

Green Belt Topic Paper

Representation from the Committee of Dronfield Civic Society

1. Summary of Representation

The plan to develop on Green Belt Land in Dronfield, as proposed in the Green Belt Topic Paper, is not sound nor legally compliant and not compliant with the NPPF.

The Topic Paper:

- is based on an inflated housing need target, from an over-ambitious growth target.
- does not demonstrate the exceptional circumstances required by the NPPF.
- shows a lack of coherence with the economic strategy
- was published several weeks after the Local Plan, suggesting that it was retrospectively designed to accommodate the Plan's proposals to build on green belt land in the Northern parts of the District, including Dronfield.
- does not demonstrate a serious attempt to identify brownfield or other potential sites.
- identifies sites in Dronfield, which are inevitably on the outskirts of the Town and away from services, and each of which has significant problems.

2. Inflated Housing Target

The requirement to build 6,600 homes in the District in the Plan period, from which the proposal to build 475 houses on the Dronfield Green Belt flows, is excessive and based on an overoptimistic growth job-led scenario, with no full and comprehensive justification for that scenario. This scenario is based on growth levels which the Council admits would require "a level of policy intervention and support", with little detail on the proposed policy interventions the Council would actually undertake. The Council had ten different models of housing need and chose the one with the highest assessed need of 330 houses per annum, which is 20% higher than the next estimate and 66% higher than the smallest.

Also, the UK economy is also not performing well with the ONS saying "our initial estimate shows the UK economy growing at its slowest pace in more than five years, with weaker manufacturing growth, subdued customer-facing industries and construction output falling significantly".

3. Exceptional Circumstances

The Topic Paper acknowledges that there is no definition of what constitutes "exceptional circumstances" but also notes that the proposed revisions to the NPPF aim to reinforce the protection of Green Belt land.

The Paper notes the five tests for Green Belt land release:

- Acuteness/intensity of objectively assessed need.
- Constraints of supply/availability.
- Difficulties of achieving sustainable development without the use of Green Belt land.
- Nature and extent of harm to Green Belt.
- Extent of amelioration.

We have already demonstrated that the assessed housing need used in the Plan is excessive.

Constraints on the supply and availability of housing across the whole District are not adequately identified. The Topic paper actually identifies housing land supply across the whole of the District which would fulfil even the most optimistic housing target without the use of Green Belt land. The Topic Paper does not demonstrate that sustainable development can be achieved without the use of Green Belt land. The Sustainable Development Commission defines sustainable development as:

"Development that meets the needs of the present, without compromising the ability of future generations to meet their own needs".

The Plan assumes that the largest settlements in North East Derbyshire, including Dronfield, are the most sustainable because of their size and the infrastructure that supports current populations. However, no evidence is offered to support the assumption that settlement size must equate with settlement sustainability. Indeed, building on the edge of towns such as Dronfield cannot be described as sustainable development. It will put excessive pressure on already over-subscribed services, such as schools and health services and will result in an increased use of cars, increasing the carbon footprint, and will increase already identified problems with the local transport and roads infrastructure.

The harm to the Green Belt in Dronfield will be significant if the Plan proposals go ahead. The Coal Aston site is within the Moss Valley Conservation Area. The Shakespeare site would close the Green Belt gap with Unstone which, itself, is likely to see the gap to Chesterfield reduce as the Peak Resort develops, which will also have implications for Dronfield as a sustainable settlement.

In terms of amelioration, which is acknowledged as a requirement in the Paper, there is obviously no guarantee that such work will, in fact, take place

The Paper, therefore, does not satisfy the requirement to show that exceptional circumstances exist to release Green Belt land in Dronfield to satisfy housing need.

4. Lack of coherence with the economic strategy

There is a lack of coherence between the housing targets and employment growth projections, with major employment growth planned for the South and East of the District. The Paper argues for housing growth in Dronfield as a "sustainable settlement" but there are no plans to expand employment sites in Callywhite Lane, the Town's main employment hub, for the foreseeable future, if ever. Also, there is one major employment site on Callywhite Lane, which has been vacant for around fifteen years.

This lack of coherence casts further doubt on the need to build 475 houses in Dronfield.

5. Late Publication of the Green Belt Topic Paper

The Paper was published five weeks after the Local Plan and, therefore, the rationale for the use of Green Belt land for housing was not available for a significant part of the consultation period. This was a major omission and suggests that the justification for the "exceptional circumstances" test was developed after the Green Belt proposals were put forward in the Plan to justify decisions already made.

Whilst the extended consultation period on the Paper is welcomed to give residents the time to process the relevant evidence base and cross reference with the Plan, NEDDC states that the extended consultation period relates only to the Paper (plus two other documents published after the Plan had been produced). The Paper actually touches on many areas which are fundamental to the Plan and it is, therefore, impossible to separate consultations in this way.

6. Brownfield and other sites

There are some strategic brownfield sites with planning permission in the District-the Coalite site, The Avenue and the Biwater site where significant numbers (more than 1,200) of potential houses have not been included in the housing supply. There is little evidence that genuine thought has been given as to how to maximise the use of brownfield sites. In Dronfield itself only three developable sites, all small, are identified-land at the rear of Dronfield library, the former Fleur de Lys pub at Unstone and the Hearty Oak site at Dronfield Woodhouse. Other brownfield sites have been discounted. There are a number of sites, some in public ownership, which should be considered:

- the former Gladys Buxton School, where the building is in poor repair, and whose sole occupant is adult education classes, which are being housed elsewhere from September 2018. It is understood that the site will then be declared surplus to requirements by Derbyshire County Council.
- the Padley and Venables site on Callywhite Lane.
- the current Sheffield FC football ground.
- the Alma site, which was terraced housing until the 1960's. Although there is a covenant on the use of the land, a use which satisfies the terms of the covenant should be explored.
- other, small, sites in public ownership around the Town.
- brownfield sites just over the border in Chesterfield, which are much more sustainable than the Green Belt sites identified on the edges of Dronfield.

7. Proposed Dronfield Green Belt sites

NPPF 83 states that the Green Belt boundaries should only be altered in exceptional circumstances. The main purpose of Green Belt is to prevent urban sprawl, to prevent the merger of neighbouring towns and settlements and to safeguard the countryside from encroachment, to preserve the character of historic towns and to help with urban regeneration by the use of derelict land. We suggest that the proposed development on three sites in Dronfield goes against this purpose.

We object to the proposed developments:

- on Shakespeare Crescent because it would extend the urban sprawl closer to Unstone with almost continuous development from Dronfield to the Fleur de Lys site, is an unsustainable difficult site given its significant distance from all local services,

which would have a large impact on the local countryside with a loss of access, habitat and amenity.

- on Eckington Road because the site is in the Moss Valley Conservation Area close to a Site of Special Scientific Interest, close to ancient woodland with considerable visual impact and loss of amenity. Again the site is unsustainable as it lies some distance from key services such as GP surgeries, schools and large food stores. Approving this proposal would weaken, rather than strengthen the Green Belt boundary.
- Stubble Hollow because the site has severe access and ecological problems.

8. Conclusion.

For all the reasons set out above, we object to the Green Belt Topic Paper and contend that it is neither legal nor sound. It has not been positively prepared and is neither justified nor effective.