examination into the Derbyshire Dales Local Plan

Summary Report of Representations on Additional Modifications

September 2017

Introduction

In July 2017 the District Council published for public consultation a schedule of 'additional modifications' to the Derbyshire Dales Pre-Submission Draft Local Plan (August 2016) (Examination Library ref. SD01). These changes to the Plan are **not considered** by the Local Plan Inspector to be necessary to rectify matters of soundness and/or legal compliance.

These additional modifications were proposed without prejudice to the Inspector's final conclusions on the Local Plan which will be informed by all representations submitted in response to the public consultation.

The public consultation on the additional modifications commenced on 3rd July 2017 and ran for six weeks until 14th August 2017. The District Council contacted over 4000 people directly either by post and email and invited to comment.

Copies of the modifications were placed 'on deposit' in the libraries and leisure centres in Ashbourne, Matlock and Wirksworth. Additional information and publicity was provided by the District Council through its website, and by issuing news alerts and press releases.

At the end of the public consultation period 451 complete representations had been received from 115 people, of which 359 were comments on the Main Modifications, 57 on the Additional Modifications and 35 on the Policy Maps and Diagram Modifications.

This report sets out the representations made on the additional modifications and has been sent to the Inspector to assist him with his deliberations on the Derbyshire Dales Local Plan and will be placed in the [Local Plan Examination Library](#)

The following documents are in the Examination Library and should be viewed in conjunction with this report.

- Derbyshire Dales Pre-Submission Draft Local Plan –Appendix 5 Policies Maps (Examination Library ref. SD02)
- Schedule of Main Modifications ((Examination Library ref. EX/36)
- Schedule of Additional Modifications (Examination Library ref. EX/37)
- Schedule of Policy Map and Diagram Modifications (Examination Library ref. EX/38)
- Adopted Derbyshire Dales Local Plan Proposals Maps (Examination Library ref. CD58)
- The Sustainability Appraisal of the Main Modifications to the Local Plan (Examination Library ref. EX/39 – EX/41)

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September 2017.

ADDITIONAL MODIFICATIONS SUMMARY REPORT

AM1 Amend Paragraph 1.1			No. of Repts	1
John Acres	5924-23	Acres Land and Planning Limited		
AM1. Para 1.1. Page 3. Support.We support the additional wording to clarify the role of the adopted Local Plan in relation to emerging Neighbourhood Plans.				
AM16 Amend Paragraph 2.46			No. of Repts	1
John Acres	5924-24	Acres Land and Planning Limited		
AM16. Change to Objective 'KI 8 Strengthening the Rural Economy'. Support.We welcome the emphasis proposed to diversify the rural economy.				
AM19 Insert New Paragraph into Spatial Vision			No. of Repts	1
John Lowe	5693-3			
AM19 The policy of maintaing open spaces on the A6 is no longer sound or appropriate for the needs of the area. It has already been eroded by the Meadow View Care home and housing development (St Elphins). The statement 'to avoid coalescence between Matlock and Darley Dale' does not stand up to scrutiny. The actual divide between the two locations is by the new ARC Leisure and Premier Inn developments. Very close to these is the Hooley residential Estate. The A6 is generally flat, is a sustainable area with good transport links and the potential to provide housing and much needed employment land. A far better location than many of the other sites being proposed.				
AM27 Amend Paragraph 5.39			No. of Repts	1
John Acres	5924-25	Acres Land and Planning Limited		
AM27. Amendment to paragraph 5.39. Support.We welcome the clarification within the plan that the Landscape Sensitivity Study was intended not as a neutral assessment of 'Landscape Sensitivity' within and around settlements but as a means of appraising the suitability of sites proposed within this plan.				
AM3 Amend Paragraph 1.8			No. of Repts	1
Victoria J Raynes	3358-7	Tansley Parish Council		
The amendment made does an injustice to communities affected by development to strike out 'and following consultation with local communities' and replace it with extensive consultation has been undertaken' I suppose does at least represent a more truthful statement. However the fact remains that the community of Tansley has not been consulted, there has been no meaningful engagement with residents or the Parish Council -contrary to NPPF 155 This AM is not sound				
AM31 Amend paragraph 6.11			No. of Repts	1
John Acres	5924-26	Acres Land and Planning Limited		
AM31. Amendment to paragraph 6.11. Support.It is helpful for the plan to specify that dwellings delivered as 'starter homes' will be exempt from the perpetuity requirement as affordable housing.				
AM33 Amend Policy HC16: Notified Sites			No. of Repts	3

Mr John Youatt

5588-16

AM 33 Highways England should be consulted now. Not wait for an unspecified date. Conclusions 1. Overall the priorities should be 'brownfield first' as regards housing for the settled community 2. The site selected by DDDC for the travelling community: Urgent steps should be taken to secure the Woodyard for the travelling community. 3. The Wolds should not be allocated in this Plan in preference to the sequential development of the quarries 4. The creation of a new village is a better strategy than extensions without infrastructure into greenfield, to minimise the impacts of the latter. 5. Unresolved issues. The following issues are unresolved. At the cost of a few weeks, all could be resolved. We are all committed to a sound Local Plan and minimising the risk of judicial review I am concerned that there are too many unresolved issues for the Plan to be sound. For the sake of a few weeks, DDDC could press its partners to resolve the following issues. I suggest a short focussed extension of the EIP to complete the following tasks, to improve the soundness of the Plan 1. Request the DCC under its new administration to review its statement that there isn't a severe traffic problem arising from peripheral housing sites in Matlock 2. Request the CCGs together with the GP practices to quantify the capital costs of a 25% increase in the number of patients. 3. Request DDDC to commission its CIL consultants to prepare a rough assessment of the headroom for Sec 52/CIL for infrastructure, using Wolds Rise as an example, in its turn consulting DCC to specify on what the levy might practically be spent 4. Ask DCC to report the outcome of the review which it has notified of the allocation of land for travellers on or close to the line of the A515 bypass, quantifying its risk assessment and noting that provision for travellers should be permanent elsewhere as agreed by DDDC. 5. Ask PDNPA and DVWHS to assess the impact of the Wolds on the NP now rather than await a formal application 6. Consult Highways England as listed at AM 33 now.

Mrs Julie Atkin

993-9

Wolds Action Group

AM 33:

The inclusion of Highways England as a consultee is welcomed. However, Highways England should have been consulted at the outset and the cumulative impacts of all the development assessed, not wait until each development comes forward. A "suck it and see" approach is unacceptable to the residents of Matlock.

Mr Rob Atkin

6412-10

Wolds Action Group

AM 33: We welcome this AM which states that Highways England should be consulted. However, we say: this should be included in the MM's and that Highways England should have been consulted at the outset of the LP process and must be consulted now before the Inspector's report is concluded.

AM34 Amend Paragraph 6.53

No. of Reps **2**

AM 34 : We disagree with the amendment to "result in a severe impact upon" the highway network. As there is no clear definition of "severe impact", this is highly subjective and wide open to creative interpretation by developers and planners. The impact of the proposed 430 new homes in this location, together with the other development, will be a tipping point and result in a severe impact. We refer to the case Bovis Homes and Miller Homes vs SSCLG (September 2016) where the judge noted, "that it would be open to a decision taken to rationally conclude that a given development could wash its own face in highway impact terms, but due to existing over capacity, the residual cumulative impacts of the development could be severe" This conclusion could quite realistically be applied to Matlock today. Conclusions: •the allocation of the Wolds is open to strong objections •the allocation relies on mitigations that will not work•the various reductions of the OAN reduce the case for the allocation of the Wolds. •removing the Wolds will not make the Plan unsound. Appendix 1 The NP effect We believe the SDNP/LD report has direct parallels with PDNP/DDD and the Inspector can choose to quote precedent to apply the NP effect (and other constraints) to meet less than the full OAN. Freddie Burgess has asked for advice at a national level - his target is 10%. Here's some analysis:- Extracts are from the Inspectors report on the Lewes Local Plan report Para 14 recognises the Park and the sea as comparable constraints. (DDD doesn't have the sea to the south – it has lowland and the city.) 14. In addition to stating the presumption in favour of sustainable development, the Plan's strategy in part 6 also recognises the district's location with the sea to the south and around 56% of its area within the South Downs National Park (NP) as important constraints. It therefore sustainably focuses new development largely on the main towns of Lewes, Seaford, Newhaven and Peacehaven (and Telscombe). Some additional growth is also directed to Ringmer and Newick as Rural Service Centres to help meet local needs, including for the rural areas outside the main towns and the NP. Para 15 rejects the imposition of development in the villages as unacceptable. 15. I am entirely satisfied that this is the most suitable and appropriate strategy for the district up to 2030 and that no reasonable alternatives exist that would be more so. For example, the suggestion that with the NP covering 56% of the district and the sea to the south the majority of new development needed to meet the full OAN of the district should instead be concentrated in the villages of the Low Weald is neither reasonable nor realistic. It would lead to an unsustainable pattern of development as well as unnecessary and unacceptable impacts on local services, facilities and infrastructure, including the largely small scale road network of that area. Para 21 records the full OAN as 9200 to 10400. 21. Based on the Coastal West Sussex Strategic Housing Market Assessment update of November 2012 that defined the Sussex Coast Housing Market Area, the Councils worked with other relevant local authorities to produce a Duty to Co-operate Housing Study (2013) (CD 058) that identified the full OANs for this district to be between 9,200 and 10,400 net new homes from 2010 to 2030. This was based largely on the 2011 Census figures, as well as the 2011-based DCLG household projections, and equivalent to 460 – 520 new dwellings per annum (dpa). Para 24 further implies that the full OAN will not be met. And incidentally, makes a case for priority to local needs for affordable housing. 24. This scale of delivery over the first 5 years of the plan period is clearly unrealistic and simply impractical in a district of this size and nature at present. Nevertheless, particularly in circumstances where the full OAN for housing over the plan period will not be met, it is even more important that the best possible provision of affordable housing is made in an attempt to mitigate the potential negative effects on the local community and economy that might otherwise arise. Both Councils share this priority. Para 25 notes wide agreement that the OAN cannot be met because of all the constraints, including the NP. 25. However, it is effectively common ground between the Councils, the HBF, the CPRE and others, including numerous Parish Councils and major house builders active in the locality, that the agreed OAN figures cannot be met in full in this district at present. This is so, even at the lowest end of the range identified, without unacceptable environmental consequences that would be contrary to the policies and guidance in the NPPF and PPG. This takes into account the constraints of the NP, the flood risks locally and other significant factors, including the capacity of the road network, notably on the A27 and A259, and coastal erosion, amongst other things, such as the two Special Areas of Conservation (SAC) and the Heritage Coast designation. As noted in respect of the DtC, there is no realistic prospect of any material help in achieving new housing delivery from nearby Councils in the near future, pending further work on a sub-regional basis and a potential plan review. Para 28 records a very low provision followed by an increase to 6900. 28. Consequently, the Plan as modified now includes a significant increase in the level of new housing provision, from 5,600 as originally submitted, to a minimum of 6,900 in total, or at least 345 new dwellings per year on average. This is approximately equivalent to zero employment growth across the district, but at least not "planning for failure" in economic terms. It would represent essentially Option F in the submission Sustainability Appraisal (SA) (para 10.11c, p.60, CD 002) and not a great increase (around 19%) on the total in the submitted plan, but an important and critical one in this instance for the reasons given. The Habitat Regulations Assessment Addendum (2015) (LDC 070) confirms that although the extra 1,300 homes will lead to some increased traffic flows and air quality impacts on the Lewes Downs SAC this would not amount to a likely significant effect; a conclusion endorsed by Natural England (NE). Para 31 concludes that the SP should be for a minimum of 6900, a significant reduction on the full OAN of 9200, ie 2300 that's a 25% reduction made to allow for the NP. 31. This modified level of growth would also be consistent with the findings of the latest SHLAA (CD 097) regarding the capacity of the district to absorb new housing development without material harm to the nationally important landscape character of the NP, and that of the Low Weald. It would also be within the capabilities of the local road network to cope, albeit with some planned and realisable improvements, as well as taking into account other relevant local constraints including flood risk and the impacts on designated sites of nature conservation interest, amongst other things. In the light of all of the above, Policy SP1 would be sound as modified to refer to a minimum of 6,900 (not 5,600) net additional dwellings and 345 (not 280) per annum, with consequential amendments to Table 4 and paras 6.14, 6.18, 6.19 and 6.22 of the text accordingly (MM 01). Appendix 2. WAG is concerned sites are being allocated now for 17 years whilst the Government policies are under review. Our idea is that great caution should be exercised in long term commitments to greenfield development beyond what is needed for the first 5 years. There are already no less than 4 greenfield sites undergoing development in Matlock within a few hundred metres of each other at the time of writing. In the Dales, 80% of allocations are quarries and thus 20% greenfield. NPPF is fatally flawed in not ensuring by a true sequential test that quarries are developed first and in not providing gap funding to make green and brown a level playing field. Greenfield development should be a last resort and not given up as an easy option for developers. CPRE, for example, has assessed the performance under the NPPF/OAN and advises a radical review. Here is its evidence. <http://www.cpre.org.uk/resources/housing-and-planning/planning/item/download/4569>

Mrs Julie Atkin	993-10	Wolds Action Group
<p>AM 34:</p> <p>I disagree with this amendment to "result in a severe impact upon" the highway network. As there is no clear definition of "severe", this is subjective and we are going to be in the position of proving that the cumulative residual impact is severe(or not) . This policy in the NPPF is flawed, leaving Matlock residents wide open to creative interpretation by developers and planners.</p> <p>To sum up :</p> <ul style="list-style-type: none"> â€¢The OAN has been reduced , but should be reduced further, given the fact that over 50% of the Derbyshire Dales is in the National Park. â€¢Development of the Wolds site will have a detrimental impact upon the National Park on two levels; both landscape impact and tourism will be negatively affected by even more greenfields being lost. CPRE has demonstrated that brownfield sites take less time to develop than greenfield. This is because development on greenfields is artificially held back to maintain higher prices. (North Matlock already has three on going developments on greenfields within a few metres of each other.) â€¢Development of Wolds will have an unacceptable impact on already overstretched roads (and we don't yet know the impact of the other developments in this regard because they aren't complete) â€¢Leaving this site in the Plan may result in brownfield sites remaining undeveloped. â€¢Removal of this site will not make the Plan unsound. 		

AM36 Amend Paragraph 6.58	No. of Reps	5
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Neil Fray	1468-2
<p>I object to the change in this modification from "create or worsen traffic problems" to "cause severe impact". There is no definition of what "cause severe impact" means.</p> <p>This change in terminology will make it more difficult to address the needs that will arise from the change in traffic that is projected</p> <p>It makes the plan unsound as it will no longer be able to adhere to the National Planning Policy Framework -</p> <p>para 14 "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change"</p> <p>These changes will be needed because the plan was never sound anyway with regard to "Positively prepared â€” the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements" for example with regard to development HC2 (u), the planning department admit there has been no analysis of traffic effect the pertinent junctions of Gritstone Road with Wolds Road and Chesterfield Road at the pedestrian entrance to the Upper site of Highfields School - and of Pinewood Road egressing into Cavendish Road onto Wellington Street.because they are not currently considered "at risk"</p> <p>Any common sense assessment of the effects of 430 new dwellings will indicate the traffic volume will be increased , as one egress from the development is effectively a single track road , and the other will discharge directly onto the path of hundreds of teenagers crossing a road with no lights or crossing patrol twice a day</p> <p>This a vulnerable group , who are under age and so whose views will not have been heard in the submission stage. They are being discriminated against by making the assesment of their safety more difficult by this modification , creating a public health risk . There is widespread acknowledgemnet that there is a special problem of risk taking in teenage years that they will not be able to be protected from this clear public health risk</p> <p>At least if injury or , heaven forbid, death occurs, the process of publishing objections will give a clear line of accountability as to who to hold responsible, and if required , prosecute for negligence in the absence of proper assessment of these junctions</p>	

Colleen Marples	1475-8	Miss
<p> I disagree with the amendment from "create or worsen traffic problems on the highway network" to "result in a severe impact upon" the highway network.</p> <p>This seems calculated to water down any potential future objections to developments based on the likely impacts of it on traffic network.</p> <p>As we are often told, there is no clear definition of "severe impact" despite the Wolds Action Group presenting evidence of a recent court case that sought to define it.</p> <p>Therefore this phrase is highly subjective and will be wide open to creative interpretation by developers and planners.</p>		

John Acres 5924-27 Acres Land and Planning Limited

AM36. Amendment to paragraph 6.58. Support. We welcome the clarification that sites can only be rejected on highway grounds where there is a 'severe' impact on the highway network.

Susan Hinchliff 5880-1

I wish to make comment on the following Additional Modification to the Local Plan (The Wolds site - HC2U): AM 36 I DO NOT SUPPORT the amendment from "create or worsen traffic problems on the highway network" to "result in a severe impact upon" the highway network. I understand that there is no clear definition of "severe impact", therefore this phrase is subjective & would be open to interpretation by unscrupulous developers & planners. Yours faithfully SA Hinchliff

Stephen Cairns 6267-1

I do not agree with the amendment from "create or worsen traffic problems on the highway network" to "result in a severe impact upon". There is no doubt that the addition of vehicles from the 430 homes proposed for the Gritstone Road/Pinewood Road site in Matlock would significantly worsen the traffic congestion in Matlock. Many of these homes will have two or three vehicles and this will cause problems at junctions on the narrow existing roads on the estate as well as compounding parking problems. There will be an associated increase in noise and air pollution from the additional traffic which will affect the health and wellbeing of current residents especially children and the elderly.

AM41 Amend Policy DS3: Land at Stancliffe Quarry, Darley Dale

No. of Reps 1

Mr Steven Buffery 2745-15 Derbyshire County Council

AM41: Page 125: Policy DS3: Land at Stancliffe Quarry, Darley Dale The Policy does not refer to SuDS and therefore to ensure early consideration is given and that sustainable drainage features are integrated in the site landscape and layout the following should be included: "Preparation of an outline drainage strategy giving early consideration to the integration of site-wide sustainable drainage systems into the layout and landscaping of development".

AM48 Amend Table 8 & Policy S8 Monitoring indicator and target

No. of Reps 39

Mrs Tarina Johnson 1333-2

AM48 Pages 19 & 20 a "minor text amendment" states that there are no reported problems that regards GP Surgeries/ Health clinic capacity now or for the next five years. This plan is very wrong to dismiss health service worries as both surgeries have been active in voicing their concerns regarding the serious capacity issues. Residents have continually expressed the difficulties they have encountered in obtaining appointments at their surgeries, throughout the consultation period. Notices have been put in surgery windows stating the problems of "providing enough doctors' appointments to meet ever increasing demand". If they are at capacity now, how can they possibly include provision for another 430 households? The amount of new development in Matlock will lead to serious overcrowding of our already full to capacity surgeries and thus endangering patient welfare.

Mr & Mrs Karl Dawes 6185-2

AM48 / Page 19 & 20

I believe the removal of HEALTH SERVICE WORRIES is RIDICULOUS;

This Section clearly states, "there are no current issues as regard to any aspects of NHS Services" There is at my Doctors Surgery a notice stating, "We now have great difficulty providing enough doctors' appointments to meet ever increasing demand" CAN THIS BE OVERLOOKED? I don't think so!

I trust these points will along with everyone else's be given full consideration and time for debate prior to any RASH decisions being made on a whim and to just fulfil objectives without fully appreciating residents' concerns and BASIC COMMON SENSE.

Mr Rob Atkin 6412-11 Wolds Action Group

AM 48 : States that "capacities in GP's surgeries/Health clinics" "no problems reported anticipated for the next five years" This is NOT what the GP's surgeries are saying. We have included a statement from the Matlock surgeries above to support our point. We understand that to have no problems with capacity is an aspirational target but the problems exist now and are over stretching resources beyond their capacity in Matlock. (see comments on MM 12 above) The most efficient way of alleviating this over stressing of the area is to re-duce the number of new homes in that area.

Susan Hinchliff 5880-2

I wish to make comment on the following Additional Modification to the Local Plan. AM48/ Page 20 This is listed as a "minor text amendment" I DO NOT SUPPORT THIS STATEMENT The document states that there are no reported problems as regards GP surgeries/health clinics capacity now or for the next 5 years. This is incorrect - My own Matlock surgery has put a notice stating that it is now having great difficulty providing enough doctors appointments due to increasing demand. I personally have noticed a considerable delay in attaining even routine appointments. This is evidence that capacity is already stretched. To state that there are & will be no problems is a lie.....Unchecked residential development without serious consideration for additional health care provision will lead to greater problems at surgeries & could ultimately endanger patient welfare. I am now of retirement age & do not expect this issue to be glossed over as a minor text amendment. My health care should not diminish as I get older because of pressures placed on surgeries by new residential development.

Patricia Barrable

3294-3

This section says that there are no concerns about GP s and surgeries being already stretched by the number of patients . There have been concerns raised by local surgeries regarding patient levels and building more houses will increase the level further, which will result in an increased demand and ultimately endanger patient health care.

Mr Geoffery Hardy

432-3

AM 48 Page 19 / 20

It is completely wrong for the plan to dismiss out of hand health service worries. Both local surgeries are working to full capacity, trying to get an appointment is very difficult as they both work on the basis of allocating appointments daily,so unless you are prepared to attend the reception at 0700 to book and appointment you have to take the risk of being able to to obtain on via the telephone after 0800.

Also the facilities at the Whitworth Hospital (provided by local resident many years ago for local residents) are being reduced year after year .

Additional pressure on the current health provision could lead to the endangerment of patient welfare especially the old

Mrs Sharon Briddon

5175-4

AM48, Capacity in GP's Surgeries/Health Clinics

This is completely unsound It is an absolute fallacy to say that there has been proper consultation with local GP's. DDDC constantly refer to having had meetings with local authorities, but how long ago did these meetings take place, and exactly who with?? In discussion with my local GP practice, it would appear no-one there is aware of any consultation to that effect. Lime Grove Surgery has a notice on the door that it is struggling to provide enough appointments My husband has been waiting over two weeks to get an appointment to look at a significant lump on his arm, to then be referred for urgent consultation at a bone cancer clinic. That delay could prove to be significant in this and other cases, and ultimately put lives at risk.

We had a Practice Manager appear at one of the consultation sessions and flatly refute the findings of DDDC "neither of the two main surgeries in Matlock were consulted in the statement that there are no issues in the next 5 years, so who is providing this inaccurate information without getting it from the front line Practice Manager and GP's? Both surgeries have stated they have provided evidence to the planning committees previously to express their concerns at additional development and the impact on surgery capacities, so why has this not been taken into consideration? Is the view of the Imperial Road Practice lead by my Doctor, Council member for the British Medical Association and General Practice Council negotiator Dr Peter Holden, not considered to be relevant?

This has been reiterated time and time again and needs further investigation as it is completely inaccurate - the proof is staring the council in the face should they choose to look further than the end of their noses, and stop referring to out of date reports from bureaucrats who have clearly been misinformed.

As well as GP Places, there is also a shortage of dental places. I would like to change dentist as am not happy with my current practice, but cannot find another local dentist able to take on any further NHS patients. I will have to look outside Matlock and travel further afield " in my car.

Please stop punishing the communities surrounding the Peak Park, use some common sense, and listen to the people at the coal face " remove this site from the local plan.

Mr Stuart Briddon

3592-4

AM48, Capacity in GP's Surgeries/Health Clinics

I find it incredible that this section states that there are no reported problems from local GP surgeries with regards the impact that the massive increase in houses that Matlock will suffer if this development goes ahead. I was present when a representative of the two surgeries in Matlock stated at a Local Plan Advisory committee meeting that they were already at capacity. Since then many more homes have already been built.

I have personal experience of how difficult it is to get an appointment at the Imperial Road Surgery as I recently had to wait two weeks for an appointment for a worrying lump on my arm. I did eventually get to see a doctor but as a result I am currently waiting for an emergency appointment at a sarcoma clinic as tests have revealed the lump to be "irregular". This is first hand experience of how the doctors surgeries are unable to cope currently. Does anyone in their right minds think the addition of another 430 houses, an additional 1000 people, will improve the situation? The building of 430 unnecessary houses on the Pinewood Road/Gritstone Road site will put the health of the WHOLE population of Matlock at risk as waiting times for appointments will inevitably increase beyond acceptable proportions.

Ms Anita Crofts

3581-5

Please see below a comment for the Council regarding the AM48/Page 19&20.

It is my belief that the plan is wrong to dismiss health service worries

It states that there are no reported problems as regards GP surgeries / health clinics capacity now or for the next five years. We are concerned that this "minor text amend" is glossing over a serious capacity issue that is already in evidence. We have already seen one Matlock surgery putting a notice in its window warning about the problems they are facing. Lime Grove Medical Centre stated "We now have great difficulty providing enough doctors' appointments to meet ever increasing demand."

This surely is evidence, if it were needed, that capacity is already stretched far beyond what is reasonable, and to state that there is not, and will not be an issue, when adding hundreds of extra patients to surgeries, is simply untrue.

It would seem that the response to the Local Plan is completely at odds with the reality of the situation on the ground.

Unchecked residential development without serious consideration for additional health care provision will lead to chronic overcrowding at surgeries and could ultimately endanger patient welfare.

Mrs H Gilbert

3316-3

Just had to wait 10 days for a doctors appointment. We are talking about a lot of extra people here if this development goes ahead. There is a shortage of GPs.

Mr Chris Hartley

6415-4

AM48. Page 19 and 20

Although this section states that there are no problems with reference to doctors and health clinics this cannot be the case when a Matlock surgery has a notice in the window 'We now have great difficulty providing enough doctor's appointments to meet ever increasing demand'

The extra patients engendered by 430 extra houses in addition to those presently being constructed on both sides of Chesterfield Road would mean a serious threat to patient welfare as many health problems require urgent attention. This links to MM52/Page 126. policy DS4.

This modification to which I have serious objections suggests that a local centre should be provided. This is acknowledging that the site is remote from existing facilities. However there are no plans for this centre to include health provision. It is not stated what form such a centre would take nor where it would be situated.

Mr David Elsworth

6001-9

Mrs Susan Smith

5436-7

Matlock Town Council

Additional Modification 48 Policy S8 Matlock. In respect of capacity in G.P. Surgeries statements were made by both Lime Grove Medical Centre and the Imperial Road Surgery in June 2016 to DDDC's Planning Committee and North Derbyshire CCG stating "they both were at capacity". In the Lime Grove Medical Centre Patient Participation Group Meeting of September 2016 the next routine GP appointment was stated as not being available for 3 weeks. The Autumn News letter stated the "Practice was over-full" this is a real issue. The situation is still ongoing. This is completely at odds with the CCG Consultation Response statement. This matter needs to be raised with the CCG to ascertain the true situation for Matlock.

Mr Stephen Crofts

6416-5

This is listed as a "minor text amend" and we DO NOT SUPPORT this statement. We believe the plan is wrong to dismiss health service worries.

It states that there are no reported problems as regards GP surgeries / health clinics capacity now or for the next five years.

We are concerned that this "minor text amend" is glossing over a serious capacity issue that is already in evidence.

We have already seen one Matlock surgery putting a notice in its window warning about the problems they are facing.

Lime Grove Medical Centre stated "We now have great difficulty providing enough doctors' appointments to meet ever increasing demand."

This surely is evidence, if it were needed, that capacity is already stretched far beyond what is reasonable, and to state that there is not, and will not be an issue, when adding hundreds of extra patients to surgeries, is simply untrue.

It would seem that the response to the Local Plan is completely at odds with the reality of the situation on the ground.

Unchecked residential development without serious consideration for additional health care provision will lead to chronic overcrowding at surgeries and could affect patient welfare.

Please consider these comments.

Christine Joy Martin

343-1

The plan is wrong to dismiss health service worries - have the local surgeries been contacted to see if there is any additional capacity for the extra residents that will live in the new homes? All the surgeries are oversubscribed and it is extremely difficult to get an appointment before all the existing homes that are currently being built are lived in. There will be a lot of very disenchanted new residents that will have to travel far and wide to register for doctors, dentist and schools too. There has been no mention of funding from the developers for Matlock in the form of schools or health facilities. Matlock will be overcrowded which will endanger patients welfare.

Anne Kernaghan 530-5

I believe the statement there are no concerns in relation to GP capacity is incorrect

Anne Kernaghan 530-6

I believe the plan is wrong to dismiss health service worries.

Demand on our Services is currently stretched to capacity with GP's currently struggling to meet demand for appointments, signage in the surgery confirms this.

Additional housing will only make this worse and potentially could lead to endangering patient welfare due to chronic overcrowding.

Andrew Kernaghan 6191-4

I believe the plan is wrong to dismiss health service worries.

Demand on our Services is currently stretched to capacity with GP's currently struggling to meet demand for appointments, signage in the surgery confirms this.

Additional housing will only make this worse and potentially could lead to endangering patient welfare due to chronic overcrowding.

Jack Kernaghan 6351-4

I believe the plan is wrong to dismiss health service worries.

Demand on our Services is currently stretched to capacity with GP's currently struggling to meet demand for appointments, signage in the surgery confirms this.

Additional housing will only make this worse and potentially could lead to endangering patient welfare due to chronic overcrowding.

Roger Brown 1800-4

AM48, Pages 19 & 20 - Health Service Facilities in Matlock

This section states that there are no reported problems regarding GP surgeries/health clinics capacity now or for the next 5 years. However, this glosses over a serious capacity issue that is already in evidence.

For example, one Matlock surgery has already posted notices on its premises about the great difficulties they are facing in providing sufficient doctors' appointments to meet ever increasing capacity. At my own surgery, one has to wait at least a week for a routine appointment, and two weeks or more to see a doctor of your choice. This must surely be evidence that capacity is stretched far beyond what is reasonable.

If a further 430 homes are built on the Gritstone Road/Pinewood Road site in Matlock, in addition to those that are already being provided in this area, it surely cannot be true to say that capacity at surgeries and clinics is not and will not be an issue when adding hundreds of extra patients to surgeries.

To allow this level of residential development without giving serious consideration to, and proper planning of health care facilities, will, I believe, lead to chronic overcrowding which could well endanger patient welfare.

Colleen Marples

1475-5

Miss

The final section of this table states: "No problems reported for reporting year or anticipated in next five years"

This is listed as a "minor text amend" and I DO NOT SUPPORT this statement

It states that there are no reported problems as regards GP surgeries / health clinics capacity now or for the next five years.

I am concerned that this "minor text amend" is glossing over a serious capacity issue that is already in evidence.

We have already seen one Matlock surgery putting a notice in its window warning about the problems they are facing.

Lime Grove Medical Centre stated "We now have great difficulty providing enough doctors' appointments to meet ever increasing demand."

This surely is evidence, if it were needed, that capacity is already stretched far beyond what is reasonable, and to state that there is not, and will not be an issue, when adding hundreds of extra patients to surgeries, is simply untrue.

It would seem that the response to the Local Plan is completely at odds with the reality of the situation on the ground.

Unchecked residential development without serious consideration for additional health care provision will lead to chronic overcrowding at surgeries.

The Wolds Action Group will be submitting a joint statement from the practice managers of the two Matlock surgeries strongly refuting the claim by the CCG that there are no problems with provision.

This should not be an additional modification, it should be a seriously considered main modification.

The proposed reduction in the OAN means that the inspector now has a chance to readdress the balance of where proposed future development takes place.

I suggest that he should take serious consideration into relieving the pressure on Matlock which is taking the brunt of the building but which is seeing no corresponding increase in infrastructure provision.

This will be at the detriment of existing, and new, residents and could result in a serious patient welfare issue in the not too distant future.

Recent national events have shown, all too tragically, what happens when council's overlook or disregard issues around communities health, safety and wellbeing.

Elizabeth Chamberlain

3435-4

It states that there are no reported problems as regards GP surgeries / health clinics capacity now or for the next five years.

This "minor text amend" is glossing over a serious capacity issue that is already in evidence.

Lime Grove Medical Centre stated "We now have great difficulty providing enough doctors' appointments to meet ever increasing demand."

This surely is evidence, if it were needed, that capacity is already stretched far beyond what is reasonable, and to state that there is not, and will not be an issue, when adding hundreds of extra patients to surgeries, is simply untrue.

It would seem that the response to the Local Plan is completely at odds with the reality of the situation on the ground.

Unchecked residential development without serious consideration for additional health care provision will lead to chronic overcrowding at surgeries and could ultimately endanger patient welfare, particularly amongst the ever aging population of Matlock.

Lynn Hines

5986-1

Capacity of Matlock GPs and Health Clinics. It has been stated in the minor text amendments that there are no current nor predicted issues with health care provision. However, Lime Grove Surgery has already posted notices stating that the surgery cannot meet the increase in demand. The addition of 5,680 houses in the Matlock area will make this situation worse and is a threat to patient welfare. This shows a lack of research into suitable alternatives, nor is there a plan to alleviate the issue. The issue of health care provision for in excess of 11000 people must be considered for a main amendment.

Jill Armshaw

6197-2

This is listed as a "minor text ammend" and I do not support this statement. It states that there are no reported problems as regards GP surgeries/health clinics capacity now or for the next five years. I am concerned that this is glossing over a serious capacity issue that is already in evidence. The Lime Grove Medical Centre has already publicly stated that they are at the present time experiencing great difficulty providing enough doctors' appointments to meet the ever increasing demand. This is surely evidence, if it were needed, that capacity is already stretched far beyond what is reasonable, and to state that there is not, and will not be an issue, when adding hundreds of extra patients to surgeries, is simply untrue.

Unchecked residential development without serious consideration for additional health care provision will lead to chronic overcrowding at surgeries and could ultimately seriously endanger patient welfare.

I myself have experienced difficulty in obtaining an appointment within my family, and this is far from acceptable. This just puts extra pressure on local hospitals or A & E departments, because when people are ill they need medical assistance as soon as possible, so if they cannot obtain a suitable GP appointment, they will go and seek medical help elsewhere. It is truly unthinkable to say this is not a problem.

wendy susan marples

704-4

I believe that dismissing Health Service worries is wrong.

In this section it states that there are no reported problems with regard to GP surgeries/health clinics at present or in 5years time.

This 'minor text amend' glosses over a very evident and serious situation within our surgeries and clinics through over capacity use.

Notices on one surgery window have warned patients that they have 'great difficulty providing enough doctors appointments due to ever increasing demand'.

Surely this is evidence that our surgeries are already stretched beyond reason and to state it will not be an issue with hundreds of extra patients is false. I would like to see this vital issue commented on in order to support our local GP's and where possible link it to a Main Modification comment.

A residential development without serious consideration for healthcare provision must be a risk to patient welfare due to overcrowded surgeries.

Katie Haywood

6186-1

The plan is wrong to dismiss health service worries

One Matlock surgery has put a notice in their window stating they have difficulty in allocating enough doctors appointments to meet an ever increasing high demand. This is evidence that the capacity is stretched beyond its capabilities and adding 100s more residents will contribute to massive pressures on the surgeries and also decrease the standard of life for existing residents putting lives at risk.

Mr Rob Atkin

6412-2

Wolds Action Group

Ref: Schedule of Additional Modification, July 2017AM 48, Policy 58, Matlock Capacity in GP's surgeries/health clinics" We are writing to make it clear that with respect to the surgeries in Matlock at Lime Grove Medical Centre and Imperial Road Surgery, the statement by the CCG that there are 'no current problems reported for the reporting yearor for the next five years,' is incorrect." •The current housing allocations and approvals in the catchments of Lime Grove and Imperial Road Surgeries would add 25% to each of their patient lists. Over a year ago both surgeries made it clear to DDDC that they were 'at capacity' and that it was impossible for them to absorb that increase. •The CCG seems to be in doubt over the numbers and timing •The CCG holds that because the practices have not 'closed their doors', it can be interpreted that there is no problem. Such a position chooses to ignore the fact that the practices would be in breach of contract if they took such a step and would stand to have their contracts terminated. •The CCG also holds that as independent 'businesses' it is down to the practices to meet and deal with the changes. At the same time, the CCG knows and accepts that the practices have no physical space for expansion •Expansion can only happen by the acquisition of new premises but the CCG can give no help until the detailed development plans have been approved. When, how and how much support might be available to implement such major expansion is a complete unknown. •This is a 'breaking wave' situation. Since the surgeries declared that they were at capacity the building of 286 new houses has commenced which will bring 700+ new patients. This will begin the degradation of what the surgeries can provide and just as a wave reaches a point on approaching the shore where it breaks so, long before the OAN is reached, the medical services provided by the two surgeries will be swamped. The situation is untenable. Conclusion: DDDC should be fully aware of the consequences for health services before it makes greenfield allocation in Matlock. Similar to health provision, the roads around Wolds are at capacity and as there is nothing from DCC Highways to specify the amount of monies needed to alleviate the impact of an extra 430 houses, the costs are unknown. The only mitigators to alleviate future traffic issues that are suggested by DCC are sustainable transport initiatives (application of these at Wolds have been comprehensively researched and presented in WAG's original statement and Hearing Statement) These sustainable transport initiatives/ mitigations will not offset the huge amounts of traffic generated by siting 430 new homes with at least two cars per home in a location remote from the town. To conclude this point: although welcomed, the reduction in the OAN does not go far enough when taking into account the National Park Effect and the current strain on infrastructure.

John Lowe

5693-4

AM48

The statement 'No problems reported for the reporting year by the CCG's or antipated in the next 5 years' is not factually correct. The Council are in error if they disregard the personal experiences of the local poulation.

Waiting 3 weeks for a GP appointment (as is the current situation at two Matlock and one Daley Dale surgery). is NOT providing an effective and responsive service. New housing developments MUST result in Developer financial contributions towards additional health funding, to ensure that the new residents in the area receive a proper level of service.

If not, the situation will deteriorate even further. The CCG views also seem to be at odds with a Senior Partner at one of the local practices who has, on a number of occasions, written to the local newspaper expressing his serious concerns about the current and future quality of GP services in the area.

Robert Maddox

812-2

It is totally wrong to consider future development in Matlock without serious consideration of health care provision to meet increased demand.

Kevin John Knight

3096-3

To say there is no reported problems regarding schools and medical seems farceicle.In Matlock the Doctors surgeries are already overstretched with difficulty getting appointments and many ofthe promary schoils are at capacity. The infrastructure cannot withstand the excessive proposed development in Matlock

Elizabeth Towe

3912-3

I do not support this "minor text amendment" It states that there are no reported problems regards GP surgeries/ Health clinics capacity now or for the next five years. It is evident now that GPs are struggling to provide the existing community with a adequate service. It would seem that the response to the local plan is completely at odds with the reality on the ground.

Stephen Cairns

6267-2

I believe that the plan is wrong to dismiss concerns regarding adequate NHS community healthcare provision through GP surgeries. I am a patient at Group Surgery, Imperial Road, Matlock and I am all too well aware of the difficulty in obtaining an appointment to see a GP. On many occasions I have not been able to get a same day emergency appointment for myself, my wife or my son. There are currently two GP surgeries in Matlock, both of which are under extreme pressure due to increased workloads and more complex patient needs combined with the increase in the age of their patients. Dr Peter Holden, who is the senior partner at my practice forwarded a motion at the recent BMA conference to introduce 'black alert' days at GP surgeries for days when a maximum number of patients was reached and it was no longer safe to see any more patients. I believe that the surgeries in Matlock are already struggling with the current population of the town and will not be able to support a further increase in the number of patients in the town. Fewer qualified doctors are choosing to enter general practice and the age of GPs in practice is rising as many near retirement.

Mr B Heathcote

3522-3

Mr Chris Hartley

926-4

Ms Lucy Heathcote

6354-3

Robert Allen

6337-5

I do support the statement, " It states that there are no reported problems as regards GP surgeries / health clinics capacity now or for the next five years." p.20. This is totally rubbish and needs to be removed from the draft plan. GP surgeries are bursting at the seems now, it takes over 7 days to get a basic appointment. Lime Grove Medical Centre stated "We now have great difficulty providing enough doctors' appointments to meet ever increasing demand. "This was placed in the window over the surgery. More houses, more people, bigger waiting lists, poorer medical care equals greater risk to health and peoples lives. Now I know building a new surgery will not make profits, yes money again, can you ask William Davies to build and finance a new surgery, I know what they would say. The current building company building homes next to the convent in Matlock, Asker Lane, has offer St Josephs Primary school Â£200 for some new books, yes that's all Â£200 ,by the way that's William Davies again remember it is all about money and profits, not local people and the environment ! They will make millions of pounds from matlock Please think carefully about the plan, think about the future, and not just the profits of the building companies and how much money the local councils will receive, put people first, local people.

Mr Rob Atkin

6412-20

Wolds Action Group

Mr J Plant

3456-1

As residents of Pinewood Road, we are concerned with over crowding of GP surgeries. More houses will only put extra strain on already stretched GP surgeries/ health clinics.

Mrs Margaret Elsworth

6171-2

I believe that the plan is wrong to dismiss the Health Service worries.

The Lime Grove practice is already over subscribed and getting an appointment is difficult. This fact is highlighted in their 2016 Newsletter published on their website. The building of any more houses will make the system unworkable, putting too much pressure on already over worked GPs and causing a knock-on effect in our hospitals.

I feel it necessary for the District Council to make an up to date assessment of the additional number of houses now being built which were not included at the beginning of the Local Plan process.

AM59 Amend Table 8 & Policy EC9 Monitoring indicator

No. of Reqs **1**

Mr Rob Atkin

6412-21

Wolds Action Group