# Local Plan Main Modifications Consultation: Frequently Asked Questions and key arguments to make in your responses

#### What is a "Local Plan"?

A Local Plan is a hugely important document which maps out where and when development will take place within any given area over a 15-20 year period. All local planning authorities (in our case North East Derbyshire District Council) are required to have an up to date Plan in place.

# What stage is the Local Plan at in North East Derbyshire and what impact does it have on Dronfield?

When the first draft of the current Plan was first announced in February 2017, it proposed 860 houses on the Green Belt across five sites around Dronfield. Following a very active campaign, in which Dronfield Councillors have been heavily involved, the currently proposed sites total 200 houses.

The Local Plan is now in the final stages of a public examination process, under an independent Planning Inspector. The Inspector has published her "Main Modifications" (MMs) which are effectively the changes she believes need to be made in order for the Plan to be "sound".

The main MMs affecting Dronfield are as follows:

- To continue with the proposal to remove land from the Green Belt at Chesterfield Road, Dronfield (DR1) to deliver 160 houses (albeit reduced from the 235 originally proposed)
- To continue with the proposal to remove land from the Green Belt at Stubley Lane, Dronfield to deliver 40 houses (DR3), but to rename the site DR2 given the removal of the previous site known as DR2 below.
- To remove from the Local Plan and scrap the proposal for 200 homes on the Green Belt at Eckington Road, Coal Aston (DR2)

#### How can I have my say in the current consultation?

The Main Modifications consultation runs from 2<sup>nd</sup> November until at least 23<sup>rd</sup> December 2020. We'd urge as many residents as possible to submit views to the Inspector as part of this consultation.

You can do so:

- In writing to Planning Policy Team, North East Derbyshire District Council, District Council Offices, 2013 Mill Lane, Wingerworth, Chesterfield, S42 6NG
- Via email to <a href="mailto:local.plan@ne-derbyshire.gov.uk">local.plan@ne-derbyshire.gov.uk</a>
- Online at https://bolsover.oc2.uk/
- You can also download pro forma response sheets and submit them either via email or through the post at <a href="https://www.ne-derbyshire.gov.uk/planning-and-local-plan/planning-policy-and-local-plan/examination/main-modifications-consultation">https://www.ne-derbyshire.gov.uk/planning-and-local-plan/examination/main-modifications-consultation</a>

This is a technical consultation and responses must be directly focused on the Main Modifications. It is vitally important that you make sure your responses are linked and make reference to the specific modifications, otherwise they risk not being considered by the Inspector. General comments simply opposing building on the Green Belt for example will not be counted.

### What do we need to oppose in the current consultation?

- We recommend you disagree with the Inspector that housebuilding at Chesterfield Road, Dronfield (DR1) should remain in the plan: residents should highlight their concerns, based on the below arguments, that proposals to build 160 houses at Chesterfield Road remain in the plan. We recommend that you strongly oppose the retention of this proposal and ask for it to be removed from the final document. (Ref MM/030)
- We recommend you disagree with the Inspector that housebuilding at Stubley Hollow, Dronfield (DR3) should remain in the plan: residents should highlight their concerns, based on the above arguments, that proposal to build 40 houses at Stubley Hollow Dronfield remain in the plan. We recommend that you strongly oppose the retention of this proposal and ask for it to be removed from the final document. (Ref MM/032)

#### What are the most important arguments we should make in our responses?

- That you remain unconvinced that the "exceptional circumstances" test has been made to remove any land in North East Derbyshire from the Green Belt: and you want the Inspector to review the current status of the plan, the five-year housing land supply that can be demonstrated and the housing numbers that have come forward in recent years (see below). If she does that, we believe that should remove any need to build on Green Belt and the remaining sites in the draft plan should be removed. (Ref Five Year Housing Land Supply Statement)
- There are several housing sites which could contribute to the District wide target of 6600, but are not being counted in the current draft of the Plan. If included, they could further weaken the case that "exceptional circumstances" have been met: a number of developments have been approved on appeal in recent years, which make a significant contribution towards the District's housing requirements (including 84 at Coney Green, Clay Cross and 250 at Holmewood). In MM/015, the Inspector also suggests that 660 houses at the former Coalite site could come forward during the Plan period, none of which have been included towards the housing requirement previously due to HS2 blight on the site. Taken together, these developments make a significant contribution to meeting housing need and further weaken the case that "exceptional circumstances" to remove Green Belt in the northern towns have been met. (Ref Five Year Housing Land Supply Statement)
- That the most recently published housing numbers by North East Derbyshire demonstrate there is no longer a shortfall of houses within the plan: in her interim report of February 2019 (ED65), the Inspector acknowledged a shortfall of 257 houses. It is important to highlight that this shortfall has now been eliminated entirely (due partly to the appeal approvals above), further removing the case that "exceptional circumstances" can be demonstrated to justify the removal of land from the Green Belt in Dronfield. If the Inspector was willing to allow a small shortfall in order to remove two Green Belt sites last year, she should use the same logic now to remove the remaining ones. (Ref Five Year Housing Land Supply Statement)

That the Inspector's justification for the removal of sites at Coal Aston and Eckington really could be applied to the remaining sites in Dronfield: that we would ask the Inspector to apply her own logic, as outlined in correspondence dated 18/02/2019, to remove the remaining Green Belt sites in Dronfield (DR1 and DR3) (Ref MM/026, MM/031, MM/033, MM/031, MM/032)

## Are there any other points we could make in our responses?

- That there are other non-Green Belt sites within Dronfield that are likely to come forward in the coming years, which demonstrate that Dronfield will still see some housing growth: The former Gladys Buxton site has recently been sold as a development opportunity. If it were to come forward, it could provide between 30-40 dwellings, further contributing to Dronfield's housing needs and weakening the argument that there are exceptional circumstances for removing Green Belt land. There may be other sites locally you can think of too. (Ref Five Year Housing Land Supply Statement)
- That coronavirus is likely to change the economic calculus of the coming years and may reduce demand: that given the current uncertain economic times, there is likely to be incrementally less demand in North East Derbyshire to 2034 and, therefore, there is a small buffer of excess houses needed in the plan to meet the 6,600 overall target. (Ref Iceni Report)
- That the Chesterfield Road site continues to risk settlement coalescence between Dronfield and Unstone: this is an issue that the Inspector has already identified but you should highlight your personal concerns, as residents, that unless the site is removed in its entirety, then it continues to risk the historic gap between Unstone and Dronfield being reduced – something that our area doesn't want to happen. Having originally suggested the removal of the western field from DR1 in February 2019, the Inspector has consented to a section of it being added back in without any justification – this will further weaken the gap between the two communities. (Ref MM/030)
- That the access arrangements at Chesterfield Road, Dronfield remain unclear: that there is no clarity on how access would meaningfully work at Chesterfield Road, Dronfield, and an additional junction onto the main road could have safety issues which render it unviable. The Inspector herself said in February 2019: "access arrangements should be identified in order to ensure that the site would be deliverable" but there is no information to suggest they have been identified. The site is also an important gateway to the town. (Ref MM/030)
- That the Unstone floods in 2019 demonstrated that there may be an issue with the Chesterfield Road site which is another reason for its removal: substantial flooding was noted in Unstone village in late 2019 derived from fields at or near this site despite the plan suggesting that this was unlikely. The site should be removed from the plan on this basis. (Ref MM/030)
- That the Chesterfield Road site is home to a number of wildlife species: several residents have reported seeing a number of animals on site, including badgers, bats and deer. Your own local knowledge will be important here. (Ref MM/030)
- That there are significant uncertainties regarding the proposal at Stubley Hollow: access arrangements have still to be confirmed at a what is

a difficult site in terms of its topography and again onto a road which could have safety challenges. The Local Plan itself (at para 5.24) references potential ecological constraints which would need to be assessed and could therefore see the destruction of local habitats. From local research, we believe it is possible that there may some archaeological value to the site as well. In a review of the Green Belt, this site scored "red" on a traffic light scale in meeting one of the defined purposes of Green Belts "to assist in safeguarding the countryside from encroachment". (MM/032)

- There are a raft of other infrastructure-related reasons why these
  developments are not sustainable: many residents have raised concerns
  recently about the capacity of the Waste Water Treatment Works at Dronfield
  and the increased amounts of odour during lockdown when more people were
  at home. You may be aware of other infrastructure-related issues (schools,
  health services, etc) from your own local knowledge which you may want to
  highlight. (Ref MM/030 MM/032)
- Development on the Green Belt is contrary to the widely held views of local residents in Dronfield, as evidenced by the Neighbourhood Plan: Dronfield Town Council's Neighbourhood Plan was adopted following a local referendum in which 88.8% voted in favour. The Plan makes clear the local support for preserving the Green Belt within the town and the planning Examiner at the time said it was an issue "that has great significance for the local community". (Ref MM/030 MM/032)

**Please note** this is not an exhaustive list and there may be other points you could make. Local knowledge is key, so if you think of additional points, please do include them. If you've already responded but think of additional points, please respond again. You can submit views as many times as you like.

#### What should I do if I have further queries?

• Contact us: We appreciate this is a technical consultation, which requires a technical response and you may want to query some of the above points with us. If so, please contact us on:

Cllr Angelique Foster: 01246 290796 <u>Cllr.AngeliqueFoster@dronfield.gov.uk</u>

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Or find your local Councillor here: http://www.dronfield.gov.uk/councillors.html

- Attend one of our meetings: Your local Dronfield Councillors are also hosting a series of online advice surgeries, via Zoom, to support residents as well. You can find out more details by clicking here.
- Review the consultation documents here: <a href="https://www.ne-derbyshire.gov.uk/planning-and-local-plan/planning-policy-and-local-plan/examination/main-modifications-consultation">https://www.ne-derbyshire.gov.uk/planning-and-local-plan/planning-policy-and-local-plan/examination/main-modifications-consultation</a>