

## Dronfield Town Council – Response to NEDDC Local Plan Proposed Modifications Consultation

*'This stage of the consultation is confined to the specifically stated Proposed Main Modifications to the North East Derbyshire (2014-2034) Publication Draft. It is not an opportunity to re-state points previously made, to raise new representations to the Publication Draft Local Plan as submitted, or to seek further changes to the Plan. The Inspector will not consider any such representations.'*

*Comments are also invited on supporting documents A-G.*

### Responses to Proposed modifications

<b>Modification Number</b>	<b>S/O, Sound?</b>	<b>Response</b>
<b>MM/002</b>	Support, Y	The clarification that supporting housing-led neighbourhood regeneration opportunities is welcomed in the Vision
<b>MM/003</b>	Support, Y	The clarification that supporting housing-led neighbourhood regeneration opportunities is welcomed for this objective
<b>MM/004</b>	Object, N	<p>The figures shown as proposed modifications do not reflect additional permissions that have been granted giving an up to date position. The cut off date of 31/3/2020 is now 9 months out of date. The Town Council request that this is brought up to date until 31<sup>st</sup> December 2020.</p> <p>In February 2019 (ED65) the Inspector removed Green Belt sites at Coal Aston, Eckington and reduced the size and capacity of DR1, Dronfield. Noting that this will mean a shortfall on reaching the 6600 housing target, she does not suggest that this in itself would make the plan unsound.</p> <p>In July 2019 (ED85) – the Council wrote back to the Inspector clarifying that the above, at the time, would mean a shortfall from the 6600 target of 257. However, since February 2020, the Council has updated commitments and completions and their April monitoring figures suggested that the shortfall figure stood at just 80, due to higher than anticipated completions and permissions. Application reference 16/01260/OL (Land North Of Pilsley Road And West</p>

		<p>Of Coney Green Road (Plot L), Clay Cross) represents a significant development of 84 dwellings which has come about outside of the District Local Plan process and was not therefore “planned”. This eliminates the shortfall detailed above entirely and leaves a small surplus of 4 dwellings.</p> <p>Since 31st March 2020 there have been two further large developments approved on appeal which again fall outside of the District Local Plan process. These are:</p> <ul style="list-style-type: none"> <li>• Appeal Reference: APP/R1038/W/20/3251224 – Land South East of Williamthorpe Road and West of Tibshelf Road, Holmewood – 250 dwellings</li> <li>• Appeal Reference: APP/R1038/W/20/3244154 – Land North of 92 Chesterfield Road, Higham – 24 dwellings</li> </ul> <p>Taken together, the above amounts to a surplus of 278 dwellings on the full District Plan period housing target of 6600, providing the Inspector with ample justification to remove further Green Belt allocations from the emerging District Local Plan.</p> <p>In addition to the above, in MM/015, the Inspector also suggests that a further 660 houses at the former Coalite site could come forward during the District Plan period, none of which have been included towards meeting the housing requirement in the District Plan previously due to HS2 blight on the site. The Town Council request that these figures are included.</p> <p>It is strongly urged that the Inspector removes sites DR1 and DR2 from the District Local Plan allocations given the above justification.</p>
<b>MM/005</b>	Object, N	This Table should be updated to reflect planning permissions and appeal decisions up until 31 <sup>st</sup> December 2020 including the sites such as Clay Cross (84 dwellings), Holmewood (250 dwellings) and Higham (24 dwellings).
<b>MM/008</b>	Support, Y	The less prescriptive approach is welcomed.
<b>MM/009</b>	Support, Y	The increased emphasis on supporting and facilitating regeneration of level 1 towns is welcomed, however, this is not borne out by the continuing emphasis on release on Green Belt land for housing when there are opportunities for brownfield redevelopment within the town centre of Dronfield as referred to by the Town Council in their response to the Main Matters at the Hearing Sessions. The Governments White Paper ‘Planning for the Future’ reiterates the long standing requirement that the development potential of brownfield land is maximized.

		<p>The list of potential brownfield sites in Dronfield was submitted by the Town Council at that time and was also referred to in the Dronfield Neighbourhood Plan (Page 20, third aim to prioritise the use of brownfield sites for housing and other forms of development and Policy HOU1 which supports windfall housing within the existing urban area).</p> <p>The following brownfield sites represent immediate opportunities for development within the District Local Plan timescale.</p> <ul style="list-style-type: none"> <li>• Gladys Buxton, Dronfield North. 35 houses. Planning application being progressed.</li> <li>• The Talbot pub site, Gosforth Valley. 8 houses. Construction started.</li> <li>• Alma land, Dronfield North. 20 houses. Discussion have been held in the past with NEDDC but not completed.</li> <li>• Padley &amp; Venables land. 50-55 houses. Application put forward in the past. Not been used in more than 10 years.</li> <li>• Manor Farm car park. 6 houses. NEDDC have put advanced plans forward.</li> </ul> <p>Alternative sites put forward by residents for development through the NP is</p> <ul style="list-style-type: none"> <li>• Thorpe Avenue. Approximately 10-15 units. The owner is willing to build and has been in touch with NEDDC. (scrub land located very close to the built form of the town)</li> <li>• Wreakes Lane/Sheffield Road site approximately 70 -80 units, the developer is currently at an advanced stage of bringing an application forward with NEDDC.</li> </ul> <p>Since the NP was published, the following site has emerged for potential development</p> <ul style="list-style-type: none"> <li>• Miners Arms, Carr Lane, 8-12 units</li> </ul> <p>In total these sites would yield 201-239 dwellings. The Inspector is strongly urged to reconsider the approach to housing allocations in the Dronfield area given these opportunities which would support redevelopment/regeneration in the town.</p>
<b>MM/010</b>	Object. N	Should the recommendations by Dronfield Town Council be accepted and DR1 and DR2 (previously DR3) removed from the District Local Plan, the table should be updated to reflect this position.
<b>MM/015</b>	Support	The inclusion of 660 dwellings and associated facilities at the Coalite Priority Regeneration Area site in the District Local Plan is supported.

<b>MM/016</b>	Support	The inclusion of 660 dwellings and associated facilities at the Coalite Priority Regeneration Area site in the District Local Plan is supported.
<b>MM/026</b>	Object, N	Sites DR1, DR2 (previously DR3) should not be allocated in this District Local Plan and removed entirely from this table.
<b>MM/030</b>	Object, N	<p>The retention of this Green Belt site DR1 in the District Local Plan is unacceptable as the Council has not demonstrated the exceptional circumstances necessary for release of Green Belt land in this location.</p> <p>The site is unsuitable for development for the following reasons:</p> <ul style="list-style-type: none"> <li>• Development on this site continues to risk settlement coalescence between Dronfield and Unstone by reducing the historic gap between the settlements.</li> <li>• Access to the site remains unclear. An additional junction onto the main road could have safety issues which render it unviable. The Inspector 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.</li> <li>• The Unstone floods in 2019 demonstrated that there may be an issue: substantial flooding was noted in Unstone village 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.</li> <li>• The site is home to a number of wildlife species.</li> <li>• The site is still used as agricultural land</li> </ul> <p>Notwithstanding these reasons for removing the site from the District Local Plan, the site area shown in the modifications is larger than envisaged by the Inspector in her interim findings that required the Council to reduce the site to ‘two fields’. The Council in their response to this have asked that the site is larger than suggested by the Inspector to ‘round off’ the site and align more closely with the existing built development. The Inspector has agreed to a proposed boundary line for the site (ED79). The new site size is 6.52 hectares and with a density of 30 dwellings per hectare would yield 196 dwellings. However, MM/111 clarifies that an assumption should be made that 80% of site areas between 6 and 10ha will be considered developable. This would yield 156 dwellings. The Town Council object to the words ‘approximately 160 dwellings’ in the modified policy. Should the site remain in the District Local Plan it is essential for clarity that the proposed modified Policy DR1 should read ‘a maximum of 160 dwellings’.</p>

		<p>In addition, the design of the site should recognize the important ‘gateway’ location of the site and require that the design and layout of the site responds to this context in addition to taking account of the gradients already mentioned in the policy. More wording should be added to the modified policy to reflect this position, should the site remain in the District Local Plan.</p> <p>In conclusion, the site is less suitable than sites which have been taken out of the Plan and it is strongly urged that the site should be removed from the District Local Plan.</p>
<b>MM/031</b>	Support	The removal of this Green Belt allocation DR2 is supported
<b>MM/032</b>	Object. N	<p>The retention of this site in the District Local Plan is unacceptable as there are number of issues with this site still outstanding. The development of this site would have an unacceptable impact upon the vicinity of the site for a number of reasons –</p> <p>Topography: the site is on a steep slope with a steep bank between the site and Stubley Hollow which will make it difficult to develop. The hill side slope will have surface water run off implications which are likely to have an adverse impact on the valley bottom, Sheffield Road and the railway line.</p> <p>Access/traffic impact: Stubley Hollow is a narrow lane, not easily widened and with no on street parking, it is the main access road to Dronfield Woodhouse despite its width. There have been longstanding issues with HGV vehicles, particularly truck deliveries to the Gunstones Bakery on Stubley Lane. No detail has been provided as to an appropriate access point for the new housing.</p> <p>Viability: 40 units is not of economic size to justify the S106 receipts available to mitigate the impact of the development or make the infrastructure improvements required.</p> <p>Location: development of this site would result in the demise of the separation between Dronfield Woodhouse (formerly a separate parish) and the rest of Dronfield which would have an adverse impact on the historic context of the area.</p> <p>Recent and emerging housing sites will deliver new housing in the immediate locality of up to 30 units. (6 houses at the Hearty Oak pub, Northern Common; 8 houses at The Talbot located off Carr Lane; The Miners Arms which is currently up for sale or lease – 8 to 12 houses; 4 units being built on the Northern Common currently.)</p>

		In conclusion, the site is less suitable than sites which have been taken out of the Plan and it is strongly urged that the site should be removed from the District Local Plan.
<b>MM/033</b>	Comment	The removal of this Green Belt Allocation appears illogical when compared to the lack of merit of sites DR1 & DR2. The same arguments that the Inspector has used to remove this site from the District Local Plan could be applied to Dronfield sites.
<b>MM/111</b>	Support	The new paragraph gives more clarity on the yield expected from new allocated sites.
<b>MM/118</b>	Support	The safeguarding of land for education facilities is supported.

<p><b>Response to document D: Report on the Implications of the ONS 2018-based Household Projections on the objectively-assessed housing need in North East Derbyshire prepared by IcenI on behalf of the Council (ED101A)</b></p>	<p>Dronfield Town Council has the following comments to make on the IcenI Report:</p> <ul style="list-style-type: none"> <li>• 2018 ONS data suggests a higher level of population and household growth than predicted in 2014 or 2016. It sets baseline demographic need at 279 dwellings pa.</li> <li>• This is elevated to 293 dpa, in order to support “improved household formation amongst younger households”.</li> <li>• Due to higher levels of migration into the District recorded in the ONS 2018 figures, it is no longer necessary to “add on” the extra dpas to justify the ambitious economic growth scenario envisaged in the 2018 Submission version of the District Plan.</li> <li>• However, they are still applying a 10% uplift to support affordable housing delivery and therefore set the target as (293 + 10% =) 322 dpa</li> <li>• IcenI and the District Council suggest that it does not represent a “meaningful change” from the original target of 330. However, even the reduction of 8 dwellings per year</li> </ul>
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	<p>over the 20 year plan period (2014-34) is 160 dwellings and therefore it is strongly urged that DR1 should be removed from the emerging District Local Plan.</p> <p>The Town Council questions that the 10% uplift for affordable housing is justifiable. Iceni allude to Government planning advice suggesting that it is reasonable, but this overall uplift is unlikely to make a direct material difference on affordable housing delivery and it would be better to address that issue through policies and allocations within the District Plan itself to promote affordable housing.</p> <p>Iceni allude to the impact of Covid-19 on housing market activity but suggest it is too early to know by how much. There is a need for additional research on this point given that we are further on through the pandemic now and have a realistic understanding that Covid-19 will continue to have a significant impact until well into 2021. Covid-19 may also impact on migration rates due to less movement and impacts could be longer lasting (people wanting to stay closer to home, family, friends etc). Changing work patterns may also drive changes in the housing market with technology advances enabling more people able to work at home. This could therefore mean that C19 has an impact both on the delivery and the demand for new housing.</p>
<p><b>Response to Document F: Five Year Housing Land Supply Statement at adoption (updated data to 31 March 2020)</b></p>	<p>In the housing land supply documents, for both major and minor sites with planning permission, the District Council has taken the decision to “halve the site promoters’ anticipated completions in 2020/21 as a minimum precaution” due to Covid-19 (paragraph 11). There is little evidence to support this approach available as yet, but the housing supply and demand in the area and the wider region should be closely scrutinised by the District Council to see if the emerging trends support this approach.</p>

	<p>It is highly likely there will be a reduction in demand for employment sites such as office, retail and hospitality space (see reuse/redevelopment of pub sites in Dronfield). More brownfield sites or commercial buildings are likely to become available for housing or conversion in the near future due to the impact of Covid 19.</p>
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