## ASHOVER PARISH COUNCIL

www.ashover-pc.gov.uk

Sara Atkinson PARISH CLERK The Sports Pavilion Milken Lane Ashover CHESTERFIELD S45 0BA TEL: (01246) 863018 E-mail: parishclerk@ashover-pc.gov.uk





06 April 2017

Helen Fairfax Planning Policy Manager North East Derbyshire District Council 2013 Mill Lane Wingerworth CHESTERFIELD S42 6NG

Dear Helen Fairfax

## North East Derbyshire Local Plan: Consultation Draft

Thank you for giving Ashover Parish Council the opportunity to comment on this important document. There is much in the draft Plan that we support. We are pleased to see that some of our concerns with the previous draft have been addressed.

Chapter 4 set outs the spatial strategy for the Plan in support of its overall aims and objectives.

It has at its heart ensuring that all new development makes a positive contribution towards the achievement of sustainable development. This is to be welcomed.

It then sets out a settlement hierarchy which forms the basis for taking forward the sustainable development aims and objectives of the Plan. All the mains towns and villages in the District have been classified into a settlement hierarchy as part of this.

The overall strategic approach as set out in the chapter is to concentrate development to the district's most sustainable settlements based on the Settlement Hierarchy, and to Strategic Sites in suitable locations that promote the re-use of previously developed land. We strongly support the principle of directing growth to the most sustainable locations.

Several settlements in Ashover Parish were considered as part of the Settlement Hierarchy. Ashover and Kelstedge have been identified as one of twenty plus communities as 'Settlements with Limited Sustainability', the third tier in the hierarchy. Alton, Littlemoor and Fallgate are identified as Level 4 Settlement. These are described as very small villages and hamlets with limited sustainability.

The draft Plan goes on to state that "there will be no housing allocations in Level 3 settlements (over and above existing commitments), although windfall developments of appropriate scale may be acceptable in line with criteria based Policy SS12 or an adopted Neighbourhood Plan. Adding "Level 4 Settlements are generally small in scale and lacking in services and facilities, there will be no allocations in these settlements. Development will be restricted to limited infill development to meet local needs, in line with criteria in Policy SS13 or an adopted Neighbourhood Plan".

The Parish Council is generally comfortable with the very modest scale of development suggested the identified settlements, as well as the Parish as a whole, as envisaged in the hierarchy and resulting district wide growth strategy.

It recognised that development can sometimes bring benefits, such as helping to support local services and facilities, and creating more diverse and mixed communities.

However, we support that the Parish and the settlements within it are neither a suitable or sustainable location for development other than small scale. It lacks the range of the social infrastructure required to sustain a larger community. Many of the limited services available in the Parish are under severe pressure. Further, the Parish has no rail service and an extremely limited bus service. This, coupled with lack of key services and local employment opportunities, means that travel by car is the overwhelming dominant mode of travel and significant development will undoubtedly result in more car journeys undermining national and local sustainability principles.

As you will be aware, the Parish Council, as reflected in the emerging Neighbourhood Plan, recognises the need for an appropriate level of housing development in Ashover Parish to meet the demands of its residents and contribute to the overall target for the District.

We previously raised concerns with regard to the level of growth the Plan had planned for the Parish in the first iteration of the draft Plan, which we did not consider to be appropriate, sustainable or justified, nor is it in accordance with the Draft Local Plan's growth strategy and sustainability principles underpinning national planning policy.

We consider that the growth strategy as it relates to Ashover Parish and set out in the draft plan to be more appropriate, in reflecting the level of infrastructure and its position as a rural community, located some distance from key employment and service centres. Turning to the report in more detail:

**Settlement Development Limits (para 4.26 onwards):** We welcome the proposal to develop Settlement Development Limits for the "settlements that fall within categories 1, 2 and 3 of the hierarchy settlement". Such limits can be a useful tool in distinguishing between areas where, in planning terms, development would be acceptable in principle such as in the main settlements and where it would not be (generally in the least sustainable locations) such as in the open countryside. We also welcome that they should not be introduced for the other less sustainable settlements in the District.

We note that it states that the revised settlement boundaries will be published alongside the Publication version of the Local Plan. We welcome clarification on the relationship between any Settlement Development Limits proposed as part of the development of a Neighbourhood Plan and those that will come forward as part of the development of the Local Plan. We would also welcome confirmation that any proposed changes to the Settlement Development Limits will be the subject of public consultation prior to their publication in the Publication Version of the Plan.

We also noted that Para. 4.79 states that further land outside Settlement Development Limits is not required to meet the development requirement of the Plan period, but Para. 4.80, however, states that these limits are being reviewed. To avoid any future tensions, the scope of the review should be clearly set out and at the earliest opportunity. The focus should be updating the boundaries to reflect the built-form rather than a wider review of development opportunities.

**Policy LC1 Housing allocations:** We note that while it states that "although historically windfalls have made a positive contribution to housing delivery in the District, an allowance has not been factored into the calculation of housing supply". We would strongly urge that an allowance should be made for 'windfalls'. These have, and will continue to make, an important contribution to housing delivery. In Ashover that majority of housing development that has taken place in the Parish has been in the form of 'Windfall Development.

**Policy LC3 Exception sites for Affordable Housing:** While we generally support the introduction of an exception sites policy, we are concerned with Policy as currently worded. Especially Para. 5.74 which states that it may be appropriate to allow a small element of market housing on exception sites. This may have unintended consequences and is contrary to the spirit and intent of the Policy. This clause should be removed.

**Policy SDC3 Landscape Character:** This policy is supported. As you will be aware this is an issue of some interest and importance to the Parish.

We welcome the references to the development of neighbourhood plans in the District and that key role in supporting and developing local and national planning policies.

I trust these points are useful, and if we can be of further assistance, please get in touch.

Yours sincerely

5. Atkinson

Sara Atkinson Parish Clerk