

**North East Derbyshire Local Plan
Publication Draft**

Representation Form

I write, on behalf of Dronfield Civic Society (Rep ID 10821), to object to the Publication Draft of the North East Derbyshire District Council's (NEDDC) Local Plan on the grounds that it is neither sound nor legal.

1. The Society's first ground for objection relates to the National Policy Planning Framework (NPPF), Point 155, on Early Collaboration which states;

"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."

This duty of the Local Authority has not been carried out in relation to Dronfield Civic Society, which has a planning remit within its constitution. It has not been approached for its views, comments or suggestions regarding the emerging Local Plan.

This is a failing of the requirement on engagement and early collaboration by NEDDC. Through last year's consultation on the Plan, Dronfield Civic Society submitted a considered and measured representation to NEDDC, based on the collective views of the Society's committee. We strongly objected to removal of land from the Green Belt. Our representation was wrongly recorded only as a comment on the Plan and not an objection. It is also not referenced on the on-line record of representations, where only those made on-line are recorded. Other planning authorities reference all submissions on their on-line system, including those which were made in writing as hard copy.

Evidence from voluntary bodies like the Civic Society in Dronfield demonstrates that NEDDC has not explored mechanisms for cross community participation in the Emerging Local Plan. This is contrary to the NPPF and, therefore, the Plan has not been positively prepared.

The Plan is not legally compliant and is not sound.

2. The Society's second area of objection to the Plan relates to the proposal to build 475 houses in Dronfield, all on the Green Belt.

We contend that the Plan does not demonstrate the exceptional circumstances required for releasing Green Belt land for housing development. Indeed, the Green Belt Topic Paper, which is intended to set out those exceptional circumstances has not been made available during the consultation- a major omission.

We believe that the methodology used to calculate the District's housing target is suspect and flawed and overestimates the number of houses needed. From that target flows the proposal to build 475 houses in Dronfield in the Plan period.

We also believe that alternative sources of housing supply, particularly brownfield sites, have not been rigorously pursued, with little evidence of research into potential other sites. We suggest there are three sites which should be examined-the Gladys Buxton Centre, the Padley and Venables site and the Sheffield FC football ground. There are also smaller brownfield sites within the town which contained houses and public houses until the middle of the last century and whose use would contribute to the improvement of the street scene in the Dronfield Conservation Area and other parts of the town.

We note that housing developments in the North of the District, like Dronfield, are not aligned with the economic strategy, as major employment growth is planned for the South and East of the District. Building houses on the Green Belt in Dronfield will lead to additional commuting, putting increased pressure on the transport infrastructure, which is already under strain, and increasing associated pollution.

We believe that the Plan is not sound and is not legally compliant.

3. Our third ground for objection to the Plan is around NEDDC's duty to cooperate with neighbouring local authorities and other statutory bodies in the production of its Plan. In order to be able to justify its Plan, NEDDC needs to be able to show that it has cooperated with Councils like Chesterfield and Bolsover, particularly in the area of housing numbers. There is little evidence of that in the Plan and the Statement of Compliance is not included in the evidence base. There are a number of brownfield sites either side of the border with Chesterfield, for example, at Sheepbridge and Hasland, which should be considered as sustainable and form part of a joint housing strategy with Chesterfield.

The Plan has not been positively prepared and is not sound nor is it legally compliant.

4. Our fourth area of objection is around the Infrastructure Delivery Plan. If building of houses on the scale proposed were to go ahead, which we believe should not happen, there will be great strain placed on Dronfield's physical infrastructure.

The road and rail systems will come under more pressure. The Safer Roads for Dronfield campaign has already identified the high volumes of traffic using the town centre and issues of school safety with parents using cars to and from school and contributing to higher pollution levels, these problems would be intensified by the proposed housing developments. Health and education facilities will need to be greatly enhanced. Local schools are already full and their sites could not accommodate additional buildings. There is nothing in the Plan showing concrete proposals to enable the infrastructure of Dronfield to cope with the proposed increase in housing and, therefore, population. This is a major weakness.

The Plan has, therefore, not been positively prepared and is neither sound nor legally compliant.

5. Our final area of objection relates to the Plan itself and NEDDC's consultation around the Publication Draft of the Plan.

The Plan is a very lengthy, dense document with much supporting evidence, which is not accessible to the lay public and, therefore, the Council should have allowed a sensible period for the consultation around the Plan and we contend that allowing only a six week consultation period is not sufficient. It is in conflict with the aims of the NPPF, in the introduction of which the Secretary of State observed "people have been put off from getting involved because planning policy itself has become so elaborate and forbidding-the preserve of specialists, rather than people in communities. This National Planning Policy Framework changes that".

We also contend that the Council's attempts at consultation were inadequate. Providing three hour drop in sessions at four locations around the District cannot seriously be regarded as adequate consultation around a Plan that will shape the future of North East Derbyshire until 2034.

The Plan is not legally compliant.

6. In summary, the committee of the Dronfield Civic Society maintains that the Publication Plan is neither sound nor legally compliant. It is not positively prepared, justified, not consistent with national policy, and has not demonstrated that the Duty to Cooperate has been met.

We come to this view for the reasons set out in each section above.

The single most important point that would help to make the Plan sound and legally compliant would be to remove the proposals for releasing land from the Green Belt for housing by revising the housing target, fully examining other options and having a less restrictive spatial strategy.