

## **Dronfield Civic Society**

### **NEDDC Local Plan Response**

#### **1. Overview**

Dronfield Civic Society is a non-political voluntary organisation which is affiliated nationally to Civic Voice. The society has over 200 members including many local businesses and has over the last 27 years campaigned to enhance our local environment and supported development which meets this aim.

The Society responded to the last consultation in April 2015 and we are pleased to see a number of our response proposals are reflected in the draft local plan including our views on heritage, public transport, the station, car parking, support for local businesses, the need for small affordable housing units and the need to protect wildlife areas. We are also pleased to note that this plan builds on the recommendations of the 'Dronfield 2035 Vision for the Town' study which identifies street scene and public realm improvements which would enhance the town environment. We are however concerned that such plans are just window dressing without the resources or capacity to implement them.

We do strongly oppose the plans to build on Dronfield's Green Belt and our position as stated in our response to the 2015 iteration has not changed viz:

***Dronfield Civic Society supports the protection of green spaces and especially the narrow areas of green belt between Dronfield and Unstone and Dronfield and the Sheffield boundary. We regard such areas as sacrosanct and that they should be permanently protected from development. (LP 7)***

*The Housing White Paper 2017 states:*

*"1.39 Therefore we propose to amend and add to national policy to make clear that:*

- *Authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:*
  - *making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
  - *the potential offered by land which is currently underused, including surplus public sector land where appropriate;*
  - *optimising the proposed density of development; and*
  - *exploring whether other authorities can help to meet some of the identified development requirement.*
  
- *and where land is removed from the Green Belt, local policies should require the impact to be offset by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land. We will also explore whether higher contributions can be collected from development as a consequence of land being released from the Green Belt."*

**We do not consider that the Council has examined fully all other reasonable options.**

## 2. The Consultation Process

The Society has serious concerns about the consultation process and will raise these concerns in other fora. For example is a period of 6 weeks an adequate time to enable residents to comment on a 270 page plan and the supporting material which underlies the plan?

The plan is not accessible to the lay audience. It is only available on-line with hard copies in libraries and anybody requiring a hard copy is being charged £18 including postage.

The public consultation in Dronfield was very busy and many residents were unable to talk with planners.

Feedback from residents who did speak with planners or the one Labour district councillor present reported that the plan for Green Belt development came across as a 'done deal' and that lip service was being paid to the consultation.

There is an overwhelming feeling in the town that OUR local District Council is not listening and that politicians in power have absented themselves from dialogue with residents.

## 3. Vision and Objectives

The Local Plan Vision states

***'By 2033 everyone in North East Derbyshire will enjoy a high quality of life, with residents, businesses and visitors all benefiting from what the district has to offer' (3.3.)***

**The plan is in conflict with the objectives which are set out to achieve this vision. For example**

**D1** How is the objective of narrowing the gap between deprived and affluent areas achieved by building 860 additional houses in the most prosperous part of the District?

**D2** How is the objective of meeting skill shortages achieved by expanding Callywhite Lane to accommodate mainly storage, warehousing and distribution companies employing few people on low-skilled, minimum wage jobs?

**D3** How is the desire to increase tourism achieved by removing sections of Green Belt including existing recreation facilities such as an 18 hole golf course?

**D4 Sustainable Communities** The removal of sport and recreation facilities required in the plan is a threat to improving health and well-being as is the significant increase in traffic volume and exhaust pollution which would be a consequence of such a significant increase in Dronfield's population.

**D5** How can the Council ensure 'an adequate mix of housing types, sizes and tenure' in the new developments planned for Dronfield? For example following the call for housing land the developer, Redmiles, proposed 449 houses on land below Shakespeare Crescent (green belt plot g) in a plan indicating low density and larger houses which would sell at market value. Given developers' ability to

demonstrate that a reasonable proportion of affordable housing is unachievable commercially there is a significant risk that any new housing development in Dronfield will be mainly for sale at market prices.

**D6 Green Belt** The Council has not demonstrated the exceptional circumstances requiring the development in the Green Belt. It has not published a Brownfield Land Review and an Infrastructure Delivery Study has not been produced.

**D7 Settlement Identity** The current proposal for Dronfield threatens settlement identity by closing the Green Belt gap between Dronfield and Unstone.

**D8 Addressing Climate Change** This objective is in conflict with the plan to build 860 houses which will result in a significant increase in traffic and associated pollution.

**D10 Heritage Assets** The plan refers to the importance of Conservation Areas but includes no policies or actions to protect and improve such areas. The Council has no expertise in this area.

**D11 Natural Assets** This objective is clearly in conflict with the Green Belt proposals.

**D13 Local Amenity** The desire to protect local amenity again is in conflict with plans which remove local amenity such as green space and recreation facilities and impacts on existing high quality and accessible countryside.

**D14 Strategic Co-operation** Where is the evidence that such co-operation has taken place with neighbouring authorities of Sheffield or Chesterfield?

#### **4. Evidence Base**

We note that the plan is underpinned by several studies including a Growth Strategy, a Green Belt Review and the Strategic Housing Market Assessment. We are concerned about the absence of an Infrastructure Study and the absence of evidence of a comprehensive audit of suitable development sites other than those in the Green Belt. The lack of an Infrastructure Study which needs to look at the impact of 860 more housing units in Dronfield, where infrastructure is already under stress, is a serious weakness of the plan.

#### **5. Green Belt**

The plan argues that greatest demand for housing is in the north and that is where there is a shortage of development sites and is why green belt is required. These are the 'exceptional circumstances' which have to be demonstrated in order to release Green Belt land for development. In relation to Dronfield the plan states that the only way housing demand can be met is by building on the identified Green Belt sites. We would disagree.

As is acknowledged in the plan a number of the proposed Green Belt sites in Dronfield have some disadvantages and it is our view the Green Belt Review does not sufficiently take into account a number of impacts, including the visual impact, of the proposed Green Belt development sites.

### **g. Land off Shakespeare Crescent and Sheffield Road**

The rationale for removing this area from the Green Belt is that it is already bounded by housing on two sides and a third side is the main road to Chesterfield. It is owned by a developer who submitted proposals for residential development following the call for housing land in 2015/16. It is likely that any development by this company would be of medium priced housing for sale at a fairly low density. The visual impact of such a development would be dramatic, significantly closing the gap with Unstone. It would leave a one field gap to the neighbouring farms and converted barns, then the railway bridge, and then very quickly commercial buildings on the left and the proposed new housing on the site of the former Fleur-de-Lys public house on the right. The visual impact for people travelling by car or bus along the main road would effectively be of a continuous built up area on one side of the road.

### **h. Hallowes Lane**

The key arguments against this site on part of Hallowes golf course is that development would;

- remove recreational space,
- cause major challenges in terms of access
- exacerbate already dangerous traffic problems on Hallowes Lane which has no pedestrian path for much of its length and whose residents are already concerned about traffic speed and volumes
- impact on access to the local countryside,
- have a serious visual impact given its location on the summit of the hill and;
- affect the current club house which is a listed building

### **i. Land off Hill Top Road**

The plan notes that highway access is an issue at this site where 190 dwellings would have a major impact on existing roads without major work.

### **j. Land North of Eckington Road**

The removal of recreational space and the impact on the Moss Valley Conservation Area are noted in the plan as deficits for this site. The Moss Valley is an important recreational area for Dronfield as well as being high quality landscape. Any development close to this landscape will have a significant detrimental impact. The site stands in a prominent position and any development will be seen from the Moss Valley.

### **k. Stubley Drive and Stubley Hollow**

The plan acknowledges that highway access is an issue here.

## 6. The Spatial Strategy

**The spatial strategy is based on the sustainability principle following NPPF guidelines.** This states that development needs to be associated with sustainable communities which in North East Derbyshire are Dronfield, Eckington, Killamarsh and Clay Cross. A significant deficit in this proposal is the lack of any synergy in the plan with the largest sustainable community in North Derbyshire, Chesterfield. Figure 2.10 illustrates this point graphically. The hole in the middle is Chesterfield, the largest settlement which lies at the centre of our sub-region. Yet there is no attempt in the plan to articulate housing need and demand with Chesterfield. Why not?

Given that the housing need projections are based on the SHMA which was completed in 2013 and covered the three District Council areas of North Derbyshire and Bassetlaw **should not the NEDDC Local Plan show clearly how the proposed housing development in NE Derbyshire relates to similar proposals in Chesterfield and Bolsover?** For example Dronfield's southern boundary with Chesterfield is at Sheepbridge where any housing development can be seen to serve the greater Dronfield area. We are aware of existing planning permission for housing on one brownfield site there (the former boat yard) and the adjacent other brownfield sites have been identified as potential housing sites by Chesterfield Borough. Does the NEDDC plan take such sites close to Dronfield into consideration? The plan does not demonstrate co-operation with neighbouring authorities, which is necessary and important given that NE Derbyshire forms part of the greater Chesterfield area. This is a serious omission.

Similarly the need for housing in Dronfield is associated with the town's proximity to Sheffield and the fact that a significant proportion of Dronfield residents work in Sheffield. Does the local plan provide evidence of co-operation with Sheffield and the combined authority? Are there brownfield sites just over the Sheffield border which would serve the local and regional economy before removing Green Belt in Dronfield? Where is the evidence that these options have been vigorously explored?

We also note that the revised spatial strategy has shifted the balance of housing development from the south to the north of the District and were advised at the public consultation event on April 7<sup>th</sup> that a number of potential housing sites in the south of the district were 'undeliverable' due either to developer reluctance or other factors such as uncertainty over the route of HS2. This leads us to conclude that the decision to plan for 860 additional houses in Dronfield is driven by developers attracted by the relatively higher prices of houses here compared to other areas in the district.

## 7. Brownfield sites

The plan does not contain evidence of a review of brownfield sites alongside that of Green Belt sites. Following publication of new regulations in March 2017, Councils are required, from April, to produce and publish a Brownfield Sites register.

[http://www.legislation.gov.uk/ukxi/2017/403/pdfs/ukxi\\_20170403\\_en.pdf](http://www.legislation.gov.uk/ukxi/2017/403/pdfs/ukxi_20170403_en.pdf)

Within Dronfield such sites can be identified in Callywhite Lane (including the former Padley and Venables site) in the area of Holmley Bank and the Alma which was housing until the late 1960s and which is in Town Council ownership. There are also smaller sites within the town which we argue should be taken into consideration. An accumulation of developments on smaller sites could help meet housing requirements in a more sustainable manner.

## **8. Land in Public Ownership**

The recent Housing White Paper says Councils should look at their own property and land portfolio to identify land for housing. There are small plots on Church Street for example in Town Council ownership which would serve for small developments perhaps for older residents or as affordable housing. The stables behind the Library in NEDDC ownership are being developed for housing but at a relative low density which is unfortunate given the need for smaller affordable units. Consideration should be given to using the adjacent space, currently a car park also for housing. There is unused land on Fanshawe Bank close to the Civic Centre and we would suggest that as part of the neighbourhood planning process other sites may be identified in the town.

## **9. Recreation and green spaces**

Paragraph 7.6. notes that Dronfield is significantly lacking in green space, outdoor sports and childrens' play space therefore such space will need to be very strictly protected **yet the plan proposes building on the golf course and on the sports facilities in Coal Aston, and on farmland with access to the Dronfield Round Walk and in part of the Moss Valley Conservation Area.**

## **10. Employment**

Creating and developing local employment is one arm of the sustainable communities objective of the local plan. For Dronfield this means protecting and expanding the Callywhite Lane industrial area as a primary employment site alongside the Stubley/Wreakes Lane industrial estate. The Gunstones and Sheffield Road employment areas are regarded as secondary sites and have less protection from other development. The plan acknowledges that Callywhite Lane suffers from access difficulties (6.23) and suggests that electrification of the main line and HS2 will resolve this. It is not clear how and when this will happen.

Any solution to the access difficulties at the present junction with Green Lane and by building a new access link to the south will be costly major capital projects. Given the economic forecasts is it reasonable or sensible to assume such improvements will take place? Dronfield already suffers from the inadequate access to Callywhite Lane caused by HGVs negotiating the difficult junction. Any expansion without the access work taking place will exacerbate this.

Further, Callywhite Lane is currently under-occupied and has been for some time so why expand? The estate is also very badly managed or not managed at all and presents an unattractive working environment to potential new businesses.

Government is currently considering relaxing the restrictions on the use of employment land for other uses including housing. We urge the Council to review the plan for Callywhite Lane and revisit the potential for housing development where appropriate.

Has the Council had discussions with such companies as Gunstones and Dunhams which are both located within residential areas to determine whether in the period of this plan those companies might locate to more suitable sites in industrial and commercial areas so freeing land for housing?

The growth strategy indicates that a significant proportion of Dronfield's working population already commutes to Sheffield and to Chesterfield. The unattractiveness of Callywhite Lane to businesses as demonstrated by its long term under-use will not result in any significant growth of employment in the town and therefore the proposed housing expansion will lead to an increased volume of commuter traffic with the consequent impact on pollution and quality of life.

### **11. Dronfield Regeneration Framework (7.9)**

The Civic Society supports the regeneration framework plans based on the 'Vision for the Town' study which was based on a poorly-attended public consultation. The key themes and proposals (table 7.1) are all strongly supported. For example the Civic Society has initiated the Safer Roads for Dronfield Campaign which seeks to improve pedestrian safety and reduce vehicle speed and pollution. We like the proposed street scene improvements and support the objective of increasing rail travel by providing more parking at the station. At the same time we have experienced a total lack of willingness on the part of NEDDC senior politicians to engage with Dronfield Civic Society and Friends of Dronfield Station with regard to the station car park. We also observe that many of the objectives and plans of the regeneration framework lie outside the power and resources of NEDDC to implement them.

### **12. Conservation Areas (8.31 )**

We are disappointed that the policy on Conservation Areas (SCD5) and listed buildings (SCD6) in stating the statutory duties is passive. There is no attempt to propose dynamic policies which seek the enhancement of such areas or buildings or which intend to review and audit their current state. For example the Character Appraisals for the Dronfield, Coal Aston and Dronfield Woodhouse Conservation areas are now very out of date. They do not accurately reflect the current condition of those areas nor do they take account of research which has added to our knowledge of those areas. We appreciate that NEDDC has capacity issues in terms of the availability of qualified staff but we urge the council to act before it is too late to effectively protect already significant deterioration.

There is an opportunity through an increase in planning fees from July 2017 to provide additional resources in the planning department and these resources should be targeted at carrying out these reviews. Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places on local planning authorities the duty to draw up and publish proposals for the preservation and enhancement of Conservation Areas in their districts. Regularly reviewed appraisals identifying threats and opportunities can be developed into a management plan, which can in turn channel development pressure to conserve the special quality of the Conservation Area.

### **13. Sustainable Travel (Policy ID6)**

The work of the Safer Roads for Dronfield campaign demonstrates the strain Dronfield's road infrastructure is already under and that vital work is needed to prevent further deterioration of often residential roads, pavements and the historic town centre. Traffic surveys demonstrate the significant number of vehicles already in Dronfield and the damage that this is doing to the general environment of the town including the effect of fuel pollutants especially near schools and residential areas.

Any substantial new housing development as set out in the draft local plan will have an overwhelmingly negative effect on Dronfield's already very busy roads both within the town and leading in and out of the town. The proposals for 800+ houses around the town could lead to an estimated 1,600 extra vehicles on our roads (every new house built will potentially attract two vehicles). This would be unacceptable for the town and our residents, would be in conflict with the NPPF which states 'that encouragement should be given to solutions which suggest reductions in greenhouse gas emissions and reduce congestion', is also in conflict with a number of the stated objectives of the plan, and in our opinion amounts to a lack of care for our environment and a threat to the safety and health of our residents.

Dronfield Civic Society

March 2017