Consultation Responses
Dronfield Neighbourhood Plan
Submission Draft 2019

Respondents
1. Mr Alan Craw, Chesterfield CAMRA
2. Mr Joe Drewry, Environment Agency
3. Mrs Jane Singleton
4. Mr John Hinchcliffe
5. Ms. Alice Watson, Natural England
6. Mr John Hinchcliffe, Dronfield Civic Society
7. Mr Steve Freek, Highways England
8. Mr Paul Emms, Gladman Developments
9. Ms. Melanie Lindsley, Coal Authority
10. Mr Peter Gray, Coal Aston Village Hall CIO
11. Mr David Dale, DCC Economy Transport and Environment
12. Helen Fairfax, NEDDC

Respondent 1:
Mr Alan Craw, Chesterfield CAMRA

Response:
These are my comments on the plan:

ASSETS OF COMMUNITY VALUE

1. All those assets in appendix 3 should be listed as per The Coach & Horses in appendix 2 as should all pubs as it is too easy to close them.

2. POLICY C1 b) The viability assessment referred to should be “A rigorous viability assessment”. Furthermore, there is no test set out whereby as asset is assessed for formal listing. For pubs in particular this is necessary.

Respondent 2:
Mr Joe Drewry, Environment Agency

Response:

Dronfield Neighbourhood Plan: Submission Draft

Thank you for consulting the Environment Agency on the Submission Draft of the Dronfield Neighbourhood Plan. The Environment Agency previously responded to the town council with the following comments and we reiterate these comments below: The Environment Agency has the following comments

General Comments
We previously highlighted that it wasn’t clear whether the neighbourhood plan allocated site allocations. We welcome that the neighbourhood plan now explicitly states that there are no allocations within the plan.

Flood Risk
The River Drone runs through Dronfield and therefore there are parts of the Dronfield NHP area that are in flood zones. We note that flood risk has now been mentioned within the neighbourhood plan. Whilst no housing allocations have been suggested within the document, we would suggest that some mention of flood risk is added into the NHP document given there is a policy for future windfall sites. The currently submitted North East Derbyshire Local Plan contains flood risk policy SDC11 which could be referenced as well as the requirements of the National Planning Policy Framework (NPPF) and the Planning Policy Guidance (PPG) for development in the flood zones. This would ensure that any future development in the flood zones within Dronfield would have to have regard for the flood risk policies at both a national and local level.

Biodiversity
The Environment Agency welcomes the proposals to protect and enhance the green and blue infrastructure and biodiversity as mentioned in policy EN4: Ecology. Again reference could be made to the relevant Biodiversity policy within the submitted North East Derbyshire Local Plan.

Respondent 3:

Mrs Jane Singleton

Response:

Dronfield Neighbourhood Plan: Submission Draft

I write in support of the Dronfield Neighbourhood Plan. It accurately represents the views of residents gathered through a comprehensive, inclusive engagement process.

Objectives and Policies are clear, well-defined and well-related to the main issues and views of residents.

Whilst the DNP was criticised at the earlier consultation for non-compliance with the strategic policies in the NED LP, the findings in the Interim Report on the NED LP by Planning Inspector Sarah Housden, have demonstrated that the DNP more accurately represents what she views as being appropriate for Dronfield. This relates to policies about Green Belt, the number of houses and size of housing developments and the Callywhite Lane Extension or Regeneration Area.

The DNP supports the continued designation of the countryside surrounding the town of Dronfield as Green Belt. It recognises the importance of landscape character and local distinctiveness. This aligns with what residents want and value and it aligns with the view of Planning Inspector. The removal of one site allocated for 200 houses to retain openness and respect important views and vistas within a
quality landscape is in line with the DNP. It also maintains the views in the DNP about the importance of the Green Belt for settlement separation and the preservation of the natural environment and the Moss Valley Conservation Area.

The reduction in size of the Shakespeare Crescent site for smaller scale development means that the Inspector has seen fit to reduce Dronfield’s allocation from 475 dwellings in the NED LP to a figure somewhere around 160 dwellings over the plan period based on half the land area of DR1. (The land area indicated by the Inspector is actually much less than half of the 9.88 hectare site, so presumably less than half of the 235 houses) The de-allocation of this site in its entirety recognises the need to maintain the integrity of settlements like Unstone. It has not addressed the view that any development on this site which originally met all five purposes of GB designation could now be viewed as being urban sprawl into the countryside and setting a precedent for further development at a future time. A policy to prevent any loss of GB as in the DNP would strengthen resistance against developers seeking unreasonable land-take for profit at the expense of the countryside. The DNP is more closely aligned to national policy with regard to the protection of the Green Belt in the new NPPF.

Over the 15 years of the Plan, the reduction in the level of development for Dronfield proposed by the Inspector means that the town would continue to grow to a previous pattern of around 10-11 dwellings a year. The Inspector’s message is one of smaller scale development, a reduction in Green Belt land take, a preservation of those important views and vistas which retain settlement separation and distinctiveness which are all in line with the objectives and policies in the DNP.

The DNP recognises that local infrastructure is up to capacity, as are schools and medical facilities and that to remain sustainable, the town should grow in the way that it has over the last ten years, so that growth can be accommodated gradually. Current schools and medical facilities could probably accommodate pupils and patients at a trickle rate rather than what has been put forward in the NED LP which would have been at a rate of 75+ dwellings a year. That would have meant extensions to medical centres up to capacity and on non-extendable sites and similarly school buildings.

The DNP has recognised that the historic street pattern in the town is struggling to keep pace with the levels of traffic now upon it. It would be detrimental to current residents if this was increased at the levels proposed in the LP. The DNP has highlighted the need for improvements to junctions before the town can accommodate any further development and I support this.

The DNP prioritises brownfield development over greenfield sites, aligning with national policy. In terms of windfalls, the former Gladys Buxton School, approved for demolition in June, should be prioritised as an affordable housing location before any alteration of Green Belt boundaries and land take. That site could potentially deliver
a similar number of dwellings without the need for the DR1 site. The DNP is correct in its assumption that future growth can be accommodated in this way with a degree of confidence in the availability of future windfall sites and I support this strategy.

The DNP presents an accurate picture of the type and mix of housing that is required for Dronfield during the plan period to cater for elderly residents, to provide more starter homes and to provide more one and two-bed dwellings. This should take precedence over the Local Plan which allocates Green Belt sites on the edge of town, with extensive countryside views, at low density, on land with steep slopes which suggests suburban estate development of detached houses on large plots which is unlikely to be the sort of housing Dronfield needs. The DNP seeks to restrict urban sprawl into the countryside and I support that. Small windfall sites within the SDL should be prioritised and further sites have been put forward to NEDDC which have not been fully considered or allocated.

In terms of the economy of the town, the DNP does not support the extension to Callywhite Lane, because it would exacerbate the problems of congestion with more HGVs through the bottleneck of Dronfield Bottom close to the town’s Secondary School. Again this is in line with what the Inspector is suggesting in her Interim Report by requesting that the 6 hectare extension to Callywhite Lane should not be counted into the overall employment land availability. It does not represent ‘employment land’ in its current state and the NED LP offers no funding mechanism, delivery or timescale as to when or if ever it will be. There are existing vacant sites on Callywhite Lane without the need for extension of 6 hectares of unattractive and difficult land, topography issues and access requirements at unknown cost.

The DNP Heritage and Design chapter fully represents the value the community places on the town’s historic buildings and Conservation Areas. There is a clearer indication than in the NED LP what and where those features are and how to manage change appropriately. The Inspector in her Interim Report has stated that there has not been enough value attached to the Moss Valley Conservation Area in the LP because of the inappropriate allocation of the DR2 site whereas the DNP demonstrates and promotes the town’s heritage and environmental assets by retaining the current Green Belt boundaries.

The DNP is an excellent document. It is well-written, well presented, scoped appropriately, configured for lay people, clear and supported due to an inclusive engagement process. It accurately reflects the key issues and what is important to residents of Dronfield without political bias. The DNP should be adopted because it is now more aligned to the Inspector’s Interim Report which implies modifications to the NED LP will be required for soundness before adoption can take place.

Jane Singleton Resident of Unstone, Dronfield
Committee Member of Dronfield Civic Society
Member of the Dronfield Green Belt Residents’ Group

14/03/2019

Respondent 4:

Mr John Hinchcliffe

Response:

Dronfield Neighbourhood Plan-Submission Draft

1. The Plan is generally well laid out and presented and is easy to read and understand.

2. It will be interesting to see how the Plan goes forward, given the fact that "it is important to understand that while a neighbourhood plan can provide for more development than has been set out in an approved District Local Plan (in this instance North East Derbyshire Local Plan) for the District, it does not allow it to plan for less development".

3. The Plan’s Aims and Objectives, set out on page 8 of the Plan, are supported. I am particularly pleased to see the emphasis on protecting and, wherever possible, enhancing Dronfield’s green and open spaces and conserving Dronfield’s identity and celebrating the town’s heritage. Both these areas are put under threat by the current iteration of the Local Plan.

4. In the Community Assets section of Themes and Policies, on page 10, I note and support the concerns of the community in relation to health and education services, that increased housing definitely risks overburdening those services.

I find it disappointing that Dronfield Station is not listed as an Important Community Asset, the Station is valued by many people in Dronfield, although I note that the Station garden is listed as a Proposed Local Green Space.

5. I very much support the statement, in the Natural Environment section of the Plan, that "The Plan supports the continued designation of the countryside surrounding the town as Green Belt, with a strong presumption against development that would conflict with its openness". I note also the statement on page 14 of the Plan that "The primary purpose of the Green Belt is to " prevent coalescence of Chesterfield and Sheffield and to maintain the integrity of settlements in between"."

The development proposals in the Local Plan for the Shakespeare site would not have met this purpose. It is, therefore, pleasing to note the reduced development for the site set out in the Inspector's recent interim findings on that Plan,

6. In the Housing and Infrastructure section of the Plan, I note, and support, the Plan's aspiration to prioritise the development of brownfield sites above greenfield and Green Belt land, which echoes core planning principles in national policy. I also support the need for development to provide the right mix and scale
of housing, to meet the needs of Dronfield's population. Windfall housing development, mentioned in the Plan, can go a long way to meeting Dronfield's housing need. I strongly support the statement in the Plan that "It is imperative that development provides suitable infrastructure to cater for both immediate and future needs". The Local Plan is inadequate in the area of infrastructure.

7. The Transport and Access section of the Plan sets out clearly the issues surrounding the inadequacy of the transport infrastructure of the Town. It is much less clear about what is to be done about the current problems, particularly around the High Street and Church Street. This is an area where the Town Council could take a lead in creating a safer environment, particularly for pedestrians.

This section also includes sustainable transport, noting that Dronfield is the only town in North East Derbyshire with a railway station. It is disappointing, therefore, to see that the Plan does not mention improved rail links, both North and South from Dronfield, nor does it mention improving bus services.

8. In the Economy section, on page 30, in relation to the state of the town centre, mention is made of the Regeneration Framework for Dronfield and what it said of opportunities for improvements to the town centre and the Civic Centre. It would be interesting to hear what the Town Council plans to do to implement those opportunities?

It is noted that, on page 32, relating to Chesterfield Road and Dronfield Bottom, the Plan states that "the road can be seen as an important visual front for the town. Improving the quality of signage and commercial frontages would have a positive impact on the appearance of this area." I agree wholeheartedly with this statement. Again, what is to be done?

Page 34, on Business and Employment, mentions the proposed extension of the Callywhite Lane Industrial Estate and the various problems associated with that and the Plan does not support further expansion of the Estate. I support this view and note that the Inspector, in her interim findings on the Local Plan, seems to agree.

9. I very much support the Themes and Policies set out in Heritage and Design section of the Plan. We need to be ever vigilant to developments which threaten the heritage elements of our town.

In relation to our three conservation areas, it is important that the District Council does carry out a review in accordance with their statutory responsibility.

10. In conclusion, I support the Neighbourhood Plan as a clear document, setting out the issues and concerns of Dronfield residents. I hope it is adopted.

11. Please notify me of your decision on the Plan.

JGH 25/03/2019
Response:

RE: Submission of Neighbourhood Plan for Dronfield

Thank you for your consultation on the above dated 01 March 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Respondent 6:

Mr John Hinchcliffe, Dronfield Civic Society

Response:

Dronfield Neighbourhood Plan: Submission Draft

Dronfield Civic Society supports the Dronfield Neighbourhood Plan.

It is well-presented, clear and easy to read and understand. It accurately represents the views of residents gathered through a comprehensive, inclusive engagement process. Objectives and Policies are clear, well-defined and well-related to the main issues and views of residents.

The Civic Society, which has a planning remit within its constitution, was invited to assist during the early stages of the plan process and made particular contribution to the chapter about heritage.

The Aims and Objectives, set out on page 8 of the Plan, are supported. We support the emphasis on protecting and, wherever possible, enhancing Dronfield's green and open spaces, conserving Dronfield's identity and
celebrating the town's heritage. We feel that all these areas are compromised by the current iteration of the NED Local Plan.

Whilst the DNP was criticised at the earlier consultation for non-compliance with the strategic policies in the NED LP, the findings in the Interim Report on the NED LP by Planning Inspector Sarah Housden, have demonstrated that the DNP more accurately represents what she views as being appropriate for Dronfield. This relates to policies about Green Belt, the number of houses and size of housing developments and the Callywhite Lane Extension or Regeneration Area.

We agree with the DNP in supporting the continued designation of the countryside surrounding the town of Dronfield as Green Belt. This recognises the importance of landscape character and local distinctiveness. It aligns with what residents want and value and it concurs with the view of Planning Inspector. The removal of one Green Belt site (DR2) allocated for 200 houses in the Local Plan, to retain openness and respect important views and vistas is in line with the policies in the DNP. It also aligns with the views about the importance of the Green Belt for settlement separation, the preservation of the natural environment and the Moss Valley Conservation Area.

The reduction in size of the Shakespeare Crescent site (DR1) for smaller scale development means that the Inspector has seen fit to reduce Dronfield’s allocation from 475 dwellings in the NED LP to a figure somewhere around 160 dwellings over the plan period based on half the land area of DR1. (The land area indicated by the Inspector is actually much less than half of the 9.88 hectare site, so presumably less than half of the 235 houses) The de-allocation of this site in its entirety recognises the need to maintain the integrity of settlements like Unstone.

A policy to prevent any loss of GB as in the DNP will strengthen resistance against developers seeking unreasonable land-take for profit at the expense of the countryside. The DNP is more closely aligned to national policy with regard to the protection of the Green Belt through the new NPPF. We therefore support this statement in the Natural Environment section of the Plan: "The Plan supports the continued designation of the countryside surrounding the town as Green Belt, with a strong presumption against development that would conflict with its openness". We note also the statement on page 14 of the Plan: "The primary purpose of the Green Belt is to “prevent coalescence of Chesterfield and Sheffield and to maintain the integrity of settlements in between”. The development proposals in the Local Plan for the Shakespeare site would not have met this purpose.

In the Community Assets section of Themes and Policies, on page 10, we support the concerns of the community in relation to health and education services. Increased housing allocated in the Local Plan for Dronfield definitely
risks overburdening those services. We find it disappointing that Dronfield Station is not listed as an Important Community Asset. The Station is valued by many people in Dronfield, although we note that the Station garden is listed as a Proposed Local Green Space.

In the Housing and Infrastructure section of the Plan, we support the Plan's aspiration to prioritise development on brownfield sites, before any greenfield and Green Belt land, which echoes core planning principles in national policy.

We agree with the DNP in terms of windfall development as being the way that Dronfield can grow sustainably. Opportunities like the former Gladys Buxton School site, approved for demolition in June, should be prioritised as an affordable housing location before any alteration of Green Belt boundaries and land take. The DNP is correct in its assumption that future growth can be accommodated in this way with a degree of confidence in the availability of future windfall sites and we support this strategy. Small windfall sites within the SDL should be prioritised and brownfield sites have been put forward to NEDDC which have not been fully considered or allocated.

We also support development which provides the right mix and scale of housing, to meet the needs of Dronfield's population. The DNP presents an accurate picture of the type and mix of housing that is required for Dronfield during the plan period to cater for elderly residents, to provide more starter homes and to provide more one and two-bed dwellings. This should take precedence over the Local Plan which allocates Green Belt sites on the edge of town, with extensive countryside views, at low density, on land with steep slopes which suggests suburban estate development of detached houses on large plots which is unlikely to be the sort of housing Dronfield needs. The DNP seeks to restrict urban sprawl into the countryside and we support that.

We strongly support the statement in the Plan that "It is imperative that development provides suitable infrastructure to cater for both immediate and future needs". The Local Plan is inadequate in the area of infrastructure and the Inspector is requesting more detail about the costing and deliverability of the Callywhite Lane/Green Lane junction and the Bowshaw Roundabout prior to any large scale development as allocated in the LP.

The DNP has recognised that the historic street pattern in the town is struggling to keep pace with the levels of traffic now upon it. It would be detrimental to current residents if this was increased at the levels proposed in the LP. The DNP has highlighted the need for improvements to junctions before the town can accommodate any further development and we support this.

This section of the Plan also covers sustainable transport and notes that Dronfield, the only town in North East Derbyshire with a railway station, has the highest potential for sustainable transport in the District. The Plan should,
therefore, be supportive of improved rail links from Dronfield, North (to Sheffield, Leeds and Manchester) and South (to Chesterfield and Nottingham) and improved bus links to the station and to neighbouring towns and cities. This would lead to a reduction in car journeys and, therefore, emissions.

There is a degree of weakness in both the LP and the DNP with regard to the proposals for the regeneration of the town centre. We feel that much is merely window dressing. There should be policies to improve the market offer and reduce the number of charity shops. Dronfield’s rich heritage could rejuvenate the town centre particularly with improvements to the public realm from The Forge up the High St to the Manor House and this should be part of the Regeneration Framework. We would be very happy to work with Dronfield Town Council on a heritage-led regeneration of the town.

It is noted that, on page 32, relating to Chesterfield Road and Dronfield Bottom, the Plan states: "The road can be seen as an important visual front for the town. Improving the quality of signage and commercial frontages would have a positive impact on the appearance of this area." We agree wholeheartedly with this statement, yet enforcement is weak and policies are lacking with regard to shop front design, colour, appropriate signage and style, with some businesses letting the area down badly.

The Business and Employment chapter on Page 34, mentions the proposed extension of the Callywhite Lane Industrial Estate and the various problems associated with that. The DNP does not support further expansion of the Estate. We support this view and note that the Inspector, in her interim findings on the Local Plan, seems to agree. Any extension to Callywhite Lane, would exacerbate the problems of congestion with more HGVs through the bottleneck of Dronfield Bottom close to the town’s Secondary School.

We very much support the Themes and Policies set out in Heritage and Design section of the Plan. We need to be ever vigilant to developments which threaten the heritage elements of our town.

In relation to our three conservation areas, it is important that the District Council does carry out a review in accordance with their statutory responsibility. Character Appraisals for each Conservation Area should be updated. The DNP Heritage and Design chapter fully represents the value the community places on the town’s historic buildings and Conservation Areas. There is a clearer indication than in the NED LP what and where those features are and how to manage change appropriately. The Inspector in her Interim Report has stated that there has not been enough value attached to the Moss Valley Conservation Area in the LP because of the inappropriate allocation of the DR2 site whereas the DNP demonstrates and promotes the town’s heritage and environmental assets by retaining the current Green Belt boundaries.
The Transport and Access section of the Plan sets out clearly the issues surrounding the inadequacy of the transport infrastructure of the Town. It is less clear about what is to be done about the current problems, particularly around the High Street and Church Street. This is an area where the Town Council could take a lead in creating a safer environment, particularly for pedestrians.

The DNP is an excellent document. It is well-written, well presented, scoped appropriately, configured for lay people, clear and supported due to an inclusive engagement process. It accurately reflects the key issues and what is important to residents of Dronfield without political bias. The DNP should be adopted because it is now more aligned to the Inspector’s Interim Report which implies that modifications to the NED LP will be required for soundness before adoption can take place.

Dronfield Civic Society Statement 21/03/2019

Respondent 7:

Mr Steve Freek, Highways England

Response:

Consultation on the Dronfield Neighbourhood Plan

Highways England welcomes the opportunity to comment on the Dronfield Neighbourhood Plan which covers the period 2016 to 2034. It is noted that the document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Dronfield Neighbourhood Plan, Highways England’s principal interest is safeguarding the M1 which routes 7 miles to the east of the Plan area.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Dronfield is required to be in conformity with the emerging North East Derbyshire (NED) Local Plan (2014-2034) and this is acknowledged within the document.

We note that Dronfield is defined as a Level 1 Town in the emerging NED Local Plan and therefore is expected to accommodate further development in addition to existing commitments and windfall developments.
Highways England was consulted in August 2018 by the Parish Council on the draft Pre-Submission version of the Dronfield Neighbourhood Plan. Our response to this consultation concluded that despite the allocation of 475 dwellings, due to the location of the Neighbourhood Plan area it was not considered that there will be any impacts on the operation of the SRN. Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ Highways England Company Limited registered in England and Wales number 09346363

Following review of the updated Neighbourhood Plan, there are no significant changes to the details provided in the August 2018 consultation documents with regards to potential implications on the operation of the SRN.

Highways England’s position therefore remains unchanged, and we have no further comments to provide, and trust the above is useful in the progression of the Dronfield Neighbourhood Plan.

Respondent 8:

Mr Paul Emms, Gladman Developments

Response:

This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Dronfield Neighbourhood Plan (DNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman requests to be added to the Council’s consultation database and to be kept informed on progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the DNP must meet are as follows:

(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.

(d) The making of the order contributes to the achievement of sustainable development.

(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper.

Paragraph 214\(^1\) of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Given the submission date of Dronfield Neighbourhood Plan, the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2012.

National Planning Policy Framework (2012) and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the of latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

1 National Planning Policy Framework, paragraph 214

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing
neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying body’s anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the DNP’s ability to meet basic condition (a) and (d) and this will be discussed in greater detail throughout this response.
**Relationship to Development Plan**

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

The adopted development plan relevant to the preparation of the Dronfield Neighbourhood Plan area, and the development plan which the DNP will be tested against is the North East Derbyshire Local Plan (NEDLP). This document was adopted in November 2005 and set out the visions, objectives, spatial strategy and overarching policies to guide development in NE Derbyshire from 2001 to 2011.

The emerging Local Plan (Inspector has issued her Interim findings following hearings) sets a housing requirement of 6,600 dwellings between 2014 and 2034 (330 dpa).

With this in mind and given that NE Derbyshire Council have an uncertain 5-year supply, Gladman suggest sufficient flexibility is provided in the policies of the plan to safeguard the DNP from conflicting with future development proposals should they be required.

**Dronfield Neighbourhood Plan**

This section highlights the key issues that Gladman would like to raise with regards to the content of the DNP as currently presented. It is considered that some policies do not reflect the requirements of national policy and guidance and, as such, Gladman have sought to recommend a series of alternative options that should be explored.

**Policy ENV1 – Green Belt**

Policy ENV1 supports the continued designation of the countryside surrounding Dronfield as Green Belt land and seeks to ensure a strong presumption against development that would conflict with the purposes of the Green Belt. As currently drafted the policy is a replication of both local and national policy, therefore its continued inclusion within the DNP is unnecessary. Notwithstanding this, Gladman are concerned that the policy in its current form does not accurately reflect the Local Authority’s position with regards to the Green Belt land surrounding Dronfield. The emerging NEDLP allocates three parcels of Green Belt land surrounding Dronfield to be released for residential development. If, as anticipated the NEDLP is adopted prior to the examination of the DNP, without reference to and support of these allocations it is highly likely that the DNP will be found to be contrary to basic condition (e).

However, if the NEDLP examination encounters an unexpected delay and as a result the DNP is examined prior to the adoption of the NEDLP, in not including a
reference of support to these allocations this policy would be superseded by

Policy ENV5: Local Green Spaces

This policy seeks to designate forty eight parcels of land as Local Green Space
(LGS). In order to designate land as LGS the Parish Council must ensure that it
is able to demonstrate robust evidence to meet national policy requirements as
set out in the Framework. The Framework makes clear at §76 that the role of
local communities seeking to designate land as LGS should be consistent with
the local planning of sustainable development.

§76 states that:

‘Local communities through local and neighbourhood plans should be able to
identify for special protection green areas of particular importance to them. By
designating land as Local Green Space local communities will be able to rule out
new development other than in very special circumstances. Identifying land as
Local Green Space should therefore be consistent with the local planning of
sustainable development and complement investment in sufficient homes, jobs
and other essential services. Local Green Space should only be designated
when a plan is prepared or reviewed, and be capable of enduring beyond the end
of the plan period.”

Further guidance is provided at §77 which sets out three tests that must be met
for the designation of LGS and states that:

‘The Local Green Space designation will not be appropriate for most green areas
or open space. The designation should only be used:

a) where the green space is in reasonably close proximity to the community it
serves;

b) where the green space is demonstrably special to a local community and
holds a particular local significance, for example because of its beauty, historic
significance, recreational value (including as a playing field), tranquillity or
richness of its wildlife; and

c) where the green area concerned is local in character and is not an extensive
tract of land.’

The requirements of the Framework are supplemented by the advice and
guidance contained in the PPG. Gladman note §007 of the PPG8 which states,

‘Designating any Local Green Space will need to be consistent with local
planning for sustainable development in the area. In particular, plans must
identify sufficient land in suitable locations to meet identified development needs
and the Local Green Space designation should not be used in a way that
undermines this aim of plan making.’

Gladman further note §015 of the PPG (ID37-015) which states, ‘§100 of the
National Planning Policy Framework is clear that Local Green Space designation
should only be used where the green area concerned is not an extensive tract of
land.

Consequently, blanket designation of open countryside adjacent to settlements
will not be appropriate. In particular, designation should not be proposed as a
‘back door’ way to try to achieve what would amount to a new area of Green Belt
by another name.’

Designation of LGS should not be used as a mechanism to designate new areas
of Green Belt (or similar), as the designation of Green Belt is inherently different
and must meet a set of stringent tests for its allocation (§135 to 139 of the
Framework).

Gladman do not believe the DNP supporting evidence is sufficiently robust to
justify the proposed allocation of land to the rear of 33-47 Gosforth Drive (site 37:
‘Telly Tubby Hill’) as LGS. The issue of whether LGS meets the criteria for
designation has been explored in a number of Examiner’s Reports across the
country and we highlight the following decisions:

- The Sedlescombe Neighbourhood Plan Examiner’s Report³ recommended the
deletion of an LGS measuring approximately 4.5ha as it was found to be an
extensive tract of land.

- The Oakley and Deane Neighbourhood Plan Examiners Report⁴ recommended
the deletion of an LGS measuring approximately 5ha and also found this area to
be not local in character. Thereby failing to meet 2 of the 3 tests for LGS
designation.

- The Alrewas Neighbourhood Plan Examiner’s Report⁵ identifies both proposed
LGS sites ‘in relation to the overall size of the Alrewas Village’ to be extensive
tracts of land. The Examiner in this instance recommended the deletion of the
proposed LGSs which measured approximately 2.4ha and 3.7ha.

2 PPG §15 Reference ID: 37-015-20140306
3 http://www.rother.gov.uk/CHttpHandler.ashx?id=22996&p=0
4 https://www.basingstoke.gov.uk/content/doclib/1382.pdf
5 https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-
policy/Neighbourhoodplans/ Downloads/Alrewas/Alrewas-Neighbourhood-Plan-
Examiners-Report.pdf
Highlighted through a number of Examiner’s Reports set out above and other ‘made’ neighbourhood plans, it is considered that land to the rear of Gosforth Drive has not been designated in accordance with national policy and guidance and subsequently is not in accordance with the basic conditions.

Whilst the Parish Council have sought to undertake some form of evidence base it does not overcome the failure to meet the specific policy requirements set out above with regards to the scale of land to be designated and therefore the proposed designation of ‘Telly Tubby Hill’. In terms of meeting the second test there is no evidence base to support that this field is ‘demonstrably special to a local community.’ In relation to its beauty, it is not of any particular scenic quality. The designation of ‘land to the rear of Gosforth Drive’ has not been made in accordance with basic conditions (a) and (d). Gladman therefore recommend that Site 37 be deleted as an LGS in its entirety.

**Policy D2: Dronfield Character Buildings and Structures of Local Heritage Interest**

D2 effectively creates new, artificial historic ‘settings’ surrounding the “character buildings and structures of local heritage interest” in Dronfield Parish, where development will be allowed under more onerous conditions than otherwise. It should be noted that the list of heritage assets contained at Appendix 5 are not all listed buildings, nor are all recorded ostensible assets within a conservation area. The setting of heritage assets is discussed at NPPF paragraphs 190 and 194, whilst definitions are provided in the NPPF Glossary. Here, the NPPF states that the Setting of a Heritage Asset “is not fixed and may change as the asset and its surroundings evolve”.

In order to understand the historic importance of these new locally listed assets and their respective settings, one would expect a heritage assessment to have been prepared to justify their inclusion. The evidence base contains no justification for the imposition of such designations.

Policy D2 is therefore clearly contrary to the NPPF in attempting to define buildings which are not considered to be a heritage asset and therefore in conflict with basic condition (a).

**Policy D3 – Good Design**

Gladman are concerned that some of the criterion in the policy are overly prescriptive and could limit suitable sustainable development coming forwards. Gladman would expect more flexibility to have been provided in the policy wording to ensure high quality residential developments are not compromised by overly restrictive criteria. We suggest regard should be had to paragraph 60 of the previous Framework which states that;
“Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles”

Housing and Infrastructure Chapter

Gladman would like to raise general objections with regards to the ‘Housing and Infrastructure’ chapter of the DNP. In the submission version the DNP continues to fail to address the Local Authority’s position in the emerging NEDLP with regards to housing allocations and requirements in the neighbourhood plan area.

Gladman are particularly concerned with page 20 of the DNP which states ‘It is considered that the town is not a suitable and sustainable location for the scale of development proposed’. Gladman are unsure exactly how the Town Council have come to this conclusion, especially as Dronfield has been identified within both adopted and emerging local planning documents as a highly sustainable settlement. This position is clarified in paragraph 7.4 of the emerging NEDLP which states; ‘The Local Plan aims to direct new growth to the district’s most sustainable settlements…. Dronfield is the largest of the four towns within the district and is an area of high demand for growth.’ Accordingly, Gladman suggest this element of text is removed from the DNP before it is made.

Further to this we note in paragraph 54 of the DNP that the Town Council does not support the housing allocations in the Green Belt, of which there are three in the emerging NEDLP. Gladman suggest that this aspect of the DNP is not in general conformity with the emerging NEDLP.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relationship of the DNP, as currently proposed, with the requirements of national planning policy and the strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.
Respondent 9:
Ms. Melanie Lindsley, Coal Authority

Response:

Dronfield Town Neighbourhood Plan

Thank you for the notification of the 1 March 2019 consulting The Coal Authority on the above NDP.

The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.

As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.

According to the Coal Authority records there are recorded risks from past coal mining activity in the area including; mine entries, recorded and unrecorded coal workings at shallow depth and surface mining activity.

However, we note that the Neighbourhood Plan does not allocate any sites for development and therefore we have no specific comments to make.

Respondent 10:
Mr Peter Gray, Coal Aston Village Hall CIO

Response:

I've just been made aware that Coal Aston Village Hall is referred to as ‘Community Centre’ in the Draft Neighbourhood Plan, Appx 41

Since the reopening of The Hall after rebuilding, effective 2000, the building is titled Coal Aston Village Hall.

We are a registered charity Coal Aston Village Hall Cio. No. 1164059

Please amend the tile and any relevant details withing the Neighbourhood Plan

Respondent 11:
Mr David Dale, DCC Economy Transport and Environment
Response:

Localism Act 2011 – Strategic Planning Comments

Dronfield Neighbourhood Plan 2016 - 2034:

Submission Draft

Thank you for consulting Derbyshire County Council (DCC) on the Dronfield Neighbourhood Plan 2016 – 2034: Submission Draft (DNP). The comments below are DCC’s Member and Officers’ technical comments with regard to the natural environment, housing and infrastructure, transport and access, economy, heritage and design, and public health aspects of the Plan.

Local Member Comments

Councillors Alex Dale and Angelique Foster, the Local County Council Members for Dronfield East and Dronfield West & Walton respectively, have been consulted. To date, no comments have been received, but if I receive any I will forward them to you.

Officer Comments

General

Consultation
It should be noted that whilst DCC’s Commissioning, Communities and Policy Department was consulted on the Pre-Submission Version of the DNP, this is the first opportunity that DCC’s Economy, Transport and Environment Department has had to make formal comments on the Plan.

Plan Preparation
A key matter that stands out is that the DNP is very well supported and informed by a wide range of evidence and studies (and a public consultation exercise) as set out on page 51: ‘Evidence Base’. These are used throughout the Plan to justify the aims and provide for a robust policy approach. It is also welcomed that the Plan includes a wide range of issues that have been deemed to be important to the local community.

Page 7 acknowledges that the preparation of the DNP has been informed by a range of specialist advisors (see Appendix 1 of the document) who have made presentations to the Steering Group. It is welcomed that this includes representatives from Derbyshire County Council’s Planning Department and Transport Policy and Programmes Section. It is pleasing to see that all the suggested matters have been included in the Plan, particularly Green Belt, housing, employment and highways and accessibility matters.

General Data Protection Regulation (GDPR)
The DNP includes a number of images of people, including children, who are clearly recognisable. DCC would ask whether or not consent been given for their use, and if so is it recorded anywhere? Has a privacy impact assessment been undertaken?

Layout
DCC would suggest that the policies should be identified in the ‘customary’ bold text (in a text box?) in order to clarify what is policy and what is supporting text.

**Colouring**

The colour palette for the graphs (pages 9 and 13 particularly) makes reading the information difficult; interpretation has to be based on assumption rather than a clear depiction of the information. There is room to label each column. DCC would also suggest that the maps would benefit from a ‘mono’ background, to improve the clarity of the notation.

**Climate Change**

Neighbourhood Plans provide an opportunity for local communities to influence development in their area and it is through such influence that national policy can be implemented, for example the achievement of climate change/greenhouse gas reduction targets. There are only minor comments about energy and none about climate change or dark skies. DCC would suggest, therefore, that the Plan should place more emphasis on these issues, notably renewable energy, buildings fit for future climate change, and dark skies.

**Natural Environment**

**Green Belt**

Dronfield is heavily constrained by strategically important Green Belt which is very narrow, particularly to the north and south of the town, and has the primary purpose of preventing the coalescence of the urban area of Sheffield with Chesterfield and the settlements in between including Dronfield, Eckington and Killamarsh. Green Belt is the primary constraint that impacts on the future growth potential of the town of Dronfield. It is welcomed and supported, therefore, that Green Belt is given prominence in the DNP and that the Plan includes an appropriate Policy ENV1 which supports the continued designation of Green Belt surrounding the town and that there will be a strong presumption against inappropriate development that would conflict with the purposes of the Green Belt or adversely affect its open character. This policy and the supporting text is compliant with the requirements of the National Planning Policy Framework (NPPF).

Appropriate reference is made to the fact that the North East Derbyshire Local Plan Submission proposed the de-allocation of three areas of Green Belt on the edge of Dronfield for allocation as proposed new housing sites, which may result in a significant change to the Green Belt boundary. Detailed consideration was given to these allocations at the Local Plan Examination hearings in November 2018, which were subject to considerable opposition from the local community in Dronfield. Although not reflected in the Green Belt Section supporting Policy ENV1, this opposition is set out in the Housing and Infrastructure Section on page 20.

**Policy ENV5: Local Green Spaces**

This refers to ‘very special circumstances’ required to justify development on these local green spaces. There is no indication in the DNP as to what those circumstances are although in the National Planning Policy Framework (NPPF), February 2019 it is stated that ‘Policies for managing development within a Local Green Space should be
consistent with those for Green Belts’ (paragraph 101). NPPF paragraph references (99 – 101) should be added to both the policy and the supporting text (The NPPF is referenced by title only in Appendix 7).

Housing and Infrastructure

Housing
In the context of comments above on the Green Belt, it is noted that page 20 of the DNP indicates that the Plan does not allocate land for housing. This is despite the fact that the preceding paragraphs set out the Plan’s opposition to Green Belt release, primarily on the basis of the view that ‘there are alternative suitable and sustainable locations elsewhere in the District, which could accommodate this housing growth’. It is considered that the DNP might have missed an opportunity to be proactive and seek to identify sites within the Parish that may be suitable for housing.

Policy HOU2: Housing Mix
The policy refers to the provision of smaller (2 bedrooms or less) dwellings suitable for young families, the disabled... should be encouraged. A ‘Building for Life’ (BfL) approach would be preferable, resulting in a mix of housing types and tenures to cater for a wide range of circumstances, but all accessible or capable of adaptation without the need for structural alteration. It should be noted that people with disabilities may also have large families and small dwellings may therefore be inappropriate.

Policy HOU3: Affordable Housing
It is welcomed and supported that the DNP has included a comprehensive section and a policy on affordable housing, which has been a long-standing issue for the town and for which there has been an acute shortage of affordable housing, caused not least by the shortage of available housing land and historic low delivery rates. There is a general requirement in the submission Local Plan for 40% of new housing sites on sites of 0.5ha to be provided as affordable units and it is pleasing to see that the DNP (page 23) supports this approach, which will be key to addressing the affordability issue in Dronfield.

The policy states that “nomination rights will normally be expected to give priority to applicants with strong local connections to Dronfield town i.e…. “. DCC would suggest that the policy should identify the criteria clearly rather than give an indicative elaboration of the meaning of ‘strong local connection’, and be written as a policy not as a suggested approach.

Policy HOU4: Infrastructure for New Housing and Other Forms of Development
The policy states that infrastructure required for new development must be in place before the granting of planning consent for that development; this includes road capacity, cycle routes, health and education services, recreational open space and utilities service infrastructure. However, these issues are dealt with as a result of planning consent and can be conditioned to be implemented prior to the development. They cannot be required as a precursor to planning consent. The policy should be omitted or the first paragraph re-worded to state that: “Additional infrastructure needs arising as a result of planning consent may be addressed through the use of planning conditions, where necessary…”
Policy HOU5: Developer Contributions
The NPPF (2019) states that ‘Plans should set out the contributions expected from development’. Section 106 contributions are governed by the Community Infrastructure Levy Regulations 2010 (as amended) and require that any request for funding meets the three tests as outlined in Section 122 (2) of the Regulations, namely that:

A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—
(a) necessary to make the development acceptable in planning terms;
(b) directly related to the development; and
(c) fairly and reasonably related in scale and kind to the development.

A number of the priority areas identified within the text supporting this policy are outside the remit of the Town Council and as such any pre-application engagement should only be for elements over which the Town Council has jurisdiction. For the other priority areas identified, contributions would be highlighted by the relevant infrastructure providers either at the pre-application stage or through the formal consultation process.

Transport & Access
DCC would suggest that the initial findings of the Planning Inspector (letter dated 18 February 2019 on the North East Derbyshire Local Plan Examination) on ‘Infrastructure’ - see below - should be taken into account in the Plan.

Infrastructure
‘21. Main Matter 7 covered the infrastructure necessary to support new development, including highway schemes. The Infrastructure Delivery Plan includes improvements to the approaches to the A61 Bowshaw Roundabout and at the B6057 Green Lane/Callywhite Lane junction in Dronfield but the deliverability and cost of the required junction improvements are not clear. This creates considerable uncertainty over the scale of developer contributions that would be sought with individual planning applications and the impact on scheme viability. I would like the Council to confirm with the necessary evidence that these schemes are deliverable with likely costs’.

Policy T&A1: Highways
DCC would suggest that the issues raised in the preamble to the policy and the policy itself are covered by the paragraph 111 of the NPPF and Policy ID1: Infrastructure Delivery and Developer Contributions, of the North East Derbyshire Local Plan Publication Draft (February 2018).

Paragraph 111 of the NPPF states that: ‘All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed’.

Policy ID1 of the North East Derbyshire Local Plan states that:
‘1. Proposals for development will only be permitted provided they can be made accessible through:
   a. the provision of necessary physical, social and green infrastructure in accordance with Policies ID 2 to 9
   b. suitable measures to mitigate the impacts of development ……

2. Where new development will necessitate the provision of new or improved infrastructure, and/or when suitable mitigation is required the developer will be required to make direct provision of such infrastructure on site within the development, or make a financial contribution to its funding through the use of Planning Obligations’

The transport assessment would identify the need for infrastructure and interventions, and their implementation would be determined by planning obligations (see the response under Policy HOU5 above) and guidance in paragraphs 108/109 of the NPPF. On that basis, DCC would therefore suggest that the policy should be removed.

**Policy T&A2 Traffic Management**
This policy encourages actions to reduce conflict and improve safety at a number of key locations, and is supported.

**Economy**

**Town Centres and Employment**
Out commuting for employment purposes by the residents of Dronfield is a long standing key issue for the parish, which impacts significantly on the sustainability of the town and wider parish. It is supported, therefore, that the DNP’s Economy section acknowledges this issue noting that between 70-80% of residents of Dronfield travel out of the area for work, and includes policies which seek to maintain and enhance the role and attractiveness of Dronfield town centre (Policy E1) and protect existing employment and business uses from change of use to alternative uses, unless it can be demonstrated that the existing employment use is not viable (Policy E5). Both of these policies are well drafted and compliant with the NPPF and should help to ensure that the level of out commuting from the area is not further exacerbated.

**Heritage and Design**

**Policy D3 Good Design**
This policy is very long and covers a number of issues relating to design, materials, designing out crime, renewable and low carbon energy, drainage/flooding, light pollution, and access to the countryside. DCC would suggest that it might be better drafted as several policies giving greater consideration to some of these issues, particularly renewables and low carbon energy, external lighting, and one issue which is missing, the provision of Low Emission Vehicle Infrastructure.

**Public Health**

*DCC’s Public Health Department has considered how the DNP aligns with the agreed ‘Strategic Statement – Planning and Health, across Derbyshire and Derby City’ (see attached) and has collated comments accordingly; where*
the Department feels it supports the priorities, where it could be strengthened, or where it might need to be more explicit.

The Submission Draft of the DNP does not make any reference to Health Impact Assessments (HIA). DCC would suggest that the following statement should be added to the DNP:

“Planning applications for major residential developments of 100 Dwellings or more should ideally be accompanied by a Health Impact Assessment (HIA) where there is likely to be a negative impact on population health as a consequence of development.”

The Submission Draft also makes no reference to Environmental Impact Assessments (EIA), and population human health as one of the EIA considerations. DCC would suggest that this should be added to the Plan.

The DNP makes little reference to a commitment to support and enhance the health and wellbeing of local residents through local planning policy. This should be strengthened throughout the document.

6.1 Prioritising positive prevention (promote the development of healthy environments that actively support people to maintain a healthy weight)
The Plan makes reference to walking and cycling, and use of public transport is prioritised as an improvement area in order to encourage healthy lifestyles and reduce the need to travel, which leads to environmental benefits as well as contributing to improving health and wellbeing; however, cycling and walking should be prioritised over road use.

Where appropriate, the Plan supports proposals for development to connect with other facilities, through walking and cycling access, accessibility by foot, cycle and people with mobility impairment, and that connections are made to link with existing walking and cycling routes; cycle hubs will be especially encouraged in convenient locations to facilitate the use of more sustainable transport methods. Within the Plan mention is made of the Town Council seeking to prioritise the use of financial contributions, whether from Section 106 agreements, Community Infrastructure Levy or negotiated obligations; the Plan could be strengthened by including other initiatives to support maintaining healthy weight and health provision - outdoor gyms in park areas, for example.

6.2 Supporting positive mental wellbeing
Although there is no specific mention of mental health and wellbeing, the “wellbeing” agenda is supported in the Plan by the inclusion of references to the natural environment and open green spaces. Areas designated as Local Green Spaces should be protected for their wildlife and environmental benefits. The ‘Five Ways to Wellbeing’ (‘Be Active’, ‘Give’ (participation in social and community life), ‘Keep Learning’, ‘Take Notice’ (access to green space) and ‘Connect’ are not mentioned specifically; however, there are elements throughout the Plan that support some areas.

6.3 Supporting healthy ageing
The Plan shows the town has a significantly higher population of over 65s: 25% compared to the national average of 16%. Despite having an ageing population, the town has lower than average reports of poor health, health problems and disability. There is no mention within the Plan of specific requirements that might be needed for an ageing population, such as specialist housing provision, accessible and adaptable dwellings and wheelchair user dwellings.

The Plan could be strengthened by making reference to encouraging Dementia-friendly communities.

6.4 Enabling people to connect with each other
The Plan makes some reference to the provision of community facilities - cultural, local shops, public houses and places of worship - being essential to the quality of life of the residents. Places benefit when the people who live there have a sense of local identity and actively participate in community life. The importance of the third sector to the life of the communities has not been mentioned with regard to volunteering opportunities, activities and the opportunity to engage with others.

The Plan makes reference to transport policies playing an important role in facilitating sustainable development, and raises the concerns of local residents that the transport system needs to be improved, which would contribute to wider sustainability and health objectives, enabling people to stay connected. The Plan could be strengthened by including social cohesion, diversity, inequalities, social interaction, and the value of being able to pursue leisure activities, in its text.

6.5 Healthy Homes
The Plan mentions the continuing need to identify opportunities for small-scale ‘windfall’ housing developments, and that housing developments should provide smaller dwellings as well as well-designed specialist housing if local needs are to be addressed. New housing development should provide a mix of housing types, sizes and tenures, taking into account evidence of existing imbalances in housing stock.

The Plan makes no mention of lifetime homes M4 (2), a category of home that is accessible and adaptable, or Housing our Ageing Population Panel for Innovation (HAPPI) home standards. New development can help provide jobs and homes for local people, improve the environment, and introduce new and potentially more active households to a deprived area.

Living in poor quality homes that require improvement has a fundamentally negative impact on health, particularly the most vulnerable people e.g. children and older people. The Plan does not acknowledge the energy efficiency of existing buildings, particularly housing, or how this might be improved to reduce both fuel poverty and greenhouse gas emissions. The Plan would be strengthened if it were to include references to ensuring that existing housing stock is maintained to a good quality, or is renovated or replaced to Building for Life (BfL) 12 (2018) standards.

DCC’s Public Health Department would advocate that the following should be included in the DNP:
<table>
<thead>
<tr>
<th>Scheme</th>
<th>Examples</th>
<th>Impact</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure design and layout of developments increase separation distances from sources of air pollution</td>
<td>Housing should be placed away from sources of pollution such as road sides where possible, or ensure main living areas face away from key sources.</td>
<td>Reduce exposure</td>
<td>National Planning Practice Guidance</td>
</tr>
<tr>
<td>Using green infrastructure to absorb dust and other pollutants</td>
<td>The use of appropriate tree species have been shown to support reductions in local air quality, including Alder, Field Maple, Hawthorne, Larch, Norway Maple, Pine and Silver Birch. Green infrastructure including hedgerows can act as a barrier for cyclists and pedestrians between sources of pollution and walking and cycling routes.</td>
<td>Reduce exposure</td>
<td>National Planning Practice Guidance</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td>EMAQ Network Planning guidance</td>
</tr>
<tr>
<td>Promote infrastructure to facilitate modes of transport with low impact on air quality</td>
<td>Promotion of cycling and walking infrastructure and appropriate access to public transport, such as cycle and pedestrian access, storage facilitates and signage. Provision of Electric Vehicle Recharging, either specific charge points or future proofing development through the laying of cable Encourage new development to promote sustainable travel choices, utilising welcome packs</td>
<td>Reduce sources of pollution</td>
<td>National Planning Practice Guidance</td>
</tr>
</tbody>
</table>
containing information and incentives to encourage the use of sustainable transport modes from new occupiers.

<table>
<thead>
<tr>
<th>Ensuring the control of dust and emissions from construction, operation and demolition</th>
<th>The adoption of an agreed protocol to control emissions from construction sites.</th>
<th>Mitigate risk</th>
<th>National Planning Practice Guidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Utilising funding to improve infrastructure such as charging points or cycling to offset the impact of new development on air quality</td>
<td></td>
<td>Mitigate risk</td>
<td>National Planning Practice Guidance</td>
</tr>
<tr>
<td>Reduce sources of air pollution from heating</td>
<td>Ensure all gas-fired boilers meet a minimum standard of 40mgNOx/kWh or consideration of alternative heat sources. Avoid the use of functional chimneys to reduce fixed solid fuel combustion usage.</td>
<td>Reduce sources of pollution</td>
<td>EMAQ network planning guidance</td>
</tr>
</tbody>
</table>

In addition, consideration should be given to the inclusion of low emission vehicle infrastructure.

Other areas from the Planning and Health Strategic Statement that would strengthen the Plan are:

- Adding and supporting Dementia-friendly communities, and enabling connectedness.
- Encouraging developers to design homes to a lifetime standard that include facilities and features that enable people to live independently for longer.
- Making reference to existing housing stock, including plans for renovation and replacing poor quality housing stock.
Appendices

Map 6: Proposed Local Green Spaces
The map is very difficult to read due to its scale, and the selection of the colour ‘green’ for the notation.

I trust that you will draw these comments to the attention of the independent Examiner.

I should also be grateful if you would notify DCC of the Council’s decision on the Plan.

Please contact me if you wish to discuss the comments further.

(Strategic Statement attachment, referred to in Public Health section of the response)

Strategic Statement
Planning and Health across Derbyshire and Derby City

Our vision is for places across Derby and Derbyshire that ensure every child and adult has the opportunity to live a healthy and fulfilling life

1. Purpose: To agree an ambitious vision, shared priorities and principles for delivering the Combined Authority’s member organisations duty to cooperate in respect of health and planning.

2. Background and information

Responsibility for public health transferred to local authorities in April 2013 and this gave councils new opportunities to improve joint working between public health and planning as well as related disciplines such as housing, transport planning and regeneration, in order to improve health and reduce health inequalities locally.

To achieve this we need to identify links between public health objectives and how places can be shaped to respond to them, with reference to the National Planning Policy Framework 2012 (NPPF) and national public health outcomes indicators. In addition, it needs to reflect the added value that joint work on planning and health can bring to local priorities identified in the Derby and Derbyshire Joint Strategic Needs Assessments and Health and Wellbeing Strategies, Director of Public Health Annual Reports, Locality Public Health Plans and the Derbyshire Healthy Communities Programme (Refs: Appendix 1).

The statement reflects the different needs of communities across Derby and Derbyshire, as well as identifying principles to underpin joint working at local and strategic level and specific health priorities for joint working on planning and health.

3. Our communities
Appendix 2 provides a summary of key information about the population of Derby and Derbyshire. Poor health is both a limiting factor to increasing economic activity rates, as well as a consequence of low economic activity rates. The causative links between socio-economic inequality and chronic stress and poor health are well understood and improving health and tackling these inequalities is a key component of achieving sustainable communities.

4. What does the planning system do already in relation to health?

The planning system acts to mediate the demands of the market and the social and environmental impact of development. As a part of this, planners work with applicants throughout the development process in a bid to secure wider social benefits, such as benefits for health infrastructure or public health. Although the planning system is positively geared towards achieving social benefit, the ability of planners to intervene in the existing built and natural environment is limited unless new development proposals come forward and planners must negotiate specific planning obligations in the context of development viability and defined criteria. This means the planning system can require reasonable, appropriate and necessary contributions from developers and social benefits need to be considered as a whole.

The NPPF guides local planning authorities to integrate the health agenda, through the ‘Promoting Healthy Communities’ chapter, into planning policy and development management decisions. Also, National Planning Practice Guidance (NPPG) provides advice for local planning authorities and specifically the role planning has to play in supporting health through the ‘Health and Wellbeing’ chapter.

There are two main tools that the planning system can use to help achieve health objectives. Firstly, through the local and neighbourhood plan process, and the development of planning policy. Although health is not usually a separate policy area in land-use planning it is regularly integrated throughout policy frameworks; for example, aiming to provide accessible service centres for local communities has health and wider benefits. Secondly, the development management process enables planners to negotiate any planning contributions and look to steer the design of a development to address health objectives.

5. What principles should underpin the planning and health agenda?

Local planning authorities can use the following principles to enable them to achieve a healthy built and natural environment across Derbyshire and Derby City:

- Embed sustainability and protection of the environment across the planning system to assure the future of a healthy built and natural environment.
- Help provide accessible service centres, shared spaces and community facilities which serve day-to-day needs
- Encourage walking and cycling through the provision of pedestrian/cyclist friendly infrastructure, measures to prevent road traffic accidents and concentrating development as close as possible to service centres and employment
- Create healthy living environments through the provision of community open space, recreation and sport facilities
- Help protect and enhance public rights of way
- Protect people’s health from air pollution, noise, flood risk and accidents
- Ensure the delivery of high quality homes and good design standards that meet the varied needs of local communities and an ageing population
- Active consultation between local planning authorities, healthcare commissioners and public health teams to help understand, and plan for, impact of development on health services and the health of communities
- Consult with communities to help understand local perspectives on health and any concerns that can be addressed through the planning system
- Look to pro-actively address areas of health inequality wherever possible
- Where appropriate seek contributions towards new health related infrastructure to support development through planning obligations
- Maximise the opportunities for recreation and connecting people with the outdoors, the natural world and cultural heritage through Derbyshire unique assets, such as the National Parks.

6. Health priorities for the planning system

This section presents the priorities for planning and health which reflect where the planning system can make the greatest contribution to delivery of priorities identified in the Health and Wellbeing Strategies for Derby and Derbyshire and other strategic local plans listed in section 2 above.

6.i: Prioritising positive prevention

The first priority is to promote the development of healthy environments that actively support people to maintain a healthy weight. We aim to change the embedded culture of routine car use to one which promotes safe active travel and use of public transport, ensuring a focus on connectedness between where people live and where they work, study, spend their leisure time and access services. In addition, we will explore how we could use local green-space to support sustainable access to healthy foods, in order to help tackle food poverty in Derbyshire. We will use evidence and intelligence\(^1\) to understand how behavioural nudges can be ‘built in’ to support these healthier behaviours, and to demonstrate the impact on the economy of having a healthier workforce.

6.ii: Supporting positive mental wellbeing

The environment in which we live directly impacts on our mental well-being - access to good quality homes, safe streets and greenspace helps support happier and healthier individuals and local communities. Using place-shaping to improve the mental wellbeing of local people has the potential to make a significant positive impact on the local economy through reducing sickness absence and maintaining a motivated and productive workforce. Neighbourhood planning can actively engage local people in ensuring community interests and concern (such as exposure to noise or air pollution) inform decisions, and the planning system as a whole can help support the delivery of the ‘Five Ways to Wellbeing’ summarised below:

a) **Be Active** – delivery of priority 6.i clearly links to this objective
b) **Give** – Active participation in social and community life can be supported through interventions that promote social connectedness (priority 6.iv below)

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\(^1\) ‘Evidence’ in this context is the term used to describe information that has been demonstrated through empirical research, while the term ‘intelligence’ incorporates information derived from a broad range of sources including evidence, service data, public perspectives / views and qualitative and quantitative information.
c) **Keep Learning** – Ensuring access to places in local communities where people can continue to learn throughout their life supports mental wellbeing.

d) **Take Notice** – Access to greenspace and local environments that help individuals connect with the natural world is proven to enhance wellbeing.

e) **Connect** – small changes to places can be planned to enable people to connect with one another more – for example simply placing benches in residential areas provides opportunities for socially isolated older people with limited mobility to get out, meet and talk to others locally.

6.iii Supporting healthy ageing

The number of people aged 65 years and over across Derby and Derbyshire is projected to increase significantly over the next 25 years. We want to maximise the very real benefits these demographic changes will bring about. Older people make a significant contribution to society and the economy in a number of ways, including through their spending power, provision of social care, volunteering and support for charities and their own families. If people can stay healthy for longer, they can continue to make a significant contribution to our communities, and reduce the increased demand on health and social care. Specific ways in which the planning system as a whole can contribute to healthy ageing is to ensure new homes are built that promote independence and respond to changing needs as people age, design new neighbourhoods which provide the infrastructure for dementia friendly communities and enable social connectedness (see priority 4.iv below).

6.iv Enabling people to connect with each other

Social cohesion is a feature of strong and vibrant communities, and is characterised by a sense of belonging, shared interest in addressing challenges and inequalities, where diversity is appreciated and people feel safe and valued. Some areas of Derbyshire are very rural and issues such as transport, opportunities for social interaction and access to services, including high speed internet access, remain a real challenge. The planning system can continue to support connectedness within communities by creating places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other including, for example, through housing developments that are mixed use, design of residential streets to encourage their use for social interaction, shared recreational space to encourage intergenerational contact, provision of neighbourhood centres and well-designed street frontages.

6.v Healthy homes

The type and condition of peoples’ homes has a direct impact on the health and well-being of individuals, families and communities across Derby and Derbyshire, and contributes to inequalities in health outcomes between different areas and groups within the population. Living in a poor quality home, characterised by damp, mould and excess cold or exposure to air pollution or noise, can lead to an increased risk of cardiovascular and respiratory disease as well as to mental health problems. In addition, structural defects can increase the risk of accidents, and overcrowding contributes to increased risk of communicable disease. We need to collate intelligence on current and future housing needs of all sections of the population, especially those most at risk of insecure tenancy and poor housing.
The contribution of strategic planning to healthy housing can be maximised by planning the building of the right homes in the right places for all sections of the population, renovating or replacing existing homes that require improvement and implementing the principles and learning from the Healthy New Towns programme. This work will be supported and informed by a review of housing and health commissioned by the Derbyshire Housing Strategy Group and Derbyshire Joint Strategic Needs Assessment Board and due to report in early Spring 2016.

7. Monitoring
The Derbyshire Planning and Health Steering Group will monitor overall progress against these priorities using two key outcomes:

- Increased healthy life expectancy in Derby and Derbyshire
- Reduced gap in healthy life expectancy between communities across Derby and Derbyshire

Appendix 1: References

<table>
<thead>
<tr>
<th>Reference</th>
<th>URL</th>
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<tr>
<td>National Planning Practice Guidance (NPPG)</td>
<td><a href="http://planningguidance.planningportal.gov.uk/">http://planningguidance.planningportal.gov.uk/</a></td>
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<td>Localism Act 2011, Chapter 20, Part 6, Chapter 1, Section 110</td>
<td><a href="http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted">http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted</a></td>
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<td>Director of Public Health Annual Reports</td>
<td>Derbyshire available at <a href="https://www.derbyshire.gov.uk/social_health/public-health/about_public_health/default.asp">https://www.derbyshire.gov.uk/social_health/public-health/about_public_health/default.asp</a></td>
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<td>Derbyshire Healthy Communities Programme</td>
<td>Five Ways to Wellbeing</td>
</tr>
<tr>
<td>----------------------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>Royal Institute of British Architects (RIBA)</td>
<td>City health check – How design can save lives and money December 2013</td>
</tr>
</tbody>
</table>

### Appendix 2: Key data about our communities

**Population:** 1,032,300 people are resident within Derby and Derbyshire.

The administrative County of Derbyshire has a population of 779,800 and Derby City has a population of 252,700. Between 2013 and 2014 Derbyshire’s population has increased by 41,300 people or 0.5% and Derby City’s by 1,100 people or 0.4%. Within the County, South Derbyshire has the largest year-on-year population growth of 1.3%, which is a greater rate of growth than seen for England (0.83%). Since 2001, Derbyshire’s population has grown by 5.9% and Derby City’s by 9.4%, compared to 9.3% for England. Again, South Derbyshire’s population has grown much faster in the same period at 18.4%. Conversely, other areas such as High Peak have seen much slower population growth of just 2.2%. The latest Sub-National Population Projections from the Office for...
Housing: There are 434,500 homes across Derby and Derbyshire

According the 2011 Census, the geographic County of Derbyshire has:

- 30% detached properties
- 39% semi-detached properties
- 21% terraced properties
- 10% flats

The latest data from ONS indicates that the number of homes is expected to increase to 517,800 in the geographic county by 2037. Derby City (22.6%) and South Derbyshire (29.6%) are projected to have the highest growth. There are high levels of home ownership within the county and therefore ensuring private dwellings are built with appropriate design specifications to enable individuals to remain in their own home as they grow older is important. In 2013, statistics from the DCLG indicate 84.9% of properties in Derbyshire are in the private sector and in Derby City this is 80.3%, compared to an average of 82.9% for England. Derby City has a higher percentage of local authority owned houses (12.6%) and housing association owned properties (7.0%) than for the administrative county of Derbyshire where figures are 8.6% and 6.5% respectively. The ratio of median house price to median earnings is 3.7 for Derby City and 5.4 for Derbyshire. In some parts of the county, such as Derbyshire Dales this ratio is much higher at 8.3, compared to the average for England of 6.7. Across the geographic county 493 affordable dwellings were provided in 2013/14. Census data indicated there are 12.0% of houses in Derbyshire and 16.8% of houses in Derby City in the private rented sector.

For more information take a look at the Housing section of the Derbyshire Observatory

Health: 79.2% of residents are in good health across Derby and Derbyshire as a whole.

<table>
<thead>
<tr>
<th>Healthy Life Expectancy</th>
<th>Years</th>
<th>Years</th>
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<tbody>
<tr>
<td>Derbyshire</td>
<td>62.3</td>
<td>62.8</td>
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<tr>
<td>Derby City</td>
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<table>
<thead>
<tr>
<th>Life Expectancy at birth</th>
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<tr>
<td>Derbyshire</td>
<td>79.4</td>
<td>83.2</td>
</tr>
<tr>
<td>Derby City</td>
<td>78.6</td>
<td>82.6</td>
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</tbody>
</table>

For many health indicators there are clear contrasts between Derby City and Derbyshire, and within the districts of the administrative county of Derbyshire other differences exist. For example, Healthy Life Expectancy varies between the two areas as shown in the infographic to the left and furthermore at a ward level these differences are more pronounced. For example in Derbyshire there is a difference of 16.7 years between the longest and shortest life expectancy at ward level. In Derby City this is 10.9 years.

According to the Index of Multiple Deprivation 2010, Derby City experiences higher levels of deprivation compared to the administrative county of Derbyshire and England as a whole. This is further reflected in the fact that Derby City has higher levels of both child and fuel poverty than the administrative county of Derbyshire, suggesting housing quality is an issue. However, in some rural communities in Derbyshire Dales where there are older stone built properties there are some of the highest fuel poverty levels in the country.

Derbyshire has an ageing population and this brings with it particular health issues, such as older people who feel socially isolated, are diagnosed with dementia and have multiple long-term health conditions.

More broadly, lifestyle factors have an impact on health and obesity is an issue for both Derbyshire and Derby City, as is smoking. Unemployment, which is an important wider determinant of health, varies across the county and the latest statistics are available in a monthly bulletin. Surprisingly, the utilisation of outdoor space for exercise or health is limited. Just 11.1% of people in Derby City and 13.3% of people in the administrative county of Derbyshire use outdoor space, compared to 17.1% for England as a whole.

For more information take a look at the Health & Wellbeing section of the Derbyshire Observatory

Issues which flag red for both city and county on the Public Health Outcomes Framework:
- Excess Weight in Adults
- Hospital admissions for alcohol related episodes
- NHS Health Check Uptake
- Injuries due to falls in people aged 65+
- School readiness
- Utilisation of green space for exercise/health reasons
Respondent 12:
Helen Fairfax, NEDDC

Response:

Submission Draft Dronfield Neighbourhood Plan
Regulation 16 Consultation

Officer Comments from North-East Derbyshire District Council

1. These are comments from North-East Derbyshire officers in response to the Pre-
Submission (Regulation 15) Consultation by Dronfield Town Council on the Draft
Dronfield Neighbourhood Plan (here referred to as ‘the draft Plan’ or ‘the Plan’) under
the requirements of the Localism Act 2011 and Regulation 15 of the Neighbourhood
Planning (General) Regulations 2012.

General comments

2. Overall, the draft Plan is well presented, and in the main, scoped appropriately,
dealing with relevant local issues, relying on surveys from the local populace to
highlight local concerns, and create the policies and objectives of the plan. There are,
however, some areas where changes will be needed to be compliant with regulations
in general and to be in conformity with the Local Plan.

3. There are also several instances where the plan contains views of the Town Council
which are critical of, or depart from the District Council’s emerging Planning strategy
and policy. The Council is sympathetic to the Town’s concerns and it is recognised
that issues are raised which are of significant concern to the Town Council, and these
are clear in the community consultation evidence. Nevertheless, some statements are
matters for the Local Plan alone, and an examiner may consider them unnecessary.

4. The Plan would benefit from a clearer demarcation of the Policies (either to be shown
in bold or within a text box) as currently they are not distinct from the wider plan text.

Relationship to Local Plan and NPPF

5. The Draft Plan correctly states (par. 4) that it has to be in general conformity with the
‘saved’ policies of the 2005 Adopted North East Derbyshire District Local Plan. It also
states that a revised North East Derbyshire Local Plan, which will replace the saved
policies of the 2005 Plan, is being developed; and that the evidence base and the
policies contained within the emerging District Local Plan have been considered in
preparing the Dronfield Neighbourhood Plan.

6. The regulations governing the preparation of a Neighbourhood Plan require it to be in
general conformity with the strategic policies of the (adopted) Local Plan; which on
submission was the 2005 North East Derbyshire Local Plan. At the time of this
consultation the NEDDC Publication Draft Local Plan is at examination. Therefore the
Neighbourhood Plan will be examined prior to the adoption of the emerging Local Plan and it will need to demonstrate general conformity with the saved policies of 2005 Local Plan, where these are consistent with national guidance in the NPPF. However, it will also need to take account of the emerging Local Plan policies and the evidence that underpins them if it is to remain relevant once that Plan is adopted.

7. The Council’s comments on conformity have been prepared with reference to the Adopted Local Plan and to its emerging replacement, the Publication Draft Local Plan as submitted, where relevant.

8. In general, the repetition of Local Plan or National (NPPF) policies in the Neighbourhood Plan is not necessary, as a Neighbourhood Plan policy is most effective where it provides a local input, and any conflict will be resolved by reference to the higher level policy.

Clarity and Certainty of Policies

9. There are instances where more certainty and clarity is needed to ensure that policies can be effectively applied by the District Council as the decision-making body on planning applications. The clear identification of specific features on a plan is critical to ensure that the District Council can apply the policy and that applicants can be certain where and how the Policy applies. In some cases the criteria in policies are ambiguous and open to interpretation due to a lack of definition. (See comments on the policies below).

Application of Policies

10. There are limitations to the way in which some policies in the Draft Plan, as they are currently worded, can be applied. For example some policies seek requirements that are not within a Neighbourhood Plan’s remit, or it is not demonstrated that they are justified by evidence (See comments on the policies below).

Specific Comments

Policies

- **POLICY C1: PROTECTION OF IMPORTANT COMMUNITY FACILITIES**
  No objection.

- **POLICY C2: SUPPORTING NEW AND ENHANCED COMMUNITY FACILITIES**
  No objection.

- **POLICY C3: ASSETS OF COMMUNITY VALUE**
  No objections.

- **POLICY ENV1: GREEN BELT**
No objection in principle, however, the Policy is worded as a statement of intent and would not operate as an effective policy in its own right, relying upon the National Policy in the NPPF.

- **POLICY ENV2: LANDSCAPE CHARACTER**
  No Objection.

- **POLICY ENV3: THE LEA BROOK VALLEY GREEN CORRIDOR**
  No Objection.

- **POLICY ENV5: LOCAL GREEN SPACES**
  The Plan has identified 48 sites in total to be designated as Local Green Spaces (LGS) (Appendix 6). In general these are not described or mapped clearly enough for them to be easily identified. This would make it difficult for them to be applied in decision making and could compromise the effectiveness of the Plan.

  In addition, the majority of these sites have designations in the adopted and/or draft Local Plans. For example, some sites fall under Policies R2 – Formal Recreation Facilities, R3 – Urban Green Space and R4 – Allotments of the Adopted Local Plan and Policy ID10 – Open Space, Sports and Recreation in the draft Local Plan. Policies R2 and R4 (and ID10) allow for a more flexible approach to safeguarding formal recreational facilities and allotments than the proposed LGS designation in the Neighbourhood Plan (see detailed NEDDC comments on individual proposed Local Green Spaces at Appendix 1)). Whilst this does not in itself raise concern over conformity with the Local Plan, the individual LGS designations in the Neighbourhood Plan need to demonstrate their justification over and above the Local Plan designation, and this is not currently made clear.

  In some cases sites are located outside the Settlement Development Limit, within the Green Belt. These sites cover mainly large areas and do not meet the first and/or third bullet point criteria as set out in para 77 of the NPPF. The National Planning Practice Guidance (NPPG) also states that “if land is already protected by Green Belt policy,” …, “then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space (Paragraph: 010 Reference ID: 37-010-20140306)”. This however is not shown by the assessment.

  The LGS designation at Dronfield Nature Park (Ref no 13 of Appendix 6), lies within an area designated for employment use under policies E1 – New Employment Land Provision and E2 – Callywhite Lane Extension in the Adopted Local Plan (WC1 – Dronfield Regeneration Area in the draft Local Plan). Whilst it may be possible for the future development of this site to retain elements of the Nature Park, the LGS policy is highly restrictive in nature and incompatible with the employment designation. Retention of this LSG within the Neighbourhood Plan could significantly prejudice the implementation of strategic policies in both the Adopted and emerging the Local Plans and is therefore considered to be out of conformity with the Local Plan.

- **ENV6: PROTECTION & ENHANCEMENT OF TREES AND WOODLANDS**
  No Objection.

- **POLICY HOU1: WINDFALL HOUSING DEVELOPMENT**
  No Objection.

- **POLICY HOU2: HOUSING MIX**
  No Objection.
- **POLICY HOU3: AFFORDABLE HOUSING**
  This Policy is not considered to be necessary as it duplicates policies in the Local Plan. Local people already receive some priority if they have a community connection, as is noted in the supporting text, through the District’s Local Plan, Supplementary Planning Guidance and Housing policies. This covers applicants from Dronfield and adjoining parishes within North East Derbyshire.

  The restrictions given in the Neighbourhood Plan would be in conflict with those applied by the Council’s Housing department. They are not considered to be easily workable in reality and would give rise to potential discriminatory concerns, as there would be other groups of people with a legitimate need to live in Dronfield. A Local Lettings Plan developed between the Parish and the Council’s housing team could be one solution to delivering affordable housing. This could contain clauses relating to applicants being local as long as there are grounds to do so and it is not discriminatory. This is not a matter for a planning policy however.

- **POLICY HOU4: INFRASTRUCTURE FOR NEW HOUSING AND OTHER FORMS OF DEVELOPMENT**
  This Policy partly duplicates strategic policies in the adopted Local Plan. It also includes elements that cannot be considered in planning decisions: The meaning of the phrase “must be addressed” is unclear.

  The criteria are generally already dealt with in the emerging Local Plan, including through Policies ID1 to ID10. Where there is any contradiction, once the Local Plan is adopted, that will take precedence.

- **POLICY HOU5: DEVELOPER CONTRIBUTIONS**
  Developer contributions are negotiated as part of the planning application process and Councils' can only seek S106 contributions for reasons that are directly related to the impacts of the proposed development. As it stands this policy does not meet the basic conditions but the words ‘Where appropriate’ to replace ‘The Town Council will seek to prioritise’ and ‘will be supported’ after ‘above’ may make it acceptable. In the absence of this policy the stated encouragement to engage with the Town Council is appropriate for the Plan text.

- **POLICY T&A 1: HIGHWAYS**
  No Objection in principle, although the policy is generally unnecessary in that it repeats Local Plan policies, although contains more detail.

- **T&A2: TRAFFIC MANAGEMENT**
  Planning obligations can only be claimed when it is demonstrated that a specific development will have an impact on highway safety in a specific area and mitigation is necessary to make the development acceptable. The policy should not identify specific areas, it is however acceptable for these areas to be highlighted in the supporting text as areas in need of improvement.

  The policy, in order to be acceptable, should be reworded to seek measures ‘where appropriate’. Alternatively it could be merged with HOU5: Developer Contributions.

- **POLICY T&A3: CYCLING AND WALKING**
  No Objection.

- **POLICY T&A4: CAR PARKING**
No Objection.

- **POLICY E1: MAINTAINING AND ENHANCING THE ROLE AND ATTRACTIVENESS OF DRONFIELD TOWN CENTRE**

  The reference to how there should be ‘in consultation with the town council’ implies a decision-making role beyond that of consultee already established in planning legislation, it should be changed to ‘including through discussion with the town council’

  There are errors in the reference to different use classes in the policy. A3 is cafes and A4 is public houses and should be amended. There is no reference to A5 (hot food takeaways) which is conspicuous by its omission.

  Also the title of this policy is misspelled and needs to be corrected.

- **POLICY E2: SHOP FRONTAGES IN THE TOWN CENTRE**

  No Objection.

- **POLICY E3: SHOPPING HUBS AND OTHER LOCAL SHOPS OUTSIDE DRONFIELD TOWN CENTRE**

  No Objections in principle, although the policy duplicates matters that will be covered by emerging Local Plan policies WC5: Retail Hierarchy and Town Centre Uses, and policy SP1: Dronfield.

- **POLICY E4: HOT FOOD TAKEAWAYS**

  This Policy is not clearly justified or supported by specific evidence. However, because it is a supportive policy and does not restrict proposals for A5 uses the Council has no objections in principle. In respect of litter bins the policy is likely to be difficult to enforce and should be included in the supporting text only. It could only reasonably be applied where it is linked to a use ordinarily associated with litter. There does not appear to be any evidence presented that this is the case for a use such as a hot food takeaway.

- **POLICY E5: EXISTING EMPLOYMENT USES**

  No Objection, although this policy duplicates policies in the emerging Local Plan.

- **POLICY E6: NEW SMALLSCALE EMPLOYMENT USES**

  No Objection.

- **POLICY D1: LISTED BUILDINGS**

  General policies for Listed Buildings are set out in the Local Plan and NPPF. This policy comes across as a statement of intent rather than a clear policy which limits its effectiveness. The Policy would carry greater weight in decision making if it included a clear aim and is locally specific, without presenting specific cases.

- **POLICY D2: DRONFIELD CHARACTER BUILDINGS AND STRUCTURES OF LOCAL HERITAGE INTEREST**

  The preceding paragraph to Policy D2 indicates that the Dronfield list of Character Buildings and Structures of Local Heritage interest is an iterative list subject to continuous revision as new assets are identified. Consequently any changes could only be subject to the Policy as part of a formal revision to the Plan. To avoid this it would be advisable to remove direct reference to the Appendix and maps from within the Policy and instead refer to the most up to date list. (See also comment on page 38 below)
The opening paragraph of Policy could therefore be removed and instead incorporated into the supporting text.

- **POLICY D3: GOOD DESIGN**

The criteria should be labelled a) – k) to aid clarity in referencing for decision making.

The 8th criterion relating to flooding should be revised to remove reference to the requirement for the design of development to mitigate existing flooding problems not related to the site. Development proposals can only be required to mitigate the impacts arising from the development itself.

If existing flooding is a particular concern in Dronfield this could be added to the list of priority funding areas at p.24 (Developer Contributions) should the District Council adopt CIL in the future.

**Comments on the non-policy aspects**

**Plans of the Area**

The Green Belt map (Map 2) illustrates the Green Belt boundaries in the Adopted Local Plan. This should be explained by way of a footnote in the Draft Plan. It should be recorded that the Map will be superseded if the current proposals in the emerging Local Plan are carried through to adoption; an illustrative map may be helpful.

**Page 15:** The Council’s Settlement Role and Function Study 2013, has been superseded by the Settlement Hierarchy Study Update December 2017. The 2017 study is the most up to date, carries the greatest weight and should be referenced to support the effectiveness of the Plan.

This applies throughout the Plan.

**Page 19 & Page 20:** The second paragraph references the emerging Local Plan, this should be clarified as being the ‘Publication Draft Local Plan as submitted’, within which the figure of proposed housing during the period 2014 – 2034 is 475. The Publication Draft Local Plan (Feb 2018) also allocated only 475 homes, both paragraphs two and three on this page could be seen as misleading. This applies similarly to several paragraphs on Page 20. It should be noted that the Publication Draft Local Plan is at Examination and may also be subject to possible changes through the formal Modifications process. The most up to date position should be referenced in the referendum version of the Plan.

**Page 23:** The Plan appears to reference the Affordable Housing Policy of the Adopted Local Pan (Policy H6) which requires 40% affordable housing from developments of 15 or more dwellings. However the amount of affordable housing required in the emerging Local Plan Policy LC2, (Publication Draft as submitted), requires 30%, for developments of 10 or more dwellings within ‘high value areas’ (which includes Dronfield). This reflects the most up to date evidence on housing needs and development viability.

The second paragraph of the ‘Infrastructure needs of housing and other forms of development’ section is not clear in its meaning.

**Page 24:** It is acknowledged that the Plan reflects the latest NEDDC position in regards to the CIL. The Plan also goes on to identify priority areas to inform the spending of any funds for infrastructure, or raised through CIL should the Council decide to adopt CIL in the future.
Page 26: The Dronfield Regeneration Framework was produced in 2016, not 2013, by Opun, the design charity for the East Midlands on behalf of North East Derbyshire District Council. References to the Regeneration Framework should be consistent throughout the document.

Page 27: The first paragraph of the sustainable transport section is misleading. The paragraph references an outdated study and implies that the only reason for Dronfield’s status is due to its railway station, which simplifies how the settlement hierarchy was established.

Page 33: The second paragraph, second sentence, of the ‘Business and Employment’ section could be read as suggesting that the Neighbourhood Plan itself will be providing infrastructure and services, rather than the Town, which is potentially misleading.

The statement: “the current infrastructure is under strain and needs improvement and regeneration money before any significant new housing is built in the town” would benefit from reference to the evidence arising from community engagement and public perception over the capacity of infrastructure.

Page 37: The supporting text for Policy D1: Listed Buildings contains detail on infrastructure, pedestrian crossings and the road network through the town. Some of this information, although pertinent may be more usefully located in the Infrastructure section of the Plan.

Page 38: The second paragraph states that “Assets on the list are required to meet certain criteria in terms of their significance.” The document Dronfield Proposed Character Buildings and Structures of Local Heritage Interest- Supporting Evidence appears to be incomplete in regards to the methodology of how heritage assets were identified, and how they were assessed, and what special features of historic importance they might have and the importance of this/these features. It appears that some evidence is omitted from the document by the inclusion of phrases such as “The following report identifies assets in the Parish…” (p. 1, par 7) and “The proposed assets were then assessed … using the process and criterion … set out below. …” (p 2, par 4).

This should be clarified and/or addressed to ensure that the supporting evidence is clear and fully justified to improve the effectiveness of the Neighbourhood Plan.

Page 44-48: Dronfield has been misspelt in the title for appendix 5.
Adapted Extract from Dronfield Neighbourhood Plan (Appendix 6)

NEDDC comments on proposed Local Green Spaces – these are made in light of their relationship to the NPPF criteria for designating LGS and to the Local Plan

**Green** – NEDDC does not have any comments on these sites

**Yellow** – NEDDC considers that LGS designation may cause issues with the adopted/drafted LP

**Orange** – NEDDC has significant concerns about the LGS designation and its relationship to the Local Plan

<table>
<thead>
<tr>
<th>DNP’s Proposed Local Green Spaces of particular importance</th>
<th>Designations/ constraints</th>
<th>NEDDC comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>No.</td>
<td>Site Name &amp; Address</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan (Urban Green Space; Park DR42A in the draft LP)</td>
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<tr>
<td>1.</td>
<td>Cliffe Park, Callywhite Lane, Dronfield, Derbyshire, S18 2XP</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan (Urban Green Space; Park DR06A in the draft LP)</td>
</tr>
<tr>
<td>2.</td>
<td>Sindelfingen Park, Pentland Road, Dronfield, Derbyshire, S18 8ZQ</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan (Urban Green Space; Park DR06A in the draft LP)</td>
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<tr>
<td>3.</td>
<td>Hillock Playground, Dronfield, Derbyshire, S18 1UH</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
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<tr>
<td>4.</td>
<td>Marsh Avenue Playground, Dronfield, Derbyshire, S18 2HA</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>5.</td>
<td>Cemetery Road Playground, Dronfield, Derbyshire, S18 1XY</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>6.</td>
<td>Moonpenny Way Playground, Dronfield, Derbyshire, S18 1SA</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>7.</td>
<td>Moonpenny Fields, Dronfield, Derbyshire, S18 1SA</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>8.</td>
<td>Birches Fold Playground, Dronfield, Derbyshire, S18 3AG</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>No.</td>
<td>Site Name &amp; Address</td>
<td>Designations/ constraints</td>
</tr>
<tr>
<td>-----</td>
<td>----------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>9.</td>
<td>Dronfield Woodhouse Recreation Ground, Carr Lane, Dronfield S18 8XB</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>10.</td>
<td>Lundy Road Playground, Dronfield, Derbyshire, S18 1UY</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>11.</td>
<td>Stonelow Recreation Ground, Dronfield, Derbyshire, S18 2EP</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>12.</td>
<td>Jubilee Park, Green Lane, Dronfield, Derbyshire, S18 2FH</td>
<td>Designated as R3 – Urban Greenspace in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>13.</td>
<td>Dronfield Nature Park, Chesterfield Road, Dronfield, Derbyshire</td>
<td>This area is part of and designated as WC1 – Dronfield Regeneration Area in the draft LP. Policy WC1 safeguards this area for development and is protected for future employment use under Policy WC3 (Employment Areas). The proposed LGS designation also comprises the existing bridge and parking spaces adjacent to B6057 which would potentially be needed to create a new access road from the B6057.</td>
</tr>
<tr>
<td>14.</td>
<td>Leabrook Valley, off Gosforth Drive, Dronfield, Derbyshire</td>
<td>It is currently unclear which site is referred to, especially bearing in mind site no 30; this needs to be clarified.</td>
</tr>
<tr>
<td>15.</td>
<td>Well dressing site, Carr Lane, Dronfield, Derbyshire</td>
<td>Informal green space</td>
</tr>
<tr>
<td>16.</td>
<td>Dronfield Junior School Fields, Dronfield, Derbyshire</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>17.</td>
<td>Gosforth Valley Playing Fields, Bubnell Road (off Stubley Drive), Dronfield Woodhouse, Derbyshire, S18 8QY</td>
<td>Designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan (Formal Sports Sites; Playing Pitches DR08 in the draft LP)</td>
</tr>
<tr>
<td>18.</td>
<td>Radbourne Common (off Pentland Road), Dronfield, Derbyshire, S18 8ZQ</td>
<td>Designated as R3 – Urban Greenspace in the 2005 adopted Local Plan (Urban Green Space; Amenity Green Space DR05 in the draft LP)</td>
</tr>
<tr>
<td>19.</td>
<td>The Green, Longacre Road</td>
<td>Informal green space</td>
</tr>
<tr>
<td>20.</td>
<td>The Green on Burns Drive</td>
<td>Housing Green Space</td>
</tr>
<tr>
<td>21.</td>
<td>The Green and path network along Shakespeare Crescent</td>
<td>Housing Green Space</td>
</tr>
<tr>
<td>22.</td>
<td>The Green on top of Poplar Close</td>
<td>Housing Green Space</td>
</tr>
<tr>
<td>No.</td>
<td>Site Name &amp; Address</td>
<td>Designations/ constraints</td>
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</tr>
<tr>
<td>23.</td>
<td>The Green at the junction Hallowes Drive/Hazel Close</td>
<td>Informal green space</td>
</tr>
<tr>
<td>24.</td>
<td>School Wood, off Barlow Lees Road, Dronfield, Derbyshire</td>
<td>This woodland covers (together with Hollins Spring Wood and Long Acre Wood) a large area in the Green Belt and is part of an area of Primary Sensitivity (AMES); It is also protected by a Local Wildlife Site (NE088, Hollins Spring Wood);</td>
</tr>
<tr>
<td>25.</td>
<td>Hollins Spring Wood, off Barlow Lees Road, Dronfield, Derbyshire</td>
<td>This woodland covers (together with School Wood and Long Acre Wood) a large area in the Green Belt and is part of an area of Primary Sensitivity (AMES); It is protected by a Local Wildlife Site (NE088, Hollins Spring Wood); The area is not within close proximity to the community.</td>
</tr>
<tr>
<td>26.</td>
<td>Long Acre Wood, off Barlow Lees Road, Dronfield, Derbyshire</td>
<td>This woodland covers (together with School Wood and Hollins Spring Wood) a large area in the Green Belt and is part of an area of Primary Sensitivity (AMES); It is protected by a Local Wildlife Site (NE084, Grasscroft Wood). The area is not within close proximity to the community.</td>
</tr>
<tr>
<td>27.</td>
<td>Frith Wood, off Stonelow Road, Dronfield, Derbyshire</td>
<td>This is a large area (17.5ha) of ancient semi-natural woodland and protected as a Local Wildlife Site (NE101, Frith Wood); the area is situated within the Green Belt.</td>
</tr>
<tr>
<td>28.</td>
<td>Woods adjacent Sindelfingen Park, Pentland Road, Dronfield, Derbyshire, S18 8ZQ</td>
<td>This small woodland is part of Sindelfingen Park which is designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>29.</td>
<td>Mill Lane Environmental Corridor, Dronfield</td>
<td>This is a wooded area along River Drone; it is neither protected nor designated in the adopted (or drafted) Local Plan.</td>
</tr>
<tr>
<td>30.</td>
<td>Lea Brook Valley Green Corridor, Dronfield, Derbyshire</td>
<td>It is currently unclear which site is referred to, especially bearing in mind site no 14; this needs to be clarified.</td>
</tr>
<tr>
<td>31.</td>
<td>Open space behind Coal Aston Village Hall, Coal Aston Playing Fields, Eckington Road, Coal Aston, Dronfield</td>
<td>Coal Aston Recreation Ground is designated as R2 – Formal Recreation Facilities in the 2005 adopted Local Plan (Formal Sports Site; Playing Pitches DR30 in the draft LP)</td>
</tr>
<tr>
<td>32.</td>
<td>Small garden at bottom of Green Lane, Dronfield</td>
<td>Informal green space</td>
</tr>
<tr>
<td>33.</td>
<td>Green area behind co-op and civic centre car park and Moonpenny</td>
<td>Unclear which area is referred to, especially bearing in mind sites 14 and 30.</td>
</tr>
<tr>
<td>No.</td>
<td>Site Name &amp; Address</td>
<td>Designations/ constraints</td>
</tr>
<tr>
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</tr>
<tr>
<td>34.</td>
<td>Well Dressing Site at Coal Aston – ‘used to be ‘the pond’ filled in during the 60s opposite the Royal Oak, Eckington Road’</td>
<td>Informal green space</td>
</tr>
<tr>
<td>35.</td>
<td>Railway Station Gardens, Chesterfield Road, Dronfield</td>
<td>Informal green space, not designated in the adopted (nor drafted) Local Plan.</td>
</tr>
<tr>
<td>36.</td>
<td>The Green, Quoit Green, Lea Road, Dronfield</td>
<td>Not designated in the 2005 adopted LP (but designated as Urban Green Space; Amenity Green Space in the draft LP)</td>
</tr>
<tr>
<td>37.</td>
<td>Land to rear of 33-47 Gosforth Drive</td>
<td>This is a field to the back of a row of houses along Gosforth Drive. The site is outside the SDL and situated within the Green Belt. It is also within an Area of Primary Sensitivity (AMES). There is also a PROW (NE7/18/3) running from the east to the west of the site.</td>
</tr>
<tr>
<td>38.</td>
<td>‘The Alma site’</td>
<td>Designated as R3 – Urban Greenspace in the 2005 adopted Local Plan (Urban Green Space; Amenity Green Space in the draft LP)</td>
</tr>
<tr>
<td>39.</td>
<td>‘The Ridding’, north east of Frithwood and Meadowland (Derbyshire Wildlife Trust)</td>
<td>This field is situated within the Green Belt and protected as a Local Wildlife Site (NE361); adjacent to Firth Wood</td>
</tr>
<tr>
<td>40.</td>
<td>Greenacre at end of Buckingham Close, off Wentworth Road Dronfield Woodhouse</td>
<td>Housing Green Space</td>
</tr>
<tr>
<td>41.</td>
<td>Greenacre at end of Belton Close, Dronfield Woodhouse</td>
<td>Housing Green Space</td>
</tr>
<tr>
<td>42.</td>
<td>The woods and path along the bridle path from Hill Top to the foot bridge at side of golf course</td>
<td>The whole site lies within the Green Belt and parts of it within an Area of Primary Sensitivity (AMES)</td>
</tr>
<tr>
<td>43.</td>
<td>Corner junction of Eckington Road and Dyche Lane, Coal Aston</td>
<td>Informal green space</td>
</tr>
<tr>
<td>44.</td>
<td>Lucas Gardens, Sheffield Road, Dronfield</td>
<td>Designated as R3 – Urban Greenspace in the 2005 adopted Local Plan (Urban Green Space; Amenity Green Space DR45 in the draft LP)</td>
</tr>
<tr>
<td>45.</td>
<td>Snape Hill Lane Allotments, Snape Hill Lane, Dronfield, S18 2GJ</td>
<td>Designated as R4 – Allotments in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>46.</td>
<td>Coal Aston Allotments, Birches Lane, Coal Aston, S18</td>
<td>Designated as R4 – Allotments in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>No.</td>
<td>Site Name &amp; Address</td>
<td>Designations/ constraints</td>
</tr>
<tr>
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</tr>
<tr>
<td>47.</td>
<td>Gomersal Lane Allotments, Gomersal Lane, Dronfield, S18 1RU</td>
<td>Designated as R4 – Allotments in the 2005 adopted Local Plan</td>
</tr>
<tr>
<td>48.</td>
<td>Cecil Road Allotments, Cecil Road, Dronfield, S18 2GU</td>
<td>Designated as R4 – Allotments in the 2005 adopted Local Plan</td>
</tr>
</tbody>
</table>